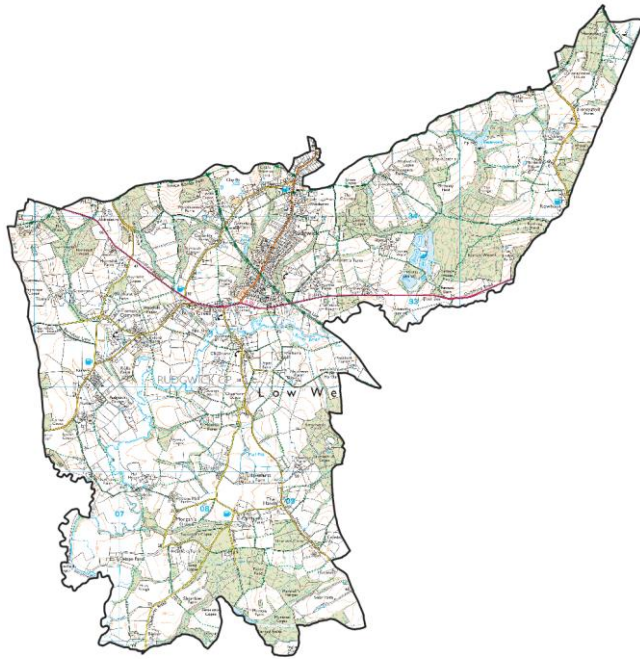




# CONSULTATION STATEMENT

## ABSTRACT

An overview of the consultation and engagement activities undertaken in the preparation of the Rudgwick Neighbourhood Plan. The latter part of this document satisfies the Regulation 15(1)(b) of the Neighbourhood Planning (General) Regulations 2012.

*Prepared by the Rudgwick  
Neighbourhood Plan Steering  
Group & Squires Planning*

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## **1. INTRODUCTION**

- 1.1 The Parish Council (PC) and the Neighbourhood Plan Steering Group (SG) are committed to creating a neighbourhood plan that responded to needs and aspirations of the local community. It will provide a framework for the future development of the parish, by ensuring it responds to the will of the local community and gives the community the ability to influence planning decisions made over the plan period.
- 1.2 The submitted Rudgwick Neighbourhood Plan is the result of considerable interaction and consultation with the community and businesses within the parish. Work has involved community groups over approximately four years, as well as surveys, public meetings and events. Activity was suspended for most of 2019 due to uncertainty around the revised NPPF and its potential impact on neighbourhood planning. The development of the plan has been overseen and coordinated by Rudgwick Parish Council, alongside the Neighbourhood Plan Steering Group and six working groups, which were formed to focus on distinct topic areas which would influence the plan, these were:
- Business and Employment
  - Education
  - Environment and Sustainability
  - Health and Wellbeing
  - Sport and Recreation
  - Transport and Road Safety
- 1.3 Throughout the process, the Steering Group and the Parish Council worked with Horsham District Council (HDC) to develop the plan submitted. In the early stages of the RNP, the Special Advisory Service from the Southdowns National Park Authority was employed to assist with the Housing Needs Assessment and later with the evaluation of Local Green Space. More recently, Squires Planning has assisted in revising the plan from the first Regulation 14 consultation to submission.

### **STRUCTURE OF THIS DOCUMENT**

- 1.4 This Consultation Statement sets out how the PC and SG have engaged with the local community whilst preparing the Rudgwick Neighbourhood Plan. It broadly aims to set out what we have done, how we did it, what we learnt and then what we did with what we learnt at each stage.
- 1.5 Section 3 of this document fulfils the legal obligations of The Neighbourhood Planning (General) Regulations 2012 Regulation 15(1) which requires a Consultation Statement to accompany the submission of a plan. Regulation 15(2) of the above-mentioned regulations confirm that a 'Consultation Statement' is a document which:
- a. contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b. explains how they were consulted;
  - c. summarises the main issues and concerns raised by the persons consulted;
  - d. describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.



## CONSULTATION & ENGAGEMENT STRATEGY

1.6 Throughout our activities to date we have sought to include all parts of the community and to ensure that key stakeholders have been included wherever possible, these include but are not limited to:

- Horsham District Council
- West Sussex County Council
- Nearby Parish Councils
- English Heritage
- Environment Agency
- Highways England
- Historic England
- Natural England
- Sport England
- Local landowners
- Local developers and agents

1.7 We have also sought to engage with the community via a variety of means, these include:

- Setting up a Steering Group consisting of Councillors and community representative volunteers;
- A dedicated section on the Parish Council Website showing all key documents and meeting notes;
- Updates on Facebook and Twitter;
- Progress updates in the Annual Parish Report;
- Articles/progress updates in the Parish Newsletter (The Rudgwick Magazine);
- Press Releases;
- Public Events to inform and gather views;
- A Parish Survey in 2015 to gather opinions, views and concerns; and,
- Consultation meetings with stakeholders as appropriate.

## **2. CONSULTATION ACTIVITIES UP TO REGULATION 14 CONSULTATION**

- 2.1 The Rudgwick Neighbourhood Plan has been in development since 2016 and over the past four years there has been much engagement with the local community encompassing numerous events, consultation activities.
- 2.2 This section sets out the consultation activities undertaken up to the Reg.14 Consultation.

### **ANNUAL PARISH MEETING (14 MARCH 2016)**

- 2.3 To help determine whether a neighbourhood plan should be prepared, several interested Councillors attended a training session to learn more about the process and what was involved. These Councillors prepared a briefing note and Agenda item on Neighbourhood Planning which was discussed at length. Around 70 people attended the meeting and had the ability to make comments during the public participation section of the meeting.
- 2.4 The outcome of the meeting (notes included in APPENDIX 1) was that a decision to go ahead with a plan for Rudgwick parish was made and individuals volunteered to get involved in the process. Those who volunteered were asked to complete a short questionnaire confirming what their interests were.

### **DESIGNATION OF NEIGHBOURHOOD PLAN AREA (APRIL – JUNE 2016)**

- 2.5 Following the Parish Council meeting in April 2016, an application for the designation of the Parish of Rudgwick as a neighbourhood area for the purpose of producing a neighbourhood development plan was made on 18 April 2016.
- 2.6 Horsham District Council ran a 4-week consultation on the proposed designation with details being hosted on their website and via a public notice in the Horsham District Post on 26 May 2016. Further discretionary publicity included paper copies of the application documents being available for inspection at the Council's principal offices in Horsham during the consultation period.
- 2.7 Following the consultation Horsham District Council formally designated the parish as a neighbourhood plan area on 28 June 2016 (decision included in APPENDIX 2).

### **PUBLIC RNP MEETING (20 JUNE 2016)**

- 2.8 A public meeting was held in Rudgwick Hall which was well attended with around 80 people attending. The intention was to increase awareness of the plan within the community and an overview of the process and how the plan for the area may progress. The meeting also established the setting up of 5 Focus Groups (Business & Employment, Education, Environment & Sustainability, Health & Wellbeing and Sport & Recreation). Presentations were made by:
  - Horsham District Council who talked about the legal process and confirmed how they would contribute and support towards the making of a plan.
  - Nuthurst Parish Council talked about their experiences to date and the benefits of preparing a plan for the local community being the first area in Horsham to prepare a neighbourhood plan.
  - Dowsett Mayhew talked about the process and how they may be able to assist the Parish Council and Steering Group to prepare a plan.

- 2.9 The meeting was very helpful and provided the emerging focus groups and community with a useful overview of what to expect and enabling them to effectively plan ahead (information provided at the event is included in APPENDIX 3)

### **PUBLIC RNP MEETING (5 SEPTEMBER 2016)**

- 2.10 The initial findings of the now established Focus Groups were presented at a public meeting to ensure the community were kept fully informed and ensure that the communities views were considered as the plans progressed.
- 2.11 The meeting was publicised with posters and a published agenda and around 70 people attended.
- 2.12 The general format was the chair of each Focus Group made a short presentation and then held a short question and answer session. The comments made were taken into account moving forward, the notice, agenda and minutes of this meeting are included in APPENDIX 4.

### **FIRST STEERING GROUP MEETING (7 NOVEMBER 2016)**

- 2.13 This was the inaugural meeting of the Steering Group and Terms of Reference were circulated for approval and signed. A secretary was also elected. The Steering Group consisted of 4 Councillors and the 6 members of the public elected as chairs of the Focus Groups. Each Focus Group had already met several times. (APPENDIX 5 has both the minutes & terms of reference)
- 2.14 The Steering Group agreed to look into a number of topic areas which would inform the plan, The Focus Groups were asked to collate evidence on their respective topic areas which were:
- Business and Employment (led by P. Wightman)
  - Education (led by V. Jarvis)
  - Environment and Sustainability (led by H. Rogers)
  - Health and Wellbeing (led by S. Blackstone)
  - Sport and Recreation (led by J. Barr)
  - Transport and Road Safety (led by P. Whyles)
- 2.15 Each group then went off and looked at the relevant topic areas. Alongside this an email database was created which enabled any interested party to sign up to receive email updates.
- 2.16 A representative from Horsham District Council attended our Steering Group meeting to update us on what we would need to do to progress our plan. The updated also included an update on other plans such as Henfield which had recently been quashed due to insufficient evidence.
- 2.17 The meeting was helpful in that it highlighted the importance of having a robust evidence base which supports the policies. It helped galvanise minds moving forward.

### **PUBLIC MEETING (5 DECEMBER 2016)**

- 2.18 A meeting was held to update the community on work undertaken to date by each of the Focus Groups and that the South Downs Consultancy would be assisting moving forward. The event was advertised using a poster and around 70 people attended which was considered a success.

- 2.19 The event was really helpful in that it also assisted to set the communities expectations at an appropriate level with the consultants providing a useful overview of what can and cannot be in the plan. A detailed discussion was also held around housing numbers and what the parish's 'fair share' would be from the amount given the neighbourhood plans to deliver by the Horsham District Planning Framework (the agenda and minutes from this meeting are included in APPENDIX 6).

#### **ANNUAL PARISH MEETING (13 MARCH 2017)**

- 2.20 As part of the annual parish meeting, an update presentation was made on the progress of the neighbourhood plan (notes from this meeting are included in APPENDIX 7). It was also announced that a Housing Needs Assessment had been commissioned to be undertaken by the South Downs Consultancy and this report should be completed in Summer 2017, it would include an appropriate housing number of Rudgwick Parish.

#### **ANNUAL PARISH MEETING (12 MARCH 2018)**

- 2.21 As part of the annual parish meeting, an update presentation (included in APPENDIX 8) was made on the progress of the neighbourhood plan. Discussion at the meeting concentrated on the possible introduction of the standard methodology by central government would result in a significant increase in the number of new homes which would need to be brought forward. There was a strong desire by the Parish Council and Steering Group expressed by Councillors to prevent spending time and money on a plan which may not be able to deliver an outcome the community would support.

#### **NEIGHBOURHOOD PLANNING CONFERENCE (26 SEPTEMBER 2018)**

- 2.22 Horsham District Council hosted a Neighbourhood Planning Conference on 26 September 2018 for all groups who were working on a plan. This event updated key members of the Steering Group on Horsham District Council's plans for a new Local Plan which would be adopted by 2021.

#### **STEERING GROUP & PARISH COUNCIL MEETINGS (NOVEMBER & DECEMBER 2018)**

- 2.23 In November & December 2018 it was decided to resume the preparation of the neighbourhood plan for the area in light of the information learned from the neighbourhood planning conference and the proposed timetables for the preparation of the new Local Plan. At a Steering Group meeting held on 12<sup>th</sup> December 2018 it was decided that the next step was to proceed with a call for sites, commencing as early as possible in 2019. This was subsequently undertaken between 26<sup>th</sup> February and 5<sup>th</sup> April 2019.
- 2.24 The call for sites was advertised online and offline online. It was advertised on the Parish Council website, the Parish Council Facebook page, the Village Notice Boards and the Rudgwick Magazine which is hand delivered to every property in the Parish (advertisements included in APPENDIX 9).
- 2.25 The Steering Group asked landowners in the Parish of Rudgwick who may have an interest in promoting their land for development to come forward and submit their site, regardless of whether they had already submitted their site to Horsham District Council. They were asked to submit:
- a. A clear statement of which types of development you wish your land to be considered for, e.g. residential, leisure, employment, etc.

- b. The area of the land in hectares. Please note that sites must be at least 0.5 hectares in size to be considered.
- c. A plan which clearly shows the extent of the land that you wish to be considered. Ideally this should be on an Ordnance Survey base or equivalent.
- d. An understanding of how the site would be accessed by vehicle and opportunities for linking in with existing footpath/pavement and cycle routes
- e. Any relevant planning history for the site, e.g. extant planning permissions that have not been brought forward.
- f. Any legal issues such as covenants restricting the use of the land.
- g. Whether there are any restrictions to your site coming forward in the short term.

2.26 Six sites were submitted to the Steering Group in response to this call for sites. However, as 4 of these were already on the SHELAA, there were just 2 new sites (Riverside Farm and land behind Rosemary Cottage, Church Street). In total there were 16 sites, 14 already logged on the SHELAA.

### **ANNUAL PARISH MEETING (11 MARCH 2019)**

- 2.27 As part of the annual parish meeting, an update presentation was made on the progress of the neighbourhood plan advising that the plan was progressing again. Notes from this meeting are included in APPENDIX 10.
- 2.28 A presentation was also made by Mr Chipp (CEO of Horsham District Council) about the challenges the Council are facing, local issues such as house prices, infrastructure, ageing population and other development pressures.

### **Steering Group Meeting (April 2019)**

- 2.29 On 18<sup>th</sup> April 2019 the Steering Group met to discuss the desired approach to delivering housing in the plan area. Following the update given by Mr Chipp at the March meeting, and the letter received from HDC on 13 March 2019 (see APPENDIX 11) and other information gleaned at that time it was decided to reconsider the approach following the Call for Sites completion.
- 2.30 Despite willingness to progress the site assessments and meet housing need locally, it became apparent by the Steering Group meeting on 22 July 2019 (minutes included in APPENDIX 12) that it would not be feasible to do this within the timeframe being given by HDC. Therefore, a decision was made to defer the allocation of sites to Horsham District Council and they would allocate sites in the emerging Local Plan. The Rudgwick Neighbourhood Plan would now focus on relevant policies to address local need (not including housing site allocations).

### **FIRST REG 14 CONSULTATION (1 JANUARY 2020)**

- 2.31 Once the Steering Group had prepared the draft plan it was put out for Regulation 14 Consultation. Prior to this consultation the draft document had been considered at the Parish Council Meeting on 9 December 2019 (minutes included in APPENDIX 13), accordingly members of the public had the ability to view the document in advance and pass comment on the document during the Public Participation session of that meeting.
- 2.32 The consultation took place over a period of 8 weeks between 23 December 2019 and 17 February

2020. Extensive advertising took place with 300 hundred copies of draft plan distributed to key locations around the parish for people to collect and read. Three banners were also erected on main junctions to ensure maximum visibility. Evidence of advertising activities are included in APPENDIX 14.

- 2.33 A public meeting was held on 6 January 2020 (see APPENDIX 15 for agenda and minutes). A presentation was made to those who attended followed by a considerable Q&A session. Around 60 people attended the meeting, but it was made clear to all that comments should be made in writing in response to the consultation.
- 2.34 At the Village Hall Day, a drop-in session was held where the public could meet SG members and discuss issues/views regarding the neighbourhood plan. Around 150 people attended the Village Hall Day with around 30 taking an interest in the plan. Again, it was made clear to all that comments should be made in writing in response to the consultation. Photos from this event are included in APPENDIX 17.
- 2.35 A presentation (included in APPENDIX 18) was also made to a group called the Rudgwick Book Exchange on 12 February 2020 on the draft plan over their monthly lunch. Paul Kornicky spoke to around 40-50 attendees and also held a Q&A session. This event was useful as it targeted the older members of the community who would not have been reached by online methods.
- 2.36 Following an initial look at the responses, a planning consultant was appointed to review the responses and assist with the necessary revisions. Unfortunately, after an initial review the consultant advised the Sub-Committee that the changes required were significant. Accordingly, the Steering Group set about preparing the necessary evidence and updating the plan.

#### **MEETING WITH RUDGWICK PRESERVATION SOCIETY (20 JANUARY 2020)**

- 2.37 A meeting with a subcommittee of the Rudgwick Preservation Society (RPS) (specifically formed to engage with the neighbourhood plan) was held following the Regulation 14 Consultation. This was to ensure that their comments made during the first Regulation 14 Consultation were considered as the plan was taken forward. The RPS has over 250 members and were a key organisation in the production of the Rudgwick Parish Design Statement, their views and input are therefore considered very important to the Steering Group as they represent a large section of our community.
- 2.38 The minutes from this meeting are included in APPENDIX 16.

### 3. REGULATION 14 CONSULTATION

- 3.1 This section provides the information required to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. It specifies:
- (a) details of the persons and bodies who were consulted about the proposed Neighbourhood development plan;
  - (b) explains how they were consulted;
  - (c) summarises the main issues and concerns raised by the persons consulted;
  - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood development plan.
- 3.2 The second Regulation 14 consultation, and the one which is relevant in accordance with the regulations was undertaken between 18 May 2020 till 19 July 2020.
- 3.3 The consultation commenced during the COVID-19 lockdown and great consideration was given as to the best way for the consultation to proceed whilst complying with the lockdown restrictions and social distancing measures in place. Great care was given to the need for a deposit copy of the plan. As a result, the consultation was extended to ensure that, for at least two weeks, people could visit the Parish Council office and view the hard copy. It is noted however that guidance was updated in May 2020 (after the start of the consultation) to state:
- ‘There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require at some stages of the process for neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location. They may be held available online. Local planning authorities may be able to advise neighbourhood planning groups on suitable methods that will provide communities with access to physical copies of documents.’*
- Paragraph: 107 Reference ID: 41-107-20200513*
- Revision date: 13 05 2020*
- 3.4 Accordingly, the consultation was carried out in a way that exceeded the relevant requirements as set out in this section.

#### WHO WAS CONSULTED?

- 3.5 Efforts were made to consult as many people that may have a stake in the parish as possible. The following bodies were sent emails (example at APPENDIX 22 ) notifying them of the consultation:

- Adur & Worthing Council
- Arun Council
- Brighton & Hove City Council
- Chichester District Council
- Horsham District Council
- Crawley Borough Council
- Mid Sussex District Council
- Mole Valley District Council
- South Downs National Park
- Surrey County Council
- Waverly Borough Council
- West Sussex County Council
- Albourne Parish Council
- Angmering Parish Council
- Bolney Parish Council
- Burpham PC
- Bury Parish Council
- Capel PC
- Charlwood Parish Council
- Clapham Parish Council
- Cranleigh Parish Council
- Findon Parish Council
- Fulking PC
- Lancing Parish Council
- Loxwood Parish Council
- NHS
- EDF Energy
- English Heritage
- Environment Agency
- Highways England
- Historic England
- Natural England
- Network Rail
- Scotia Gas Networks
- Scottish Southern
- Southern Water
- Sport England
- Thames Water

- West Sussex Local Access Forum (WSLAF)
- Ewhurst Ellens Green Parish Council
- Broadbridge Heath Parish Council
- Slinfold Parish Council
- Warnham Parish Council
- Abinger Parish Council
- Newdigate Parish Council
- Patching PC
- Slaugham Parish Council
- Sompting Parish Council
- Stopham PC
- Twineham Parish Council
- Wisborough Green Parish Council
- UK Power Networks
- Telefónica UK LIMITED
- Coal Authority
- Marine Management Organisation
- Billingshurst Parish Council

- 3.6 In addition, 147 others were consulted. This included local developers and agents (including relevant site SHEELA site owners) and those who had previously responded to the consultation were notified by email. Unfortunately, specific details of these cannot be published here for GDPR reasons.
- 3.7 It should be noted that landowners of proposed Local Green Space designations were also specifically notified of the consultation and included details of the proposed designation on their land (see APPENDIX 24 for a copy of the notification they received).

### **HOW WERE THEY CONSULTED?**

- 3.8 Efforts were made to consult with as many people as possible. The main methods adopted to raise awareness of the consultation are set out below.:
- The Rudgwick (Parish) Magazine was still in circulation despite COVID-19 and hand delivered to every residential property in the parish. The neighbourhood plan had a distinctive 4 page inset in the May and June issues. The May & June issue both included a notice regarding the consultation and some other supporting information. Copies of these are included in APPENDIX 19 and APPENDIX 20 respectively.
  - Announcements on the Parish Council website and other social media platforms. Examples included at APPENDIX 21.
  - Direct emails to all local businesses or organisations who can be identified by the Steering Group.
  - Letters to those whose land is identified to be designated as Local Green Space (included in APPENDIX 24).
  - Direct email on the day the consultation starts to consultation bodies referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan.
  - Direct emails to everyone on the Parish Council's database, the HDC consultee database and those that have previously been involved with the preparation of the neighbourhood plan (who have asked to be notified and email details kept on file). Emails were sent at the start of the consultation (see APPENDIX 22) and reminder emails sent on 3<sup>rd</sup> July, 16 days before the end of the consultation (see APPENDIX 23).
  - A3 Poster and large Banner (see APPENDIX 25) were put up advertising the consultation in locations still visited during lockdown:
    - Village Noticeboard adjacent Co-Op parade of shops
    - Banner at main junction of Church Street with the A281



### 3.9 Those interested were able to inspect the documents in the following ways:

- Online on the Parish Council website. All consultation documents were available to view, download and/or print 24/7 for the duration of the consultation period.
- The consultation documents were available to be inspected in people's own homes. If individuals were unable to access the documents on the Parish Council website, they could phone the Parish Council and request a hard copy of the document(s) they wish to see. Hard copies would then be printed and delivered to the person who requested them either in person or via the royal mail.
- Finally, a hard copy (or copies of the documentation) were available to be read at Rudgwick Hall by appointment in the final two weeks of the consultation period once the lockdown had eased. Suitable PPE and disinfectant were made available to those visiting.

### 3.10 Representations on the plan and associated documents were accepted in the following ways:

- Via an online consultation response form.
- By completing a consultation response form that was downloadable from the Parish Council website (word document included at APPENDIX 26) and emailing it back to the Parish Council.
- By downloading a consultation response form from the Parish Council website, printing it, completing it and posting it back to the Parish Council.
- By phoning the Parish Council and requesting a paper form which will be delivered to the person who requested it (aim is within 36 hours).
- Any other form of written submission, such as a letter to the Parish Council.

## MAIN ISSUES AND CONCERNS RAISED & HOW THEY HAVE BEEN ADDRESSED

3.11 This section considers the main issues and concerns raised in the responses to the Regulation 14 Consultation. It sets out how these issues and concerns have been considered and, where relevant, addressed in the submission version of the Rudgwick Neighbourhood Plan.

3.12 For transparency, we include anonymised verbatim Regulation 14 Consultation representations in APPENDIX 27 of this document. Against each comment is a brief response from the Steering Group setting out how that comment has been taken into account. It should be noted that whilst we have made every endeavour to include all responses and comments made, some were too lengthy to include in our database, we were also unable to collate graphics in it meaning they are not complete.

3.13 The comments received covered a range of matters with the majority seeking clarifications of text of policy, correction of typographical errors or factual information or other small amendments. Following consideration of the comments received at the regulation 14 consultation, the main issues/concerns raised, and how they have been addressed, are set out below:

### ***(a) The vision and objectives were not clear.***

3.14 On reviewing the consultation responses, it was apparent that the vision and objectives were written in a way that was not easy to understand. The vision is written looking from the end of the

plan period back to the current day. Many thought that it was setting the scene as it stood today and disagreed with the statements.

- 3.15 The Steering Group reviewed the vision and objectives to simplify them, removing superfluous text and changing formatting so that it is clear what its purpose is.

***(b) Whether the Spatial Strategy conflicts with the NPPF / HDPF.***

- 3.16 The spatial strategy set out RNP1 was met with widespread support from the community, but concerns were raised by consultees. These concerns included:

- Whether the policy requirement for development to *'not result in the further coalescence of the six parish settlements or the diminution of a settlement's identity or built pattern'* is realistic given the need for new housing and that neither the adopted HDPF nor the emerging Local Plan say that such a requirement could be included within a neighbourhood plan.
- That RNP1.3 could act as an unnecessary constraint on sustainable development and does not provide sufficient flexibility moving forward. It was suggested that flexibility is required in the RNP to ensure that the Plan does not conflict with the emerging Horsham Local Plan.

- 3.17 These concerns were considered and despite the Steering Group not agreeing with the points made the policy was amended to provide greater clarity and ensure the wording reflected the intention of the Steering Group.

- 3.18 The amendments made include a clarifying point to RNP1.1 to confirm that outside of defined built up areas (set by the District Council) new residential development should only be on allocated sites. RNP 1.3 which sought to prevent coalescence has been amended to confirm that sites outside of defined areas should be designed in a way to reduce coalescence.

- 3.19 With regard to RNP1.3 the Steering Group fundamentally disagree with the concern raised. Gov.uk confirms that:

*'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.*

*Paragraph: 001 Reference ID: 41-001-20190509*

*Revision date: 09 05 2019*

- 3.20 Seeking to ensure that defensible boundaries are retained is an important element of the shaping the development and growth of the plan area which is entirely in line with the NPPF.

- 3.21 Notwithstanding the above, the policy wording has been amended to provide additional clarity and caveats to ensure that this plan will not conflict with any future plan produced by Horsham District Council.

***(c) Whether the plan should allocate sites for new housing.***

- 3.22 Some responses, primarily from those promoting land for development, criticised the plan for not addressing local housing need and specifically allocating sites for residential development. Whilst this question has been considered several times by the Steering Group it was discussed again after the Regulation 14 consultation and the outcome was the same.
- 3.23 Horsham District Council are currently progressing a new Local Plan for the area to meet the District wide need. Guidance confirms that the local planning authority should proactively and positively work in a collaborative way with the qualifying body to resolve local issues, including housing provision. This has been done and an agreement has been made by both parties for the District Council to consider and address new housing in their plan.
- 3.24 Accordingly, this plan does not allocate sites for new housing

***(d) Whether the requirements for housing type/mix, tenure and standards are supported by evidence.***

- 3.25 The Regulation 14 version of the plan included policies which sought to control the mix of housing (RNP2), type of affordable housing provided (RNP4) and housing Density (RNP5). Concerns were raised by several consultees that these policies were either not in general conformity with the strategic policies in the development plan or were not based on robust evidence.
- 3.26 The policies relating to housing were all based on and informed by the relevant evidence gathered and is set out in the 'Housing Matters' report. This includes the Housing Needs Assessment<sup>1</sup> which scrutinised the existing housing stock and demand for housing against the existing Horsham District Council evidence<sup>2</sup> regarding housing mix. This assessment flagged that the housing mix requirements in Rudgwick are distinctly different from the rest of the District. Furthermore, the Steering Group has undertaken a detailed analysis<sup>3</sup> of development that has occurred in the plan period since 2011 and this reveals an overprovision of larger dwellings and under provision of smaller dwellings. Findings which have directly influenced the policies put forward.
- 3.27 Notwithstanding this, following receipt of these comments the steering Group have reviewed the evidence and proposed policy wording. In addition, and in direct response to the concerns raised, further analysis has been undertaken which is set out in the Housing Matters report. This has resulted in a slightly different requirements now being proposed in the submission plan. In addition, the Steering Group have sought to ensure the policy requirements are reasonable and have introduced a suitable degree of flexibility to allow a site by site solution, whilst addressing the identified needs of the community.
- 3.28 The relevant policies in the submission RNDP have taken the comments received at the Regulation 14 consultation into account and seeks to rectify the existing imbalance that exists within Rudgwick's housing stock. Through the use of the policies, which are based on robust evidence, local provision at the end of the plan period will align with the strategic aspirations of the HDPF, the NPPF and what the community needs.

***(f) Whether the plans policies are too restrictive.***

- 3.29 A common critique of neighbourhood plans is that they are too restrictive and seek to prevent development that should arguably come forward from taking place. The plan includes a range of

<sup>1</sup> South Downs National Park, *Rudgwick Housing Needs Assessment* (July 2017)

<sup>2</sup> Chilmark Consulting, *Market Housing Mix* (November 2016)

<sup>3</sup> Rudgwick Steering Group, *Housing Matters* (May 2020), Section 2

policies aimed at supporting development to come forward within the plan area in a way that accords with local aspirations.

3.30 Accordingly, the policies within the plan is not considered to be restrictive. Instead it seeks to guide development to ensure that it comes forward in an appropriate way.

***(g) Whether the policies in the plan will render development unviable.***

3.31 Several parties have raised concerns over the impact of policy requirements on the viability of development and asked that the policies and plan is accompanied by evidence demonstrating this.

3.32 The impact of the plan on development viability has been at the forefront of the Steering Groups minds throughout the development of policies and given concerns remain many of the policies have amended to ensure that restrictions may be loosened where viability is threatened. Most notably:

- RNP2 - Housing Mix, includes a clause to allow the mix specified to not be met if there are compelling reasons to deviate, based upon local demonstrable housing needs.
- RNP3 - Homes For Older People, has been amended to decrease from ‘*a significant proportion*’, to just 15%, the amount of new homes that should be bungalows or open market retirement housing. It is noted that this requirement should positively impact viability as such properties can command better values. RNP3.4 states that all new homes should achieve M4(2)\* of the optional requirements in the Building Regulations, it is important to note that it does not say must. As a result, there is some flexibility and where the policy cannot be met (for viability reasons for example) some leniency will be shown.
- RNP4 - Affordable Housing, protects minimum levels of affordable home ownership housing without prejudicing the ability to meet the identified affordable housing needs of specific groups locally.
- RNP5 - Housing Density, has been amended to remove the reference to a density cap, instead utilising an assessment-based approach to ensure development comes forward in line with the surrounding area. Such an approach is in accordance with development plan policy. In addition, exceptions have been included to specify where development of a higher density may be considered acceptable.
- RNP8- Development Height, has again been amended to ensure that it is not unnecessarily restrictive whilst ensuring the character of the Parish is retained.

3.33 Overall, considerable changes have been made to the plan to ensure viability is not negatively affected by the policies in it.

**APPENDIX 1 – Notes from Annual Parish Meeting (March 2016)**

**Annual Parish Meeting: 14<sup>th</sup> March 2016 at RH, 7.30pm**

**Extract relating to Neighbourhood Plan**

**Introduction to Neighbourhood Planning and its impact on Rudgwick**

The Rudgwick Parish Plan had been undertaken in 2006 and the Design Statement in 2009. Unlike the Parish Plan, a neighbourhood plan would be legally binding, and residents would have a say in where future development should be located and what infrastructure and amenities they wanted. The question was whether it was the right thing to do and if there were the necessary resources. A Steering Group of 3 parish councillors and 9 residents was needed. Mr Roger Nash, Chairman of the Preservation Society, stressed the need to work with the Parish Council in every way and suggested that residents look at the completed Neighbourhood Plans of Kirdford, Loxwood and Wisborough Green for information. If Rudgwick did not have a Neighbourhood Plan HDC would dictate where future developments would be located. The consensus of the meeting was that Rudgwick should undertake a Neighbourhood Plan and commence as soon as possible.

The Chairman invited residents to look at the displays showing the HDC Strategic Housing Land Availability (SHELAA) and information about neighbourhood planning and make comments on housing numbers and types, infrastructure community facilities and potential housing sites.

## **APPENDIX 2 – Decision to designate plan area**

### **HORSHAM DISTRICT COUNCIL NEIGHBOURHOOD PLAN AREA DESIGNATION**

#### **PARISH OF RUDGWICK**

#### **DESIGNATION OF AREA**

## **1 BACKGROUND**

- 1.1 The Neighbourhood Planning (General) Regulations 2012 specify what a local authority must do to publicise an 'area application' and, following consideration and determination of the application, what it must do to publicise the outcome. Regulation 2(6) requires that a copy of the area application, details of how to make representations and the date by which those representations must be received (being not less than 4 weeks from the date the application is first publicised) must be put on the local planning authority website. Regulation 7 requires that as soon as possible after determining the application the decision should be published on their website.
- 1.2 The Council, on 25 July 2013, delegated authority to the Head of Strategic Planning and Sustainability in consultation with the Cabinet Member for Planning and Development, to publicise applications for neighbourhood areas, consider representations and determine applications.

## **2 APPLICATION**

- 2.1 An application for the designation of the Parish of Rudgwick as a neighbourhood area for the purpose of producing a neighbourhood development plan was received from Rudgwick Parish Council on 18 April 2016 as shown in Annex A. The Parish Council had not made any previous application.
- 2.2 The application included a statement that the applicant was a 'relevant body', being a parish council, under Section 61(G) of the Town and Country Planning Act 1990.
- 2.3 The application was accompanied by a statement explaining why this area is considered appropriate to be designated as a neighbourhood area, and a map on an Ordnance Survey base identifying the intended neighbourhood plan area (Annex B).
- 2.4 The Council considers the application meets the requirements of Regulation 5.

## **3 PUBLICITY AND CONSULTATION**

- 3.1 The Council's website explained the purpose and period of the consultation (4 weeks), and how to make a representation either on the website or in writing to the Council. There was access via the website to a copy of the application documents received from the applicant. The application was also advertised by public notice in the Horsham District Post on 26 May 2016.

3.2 Further discretionary publicity included paper copies of the application documents being available for inspection at the Council's principal offices in Horsham during the consultation period.

3.3 The Council is satisfied that this publicity has allowed the area to be brought to the attention of people who live, work or carry on business in the area to which the application relates, and that it meets the requirements set out in Regulation 6.

#### **4 REPRESENTATIONS**

4.1 The Council received no representations in support of the application. No objections were received.

#### **5 COMMENT**

5.1 The plan area does not overlap with any other area and is considered to be compatible with the objective of good town planning and the strategic policies of the Horsham Development Planning Framework which was adopted on 27 November 2015.

#### **6 DELEGATED DECISION**

6.1 The Head of Strategic Planning and Sustainability and the Cabinet Member for Planning and Development hereby exercise their delegated authority to agree the application and designate the Parish of Rudgwick as a Neighbourhood Development Plan Area.

6.2 A copy of this note will be placed on the Council's website, sent to Rudgwick Parish Council and to relevant District Councillors. A map of the designated area will also be posted on the Council's website.

6.3 The publicity for the Council's decision will thereby meet the requirements of Regulation 7.



**BARBARA CHILDS** .....  
**HEAD OF STRATEGIC PLANNING & SUSTAINABILITY**  
 Date: 28 June 2016



**COUNCILLOR CLAIRE VICKERS** .....  
**CABINET MEMBER FOR PLANNING AND DEVELOPMENT**  
 Date: 28 June 2016





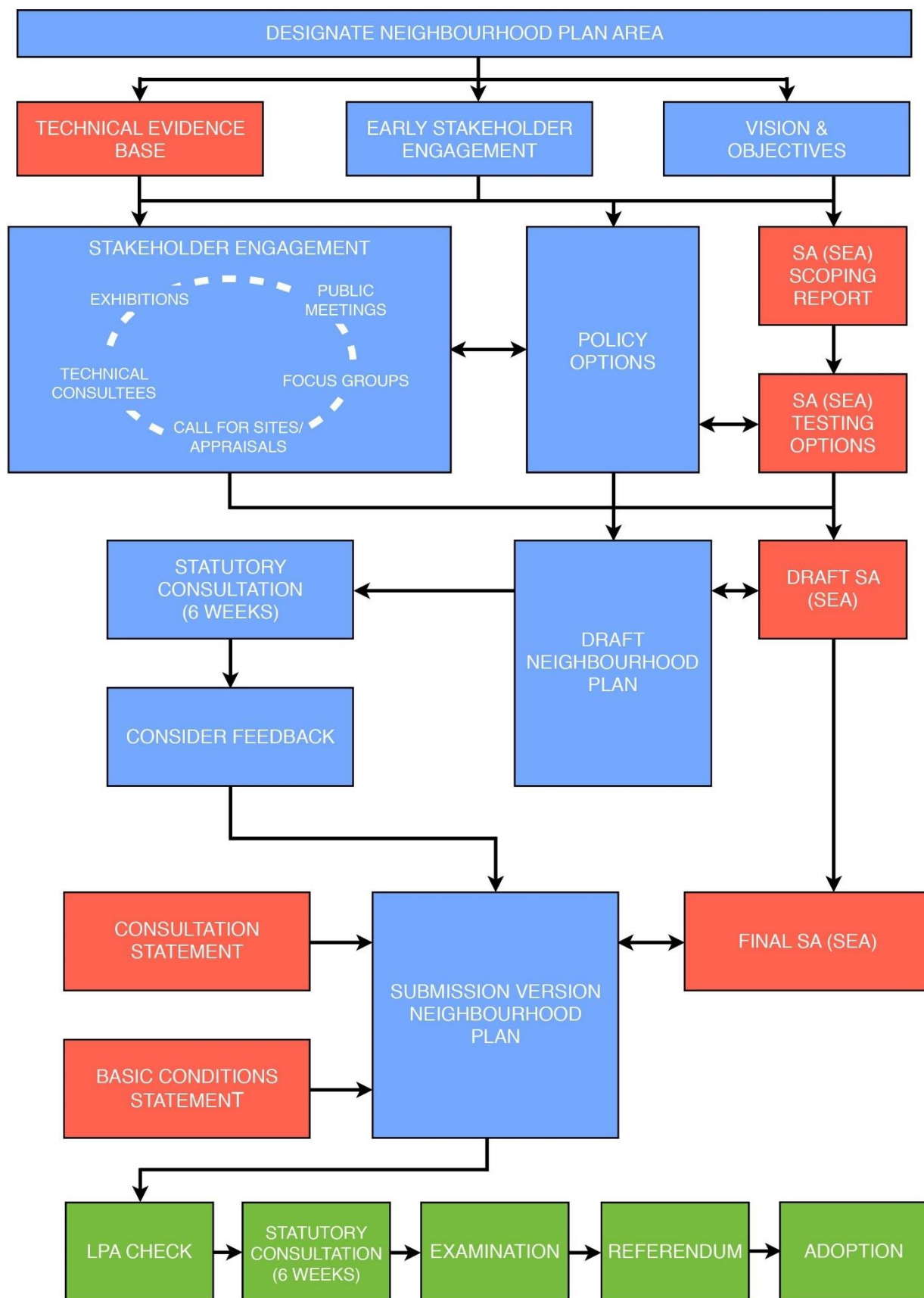
**APPENDIX 3 – Information from public RNP meeting on 20 JUNE 2016**

**NEIGHBOURHOOD PLANNING MEETING**

**20<sup>TH</sup> JUNE 2016**

- 1. Opening address and update**  
Richard Landeryou Chair Rudgwick Parish Council
  
- 2. Neighbourhood Planning procedure.**  
Maggie Williams Horsham District Council
  
- 3. Owen Hydes OBE Chair of Nuthurst Neighbourhood Plan Steering Group.** Will relate the experience of Nuthurst Parish in successfully making a NP
  
- 4. Dale Mayhew from Dowsett Mayhew**  
The role and best use of the Consult in a Neighbourhood Plan
  
- 5. The next steps**  
Ian Maclachlan Chair of the Steering Group

## RUDGWICK NEIGHBOURHOOD PLAN - HOW TO ACHIEVE YOUR PLAN





# **Presentation to Rudgwick Parish Council Neighbourhood Planning Meeting**

## **Nuthurst Experience**

**Owen Hydes OBE**

Nuthurst Parish Councillor

Chair of the Neighbourhood Plan Steering Group

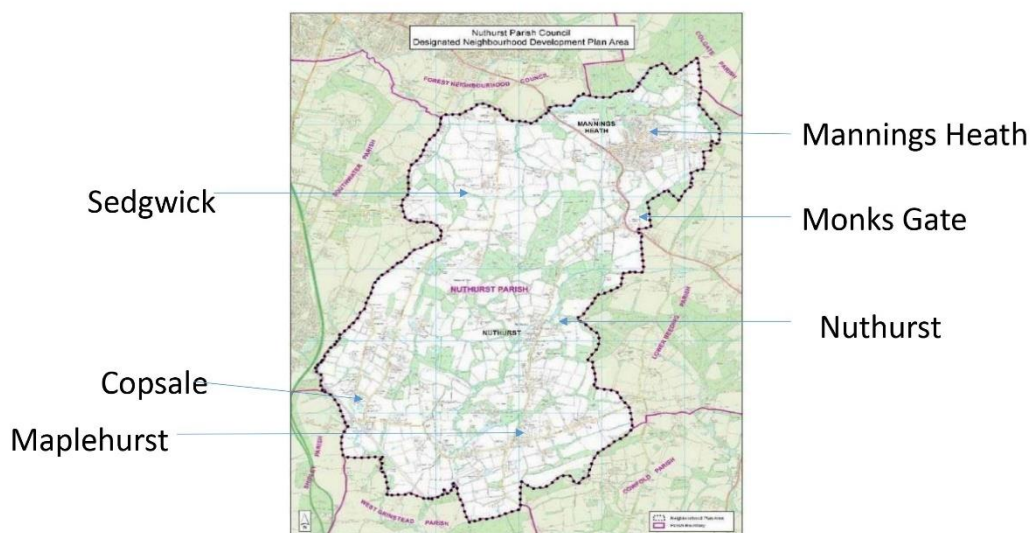


## **Presentation**

- About Nuthurst Parish
- Our Neighbourhood Plan
- Why do a Neighbourhood Plan?
- Who was involved in the Plan?
- What issues/needs did it identify?
- How easy to produce – what barriers faced?
- What benefits has the community accrued (socially economically and environmentally)?
- Subsequent challenges



# Map of Nuthurst Parish



## Key Statistics



- Population 1,777, Mannings Heath about 1,100
- 778 Dwellings, mainly detached
- Rural character – 13 active farms
- Services include: primary school, three pubs, two churches, two village halls, one village shop, one garage/shop and a golf complex
- But no doctor's surgery, no dentist's surgery, no secondary school, no post office, no main drainage in 4 settlements, no mains gas, frequent electricity power cuts
- Limited bus services – no bus service in some settlements and infrequent elsewhere



## Mannings Heath



## Monks Gate



## Nuthurst



St. Andrew's School

St. Andrew's Church



## Maplehurst





## Copsale



Copsale Village Hall



## Sedgwick





## Our Neighbourhood Plan Timetable



- May 2013 – Parish Council starts to consider a Neighbourhood Plan
- August 2013 – set up Steering Group and Focus Groups
- January 2014 – General Survey and Housing Needs Survey
- February 2014 – Call for sites for development
- April 2014 – published State of Parish Report
- May 2014 – Assessed sites against planning criteria
- November 2014 – Parish consulted on Pre-submission Plan
- February 2015 – Horsham DC consulted on Submission Plan
- June 2015 – Independent Examiner’s Report
- September 2015 – Referendum – 86.6% “Yes Vote” – turnout 50%
- October 2015 – HDC “made” the Plan



## Our Neighbourhood Plan Key provisions



- Provides for about 50 houses
- Eight small developments spread across the Parish – three in Mannings Heath, two in Monks gate, two in Maplehurst and one in Nuthurst
- Provides for some smaller houses for younger people and for older people to downsize
- Allows for some “affordable” houses
- Provides protection from development for 8 local green spaces





## Why do a Neighbourhood Plan?



- Threat of major development
- Control where development takes place
- Protect our rural Parish



## Who was involved in the Plan?



- Nuthurst Parish Council
- **The community**
- Steering Group – 3 Councillors and 9 residents
- 4 Focus Groups – mainly residents
- Action in rural Sussex and planning consultants, rCOH
- Horsham District Council



## What issues/needs were identified?



- No housing target set by Horsham District Council
- No large developments wanted
- Small developments spread across the Parish
- Maintain rural nature and protect the rural environment
- Managing increased traffic on rural roads
- Avoiding localised flooding



## How easy to produce? What barriers faced?



- Commitment to hard work over 2+ years
- Securing Community involvement and approval – **CONSULTATION**
- Deciding how many houses and where – **CONSULTATION/SITE ASSESSMENT**
- Dealing with individuals challenging the process
- From disgruntled landowners – **STAY STRONG AND COMMITTED**
  - Pressure
  - Threats of legal action
  - Corruption of Parish Council's Regulation 14 Consultation



## What benefits to the Community?



- **Socially**
  - Brought community together and engendered community spirit
  - Community able to take forward projects identified during Plan
- **Economically**
  - Rejuvenate the settlements
  - Maintain and protect services
- **Environmentally**
  - Created 8 local green spaces – no development permitted
  - Maintain and enhance screens of trees and bushes
  - Mitigation of flooding
  - Two ponds and surrounding areas made nature reserves for community



## Subsequent challenges



- **Sites not in made Neighbourhood Plan**
  - Horsham District Council put site in 2015 SHELAA as “developable”
  - Appeal to Planning Inspectorate against refusal of Planning permission



**Finally**



**THANK YOU  
ANY QUESTIONS?  
[Nuthurstplan.wordpress.com](http://Nuthurstplan.wordpress.com)**



## **PLANNING PRESENTATION**

### **Rudgwick Parish**

### **June 2016**

**Maggie Williams**  
HDC Neighbourhood Planning Officer

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## **What is Neighbourhood Planning**

- Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area
  - Plans are written by local communities and can set out where they want new homes, shops and offices to be built
  - Plans can also protect open spaces that are valued by local communities, known as Local Green Spaces
  - Neighbourhood Plans have to go through various regulatory stages including an examination and a local referendum before the Plan is “made”
  - Once “made” a neighbourhood Plan becomes part of the Development Plan
-



## Relationship between HDPF and a Neighbourhood Plan

- All Neighbourhood Plans have to be in “general compliance” with the HDPF
  - HDPF provides clarity e.g. Policy 4 talks about settlement expansion and Policy 15 states that at least 1,500 dwellings are expected to come forward through Neighbourhood Plans
- 



## Implications of the Statutory Roles

- Preparation of the Neighbourhood Plan is the responsibility of the Town or Parish Council, the LPA's role at this stage is just advisory.
- The LPA's statutory role is about legal processes, the content of the Plan is for the Town or Parish Council to decide and the Examiner to test.
- All the formal decision-making stages to make the Plan part of the statutory Development Plan are for the LPA, therefore it is the LPA that will be judicially reviewed if any of the processes are wrong.
- LPA has a duty of care in supporting local communities to prepare Neighbourhood Plans



## Horsham District Council Offer of Support



- HDC offers support at various stages of the process and this is set out on the Council's website at <https://www.horsham.gov.uk/planning/neighbourhood-planning/neighbourhood-grants>
- Our revised "Offer of Support" means that HDC will take a more pro-active approach at a very early stage with regard to site assessments and Sustainability Appraisal/Strategic Environmental Appraisal
- We will want to review the evidence base and in particular the way in which sites are assessed before the Plan is drafted
- We would like to see drafts of Plans before they are published for consultation

## Useful Contacts

- [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)
- [Strategic.planning@horsham.gov.uk](mailto:Strategic.planning@horsham.gov.uk)
- [neighbourhood.planning@horsham.gov.uk](mailto:neighbourhood.planning@horsham.gov.uk)
- Main switchboard 01403 215100



**Rudgwick**  
**Neighbourhood Plan**

**The Future of Our Village**

**Next Public Meeting –  
Monday 5<sup>th</sup> September  
7:30pm in the  
Village Hall**

**All Rudgwick Residents Welcome  
Come along and get involved**

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### **Agenda**

- **Introduction – Ian Maclachlan, Chairman**
- **Co-opt focus group chairs onto the RNP Steering Group**
- **Brief statement of aims and progress so far from each Focus Group chairperson – maximum five minutes each**
  - • Transport and Road Safety
  - • Education
  - • Health and Wellbeing
  - • Environment and Sustainability
  - • Business and Employment
  - • Sport and Recreation
- **Update on various planning matters, specifically – Fairlee, land adjacent to Woodfalls, Loxwood Road and potential site at Baynards Lane (Ewhurst Parish)**
- **AOB**
- **9pm – Summary and close meeting – Ian Maclachlan, Chairman**

## **Rudgwick Neighbourhood Plan**

### **Minutes of Public Meeting held on 5<sup>th</sup> September 2106**

Ian Mac opened the meeting noting how many Cox Green people were present and they were asked to provide their contact details at the table at the back to stay in touch with development of the Rudgwick Neighbourhood plan. The Cox Green people were present as they are concerned about the potential development of a 22 acre field adjacent to Baynards Lane at Cox Green. Whilst this site is in Ewhurst Parish it borders on Rudgwick and any development would significantly impact Rudgwick and its infrastructure. The concern of residents is entirely justified especially in the light of survey activity. However both Waverly DC and Horsham DC have indicated they would object to development on this site and it is not expected to be included in the Ewhurst NP as a recommended site. Incidentally the Ewhurst NP is only expected to cater for the building of about eighty new houses in total so this site is far too large to be included for potential development under their plan.

Ian explained Horsham District Council will be expecting us to find 10% more homes for development in the next 10-15 years that is 10% of the existing 1300 households approx. This figure of 130 homes does not include existing developments that are already underway or have planning permission such as Summerfold or Windacres etc

It was noted that although the village hall is full the people present represent a tiny percentage of the whole population of about 3000 in the village. Once the NP is completed and approved as evidence based there will be a village referendum to vote to approve the neighbourhood plan. It's important as many people as possible engage to have their say in this process.

Since the last meeting most focus groups have had meetings and voted in a Chairperson. The chair persons were invited to step forward and join the NP Steering Group and to update the meeting on their progress so far.

1. Paul Whyles – Transport and Road Safety group  
Reported they have a fairly large group of 12-13 people who have had 2 meetings to date. Their first meeting was a very lively discussion of diverse interests and knowledge. Road safety and traffic are very pressing issues. They plan to estimate how new developments and the resulting increase in traffic will affect us all. The group are aware that the RPC are doing work on calming however the group planned to look at other measures such as Identifying bottlenecks find ways to ease those. The group will look at accident statistics. They plan to look at Pedestrian path ways /pavements to increase walking around the village particularly where there are no pavements. The group will look at how to encourage villagers to walk more and use the local bus services. In their next meeting they will begin the process of data gathering research - Any further suggestions welcome.
2. Sue Batstone - Health and Wellbeing group?  
This is a group of 8 people. They started by defining what health and wellbeing is – They settled on “a state of being healthy happy and satisfied with one’s quality of life”. They will need help from other groups to identify demographics to identify what they see as the three natural groups, the elderly, the young (under working age) and the working age population. They plan to look at how the village will be affected by the changes and how this affects

each group. It was also noted that the village is stuck between 2 health authorities Sussex and Surrey.

3. George Trowbridge – was standing in for Heather Rogers who was voted chair of the Environment and Sustainability focus group, as she could not be present. This group has explored what Sustainability and Environment cover. It will consider the impact of local development on local habitats water supply and the impact on landscape – suggestions and volunteers needed.
4. The business and employment forum had not met yet and where due to have their first meeting the following day. Update - Philip Wightman has been elected Chair at the first meeting on 6/9/16
5. Education forum Chair was not present.
6. Sports and recreation forum Chair was not present.

All chairpersons will sit on the main steering group along with the Parish Councillors leading the Neighbourhood plan.

Various current planning applications were then discussed

1. Fairlee – Was last discussed in detail at the last planning meeting which unanimously recommended to reject the application. HDC planning dept had also recommended to the committee rejecting the plans. Update - the application was rejected at the HDC Planning Committee Meeting on 6/9/16 but will most likely go to appeal. Roger Nash from RPS and two other objectors spoke for speak 2 minutes each.  
There were 240 public objections against the plan and one in favour.  
We need to get on with NP as the sooner that is finished the more influence we will have. The Fairlee development is being promoted by Gladman who are aggressive land consultants working to get outline planning to build thus increasing the value of land 10-20 fold then then selling it on to a developer. The current plans propose unsuitable road access to the A281. There are concerns how services will work with so many more homes and how infrastructure will cope. Concerns were raised about the sewers as there are already issues following the Chruchmans meadow development and the additional demand from Somerfold and Windacres (if it goes ahead). There are still no approved plans for waste water at the new Summerfold development even though the house have already gone up. The fish locally are being killed by pollution form sewage overflow into the river Arun. (our drinking water also comes from the river according to Southern Water website). Another parishioner asked what counter measures can we put in place to make sure Fairlee is rejected? Roger Nash(RPS) has had experience with the traveller site appeals and how long that can take. HDC will work to deal with appeals and any legal issues arising. Is there value in finding out why Storrington site was rejected; maybe we could learn something from that? Another parishioner stood to say that private individuals had funded much of the work to object, £2600 having already been spent privately on traffic survey leaflets etc. She asked people to think about donating to a war chest and volunteer to fight this application. It was pointed out that there are already strong groups to collaborate with Protect our Waverley, Cranleigh Society etc - there are 4450 homes planned for those areas. Billingshurst have 200 houses – we need to learn form others who have dealt with similar situations successfully such as Storrington and pool resources and get more people involved. Ian said there are good facilities on HDC website to electronically object on line which takes just a few minutes. One parishioner asked if we could have a village website to communicate – The

village website is being reviewed and integrated with facebook and twitter to aid better communication – there are a lot of resources on this site that can be used. Katie Gilmore (PC) is working on doing this as she has a skill set and background of doing this work before. Next council meeting is 12<sup>th</sup> September 2016 to approve the IT plan. Parishioners welcome to attend.

2. Land adjacent to Woodfalls, Loxwood Road – The developers appeal against the HDC rejection of this development has been rejected meaning the most recent proposed plan will NOT go ahead. It was a plan for 6 large dwellings with access to Loxwood road on a bend. This does not preclude the developer from putting forward another plan in the future.

3. Baynards lane at Cox Green survey activity

This is a potential development at the corner of Baynards Lane amounting to 22 acres which is three times the size of Fairlee. It backs onto houses in Rudgwick but sits on the boundary of Ewhurst Parish. Currently we understand that it will NOT be a preferred site in the Ewhurst NP.

HDC was informed as it borders its boundary and HDC plan to strongly object. Surrey have also been working in readiness for a planning application. We need to keep a close eye on this. Residents were asked for further information.

One resident told us he tried to buy a strip of land to extend his garden 18 m ago and approached a local farmer who rented it. In his opinion that strip of land would form a link road to the main road so unlikely to be sold – Resident did approach owner but never heard back.

A driveway has been put in from the owner's house to Cox Green to set a precedent for building a right of way. They speculated that someone is spending money getting the land ready and would hardly be frivolous.

A resident referred to previous planning restrictions covering the area which ensured it was protected by very strict planning restrictions and the value of the view and countryside protected – he reflected why has it changed to allow building on green land? Richard Landeryou, RPC Chairman responded to say that over the past ten to fifteen years planning laws have changed it least partially in response to the need for more houses and that Waverly and Horsham are not exempt from these pressures. HDC has a planning framework and land supply in place whereas Waverly is just putting theirs together. Permission is sometimes granted due to an absence of a planning framework/land supply. We need to remember that developers build houses not councils. If WBC plan is agreed this month it will give them more control over where development takes place.

Further questions were invited

One resident asked what's happening with Windacres. We believe its application for planning runs out in the next few weeks but they may reapply.

NP will proactively be asking landowners to come forward with land as part of the neighbourhood plan for development and land such as the pig farm and Fairlee may well be put forward for consideration. There is a strict framework under which all land proposed is considered and this will be applied equally to all sites put forward. The development of the NP is subject to a process under the guidance of a consultant with experience of previous NPs. There

will be development but all villagers get to vote in the referendum for the NP. It may include sites outside of the current building line. All plans must be evidence based.

The pig farm has been owned by a travelling family for 30 years and previous development plans have all been rejected by both the RPC and HDC. It is understood that the owner is now looking at splitting it into 5 single sites although the process to carve up is costly. Splitting it won't necessarily make permission easier. He could put that site forward for NP.

It is estimated to take 1 year to finish NP.

A resident asked about infrastructure. The A281 is already choked what can be done about infrastructure. Ian explained there is a level of cooperation between Counties on large projects such as increasing size of A281 between Surrey /Sussex. The fact is we cannot stop development but we can put it where it is agreed to be most suitable.

Who represents such things back to county? It was stated that John Bailey feedback to HDC and Liz Kitchener to West Sussex County Council/County Hall. Both regularly attend Parish Council meetings convey our views to District and County Councils.

A resident raised an issue about Queen Elizabeth road to do with parking and visibility at school drop-off times. This is not a matter for the NP but will be raised at the next Parish Council meeting with a view to getting County Highways involved.

Another resident asked why wasn't there a housing forum? Ian responded that the steering group essentially is the housing forum and so there is no need to duplicate this with another sub group. The overarching main purpose of having an NP was to identify where development can take place.

Who was in control of the types of housing built? We can put forward guidance as to what we would like to see but ultimately it's up to developers what they apply for permission for. We can't dictate. NPs propose what type and size of housing suits the needs and style of the village and the planning department and District Council will consider that input when making a decision.

We do not know how many homes we can come up with until the land comes forward. We need to be looking at 130 to 150 houses not including those already approved or in progress.

Everything in the NP needs to be evidence based. We have to have a number of homes acceptable to HDC. Too few and we risk our plan being rejected. It's a case of getting the balance right.

One resident was concerned it was a vast task. She asked about access to demographical information, housing needs survey etc. Housing needs survey 2013 action plan is on the Parish website. HDC has a demographic department who may assist by using the 2011 census. There are currently approx. 3000 people across 1300 households.

The next NP meeting will be held in 2 months' time on 7<sup>th</sup> November by which time all chair people will have been elected and we should have had at least one full steering committee meeting and a process for calling for and publicising sites.

Many thanks to Councillor Joanne Dove for taking the notes on which these minutes are based.

## APPENDIX 5 – Steering Group Minutes (June 2016) & Terms of Reference

**Rudgwick Neighbourhood Plan  
Steering Group Meeting  
7 p.m. Monday 7 November 2016  
Rudgwick Village Hall**

### **Present**

|                        |   |                                                                       |
|------------------------|---|-----------------------------------------------------------------------|
| Parish Council         | - | Ian Mac – Chairman<br>Richard Landeryou<br>Joanne Dove<br>Rob Bookham |
| Focus Groups (Chairs)  | - |                                                                       |
| Transport              | - | Paul Whyles                                                           |
| Health & Wellbeing     | - | Renee Fickling (Representing Susan Batstone)                          |
| Sports & Recreation    | - | Johnny Barr                                                           |
| Business & Employment- | - | Philip Wightman                                                       |
| Environment            | - | Heather Rogers                                                        |
| Education              | - | Apologies                                                             |

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Renee Fickling agreed to be the Secretary to the Steering Group and will attend future meetings to take the Minutes.

**Steering Group Terms of Reference** circulated. No objections were raised and signed by those present.

### **Action**

Outstanding signatures to be obtained from:-

- Sue Batstone – Chair of Health & Wellbeing Group
- Victoria Jarvis – Chair of Education Group.

---

Also present was Maggie Williams, Neighbourhood Planning Officer at HDC who provided an update on the issues surrounding Henfield's NP and recent High Court decision.

The model of the NP was introduced in 2012 and has moved on greatly since. They are now being more closely scrutinised by developers and vulnerable to a number of challenges. Henfield is the first successful challenge that has resulted in their NP being quashed.

Henfield was one of the first Parishes to produce a NP and was the second NP to be approved by HDC. Various planning applications in Henfield were refused and unsuccessfully appealed. The challenge in question related to a site that was adjacent to a plot that had been granted planning permission as, at that time, there was no 5 year housing plan. In addition to challenging the refusal of planning permission, the developer also challenged Henfield's NP on the basis that it discounted development to the east side of the village without giving



adequate reasons why. The community had concerns regarding development to that side of the village due to traffic issues and were not happy for development to take place there. However, no technical evidence had been produced to support the community's view and Henfield's NP was quashed on the grounds that Henfield had failed to comply with the Sustainability Appraisal process which provides that every alternative option must be considered. Henfield's NP had failed to consider all options for development.

Why was the view of the community not good enough? It was not backed up by any evidence whatsoever.

Henfield now has no Neighbourhood Plan and if they wish to produce one will be required to start again from scratch.

There was a similar situation in Aylesbury Vale whose NP was challenged as not sufficiently evidence based. Aylesbury Vale conceded the challenge.

Nuthurst was also one of the first to produce a NP and is quite thin in substance, it would not be passed as a NP today.

HDC have a duty to support only and producing the plan is our responsibility. The NP only becomes Horsham's responsibility once it has been submitted.

NPs now need to be more robust and it was advised that it is important to get a good independent consultant to assist early on in the process. Advised that the clerk telephone other clerks for recommendations. A list of Consultants is available from HDC.

Need to consider how Sustainability Appraisals are to be funded. Financial support is available from Locality and grants can be obtained. Base funding of £9,000 is available and we need to contact them for confirmation on what they will or will not support.

Offer of Support is currently being revised at HDC.

Call for Sites itself is not a particularly difficult process.

- publicise and give time to respond.
- need a methodology on how to assess what has been submitted. Retained consultant advises on this process.
- need to submit assessment to Council who will then decide how to select sites.

Recommended having the site assessment approved independently before submission to HDC.

Once NP submitted it will then go through the process of:-

- Examination.
- Health check.
- Examined again.
- Examiner's Report.
- DC then have to make a decision on whether to sign off or not.

- Developers then have 6 weeks to challenge the Plan. (Developers can also challenge the decision to go to Referendum.)

**HDC now want:-**

To see draft plans.  
Must be evidence base.  
The process must be published on a public website.

Parish plans have no legal weight.  
The NP is expected to deliver homes. If have no Neighbourhood Plan, plans will be allocated to you by the DC.

Rudgwick is categorised as a medium sized settlement and there must be planning for some development but not as much as the category above (i.e. Southwater/Pulborough/Storrington etc.). Rudgwick is constrained by ancient woodland, there are not many sites and the level of development will not be high. Broadbridge Heath, North Horsham and Colgate are the only ones not doing a NP.

Best scoring system is the traffic light system – red/amber/green. A number system is too arbitrary.

There are various ways of looking at housing:-

- historical completion rates.
- growth in households.
- population Census.

Get some advice from Consultant.

On the question of Land use, look at type and size of property. Decisions must be evidence based.

Do a Parish Survey.

- Last one done in 2013 and may have to update it.

When you have a figure on the number of houses then you need to talk to the Council.

Local green space can be allocated in NP.

- Need to do a Local Greenspace Report.
- Must be assessed in accordance with published criteria in the HDF.

Can allocate part of a site for recreation

- make it as a policy
- have good evidence that it can be delivered. Avoid repeating policies that are already in the HDF. Stick to policies that are specifically localised.

Have a vision of what your village wants. Don't be frightened of it but make sure your NP is as robust as it can possibly be.

Now have the benefit of seeing what has gone wrong elsewhere.

Need to develop a project plan. Agree a desired completion date and work back from that to determine the timing gates and how much more time may be needed. Factor in 12 weeks of Statutory Consultation.

### **Updates from the Focus Groups**

#### **Transport** - 3 meetings to date.

Have considered –

- Questions for a survey
- Bus service
- Pavements/pathways
- Downs Link Crossing
- Crash statistics
- Considering setting up traffic survey at 9 locations around the village. Estimated cost of around £2,500. Cameras will increase cost.

Will look at The Dunsfold Traffic Survey and Protect our Waverly Traffic Survey.

Also considered consulting an Independent Transport Consultant for advice on how best to proceed.

#### **Health & Wellbeing** – 3 meetings to date.

Have identified our target groups as the

Elderly  
Young families/children/youths  
Working age population.

Have concentrated on the Health aspect to date:-

- Met with Practice Manager of Rudgwick Medical Centre who confirmed that they have the capacity to take on an additional 600 patients. Dentists are tenants and therefore have the space in the building if required.
- Have identified the relevant nursing homes within a 5 mile radius.
- Sussex has the highest case of dementia care nationally.

Will be liaising with Sports & Recreation to ensure no overlap when looking at Wellbeing.

#### **Sports & Recreation** – 3 meetings to date.

Various sporting groups operate in the village. Rudgwick Junior Football Club currently have 2 age groups playing outside the village and looking for larger sites to supplement the current facilities and to provide a multi-purpose sports facility.

PC expressed concerns that the club draws in a significant number from outside the village and need to know what that extent is in order to determine funding. Being asked to fund facilities for users who are not parishioners and are not contributing. Need to know the breakdown.

The RSCC and how it is run is a worry. Organisation appears very complicated and they may have to consider changing its Constitution.

Not operating as a viable commercial concern with a turnover last year of £44,000.

**Business & Employment** – 3 meetings to date.

In 2006 there were 105 registered businesses in Rudgwick.

In 2016 – 236.

Obtained list from HDC Development Team.

Want to compose a separate survey targeted at the businesses registered in Rudgwick.

**Environment** – 3 meetings to date.

Have agreed that the best contribution they can make to the NP is as mappers highlighting

- Sewerage
- Water
- Flood plains
- Heritage assets (Rudgwick Preservation Society will assist)
- Landscape features
- Habitats

Will also look at sustainable building codes.

**Discussed**

**Planning Consultant** –

Dale Mayhew is now out of the running as currently overwhelmed with work. Have approached Troy Navigus who have consulted on the NP for Warnham and Billingham. They have agreed to attend the next public meeting on 05.12.2016. Southdowns National Park Authority also have consulting capability which will be investigated. However, the Steering Group need to meet before that date to consider selecting and appointing a Consultant.

**Funding** –

In light of recent development, RPC will have to revisit the initial funding approved for this project. The Consultant will provide advice on funding levels.

RPC will contact Locality for information on additional funding available.

**RPC Website** –

Being revamped.

RPC have obtained and accepted a quote from a company for this to be done. Each Focus Group can then upload their Minutes directly. Minutes are to be taken at all meetings.

**Survey** –

Barbara, Parish Clerk, to provide a copy of the Survey circulated in 2006 for the purposes of the Parish Plan. This can be reviewed and the Focus Group asked to contribute to the composition of new Survey.

**HDC Neighbourhood Planning Officer**

Maggie to look into:-

- Flooding Zone
- Contributions/Funding
- Details of Revised Offer of Support
- Details of her replacement at HDC – Norman Kwan – in position from 14.11.16.

**NEXT MEETING – 28<sup>TH</sup> November**  
**Jubilee Hall, Church Street. *Please note change of venue.***  
**7 p.m. – 9 p.m.**

## **Rudgwick Neighbourhood Plan Steering Group Terms of Reference**

### **1. Background**

In early 2016 discussions were held by Rudgwick Parish Council in light of the Government's changes to the planning system, enabling communities to produce a Neighbourhood Plan. It is intended that this process will enable communities to actively influence land use and development, as part of statutory planning. The Parish Council felt this could be an opportunity to shape future development in the area whilst safeguarding and enhancing what is valued. Following various discussions and meetings a Steering Group was established to oversee the process of preparing a NP, within the context of the Horsham District Council Planning Framework covering the years to 2031.

### **2. Purpose**

The Steering Group's purpose is to design, implement and oversee the Neighbourhood Plan process in order that this will then progress to Independent Examination and a successful community referendum and ultimately be adopted by Horsham District Council (HDC) and become an integral part of HDC Planning Framework.

### **3. Principles**

- That the Steering Group will undertake the process in a democratic, transparent and fair fashion, allowing opinions and ideas to be put forward by all.
- That the Steering Group will give or encourage those who live in Rudgwick the opportunity to inform and shape the process e.g. through taking part in the consultation process.
- That the Steering Group will make this a positive and constructive process.
- That it is intended to take a holistic approach that will improve quality of life and strengthen the community.

### **4. Tasks and Activities**

- Work with the Parish Council and ensure that they are fully informed throughout the process, and appropriate decisions referred to them when applicable;
- All key decisions must be mutually agreed by the Steering Group and the Parish Council – hence the need to ensure communication is effective and appropriate;
- Prepare a project plan to set out how they will create a NP;
- The project plan should contain a timeframe to focus activity and to aid planning;
- Publicise the intention to produce a NP, to inform and engage the community, and publicise all subsequent activities and progress;
- Meet regularly to agree actions and discuss issues that arise, in order that the process is dealt with in an efficient and timely manner;
- Gather baseline information;
- Establish and understand the needs of residents and what the long term vision or aspiration is;
- Decide upon and, if required, set up sub-groups (or focus groups) to gather statistics, information and views, subject to this being agreed and delegated by the full steering group;
- Liaise with residents, partners and stakeholders throughout the development of the NP;
- Consult as widely and thoroughly as is possible to ensure that the draft and final NDP is representative of the views of the residents;
- Analyse the available information to prepare the draft and final NP;

- Produce notes/minutes from Steering Group meetings and circulate to the Parish Council and Steering Group members (and others as agreed to be appropriate e.g. support staff);
- Set up a mechanism to inform interested residents of progress e.g. monthly updates by email. Encourage residents to sign up to this;
- Actively publicise the draft NP prior to the Referendum;
- Agree financial arrangements and budget with the Parish Council.

#### **5. Membership of Steering Group**

- The Steering Group should consist of no less than 10 Members;
- The Parish Council must be represented on the Steering Group;
- Members must reside in the parish.
- A person living outside the parish but running an established local business may be invited to join, subject to there being no conflict of interest;
- The Steering Group shall be quorate when at least half of the members attend;
- HDC officers or Councillors, as well as other agencies appointed by the Council to support the process cannot be voting members of the Steering Group but are able to attend meetings and contribute to the discussions as required.

#### **6. Roles within Steering Group**

- The Steering Group shall have a Chair, a Vice Chair and a Secretary.
- If the Chair and Vice Chair are unable to attend a meeting then a temporary Chair (selected from the Steering Group members) will be elected for that meeting.
- The Secretary will take notes/minutes from the meeting, record main decisions and action points; and make available to the public these and any relevant information as appropriate.

#### **7. Steering Group Meeting Arrangements**

- The Steering Group (and sub or focus groups) shall meet regularly and as necessary;
- The public can observe the meeting and speak at the Chairpersons discretion;
- Decisions from sub or focus groups should be relayed back to the full Steering Group for ratification and/or information;
- From time to time other stakeholders or interested parties may be invited to attend a specific Steering Group meeting to give a presentation and/or discuss their interest in the proposed NP;
- A list of Steering Group members and contact details shall be maintained.
- Details of, and any changes to, the Steering Group membership will need to be notified to, and agreed by the Parish Council.

#### **8. Finance**

- Expenditure to be agreed by majority decision by the Steering Group.
- Finance decisions will need to be recorded in the minutes and notified to the Parish Council.
- Expenditure must fall within the level of funds held by the Parish Council for the purpose of the NP who will supply financial updates to the Steering Group in order to make appropriate financial decisions.
- If expenditure is desired in excess of the funds available, this will need to be decided upon and agreed by all of the Parish Council

#### **9. Changes to the Terms of Reference**



Any amendments to the terms of reference may be made at a Steering Group meeting and agreed by the majority of the Steering Group members. Amendments to be notified to the Parish Council.

#### **10. Dissolution of the Group**

- The members will agree by a majority vote at a Steering Group meeting, to call a Special General Meeting for the sole purpose to dissolve the group.
- Upon dissolution of the group any remaining funds shall revert to the Parish Council. No individual member of the group shall benefit from the dispersal.
- The Terms of Reference were adopted at a Rudgwick Neighbourhood Plan Steering Group meeting on Monday 7<sup>th</sup> November 2016

| Role                                                         | Signature | Date |
|--------------------------------------------------------------|-----------|------|
| Chairperson of SG                                            |           |      |
| Signed<br>Ian Maclachlan                                     |           |      |
| Vice-Chairperson of SG                                       |           |      |
| Signed<br>Richard Landeryou                                  |           |      |
| Secretary of SG                                              |           |      |
| Signed                                                       |           |      |
| Chairperson of Business and<br>Employment Focus Group        |           |      |
| Signed<br>Paul Wightman                                      |           |      |
| Chairperson of Education Focus Group                         |           |      |
| Signed<br>Victoria Jarvis                                    |           |      |
| Chairperson of Environment and<br>Sustainability Focus Group |           |      |
| Signed<br>Heather Rogers                                     |           |      |
| Chairperson of Health and Wellbeing<br>Focus Group           |           |      |
| Signed<br>Sue Batstone                                       |           |      |

|                                                      |  |  |
|------------------------------------------------------|--|--|
| Chairperson of Transport and Road Safety Focus Group |  |  |
| Signed<br>Paul Whyles                                |  |  |
| Chairperson of Sport and Recreation Focus Group      |  |  |
| Signed<br>Johnny Barr                                |  |  |
| Parish Council Representative                        |  |  |
| Signed<br>Joanne Dove                                |  |  |
| Parish Council Representative                        |  |  |
| Signed<br>Rob Bookham                                |  |  |

**APPENDIX 6 – Agenda & minutes from public meeting on 5 December 2016**

**Rudgwick Neighbourhood Plan**

**Public Meeting**

**7:30pm Monday 5<sup>th</sup> December 2016**

**Village Hall, Bucks Green**

**Agenda**

- **Chairman's Introduction** **Ian Mac**
- **Introduce South Downs National Park Authority as  
Consultants to Support RNP** **Ian Mac**
- **Presentation from SDNPA Consultant plus Q&A** **Sarah Nelson**
- **Focus Group Updates** **Focus Chairs**
- **AOB** **All**
- **Chairman's Summary** **Ian Mac**
- **Date of next meeting**
- **Close by 9pm**

**Rudgwick Neighbourhood Plan  
Public Meeting  
7.30 p.m. 5 December 2016  
Rudgwick Village Hall**

**Present**

Parish Council - Ian Mac – Chairman  
Richard Landeryou  
Robert Bookham

Focus Groups

|                        |                             |
|------------------------|-----------------------------|
| Business & Employment- | Philip Wightman             |
| Sports & Recreation    | - Johnny Barr               |
| Health & Wellbeing     | - Susan Batstone            |
| Environment            | - Heather Rogers            |
| Transport              | - Represented by Nikki West |
| Education              | - Represented by Jane Suter |

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**Introduction** - Ian Mac

The Parish Council intend to appoint a Consultant to assist us with drawing up the Neighbourhood Plan and are looking at the South Downs National Park Authority (SDNPA) to take on that role.

Ian Mac and Richard Landeryou met with Sarah Nelson from SDNPA who works on plans for all the Parishes within the South Downs National Park Authority. Sarah is also an ex-Horsham District Planner and it is proposed that she and her team will work with us to support us on our Neighbourhood Plan.

**Presentation from SDNPA** - Sarah Nelson

The Authority is looking to generate income ourselves and this is our first venture as Consultants. We are a team of 3 and will be recruiting a 4<sup>th</sup>. Any profits made go back into SDNPA. To date 13 plans have been made and none rejected.

Our focus has been on rural communities. With Neighbourhood Plans the key thing to remember is that the aim is development.

The Neighbourhood Plan will have statutory powers and links in with the Horsham Development Framework. The two documents need to work together and has to fit in with the National Planning Policy Framework.

You need to construct a local plan for Rudgwick which ends in a Referendum where residents in the village get to vote. The plan has to be supported by a simple majority for it to proceed.

This is all underpinned by the Localism Act. The Government is keen on devolving powers to local communities for them to decide what they want. If we do not have a plan, Horsham District Planning will decide on the level of development in Rudgwick and where the sites will be.

What you can do:-

Within your Neighbourhood Plan you can set out detailed planning for the village specifying type, location, design etc. This is the best opportunity for you to influence the type of place you want to have.

You can allocate land yourself provided it is appropriate, sensible and deliverable. Will need robust evidence, must be transparent and can decide where everything goes.

You can protect important spaces – local green spaces and areas that are important for cultural, historical and natural reasons.

What you cannot do:-

- you cannot stop development
- you cannot retrospectively stop development already granted ie underway or with full planning permission already granted.

All decisions must be evidenced and based on planning fact.

The Neighbourhood Plan deals with Land Use only. If it does not require a planning application it is not something you can influence and should not be in the Neighbourhood Plan. You cannot deviate from strategic documents.

### **Public Questions**

Q. Can pressures such as school, traffic etc. be taken into account?

A. You will have to get your facts and collate the information to demonstrate how the development would impact on these areas of concern. Cannot require things like a train links, free bus service etc. You can be aspirational but must be realistic. Consultant will be there to guide.

Q. What does strategic documents mean?

A. These are general documents which all Parishes must comply with but do not take into account specific local issues. The National Planning Framework and the Horsham District Planning Framework are examples.

Q. Can we specify areas we want to see development in?

A. Neighbourhood Plan should not have an overarching policy of no development. However, any development outside of the Neighbourhood Plan should fall to be refused. No plan ever prevents all development, just doing the best you can do.

Q. Do you have a feel on how many houses we should be looking at?

A. A top line of 10% of 16,000 in village has been suggested. If we can get it below, with strong evidence to support it, then all well and good. You need to thoroughly research it to support the final number. The evidence is crucial or will be susceptible to challenge by developers. You have to have a well argued, well supported plan.

Sites will go up in the future and if it is not in the plan it can be refused. However, there is no guarantee it will not go to appeal. Horsham have had a number of issues with Neighbourhood Plans – Storrington, Pulborough, Henfield and it is all about evidence.

Q. Does the Building Envelope still apply?

A. You now have the power to review that Built Up Boundary and make amendments.

Q. What is the level of acceptance of Neighbourhood Plans and what is the likelihood of it being superseded.

A. Sarah went through the procedure – examination, health check, re-examination etc. Amendments can be made to the plan where necessary.

May have to go out and get more evidence.

Then submitted to Horsham District.

Checked to ensure it meets all legal conditions.

Then appoint an independent examiner.

Invite comments.

Independent examiner will make recommendations and generally tries to accommodate what the local community want.

It is then published.

Referendum held.

Vote taken.

If yes, Horsham District then have to make the plan.

It will be made part of Horsham District Plan containing a Rudgwick chapter.

Changes in national policy can supersede the plan, however, to date 250 Referendums have taken place across the country. The Government will not take away Localism and is determined to make it work.

Q. Focus Groups feel they need direction.

A. They have been given the task of putting together 10 objectives as to what each focus group is aiming to achieve.

Q. Are the utility companies obliged to give you data and information on what plans they have to extend their facilities?

A. They have a duty to reply but a lot of information is available on their websites.

Q. Key driver for housing was population projections which are out of date.

A. Can make educated guesses but there are no statistics that would be accurate.

Q. Horsham has to provide 16,000. Our target is 1,500 (?) which is 2 ½ %.(?) Why are we looking at 10%?

A. Horsham has not yet decided how it is to be divided. Only Nuthurst's Neighbourhood Plan has been made so currently have an allocation 0% - 5%.

Q. How will you engage with the community and landowners?

A. Will give you advice on this but looking at updating the Parish website, noticeboards, Parish magazine, leaflet drop. Need to be seen to have made reasonable efforts with the call for land.

- Funding**
- £5,000 approved in the 2016/2017 Parish budget.
  - £5,000 to come in the 2017/2018 budget.
  - £9,000 from Locality- have to apply for it in stages, will not get it all in one go.
  - other sources.

£20,000 does not go far when dealing with surveys, data collection and consultants. Aim is to do as much of the work ourselves only calling on the consultants when we really need them.

**Focus groups provided updates**

**Business**

- 436 registered businesses in Rudgwick.
- Looking at compiling a Questionnaire.

**Sports & Recreation**

- Need to benefit from future development and looking at a multi-purpose facility to benefit all the sports groups.

**Environment**

- Aim to guide decisions on where development should take place.
- Future development should be sustainable and environmentally friendly.
- Designating green spaces.

Lots of information we can gather to support or reject the viability of sites.

**Health & Wellbeing**

- Health Centre have a lot of capacity for new patients.
- Wellbeing is a loose term which ties into all the other groups. Cannot quantify it, cannot put your finger on it so need a questionnaire to help us identify what affects your enjoyment in living in the village.

**Education**

- Schools take in children from out of the area such as Dorking, Broadbridge Heath, Ewhurst, Camberley (?).

A separate Infant School is not favoured by the Headmistress who feels that it causes competition among the schools and would prefer new buildings at the existing school.

Waiting for Questionnaires sent out to parents to come back.

**Transport**

- Bus service- A survey was done by the company and they say that they are currently providing a service we say we need.
- Traffic - Will look to obtain 2 quotes from 2 companies to identify the roads that need to be monitored to obtain data collection once the sites have been identified. Need to identify where to put calming measures in place.
- Air pollution - Will work in tandem with the Environment group.



**Other Business**

Q. - Is another Housing Need Survey going to be done?  
 A. - Last Survey done in 2013 and will be doing another. Action in Rural Sussex will run the Questionnaire for us.

Q. - What is affordable housing?  
 A. - Housing for rent and housing sold at a discount from a Housing Association. Cannot stipulate a certain market value, can only stipulate size.

Q. - 10% of existing housing stock is dangerous and should be looking at less.  
 A. - 10% of 16,000 is a starting figure, a notional figure to be tested. HDC have not given us a figure and the numbers will come out of the call for sites. Need to have a discussion with Horsham about numbers.

Q. - 10% would be appalling, 2% is what we should be looking at.  
 A. - The evidence will have to be there.

Q. - What is the communication between Surrey and Sussex regarding the proposed development at Cox Green?  
 A. - Horsham DC have objected.  
 The development comes under Waverley & the site is not part of Ewhurst's Neighbourhood Plan.  
 Cannot see how the development would be approved but no guarantee.  
 Waverley does not have a Planning Framework so the Ewhurst Neighbourhood Plan will have no weight until they do.

**Chairman**

- Will put Sarah Nelson and team forward to the Parish Council for appointment.
- In the next few weeks we will be moving to new website and everything will be published on there.

**Chairman's Note –** There is considerable confusion over the potential housing numbers that we will need to come up with in our plan. My original guideline number for consideration was about 10% in addition to the current number in Rudgwick. This has been challenged as being far too high and a suggestion of 2.5% put forward supported by some HDC numbers. I believe the basis for these calculations is incorrect but some research is needed to better understand the numbers. This will be done and the numbers will be analysed and explained at the February meeting.

**Next public meeting**

6 February 2017  
 Rudgwick Village Hall  
 7.30 p.m.

## **APPENDIX 7 – Notes from Annual Parish Meeting in March 2017**

**Annual Parish Meeting: 13<sup>th</sup> March 2017 at RH, 7.30pm**

### **Extract relating to Neighbourhood Plan**

#### **Rudgwick Neighbourhood Plan Update**

Parish Councillor Ian Maclachlan, Chairman of the Neighbourhood Plan Steering Group, gave an update on the past years' activities.

Four public meetings had been held and quite well attended. The Steering Group and six focus groups had been setup and a number of meetings held. From the investigations that were being made it was discovered that the primary school was nearly full and that a proportion of the pupils did not live in the parish. The governors of the school had been made aware of this and it was agreed that places would be for local children. New development would require extra capacity at the school. The medical centre has the capacity for further patients and can meet the demand. Cllr. Maclachlan thanked all the volunteers who were trying their best to represent the village and its views. The Neighbourhood Plan will help to achieve sustainable development of the type and in the places that it is wanted. Pressure from central government for more and more housing in the end comes down to the people who are impacted locally, and the aim is to try to make sure that the impact is as acceptable as possible. The current position with the Neighbourhood Plans has been complicated by the challenge in court, and rejection, of the Henfield Neighbourhood Plan as the evidence was not judged to be acceptable. Plans will have to be more rigorous and new rules are being introduced. There is a lot of new input from HDC and a need for them to be much more involved. Currently 23 parishes, with different levels of sustainability and detail were putting Neighbourhood Plans together. HDC were not currently giving out numbers of housing but it could be in Rudgwick's interest to complete their Neighbourhood Plan before the Local Development Plan adopted in 2015 is reviewed. The next step is to revisit and assess the parish housing requirements. Housing needs surveys tend to focus on social housing but there is also a need for downsizing market housing. HDC state that this can easily be met within the District, but people want to stay where they have always lived.

Sites for development need to be put forward and then there is a rigorous assessment process backed up by professional consultants.

Cllr. Maclachlan said the Neighbourhood Plan Team would do their best and residents were invited to ask questions.

**Definition of sustainability** – a strategic environmental assessment and sustainability appraisal was an obligatory part of the Neighbourhood Plan.

**Development at Rudgwick Metals** – how was the new application approved with more houses than the previous application. The previous provision for a community facility had been removed and the housing increased. The site had been specifically allocated for development. The approval was contrary to the views of the HDC Conservation Officer and both the Parish Council and the Preservation Society. Cllr. Maclachlan suggested setting up a group of councillors and residents to try and work with the developers to mitigate the urbanisation of the site.

**Distribution of 1600 new homes throughout the villages of Horsham District** – of the 23 parishes carrying out Neighbourhood Plans a number would be unsustainable and unlikely to have any development. If Rudgwick can complete its Neighbourhood Plan, with a sustainable number of houses before HDC review the Local Plan it

stands a better chance of being accepted. Interim development can be taken into consideration in terms of impact on the sustainability of future developments but not to reduce the numbers.

**Continuing viability of the Focus Groups** – should they carry on if there is no impact on the land. Assurance was given that more facilities would be needed, and the work of the Focus Groups should continue.

**Rural Housing Alliance** – was it worth looking at a specifically managed housing scheme where the Parish Council can take the lead in certain types of development. The schemes were for affordable housing and there was also a need for a mix of market housing. Mrs Jo Bowen proposed a vote of thanks to Cllr. Maclachlan and all those working so hard on our behalf and this was unanimously agreed.

## **APPENDIX 8 - Presentation made at Annual Parish Meeting in March 2018**

**Annual Parish Meeting: 12th March 2018 at RH, 7.30pm**

**Extract relating to Neighbourhood Plan**

### **Rudgwick Neighbourhood Plan (RNHP) Update**

Cllr Ian Maclachlan, Chair of the Steering Group reported on the latest developments. Planning criteria have seen a number of changes in the last 12 months.

The Housing Needs Assessment covers all sections of society, i.e. needs of the elderly, young people, etc. rather than the previous focus on “social housing”, Southdown National Planning Team Consultants undertook this role on behalf of Rudgwick. The assessment was submitted to HDC Planning Department and no significant changes were required. The number of proposed new dwellings ranged between 70 and 100 (by 2031). HDC Planning Department advised to aim for the upper end and confirmed that the 20 additional Windacres development could be included, however not the original 35 Windacres dwellings or Summerfold development.

Government Consultation in September 2017 “Right Homes, Right Places” resulted in an increased expectation of number of houses in the Horsham Council District: from 16,000 to 19,200 (including 750 windfall developments and 1,600 from village Neighbourhood Plans).

Grounds are shifting: a possible review of build-up boundaries for the HDC villages in the very near future; a tightening up of boundaries of Cox Green (Surrey/West Sussex). The Steering Group has met, attended a HDC Conference on Neighbourhood Plans and this has resulted in the decision to wait three to four months until further information is available.

The Steering Group is disappointed with the slow progress but is aware of the time and money being spent on a plan that will not meet requirements/have the approval of the local community.

### **QUESTIONS:**

Should we not press on and have a RNHP so we can limit the number of developments to the 100? - Considerations are to be given to spending a large amount of money on a plan that will be objected against.

Is there a mechanism for pausing the plan? - No, no one is required to be informed.

Can we be sure that a plan is produced? - There is hope for that. However, we must ensure that the plan appropriate and for that we shall require further clarity.

Three out of 23 neighbourhood plans have been drawn up. Two parishes have had their plan overturned. Up to now £3,000 has been spent on the plan and this could go up to £20,000, possibly more.

## APPENDIX 9 – Call for sites notice

### RUDGWICK NEIGHBOURHOOD PLAN: CALL FOR SITES

As part of the preparation of the Rudgwick Neighbourhood Plan, it is important for us to consider the merits of making site allocations for development in order to address local needs. We are therefore placing a call out to landowners in the Parish of Rudgwick who may have an interest in promoting their land for development. The Neighbourhood Plan is looking to address our needs over the next 15 years.

If you are a landowner – or represent a landowner - and wish for your land to be considered for allocation in the Neighbourhood Plan, you are required to provide us with the following details:

- a) A clear statement of which types of development you wish your land to be considered for, e.g. residential, leisure, employment, etc.
- b) The area of the land in hectares. Please note that sites must be at least 0.5 hectares in size to be considered.
- c) A plan which clearly shows the extent of the land that you wish to be considered. Ideally this should be on an Ordnance Survey base or equivalent.
- d) An understanding of how the site would be accessed by vehicle and opportunities for linking in with existing footpath/pavement and cycle routes
- e) Any relevant planning history for the site, e.g. extant planning permissions that have not been brought forward.
- f) Any legal issues such as covenants restricting the use of the land.
- g) Whether there are any restrictions to your site coming forward in the short term.

It is important that you submit your sites as part of the Neighbourhood Plan process. It establishes the principle of development of the land in question for that particular use. At present, much of the land around Rudgwick is not established as land for development and so is unlikely to have a good

prospect of securing planning permission for development; an allocation would change that. Equally however, it is important that the sites which are allocated contribute towards achieving the vision and objectives of the Neighbourhood Plan, as set by the community.

If you have already made a submission to Horsham District Council in respect of its Strategic Housing and Employment Land Availability Assessment (SHELAA), we request that you also make a submission to the Rudgwick Neighbourhood Plan process if you wish for the site to be considered for allocation within the Neighbourhood Plan. The Neighbourhood Plan is focusing on potential local – as opposed to strategic – scale allocations so this is particularly important for small (non-strategic) sites. If you do not submit your site to the Rudgwick Neighbourhood Plan Call for Sites process then there is no guarantee that it will be considered through this process.

We require all submissions to be made in writing by 5pm on Tuesday 2<sup>nd</sup> April 2019.

Submissions must be made to the Rudgwick Parish Council office, Rudgwick Hall, Bucks Green, Rudgwick, West Sussex, RH12 3JJ

## **APPENDIX 10 – Notes from Annual Parish Meeting in March 2019**

**Annual Parish Meeting: 11<sup>th</sup> March 2019 at RH, 7.30pm**

**Extract relating to Neighbourhood Plan (Draft Minutes)**

### **Neighbourhood Plan Steering Committee**

Cllr Maclachlan, Chairman provided a brief update on the Neighbourhood Plan Steering Committee (NHPSC) work. He briefly reflected on the changes of housing requirements, using his grandparents' housing history as an example. Just as in the nineteen twenties and sixties, there is a shortage of affordable housing, especially for people with specific housing requirements such as young people, the elderly. It was important to meet those needs, in general and in Rudgwick in particular – there is no need for five-bedroom houses in small villages. Development should be focussed in cities, addressing homelessness, bad housing stock and making use of brown field sites. The Rudgwick NHPSC halted their work last year, waiting for the latest information from HDC. It has now issued a call for site, advertised on village notice boards, Parish Website and Facebook page – the closing date being 2nd April 2019.

**APPENDIX 11 – Letter from Horsham District Council dated 13 March 2019**

Parish Council Chair  
Neighbourhood Planning

Our ref: NP Planning  
Your ref:

Date: 13 March 2019

Sent by email.

Dear Sir/Madam,

**Re: The Future of Neighbourhood Planning**

As you will know, we recently held two seminars to discuss the future of Neighbourhood Planning. The aim of the seminar was to better understand the issues that are facing both neighbourhood planning groups and the local authority as it progresses the local plan review. It was agreed Horsham District Council would follow up the seminar with a letter outlining the main issues discussed at the seminar together with the next steps.

**Discussion Summary**

We have already circulated a copy of the presentation from the seminar sessions. The key outcomes from the seminar session can be summarised below and full summary of the discussions is appended to this letter.

- There is an increasing burden on neighbourhood planning groups. The early 'light touch' approach for neighbourhood planning is no longer viable nor appropriate. It is clear that the burden of evidence and the time taken to navigate the process has become more costly, complicated and resource intensive for all local communities.
- The revised National Planning Policy Framework (NPPF) now requires local authorities to calculate housing need based on a standard methodology. This will lead to increased housing requirements for the district in the future, which will need to be planned for in the Council's Local Plan Review. In addition, the Council has a duty to consider whether it has any capacity to meet the unmet housing needs that may arise in surrounding districts and boroughs.
- Local authorities are also now required to set out housing requirements in their Local Plans for designated neighbourhood plan areas (paragraph 65 of the new NPPF). Any new housing to be provided in neighbourhood plans in future will need to take account of the future development strategy for the District.
- The Local Plan Review process has commenced with work taking place on a number of evidence base studies. The outcome from this work will be used to help inform a Preferred Strategy document for the new Plan. This will set out for consultation a draft strategy for the future which ensures the district continues to be able to meet its development needs. It will also identify potential development locations and the number of houses that neighbourhood planning may be expected to provide. **Please note that this work has yet to commence, and no numbers have been allotted to any settlement or neighbourhood plan area as yet.**

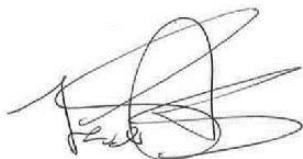
- It is recognised that current neighbourhood plans have been or are being prepared using the current Horsham District Planning Framework which has an overall requirement for at least 1500 homes to be delivered through neighbourhood plans and that this figure is likely to change when the local plan is reviewed. This will have implications for both made neighbourhood plans and plans which are currently being prepared.

### Future Implications

In Horsham District, different neighbourhood planning groups are at different stages of plan preparation. Some are made, some well progressed through the process and others are still at the evidence gathering stage. As a result, the Local Plan Review will affect parishes in different ways. These detailed options are set out on the following pages together with the advantages and disadvantages of the different approaches agreed at the seminar sessions.

Although we understand that the issues that surround decisions on how and whether your parish chooses to progress with neighbourhood planning will be complex, we are asking that we receive an initial view on your preferred approach, on or before **Friday 31 May 2019**. We will continue to discuss the implications arising from the local plan review with you as we progress the preparation of this document, but if you have any immediate questions or queries please do contact our neighbourhood planning team ([neighbourhood.planning@horsham.gov.uk](mailto:neighbourhood.planning@horsham.gov.uk)).

Yours faithfully,



**Trevor Saunders**  
Interim Head of Strategic Planning



## Future Neighbourhood Plan Options

### Parishes with Made Neighbourhood Plans

Parishes with a made neighbourhood plan will not need to consider starting a review of their plans until such time as the new Local Plan is adopted which is expected to be in mid – late 2021. The likely options are:

- 1) Commence a review of the neighbourhood plan to take account of any revised housing numbers which are allocated to the parish by the Local Plan Review. It should be recognised that to meet the step-change in housing growth that is being placed upon the Council, it is likely that most parishes will need to give serious consideration to the release of greenfield land in their parish area. Parishes will therefore need to take a view on how additional greenfield development could be brought forward in a manner that would pass the 'hurdle' of the referendum.
- 2) Retain the existing neighbourhood plan, but decide not to review it. Horsham District Council will instead lead the allocation of any sites in the parish to meet any revised housing numbers through the Local Plan Review, whilst consulting with the community. The District Council will also need to consider whether it is necessary to release additional greenfield land. This is tested by an independent inspector but there is no public referendum stage.

With this approach the existing neighbourhood plan and any allocations would remain in place for the rest of its plan period, but the new local plan policies would supersede those in the neighbourhood plan if there are areas where the two are not in alignment.

- 3) A hybrid option: Horsham District Council meets housing needs through the local plan process as set out in option 2. On adoption of the new local plan, the neighbourhood plan could still be reviewed to update on any policy issues considered to be relevant to the parish such as design or local greenspaces. The parish could also choose to allocate additional housing sites on top of those identified in the Local Plan if it wishes to do so.

### Parishes with plans at and advanced stage of plan preparation

A number of parishes have reached an advanced stage in the plan preparation process, (generally at regulation 14 or beyond). It is expected that these plans will be 'made' by the time the Council submits its new local plan for Examination in the late summer of 2020. In this instance, the options are considered to be:

- 1) Commence an early review of the neighbourhood plan to take account of any revised housing numbers which are allocated to the parish in the Local Plan Review. Any review of the neighbourhood plan should recognise the step-change in housing growth required for the area, it is likely that most parishes will need to give serious consideration to the release of greenfield land in their parish area. It is recognised that neighbourhood plans must pass a referendum. Parishes may wish to take a view on how additional greenfield development could be brought forward in a manner that would pass this particular hurdle.
- 2) Retain the existing neighbourhood plan, but decide not to review it. Horsham District Council will instead lead the allocation of any sites in the parish to meet any revised housing numbers through the Local Plan Review, whilst consulting with the community. The District Council will also need to consider whether it is necessary to release

additional greenfield land. This is tested by an independent inspector but there is no public referendum stage.

With this approach the existing neighbourhood plan and any allocations would remain in place for the rest of its plan period, but the new local plan policies would supersede those in the neighbourhood plan if there are areas where the two are not in alignment.

- 3) A hybrid option: Horsham District Council meets housing needs through the local plan process as set out in option 2. On adoption of the new local plan, the neighbourhood plan could still be reviewed to update on any policy issues considered to be relevant to the parish such as design or local greenspaces. The parish could also choose to allocate additional housing sites on top of those identified in the Local Plan if it wishes to do so.

It should be noted that if for any reason the neighbourhood plan preparation process is delayed for any reason, the approaches set out for parishes at an early stage of plan making will need to be considered.

### **Parishes at an early stage of plan making**

It is recognised that for a number of reasons, some neighbourhood plan areas are at the earlier stages of the neighbourhood plan preparation process. There is a risk that some of these neighbourhood plans may be overtaken by the local plan preparation process and superseded before the neighbourhood plan can be made.

The Council will therefore need to take a view as to the deadline by which neighbourhood plans which have not reached Regulation 15 (submission to the Council) will not be progressed to Examination by the Council. We hope to make a decision on this deadline within the next few months. For these neighbourhood planning groups it is considered that the main options are as follows:

- 1) Place the neighbourhood plan preparation process 'on hold' and then restart the process of plan preparation to take account of housing numbers which are allocated to the parish in the Local Plan Review. Any review of the neighbourhood plan should recognise the step-change in housing growth required for the area, it is likely that most parishes will need to give serious consideration to the release of greenfield land in their parish area. It is recognised that neighbourhood plans must pass a referendum. Parishes may wish to take a view on how additional greenfield development could be brought forward in a manner that would pass this particular hurdle.
- 2) Horsham District Council meets housing needs for the parish through the local plan process. Parish level needs would be met in consultation with the local community. Again it should be recognised that the District Council will need to consider whether it is necessary to release additional greenfield land if such an approach is pursued. This is tested by an independent inspector but there is no public referendum stage.

On adoption of the new local plan, the neighbourhood plan could be prepared – this could bring forward additional housing numbers on top of any allocations, or could simply consider other policy areas centred on community policies, design guidance or local green space policies and still be eligible to claim 25% CIL receipts as a result of having a made neighbourhood plan in place.



**'Pros and cons' of different approaches**

The following tables set out the advantages and disadvantages of pursuing the different options. It should however be recognised that they are not exhaustive, and in addition the weight of one or two advantages may be considered to outweigh a larger number of disadvantages (or vice versa).

| <b>Review / commence neighbourhood plan on adoption of new local plan</b>                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Advantages – the 'pros'</b>                                                                                                                                                                                                                           | <b>Disadvantages – the 'cons'</b>                                                                                                                                                                                                                                                                        |
| There is now greater understanding and experience of the neighbourhood planning and the processes, expectations and costs involved. Expertise may potentially be retained if existing volunteers continue. New volunteers can bring a fresh perspective. | Older neighbourhood plans were produced under a 'light touch' era and the level of new evidence required may be much greater and more costly.                                                                                                                                                            |
| Neighbourhood plans remain a useful tool to help communities shape their local area, making sure the right homes are built in the right places.                                                                                                          | Getting additional housing numbers through a referendum may be very difficult particularly given the pressure to deliver a step change in housing growth, as this is likely to require the release of greenfield land. At this stage there is still uncertainty as to what any number may be.            |
| Neighbourhood Planning ensures the community remains engaged with the planning process. Parishes understand their communities and issues affecting them better than anyone else.                                                                         | Neighbourhood Planning can be an expensive and timely process. The latest external funding committed from government amounts to £23M from 2018. Further external funding will need to be secured for later years, and as yet, is not guaranteed.                                                         |
| Having a neighbourhood plan in place can give some protection against unplanned development in some situations where the local authority cannot demonstrate a 5 year housing land supply.                                                                | There may be loss of valued experienced steering group members who choose to move on. Finding volunteers with particular skillsets who want to commit significant part of their free time over an extended period is difficult. Some NPs are dependent on particular individuals driving on the process. |
| The Plan and the associated work may help to form the basis for spinoff community projects or proposals thus yielding benefits beyond the Plan.                                                                                                          | The planning system is complicated and overly burdensome for non-professionals. As NP sits within broader planning hierarchy and problems have arisen due to the changing policy landscape - some respondents had found their Plans subject to developer challenge, often with bruising results.         |
|                                                                                                                                                                                                                                                          | The technical burden of having a robust evidence base is very difficult to achieve even with professional assistance, which can be costly.                                                                                                                                                               |

|  |                                                                                                                            |
|--|----------------------------------------------------------------------------------------------------------------------------|
|  | Neighbourhood Plans can also lead to particular tensions within a community – e.g. when housing proposals are put forward. |
|--|----------------------------------------------------------------------------------------------------------------------------|

| Working with the District Council to allocate land in the new local plan                                                                                                                                                   |                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Advantages – the ‘pros’                                                                                                                                                                                                    | Disadvantages – the ‘cons’                                                                                                                                                                                                                                       |
| This approach will be able to make use of the resources available to Horsham District Council as part of the Local Plan preparation process. (The Council receive only limited funding to support neighbourhood planning). | The local planning authority takes the leading role and therefore some in the community will see this as a more ‘top down’ approach and perceive it to be more difficult for local issues and aspirations to be incorporated into the more strategic local plan. |
| More difficult decisions on the location and strategy for development is made by the local authority but in consultation with the community.                                                                               | There may be less community engagement as the allocation process is considered to be more top down.                                                                                                                                                              |
| No referendum required but the release of greenfield land, which may be contentious to local communities.                                                                                                                  |                                                                                                                                                                                                                                                                  |
| Without focussing on planning matters there may be resources to help bring forward other community projects.                                                                                                               |                                                                                                                                                                                                                                                                  |
| Parish Councils can still do a neighbourhood plan after adoption of the Local Plan with or without the site allocations. They will still be entitled to 25% of any CIL receipts from development in their Parish.          |                                                                                                                                                                                                                                                                  |
| Support from District Council officers who have the professional expertise to adapt quickly with Government changes and update the evidence base.                                                                          |                                                                                                                                                                                                                                                                  |

Summary of seminar debate:

### Headlines

1. The recent two seminars held over two days in January 2019, is a follow up from last year's Neighbourhood Planning Conference which sought to examine particular issues such as gathering suitably robust evidence and issues surrounding producing a neighbourhood plan.
2. The introduction of the new NPPF last year introduces many significant changes to the planning system such as the housing delivery test, regular local plan reviews and the standardised methodology to derive a housing need number for a district.
3. HDC acknowledges the assertion that a 'light touch' for neighbourhood planning is no longer viable and nor appropriate. It was clear the burden of evidence and the time taken to navigate the process was becoming more costly, complicated and resource intensive.
4. Two studies were presented to draw attention to the delivery of housing development through neighbourhood planning (Lichfields: [The Delivery of Neighbourhood Planning](#) May 2018) and another study from the [University of Reading HIVE Research Study](#) (June 2018) which looked into participants experience in Neighbourhood Planning.
5. Neighbourhood Plans remain popular but there are significant issues that require further attention such as further legislative changes which will impact on neighbourhood plan.
6. HDC have commenced its review of the HDPF. It was highlighted the extent of the evidence base that required a review requiring commissioning of many consultants. It was made explicit as part of the impending review of the Horsham District Planning Framework that the NPPF requires Local Planning Authorities are required to distribute new emerging housing numbers to individual neighbourhood plans. It is anticipated that the Inspector Report will be deposited with the Local Authority at some point in 2021. The Inspector Report will provide the necessary certainty for neighbourhood planners to proceed with confidence to
7. It is anticipated the new standard methodology will generate a new district wide housing number which HDC will accommodate as it rolls forward the local plan to 2036. Over the coming months HDC officers have started that review which means looking in earnest where it can accommodate new growth in the future. The new housing number will be distributed in accordance with any review of the settlement hierarchy. This work has yet to be done and no numbers have been allotted to any settlement or neighbourhood plan area as yet.
8. This summer presents a unique opportunity as HDC rolls forward with its Local Plan review for local communities to review if there is an appetite to pursue a neighbourhood plan or delegate the responsibility to the local authority. A number of options were discussed and presented. They should be cross referenced with the presentation slides.





**APPENDIX 12 – Minutes of Steering Group meeting on 22 July 2019**

**Rudgwick Neighbourhood Plan  
Steering Group Meeting Minutes  
22nd July 2019 at 7:45 pm  
Rudgwick Village Hall**

**Present:**

Ian Mac – Chairman  
Richard Landeryou  
Paul Thompson  
Paul Kornycky  
Heather Rodgers  
Nikki West

**Apologies:**

Renee Fickling  
Philip Whiteman

**Absent:**

Roger Goodway  
Victoria Jarvis

- Ian outlined the current position and clarified the Options referred to in HDC's letter of 13<sup>th</sup> March. He also referenced the document circulated by email which showed the criteria by which HDC would evaluate all SHELAA sites as part of the HDPF review. So, should we separately undertake site evaluations in our NP or leave to HDC?
- Paul T. expressed concerns that if we delegated site selection to HDC, we may struggle to get our NP through a referendum.
- Paul K. noted that HDC would be determining the overall number of homes anyway & HDC have been very robust in refusing sites in our area. Also, if our site evaluation was different to HDC's, what would we do? If HDC do site evaluation/allocation, it will be easier to defend against developers. Also it keeps it impersonal & at arm's length. If we did do sites in our NP then we would have to be at Reg 15 by end November, difficult. Alternatively, we can do a 'simpler' NP without sites (i.e. with just policies etc.) and then it would be a document material to the HDPF review of sites.
- A debate then followed with broad agreement that if we were to go with the 'simpler' NP we should still incorporate the Housing Needs Assessment and the subsequent review that confirmed Rudgwick's figure as 50-60, aligning to the HDPF requirement for 1500 homes via Neighbourhood Plans, as we don't want this information to be lost.
- Paul K. then explained the analysis he had done to 'chart' the sites that we currently are aware of (spreadsheet circulated beforehand). He explained that the HDC categorisation of 'non-developable' appeared to hide two very different things i.e. those sites which have suitability issues identified and those which don't, because none of them have been allocated (either in the Local Plan or a Neighbourhood Plan), hence (regardless of suitability) they are all classified as 'non-developable'. Separating out those with suitability issues already identified, and also indicating those which are/are not adjacent to the BUAB gives a much better overview as to the current site position. He then explained that we really should have a very critical look

at our BUAB as we are going to have to expand it somewhere and maybe the findings could be incorporated somehow into our policies.

- Richard mentioned that HDC would be looking in detail again at everything on the SHELAA, including sites rejected at Appeal. He had been advised that whilst Rudgwick's numbers would be increased, they would not be massively so.
- Ian said that he would expect HDC to do a further call for sites before undertaking the annual SHELAA review later this year.
- Paul K. mentioned that funding was available from the 'Locality' Quango, and the process appeared very straightforward. We could tap in to this to assist us with finalising our policies.
- Johnny & Nikki jointly suggested we should vote on the matter & so Ian proposed a motion "A Neighbourhood Plan with comprehensive & robust policies which will achieve an agreed vision for our village. Site evaluation & allocation will be delegated to HDC as part of the Local Plan Review, but we must ensure that HDC comply with our policies & consult. We will include the Housing Needs Report & Update, so that will record the 'HDC agreed' housing number (HDPF aligned) and also **will** include a list of sites, but no site evaluation". The motion was agreed without any dissent.
- Paul T. suggested that we could use the headings from neighbouring, neighbourhood plans to begin to collate policies etc. as he has already loaded onto our website.
- Richard suggested that we should cross-ref policies for housing types etc. with the housing needs assessment.
- It was agreed that we should incorporate the Rudgwick Design statement into the NP, but Paul T. would like to review it first as he pointed out that it is 10 years old.
- Heather asked about the Locality funding. Paul K. explained that there was an overall aggregate limit of £9K (for NPs without sites) and all that was needed was to be specific e.g. if we determined that we needed 5 days of consultant time to assist with drawing up policies over the next 2 months at £x per day, that would be OK. Monies would then be sent to Parish Council.
- Paul T & Richard confirmed that some funds were also earmarked in the RPC reserves
- Ian suggested that as there was limited time left, we needed to start producing something that we could knock into shape. Doing this by committee doesn't work. So.....
- Heather agreed to flesh out Paul K original vision brainstorm.
- Heather also to provide some info on Environmental matters
- Johnny to input something on Sports & Leisure
- Paul T. to circulate a headings list so that people could 'adopt' some topics (via Reply All) to then individually prepare an initial rough draft for the next meeting
- Paul K promised to look at subject headings for policies e.g. max density, zones etc.
- Phil was nominated (in his absence) to write up something on local businesses.
- Nikki would track down the documents on traffic & extract anything useful.

**Next meeting: Monday 12<sup>th</sup> August 2019 at 7:30pm in Rudgwick Village Hall**



**APPENDIX 13 – Minutes of Parish Council meeting on 9 December 2019****RUDGWICK PARISH COUNCIL**

Minutes of the Meeting of the Parish Council held on Monday 9<sup>th</sup> December 2019 at Rudgwick Hall, Bucks Green, RH12 3JJ at 7 pm.

**Present:** Councillors D Buckley (Chairman), P Thompson (Vice-Chairman), M Ellis, A Haynes, S Kornysky, R Landeryou (Parish/ Horsham District Councillor), I Maclachlan and W Manson. Councillor Gormley was absent.

**Also, in attendance:** Parish Clerk Jonna Foote and three members of the public.

- FC151 -19/20      **Apologies for Absence**  
Apologies from West Sussex County Councillor C Mitchell were received and **noted**.
- FC152-19/20      **Declarations of Interest**  
A declaration of Interest as defined under the Localism Act 2011 and the Parish Council Code of Conduct was made by Cllr Thompson, regarding agenda item FC166-19/20 Neighbourhood Plan (printing of booklet element). This was **agreed** to be **noted**.
- FC153-19/20      **Minutes of Council Meeting of 11<sup>th</sup> November 2019** (Minutes on Rudgwick Parish Website)  
It was **resolved** to **approve** the [Minutes](#) of the Council Meeting held on 11<sup>th</sup> November 2019 to be accurate records and these were signed by the Chairman.
- FC154-19/20      **Minutes of Finance, Policies and Human Resources Committee Meeting of 22<sup>nd</sup> August 2019**  
It was **resolved** to **adopt** the [Minutes](#) of Finance, Policies and Human Resources Committee Meeting of 22<sup>nd</sup> August 2019.
- FC155-19/20      **Barleycroft, Rudgwick – Allocation of Affordable Rented Housing Process**  
The Chairman welcomed the guest speaker R Jarvis, Head of Housing & Community Services, Horsham District Council (HDC).  
Mr Jarvis provided an overview of the allocation of affordable housing and confirmed that in the allocation of the 10 rented/9 shared ownership Dairy Close, Barleycroft development those applicants living in Rudgwick/having a connection with Rudgwick (employment) for two years or more, would be given priority (currently two applicants). Certain criteria (e.g. on income, savings) would apply for the rented accommodation. HDC will advertise the rented properties 8-12 weeks prior to completion and interested parties can then register, with before mentioned applicants being given priority above any others. If there are properties remaining after “Rudgwick allocations” interested applicants from the Horsham District Council housing list will be considered. This is based on housing need (overcrowding, homelessness, social welfare, under occupation, medical reasons) and not on housing desire. There are reasons for disqualification (e.g. being more than 8 weeks in rental payment arrears) and full details can be obtained from HDC. Cllr Kornysky reported that at the last Barleycroft liaison meeting completion of the affordable housing was expected to be February 2020. Mr Jarvis was not aware of this and would confirm this with the developer. The properties may well be advertised later this week. It was agreed that information is to be sent to the Clerk to put on village notice boards, website and Facebook.  
The Chairman thanked Mr Jarvis for the wealth of information he had provided.  
It was **agreed** for the information to be **noted**.

FC156-19/20

**Chairman's announcements** (for noting only)

The Chairman made the following announcements, these were received and **agreed** to be **noted**:

- HDC commissioned the Planning Advisory Service to undertake an audit of the Council's Enforcement and Compliance department. Two planners (from the other councils) held meetings with interested parties. One meeting was attended by the chairman together with a small group of other councillors. There were several complaints from various areas, but no details were discussed. A report is expected before Christmas, with HDC deciding on the release.
- Resignation of Councillor Wild – the Chairman expressed his thanks for the expertise Cllr Wild brought to the Council, the amount of work he undertook and support he gave.
- [Village Hall Day](#) 25<sup>th</sup> January 2020 – the event was now being advertised to residents and the Chairman asked for councillors to volunteer their services on the morning.

FC157-19/20

**District and County Councillors Reports**

Horsham District Councillor Landeryou reported that WSCC had re-considered their earlier gritting decision and as a result it had been overturned; he had been on a visit to the Ford waste recycling plant which had been very informative; he had attended one of the HDC's enforcement meetings where difficulties had been discussed and a Planning Advisory Service Report will be published before Christmas.

The report was **received** and agreed to be **noted**.

FC158-19/20

**Public Speaking Session**

A Rudgwick resident provided an update on planning applications that were submitted to/dismissed by the planning inspectorate.

A Cox Green resident reported on the Fordcombe development actions regarding the replacement of four mature trees that were felled. (HDC Enforcement Officer provided details of species to be replaced but omitted the fact that these should be mature trees rather than saplings.)

Information was **agreed** to be **noted**.

FC159-19/20

**Planning**

It was reported:

- i) Current Planning Applications were **resolved** unanimously and **agreed** to be **noted** for comment to Horsham District Council (HDC).

| Applications for consideration at Rudgwick Parish Council Meeting 9 <sup>th</sup> December 2019 |                                                               |                                                                                                                                                                      |                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Applic. No                                                                                      | Applicant                                                     | Reason for Application                                                                                                                                               | Recommendation                                                                                                                                                                                                                                             |
| <a href="#">DC/19/2364</a><br>21.11.2019                                                        | Mill Hill House,<br>Guildford Road.<br>Rudgwick               | Application to confirm the use as a single dwelling house began more than four years before the date of this application (Lawful Development Certificate - Existing) | <b>No objection/ No comment subject to the environmental report being noted. objection</b><br>(responses to these applications had been incorrectly noted and appropriate corrections approved at January 2020 meeting and submitted to HDC Planning Dept) |
| <a href="#">DC/19/2354</a><br>19.11.2019                                                        | Lock Barn,<br>Havenhurst Farm,<br>The Haven,<br>Billingshurst | Prior approval for a proposed change of use to convert two existing oak framed barns into dwellings                                                                  | <b>No objection subject to the environmental report being noted. objection</b>                                                                                                                                                                             |

- ii) Planning Applications [comments](#) made under delegated powers were **agreed** to be **noted**.
- iii) [Schedule of Planning Decisions](#) made by HDC in respect of previous applications were **agreed** to be **noted**.
- iv) [Appeals lodged/decided](#) by HDC in respect of previous applications were **agreed** to be **noted**.
- v) [Enforcement](#) Notices made by HDC were **agreed** to be **noted**.

FC160-19/20

**Correspondence Update**

It was **agreed** to **note** correspondence updates:

- Barley Croft Affordable Housing Allocation ([HDC email/Clarion Housing Association email](#));
- [Letter](#) regarding gritting of Rudgwick roads from Chairman, North Horsham County Local Committee to Cabinet Member for Highways and Infrastructure, West Sussex County Council;
- [Letter](#) to Mount Green Housing Association – Hawkridge Social Housing  
A reply was received, stating that the Housing Association is addressing repairs and would investigate the requirements for the construction of ramps.

FC161-19/20

**Clerk's announcements/decisions**

Clerk's announcements/decisions as recorded in the clerk's report/below, were received and **agreed** to be **noted**.

- Fob entry system at KGV building
- Internal audit report  
The Chairman asked for it to be noted that this was the first time that no recommendations were made and that the clerk and assistant clerk were to be thanked for their hard work to achieve this.

FC162-19/20

**Parish Council representatives on outside Organisations**

Report/updates from Parish Council representatives on outside organisations were received and **agreed** to be **noted**.

- HALC Meeting 24<sup>th</sup> November 2019 Meeting [minutes](#)  
It was reported that HDC Planning enforcement approach had been outlined and some example cases presented. The statistical data requested by Rudgwick PC was presented in tables in the slide set. These warrant further analysis and review by RPC in order to have a better understanding of the situation. In particular there is a need to understand the 'not expedient' classification as this appears to represent a too convenient means of closing cases.
- Extraordinary HALC Meeting on Planning 4<sup>th</sup> December 2019  
It was reported that there are 7-9 strategic sites (1,000 – 5,000 dwellings); nearest to Rudgwick a 1,000-dwelling site at Kingsfold. Current housing numbers are 800 p.a. between 2019-2036. However, new number is approximately 1,000 p.a. with potentially, an additional 5/800 dwellings p.a. and the unknown share of "unmet need from neighbouring councils" that could be 3,000 dwellings p.a. There was no information available regarding Neighbourhood Plans/ impact on villages.
- Rudgwick Youth Centre 18<sup>th</sup> November 2019 Meeting [report](#).

FC163-19/20

**Finance, Policies and Human Resources (FPHR) Committee**

It was **agreed** to **note** that there was no councillor in the position to take up the appointment of

RPC Council Meeting 9<sup>th</sup> December 2019

41



committee chairman.

FC164-19/20

#### Finance

Ministry of Housing, Communities and Local Government sum for the purpose of S137(4)(a) of the Local Government Act 1972 for 2020/1 is £8.32 per elector/ payments made/received/ Detailed Receipts & Payments by budget heading/Bank Reconciliation Lloyds Accounts were received, and in absence of a Chair of FPHR Committee signed by the Chairman and agreed to be **noted**. It was **resolved** to **approve** payments to be made.

| Rudgwick Parish Council December 2019 |                                                   |            |          |                  |
|---------------------------------------|---------------------------------------------------|------------|----------|------------------|
| Payments approved                     |                                                   |            |          |                  |
| Inv. Date                             | Detail                                            | 21         | DD       |                  |
| 25.11.2019                            | HDC Trade Refuse bin August 2019                  |            | £ 63.20  |                  |
| 25.11.2019                            | HDC Trade Refuse bin September 2019               |            | £ 63.20  |                  |
| 29.11.2019                            | TMS - Investigate occupancy sensor in RH ladies   | £ 115.19   |          |                  |
| 29.11.2019                            | TMS - Investigate/replace 4 emergency lights      | £ 205.20   |          |                  |
| 29.11.2019                            | TMS - Remedial electrical RH repairs as per quote | £ 1,036.09 |          |                  |
| 29.11.2019                            | TMS - Repair RH kitchen light                     | £ 59.24    |          |                  |
| 29.11.2019                            | TMS - Investigate/repair extract fans & heating   | £ 52.50    |          |                  |
| 29.11.2019                            | Mark Mulberry - Internal audit (6 month)          | £ 172.62   |          |                  |
| 03.12.2019                            | BT - RH/JH Broadband & Phone December 2019        |            | £ 135.00 |                  |
| 28.11.2019                            | SSE - RH Electricity 3 Sept-27 Nov 2019           |            | £ 230.61 |                  |
| 30.11.2019                            | Seofon - Payroll November 2019                    | £ 24.00    |          |                  |
| 06.12.2019                            | SSE - Unmetered Supply November 2019              |            | £ 170.85 |                  |
| 04.12.2019                            | HDC - Refuse Collection October 2019              |            | £ 79.00  |                  |
| 09.12.2019                            | British Telecom                                   |            | £ 11.72  |                  |
| 09.12.2019                            | Little Street - KGV Gas October & November)       | £ 196.40   |          |                  |
| 09.12.2019                            | Deposit Refund RH Hire 126-19/20                  | £ 50.00    |          |                  |
|                                       |                                                   | £ 1,911.24 | £ 753.58 |                  |
| <b>Total</b>                          |                                                   |            |          | <b>£2,664.82</b> |

FC165-19/20

#### Proposed Budget 2020/21

The proposed budget for 2020/21 as recommended by the Finance, Policies and Human Resources Committee was received, updated with latest information available, and **agreed** unanimously to be **resolved**.

This resulted in the [final budget](#) forecast 2020/21, with a precept to be asked to come down from Horsham District Council of £100,331. Divided by the tax base figure of 1,408.50, providing a parish council tax of £71.23 for a Band D household, a 2.47% increase on 2019/20.

FC166-19/20

#### Rudgwick Neighbourhood Plan

It was **agreed** unanimously to **resolve**:

1. Start of the Regulation 14 Public Consultation on 20<sup>th</sup> December, for eight weeks allowing for the Christmas period, rather than the usual six weeks in accordance with advice from HDC;
2. Spending of up £2,000 plus VAT for South Downs National Parks for a sustainability assessment;

3. Allocate the printing of 200 Neighbourhood Plan booklets at a cost of £700 plus VAT to "Positive Endeavour"; (NB Cllr Thompson did not partake in the voting on this item.)
4. Allocate the supply of four banners at a cost of £136.80 plus VAT to Tradebuys (with 20% discount for first order) (for details – see [report](#))

FC167-19/20

**Section 106 Working Group****It was agreed unanimously to resolve the recommendations made by the S106 Working Group;**

1. Send letter (see report) to Berkeley Homes (Southern) Ltd regarding re-allocation of S106 monies from P4 DC/16/2917 Rudgwick Metals monies (total of £58,286) from a MUGA (Multi Use Games Area) to the building of a new **concrete** skatepark (S106 06-19/20).
2. Send letter to other parties when confirmed by Horsham District Council S106 department
3. Parish Council to arrange for the Traffic Calming Group to reconvene as soon as possible, with Cllrs Kornycky and Manson to join the Working Group.
4. Unspent S106 funds
  - DC/08/1805 £234 towards a new Jubilee Hall Noticeboard
  - U3 DC/13/1385 £1,874 towards a future, new accessible KGV car park/tennis court foot path.
  - U7 DC/13/1385 £5,028 to Rudgwick Traffic Calming Scheme if this is possible (to be investigated – Cllr Landeryou to clarify with HDC)
  - U8 DC/15/0679 £62,280 to Rudgwick Traffic Calming Scheme if this is possible (to be investigated – Cllr Landeryou to clarify with HDC)
  - U2 DC/15/0679 £1,772 towards purchase and installation of three fire doors and fire alarm for Rudgwick Youth Centre
  - U4 DC/15/0679 £16,221 (used for Churchman's Meadows Playground)
  - U2 DC/15/0679 £8,244 to combined with Rudgwick Parish Council Earmarked Reserves and to explore if there is a need for a hearing loop/sound system and projector at Jubilee Hall.
5. Potential S106 funds
  - P4 DC/16/2917 Rudgwick Metals monies (total of £58,286) to be transferred from a MUGA (Multi Use Games Area) to the building of a new concrete skatepark.
6. P5 DC/16/2917 £113,949 - Traffic Calming Scheme and for Cllr Landeryou to clarify with WSCC if the money can be allocated to the Rudgwick Traffic Calming Scheme currently being developed. Also, to arrange a meeting with WSCC.
7. Future Planning for S106/CIL monies
  - P1 DC/16/2917 £18,733 - for the re-development of the Youth Centre
  - P4 DC/16/2917 £21,335 – for the refurbishment of Rudgwick Hall, to be combined with the Ear Marked Reserve for Rudgwick Hall refurbishment in the Rudgwick Parish Council Budget and to be part-allocated to the purchase and installation of a new boiler (Summer 2020).

Cllr Kornycky reported the update received from HDC regarding the S106 clarification for potential spending. It was agreed for the Clerk to write to HDC S106 department to ask for a meeting for further discussion, between S106 Working Group members (Cllrs Kornycky, Manson and Ellis and Mr Kornycky) and HDC S106 department.

FC168-19/20

**King George V Building – Little Street**

It was agreed unanimously to resolve a contribution of £637.50 towards installation of electric water heater to Little Street, resulting in lower gas bills.

FC169-19/20

**Legionella Risk Assessments for Parish Buildings**

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- FC170-19/20 It was unanimously **agreed** to receive and **resolve** the appointment of Valens Water Ltd for Legionella Risk Assessment and training for Rudgwick Parish Council (Rudgwick and Jubilee Halls and King George V building with the option to discuss Rudgwick Youth Centre.) at a cost of £865.00  
**Cemetery Extension**  
It was unanimously **agreed** to **resolve** the spending of £1,700 from Earmarked Reserve for the next development stage of the cemetery extension as described in the [report](#).
- FC171-19/20 **Request for grant for project Kenya**  
**It was agreed to receive the update and it to be noted.**  
The hire of Rudgwick Hall will attract a 10% discount and where possible, setting up time will be available, free of charge.
- FC172-19/20 **To exclude the public and press from the business about to be transacted.**  
It was **agreed** to **resolve** to exclude the public from the business about to be transacted due to staff in confidence.
- FC173-19/20 **Staffing**  
It was unanimously **agreed** to **resolve** to meet contractual obligations regarding the Clerk's pay as detailed in the confidential report.  
On the request from the Clerk, councillors unanimously **agreed** to re-visit agenda item
- FC163-19/20 Finance, Policies and Human Resources (FPHR) Committee**  
To ensure an effective payment of invoices system according to Rudgwick Parish Council's Financial Regulations it was unanimously **agreed** to **resolve** for Cllr Elis to take on the position of "acting chairman of the FPHR Committee", including the monitoring of invoice payments until a permanent chair was voted on.
- FC174-19/20 **Date of next meeting**  
**It was agreed to note the date of the next meeting as Monday 13<sup>th</sup> January 2020 at 7.00 pm**

*There being no other business, the chairman closed the meeting at 8.51 pm*

.....  
**Councillor D Buckley**  
**Chairman**

.....  
**Date**

**APPENDIX 14 - First Reg.14 advertising material**

## **Rudgwick Neighbourhood Development Plan**

### **(published on the Neighbourhood Plan Page of the RPC website)**

The Rudgwick Parish Council has approved the Regulation 14 consultation process for the Rudgwick Neighbourhood Plan. This commences on 23rd December 2019 and last for 8 weeks until 17th February 2020.

Following the consultation, the Steering Group will undertake any necessary revisions and submit the resulting document for the Regulation 15 process. The Regulation 14 process is announced on this Rudgwick Parish Council website, on the Council Facebook page and in the Rudgwick Magazine. Appropriate material will be put on the Parish Notice Boards and Banners strategically placed around the Parish.

Download versions of the plan are available on this Website here and hard copies available from the Parish Clerk at Rudgwick Hall during the consultation period. We look forward to receiving you views and comments. If you wish to do this online, please click online survey.

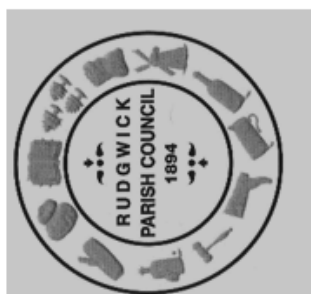
If you wish to send the clerk your information by email (on a word document, with all details as on hard copy document), please ensure that you are aware of the following: A summary of all comments made will be publicly available.

Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1998 and General Data Protection Regulations. The Parish Council will process your details in relation to this preparation of this document only.

As part of the Consultation and in line with the new General Data Protection Regulations (GDPR) please confirm that you are happy for the Parish Council to pass your contact details (name, address/email address) onto Horsham District Council (HDC) so that they can contact you at Regulation 16 consultation. Please confirm that you are happy for the Parish Council to pass your details onto HDC:

A presentation will be given at Rudgwick Hall at 7.00pm on 6th January 2020, all welcome.





# **RUDGWICK NEIGHBOURHOOD PLAN**

# **CONSULTATION MEETING**

**Monday 6<sup>th</sup> January 2020 at Rudgwick Hall, Bucks Green, RH12 3JJ at 7.00 pm**

**The Rudgwick Neighbourhood Plan Steering Committee looks forward to welcoming you and  
presenting to you the pre-examination plan.**

# RUDGWICK NEIGHBOURHOOD PLAN Consultation

## 23.12.2019 - 17.02.2020



@rudgwickparishcouncil

Parish Office: 01403822678 / 07927702321

Website: [www.rudgwick-pc.org.uk](http://www.rudgwick-pc.org.uk)

Email: [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk)

## **APPENDIX 15 - Agenda and minutes of meeting held on 6 January 2020**

### Rudgwick Neighbourhood Plan

#### Public Consultation Meeting

Monday 6<sup>th</sup> January 7pm

Rudgwick Hall

#### Agenda

- Introduction – Ian Mac – Steering Group Chairman
- Housing Numbers and Sites – Paul Thompson – Parish Councillor
- Housing Policies – Paul Kornysky – Steering Group Member
- Environmental Policies – Heather Rogers – Steering Group Member
- Business Policies – Philip Wightman – Steering Group Member
- Sports and Leisure Policies – Johnny Barr – Steering Group Member
- Infrastructure Policies – Ian Mac – Steering Group Chairman
- Public Participation – Discussion, questions & answers etc
- Summary and Close – Richard Landeryou – Councillor, Rudgwick PC and Horsham DC
- Close meeting – 9pm (approx.)

Notes – As the draft Neighbourhood Plan will have been widely distributed, both electronically and in hard copy, over the last couple of weeks, the presentations by the Steering Group members will be at a high level. This is to allow the maximum amount of time for those attending the meeting to express their own views on the plan and ask as many questions as possible. The main objective of the meeting is to ascertain the views of those who live in the village on the draft plan and take those views into account during the consultation process.

The purpose of the Rudgwick Neighbourhood plan is to sit alongside the existing Horsham District Local Plan (known as the HDPF). The HDPF covers the period to 2031 and our Neighbourhood Plan covers the same period. Our Neighbourhood Plan aims to guide and influence Horsham District Council in the application of Local Plan policies in Rudgwick over that period. Over the next two years the HDPF will be reviewed and extended to 2036. The Horsham District Plan is subject to review every five years and we will have the option (but not the obligation) to review our Neighbourhood Plan at the same time.

Ian Maclachlan - Chairman, Rudgwick Neighbourhood Plan

***Rudgwick Neighbourhood Plan  
Regulation 14 Consultation Meeting  
Presentation and Discussions***

**7.00 PM on 6<sup>th</sup> January 2020**

*Consultation runs from 23 December 2019 until 17<sup>th</sup> February 2020*

***Your support and comments are vital to a successful plan***

***Rudgwick Neighbourhood Plan  
Regulation 14 Consultation Meeting  
AGENDA***

**Presentations**

- **Introduction** – Ian Mac – Steering Group Chairman
- **Housing Numbers and Sites** – Paul Thompson – Parish Councillor
- **Housing Policies (policies 1 – 6)** – Paul Kornycky – Steering Group Member
- **Environmental Policies (policies 7, 14 & 15)** – Heather Rogers – Steering Group Member
- **Business Policy (policy 8)** – Philip Wightman – Steering Group Member
- **Highways & Road Safety (policies 9 & 10)** – Nikki Denton – Steering Group Member
- **Sports and Leisure Policies (policies 12 & 13)** – Johnny Barr – Steering Group Member
- **Infrastructure Policy (Policy 11)** – Ian Mac – Steering Group Chairman
  
- **Public Participation** – Discussion, questions & answers etc
- **Summary and Close** – Richard Landeryou – Councillor, Rudgwick PC and Horsham DC

# *Rudgwick Neighbourhood Plan*

## **Introduction**

Ian Mac – Steering Group Chairman

# *Rudgwick Neighbourhood Development Plan*

## PLAN versus NO PLAN

### With a plan

HDC take account of  
our plan policies

Developers have to  
consider our local policies

Rudgwick gets 25% of CIL  
money from all development

### Without a plan

HDC will not consult us  
at all

Developers only have to  
consider national and HDC policies

Only 15% of CIL money

## KEY EVENTS

- Completion of Public Consultation – 17<sup>th</sup> February 2020
- Edit plan taking consultation into account – Late Feb/March
- Independent Examination of our plan – Early Q2
- Revise plan following examination – Early Q2
- Referendum of Rudgwick Residents – Mid Q2
- Rudgwick Neighbourhood plan is “Made” – Late Q2



## *Rudgwick Neighbourhood Plan*

# Housing Numbers and Sites

Paul Thompson – Parish Councillor

## Background: HDPF and HDPF-2

- **HDPF Horsham District Planning Framework** – (2015) runs till 2031
- **HDPF-2 Horsham District Planning Framework** – (2019?) runs till 2036
- In March 2019, HDC indicated that due to the preparation of a revised HDPF (denoted HDPF-2) there was a need to choose how unmade Neighbourhood plans will be approached.
- The approach we selected was:-
  - **Retain the existing neighbourhood plan, but decide not to review it.**  
Horsham District Council will instead lead the allocation of any sites in the parish to meet any revised housing numbers through the Local Plan Review, whilst consulting with the community.
  - **The District Council will also need to consider whether it is necessary to release additional greenfield land. This is tested by an independent inspector but there is no public referendum stage.**
  - **With this approach the existing neighbourhood plan and any allocations would remain in place for the rest of its plan period, but the new local plan policies would supersede those in the neighbourhood plan if there are areas where the two are not in alignment.**
- The RNP is HDPF based & should be made well before HDPF-2 is very far advanced i.e. 2Q-2020?
- Our plan therefore has dates aligned with the existing HDPF i.e. to 2031 and not HDPF-2 which runs to 2036.

## Housing Sites & Strategy

- **We are not allocating sites because of imminent site nominations by HDPF-2.**
- We may well have to review our plan after HDPF-2 is adopted in 2022, but that will be an easier task as HDC should have done the site allocations up to 2036 & so we hope to just have to tweak our existing policies or perhaps add a couple.

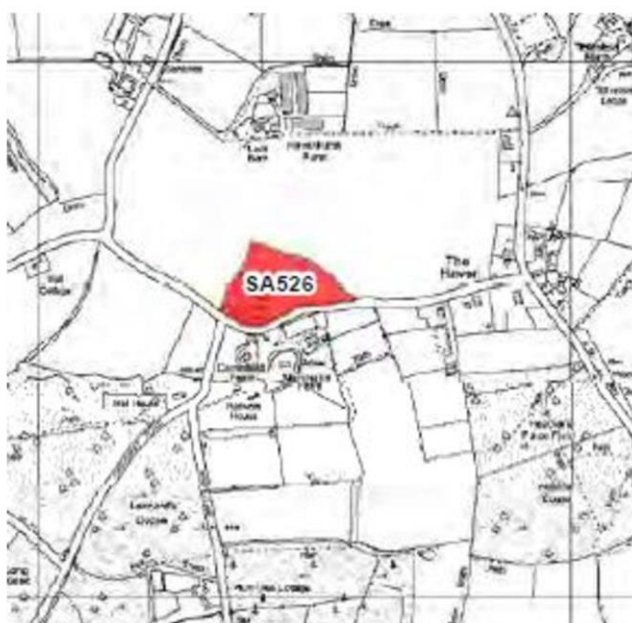
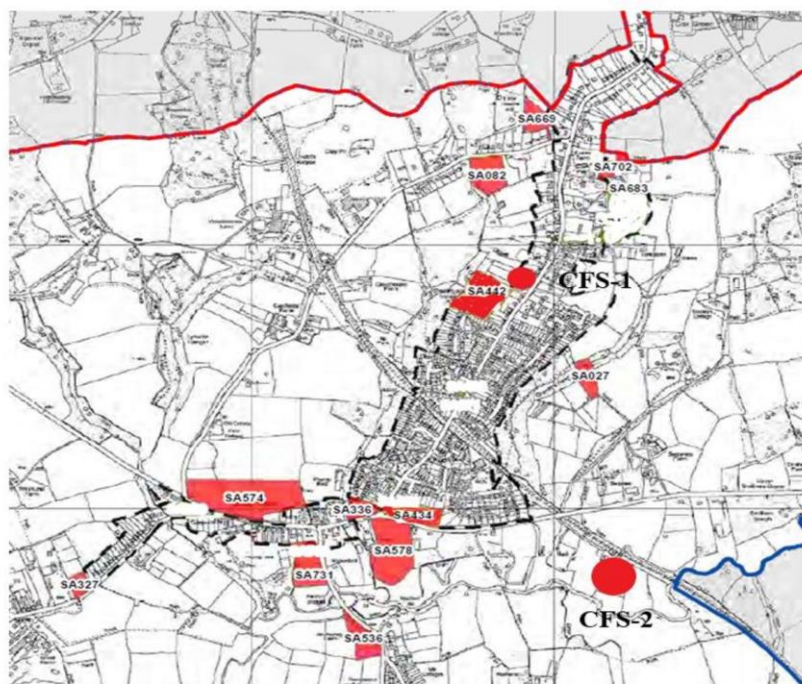
## Housing Needs Assessment

- We had a **Housing Needs Assessment** carried out for us by South Downs National Park Authority (under contract).
- This was reviewed by the Steering Group and some adjustments made taking into account more recent studies. The results were presented to HDC.
- **The result is that some 50 to 60 additional dwellings will be required to meet the needs in the period up to 2031.**
- 19 units are already under construction as part of the Windacres/Rudgwick Metals development.
- 50 to 60 dwellings has been accepted as our base number in relation to the current overall number of 1500 houses expected from the parishes by HDC.

## Housing Call for Sites

- The Rudgwick Neighbourhood Plan Steering Group instigated the required Call for Sites on 26<sup>th</sup> February 2019. This was done using various media, namely:
  - RPC website
  - RPC Facebook page
  - Village Notice Boards
  - The Rudgwick Magazine
- This process which includes sites already featured in the HDC **S**trategic **H**ousing and **E**conomic **L**and **A**vailability **A**ssessment (**SHELAA**) for Rudgwick.
- **In all 17 potential sites were identified by this process and are listed in the Plan.**
- Note: No selection from these sites has been made in the Plan as discussed earlier.

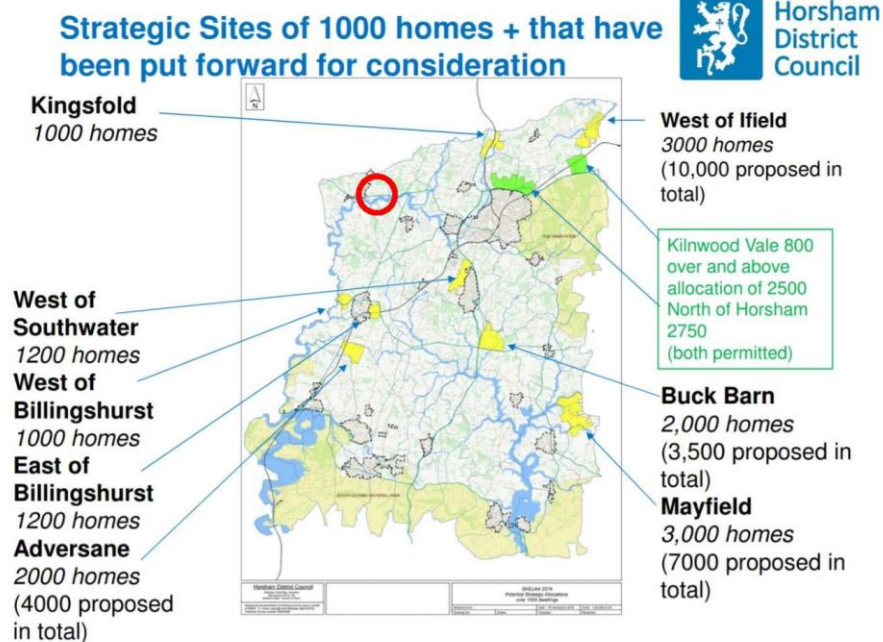
| Number | Ref.  | SITE NAME                                      | SITE ADDRESS                                                                                                    | TOTAL UNITS | AREA Ha | DENSITY DpH |
|--------|-------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------|---------|-------------|
| 1      | SA434 | Land at junction of Church Street/Watts Corner | Guildford Road, Rudgwick                                                                                        | 12          | 1.11    | 10.8        |
| 2      | SA442 | Land to the West of Church Street              | Land to the West of Church Street, Rudgwick                                                                     | 18          | 2.2     | 8.2         |
| 3      | SA027 | Land North of Bowcroft Lane                    | Rudgwick                                                                                                        | N/K         | 0.7     | ---         |
| 4      | SA082 | Rudgwick Glebe, Lynwick Street                 | Lynwick Street, Rudgwick                                                                                        | N/K         | 1.53    | ---         |
| 5      | SA327 | Land to East of Woodfalls Manor                | Loxwood Road, Bucks Green                                                                                       | 6           | 0.84    | 7.1         |
| 6      | SA336 | Land West of Watts Corner                      | Church Street, Rudgwick                                                                                         | 16          | 0.68    | 23.5        |
| 7      | SA526 | Land adjoining the Blue Ship PH                | The Haven                                                                                                       | N/K         | 2.61    | ---         |
| 8      | SA536 | Anchorage Farm                                 | Haven Road                                                                                                      | N/K         | 1.04    | ---         |
| 9      | SA574 | Land North of Guildford Rd.                    | Guildford Rd., Bucks Green                                                                                      | 120*        | 4.87    | 24.6        |
| 10     | SA578 | Land at Fairlee                                | Guildford Road, Rudgwick                                                                                        | 65          | 2.17    | 30.0        |
| 11     | SA669 | Swallow Ridge                                  | Lynwick Street, Rudgwick                                                                                        | 6           | 0.85    | 7.1         |
| 12     | SA683 | Land East of Highcroft Drive                   | Highcroft Drive, Rudgwick                                                                                       | 6           | 0.29    | 20.7        |
| 13     | SA702 | Land adjoining the Old Parsonage               | North of Kelsey House Drive                                                                                     | N/K         | 0.46    | ---         |
| 14     | SA731 | Land South of Bucks Green                      | Haven Road                                                                                                      | N/K         | 1.6     | ---         |
| 15     | SA529 | The Fox Inn                                    | Guildford Road, Rudgwick                                                                                        | 6           | 0.37    | 16.2        |
| 16     | CFS 1 | Off Church Street behind existing properties   | Land off Church Street behind existing properties and requiring the demolition of one of them to provide access | N/K         | 0.75    | ---         |
| 17     | CFS 2 | Riverside Farm                                 | Land at Riverside Farm South of the A281 and next to Downs Link                                                 | N/K         | 1.2     | ---         |





## HDPF-2 Future activities to be conducted by HDC

- Determine overall Housing Numbers for the District
- Allocate **Strategic Sites**
- Determine the overall number to update the 1500, but this time give each Parish its own number (they are required to do this under the new NPPF rules).
- For Rudgwick, evaluate all sites and allocate to meet Rudgwick's quota.



**This is not intended to scare you! Adopting our NP should avoid any of this in our Parish**

# ***Rudgwick Neighbourhood Plan***

## **Policies**

### **15 Policies covering:**

- “ Housing
- “ Environment
- “ Business
- “ Sport & Leisure
- “ Highways & Road Safety
- “ Infrastructure

# ***Rudgwick Neighbourhood Plan***

## **Housing Policies**

**Paul Kornycky**

Policies 1 to 6





### Rudgwick and Bucks Green Built Up Areas

Cox Green has a built-up area which adjoins Rudgwick's  
The Haven, Tisman's Common & Rowhook do not have a built-up area  
(Secondary Settlements—Rowhook & The Haven considered & rejected by HDC)

### **RNP Policy 1: BUAB (Built Up Area Boundaries)**

Development within the Rudgwick BUAB or Bucks Green BUAB will be permitted in accordance with HDPF Policy 3. Outside these BUABs, settlement growth will be supported on sites allocated in conformity with HDPF Policy 4.

To ensure that any development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced thereby preserving the integrity of the settlement patterns which have evolved over many years, any site so allocated should not result in:-

### Expansion of the Rudgwick BUAB

- 1) Into Lynwick Street, due to its rural nature and low density of housing relating to the countryside.
- 2) South of the A281, splitting the village across a trunk road.

### Expansion of the Bucks Green BUAB

- 1) East of the Loxwood Road, as this area is valued countryside with sporadic housing and extremely rural.
- 2) Eastwards along the A281 & thereby coalesce with the BUAB of Rudgwick.
- 3) Beyond the Lynwick Street junction.

## **RNP Policy 2: Housing Mix**

For sites delivering 10 dwellings or more,

*excluding social rented, affordable rented & shared ownership tenure dwellings,*

the housing mix should adhere to the following, unless there are compelling reasons to deviate based upon local demonstrable needs:

- 1 Bed – 15% (minimum)
- 2 Bed – 50% (minimum)
- 3 Bed – 30% (to balance)
- 4/5 Bed – 5% (maximum)

## **RNP Policy 3: Development Height**

Developments incorporating and/or retaining bungalows will be strongly supported as these help to meet the identified housing needs of older or disabled residents in the Parish.

Development above two-storey in height will not be permitted unless:

- 1) It is within 100m of the Co-Op 'parade' of shops and
- 2) a clear local need is demonstrated and
- 3) the development will be in-keeping with immediately adjacent properties and
- 4) will then be limited to three-storey.

## **RNP Policy 4: Development Density**

Housing densities will be accepted that fit in with the existing street scene subject to the following:

(A) Development greater than a net density of 20 DpH will not be allowed unless:

- 1) For sheltered accommodation, flats or similar, Or
- 2) The housing mix fully complies with Policy 2, Or
- 3) Viability evidence based on Existing Use Land Value Plus (PPG Para: 013 Reference ID: 10-013-20190509) proves that the development would be unviable otherwise (generally for brownfield sites with higher land values)

...in which case the maximum net density may be increased to 25.

(B) Development density should:

- 1) Respect and be in accordance with the density of neighbouring developed land
- 2) Follow the settlement pattern i.e. the higher densities are on those sites closer to the Village Centre & thereby local services.

## **RNP Policy 5: Affordable Housing**

The RNP supports the provision of affordable housing in accordance with HDPF Policy 16.

However, to address the shortage of shared ownership properties the percentages detailed below are encouraged:

- 1) Affordable rented 30%
- 2) Affordable shared ownership 70%

The allocation of Affordable Housing, especially rented, will be expected to follow a local connection scheme, giving priority to those working or living in Rudgwick (or where a close relative is living in Rudgwick).



### **RNP Policy 6: Sheltered Accommodation**

Developments which provide an element of 'market based' sheltered housing would be supported incorporating an appropriate mix of units for rent or sale.

Sites should be within a convenient distance of local services and bus stops i.e. not necessitating the use by residents of private car for access to basic facilities.

## ***Rudgwick Neighbourhood Plan*** **Environmental Policies**

**Heather Rogers**  
(policies 7, 14 & 15)

## **RNP Policy 7: Design Plan**

Applications which accord with the Rudgwick Parish Design Statement and its Guidance, will be supported.

Development should recognise and respect that the one Parish of Rudgwick comprises six distinct hamlets, each with its own design features.

## **RNP Policy 14: Local Green Spaces**

To establish the seven areas indicated below as Local Green Spaces to be protected in accordance with the National Local Green Spaces policy (NPPF 11.10):

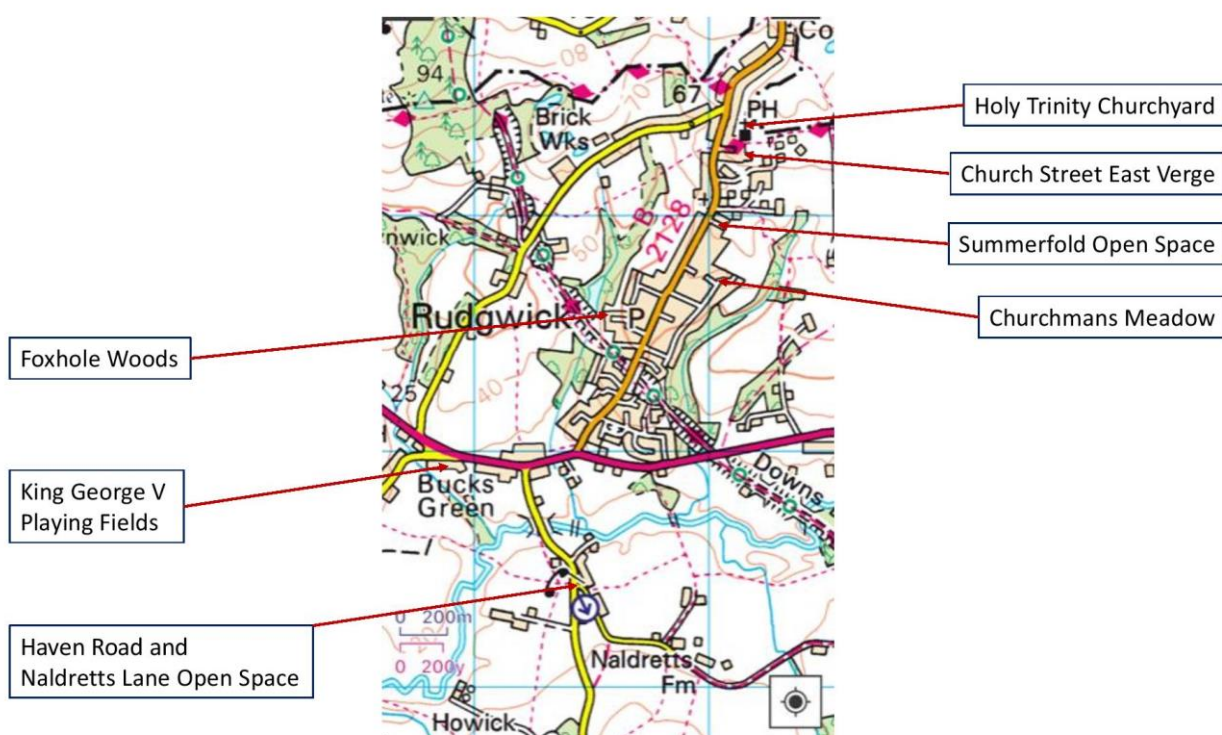
1. King George V Playing Fields – principally for its recreational value to the local community but including the Biodiversity area.
2. Churchmans Meadow – principally for its recreational value to the local community.
3. Land at Foxholes Woods – principally for its recreation, tranquillity and potential wildlife value.
4. Holy Trinity Church yard – principally for its history and tranquillity value.
5. Summerfold Open Space
6. Church Street (east side) in Conservation Area Wide Verge
7. Haven Road and Naldretts Lane open space

### RNP Policy 15: Green Infrastructure, Trees and Ancient Woodland

Otherwise compliant Development that enhances Rudgwick's Green Infrastructure will be positively considered. Climate Change requires a robust approach to tree retention, especially woodland.

Any significant trees (defined as a tree that is over 3 inches in diameter at chest height) within development sites should be retained wherever possible, but if this is not the case then the Landscape Plans for the development must ensure that the residual number of trees after completion of the development is at least equal to, preferably greater than, the initial number. Any replacement trees should be of a similar 'feasible' scale and type to those removed. Dead or diseased trees should be replaced with healthy and not discounted. Replacement trees should preferably favour native species over non-native. Rarely and exceptionally, and only where fully justified, off-site replacement may be permitted but then with at least 2 replacement trees for each one lost.

Given its rural nature, Rudgwick has significant tracts of ancient woodlands (see Annex C: Additional Maps) which will be protected from development as per statutory regulations.





# *Rudgwick Neighbourhood Plan*

## **Business Policy**

**Philip Wightman**

(policy 8)

### **RNP Policy 8: Business**

- 1) The rural economy will be supported by farming, light industrial or home working.
- 2) New or expanded industrial activity will be supported in the two main existing areas (Old Brickworks or Bucks Green)
- 3) Ensure suitably fast broadband/Internet availability especially to those some distance from the telephone exchange.
- 4) Protect productive farming land from development, such that the Parish plays its part in feeding the nation.

## ***Rudgwick Neighbourhood Plan*** **Highways & Road Safety Policies**

**Nikki Denton**  
(policies 9 & 10)

### **RNP Policy 9: Road Safety**

Development that is aligned with the sustainable transport principles of HDPF Policy 40, will be supported.

Consequently, proposals for development on allocated sites in Rudgwick should provide good pedestrian and cycle connections, notably to the shop and the school.

For this shift to more sustainable transport to be effective, infrastructure improvements will be needed to improve road safety in the centre of the village.

This would include improved pathways at the top of Church Street and potentially a cycle path, controlled crossings serving the two schools and near the top of Church Street, and a traffic calming scheme the length of Church Street.

## **RNP Policy 10: Access for Cyclists**

Any proposed development should consider and provide appropriate safe access for cyclists and storage/racks as appropriate.

In particular, if a development can contribute land or rights of way to facilitate a safe cycle network linking the Co-Op, King George V Playing Fields and the Primary School then it will be expected to do so.

Similarly, any development fronting Church Street in the vicinity of the Kings Head/Parish Church will, wherever possible, be required to consider and design for the safety of cyclists and also of pedestrians.

## ***Rudgwick Neighbourhood Plan*** **Sports and Leisure Policies**

**Johnny Barr**  
(policies 12 & 13)

**RNP Policy 12: Sports and Leisure**

New or expanded facilities will be supported but should demonstrate that no adverse impact to the amenity or character and appearance of the surrounding Rudgwick area will arise, and no adverse impact on the road network will occur.

They should also be proven economically sustainable given the rural nature of the parish and the accessibility of extensive facilities in nearby Horsham and Cranleigh.

**RNP Policy 13: Allotments**

Subject to compliance with other planning policies, a development that provides land for allotments in a suitable location will be favourably considered.

## ***Rudgwick Neighbourhood Plan*** **Infrastructure Policy**

**Ian Mac**  
(policy 11)

### Policy 11: Infrastructure Improvements and Provision

The linkage of any development with infrastructure provision noted in HDPF Policy 19 is strongly supported.

Specifically we would require evidence of adequate and demonstrated

- Water Supply
- Water Disposal – both foul water and rain water
- Electricity Supply
- Travel and Transport Facilities
- Telecommunications inc. Broadband and Mobile
- Social Facilities inc. shops, doctors, churches, schools, pubs, etc



**RNP Policy 11: Infrastructure Improvements & Provision**

The linkage of any development with infrastructure provision noted in HDPF Policy 39 is strongly supported. Any proposed development should provide appropriate and timely infrastructure for the Parish to ensure that the development does not overload existing facilities. In particular, attention must be focussed upon the following for the new development:-

- adequate & demonstrated Water Supply
- adequate & demonstrated Electricity Supply
- adequate & demonstrated Water Disposal facilities – Foul and Rain Water
- adequate & demonstrated Travel and Transport facilities
- adequate & demonstrated Telecommunications – Broadband and Mobile
- impact upon Social Facilities – Shops, doctors, churches, schools, pubs etc.

with a clear infrastructure delivery plan to ensure that the environment and amenities of existing or new local residents is not adversely affected.

## ***Rudgwick Neighbourhood Plan***

### **Public Participation**

**Ian Mac**

**Discussion, questions & answers etc**



# ***Rudgwick Neighbourhood Plan***

## **Summary and Close**

**Richard Landeryou – Councillor, Rudgwick PC and Horsham DC**

**Rudgwick Neighbourhood Plan  
Public Meeting Minutes  
6<sup>th</sup> January 2020**

**Present:**

Ian Mac, Chairman  
Richard Landeryou  
Johnny Barr  
Philip Whiteman  
Paul Thompson  
Nikki West  
Paul Kornycky  
Heather Rodgers  
Renee Fickling  
plus

Approximately 60 members of the public were in attendance at this meeting.

**Question and Answer Session****Question**

**Martin King** (Vicar): encouraged by what we have heard and the policies make a lot of sense. With regard to policy 11, please consider gas and renewable energy, solar panels, etc.

**Answer**

Not mandatory and all we can do is encourage sustainable energy measures.

**Question**

**Steve Hill**: you appear to be pushing for increased density and 3 storey building height in the Co-op area of the village and I am of the view that this area needs to be protected from development rather than encouraging further development. This area is busy enough at the moment and this push will make it even busier.

**Answer (IM)**

We are not pushing for development but recognising that the only 3 storey developments are in that area. None of the 17 sites put forward for assessment are within 100 metres of the Co-op so we are not looking at any such developments taking place in the immediate future. However, it is accepted that the Telephone Exchange and Catchpole are vulnerable.

**Question/Comment**

Simon Quail: Policy 14(6) is very welcome but conflicts with Policies 9 and 10 and does not take into account the ancient Horsham stone footpath on the grass verge of Church St south of the church. Think very carefully about where you put any cycle or footpath.

**Question**

**Doug Betts**: regarding approved planning applications, the Windacres site has been omitted, please include. The sites and maps should also be included in the Neighbourhood Plan.

**Answer (PT)**

There is an indication in the Plan that Windacres is included in the numbers. CFS1 and 2 - the map will be included in the document.

**Question**

**Maeve Philby** – re traffic calming measures on the A281 and establishing a route from the school and shops etc to the playing field, it's too dangerous.

**Answer (IM)**

Our thinking is to favour any development that could facilitate a safer route through the site and would require giving up some of the land to enable this. Looking at the sites currently available, this is an unlikely prospect. The A281 is a trunk route and we are constantly drawing the attention of West Sussex Highways to various issues on the A281. This is a work in progress and we have a meeting with West Sussex Highways on Friday regarding calming measures on the A281 and in the village in general.

**Question/Comment**

**Roger Nash:** there is a potential conflict with some of the policies requiring that we stress-test them against each other. Developers take policies and test them for their own purposes and we need to be careful of this.

**Question**

**Sean Scully:** please consider the stability of soil for any buildings erected, very concerned about the buildings down by the surgery. Also, compel the developers to only consider brown field sites.

**Answer (IM)**

The site by the surgery was not supported by the Parish Council as we were also concerned about the stability. We also opposed the 3 storey plan and managed to have the height reduced at one end of the development. That site was a brown field site. We would also prefer to see developments on brown rather than green field sites. The Fox is on a brown field site and seeing that developed would mean the loss of a much valued public house so, be careful what you wish for. However, it is a Grade 2 listed building which should protect it to some degree against development.

**Question**

**John Newalls:** are you prepared to change the Neighbourhood Plan or is this it? A lot of time and effort was taken to produce the Design Statement which has amounted to nothing and to a large extent has been ignored.

**Answer**

We will take into consideration your input and we will review and adjust it at a number of stages. The Parish Council will be quoting the Design Statement in our objections to the Pathfield Development and it has been included as guidance within our Plan. We have asked the Southdowns Consultants to review and rubber-stamp the Design Statement and it will be incorporated into the Plan. Once made up, the Design Statement will become policy and will have to be complied with. The Neighbourhood Plan will raise the legal status of the Design Statement.

**Question**

Roger Goodways: there was a Call for Sites and the decision making was then handed over to HDC. What was the reason and rationale for that?

**Answer (IM)**

Some Plans from other Parishes have included the whole site evaluation. We did the Call for Sites and spoke in detail with Horsham District Council regarding the evaluation of those sites. They proceeded to send us a 70 plus technical questionnaire against which each site needed to be evaluated. We decided not to do it because of:-

- (i) the onerous nature of the evaluation process;
- (ii) how long it would have taken us to do it, and

- (iii) we as a group all live in the village and favouring some sites over others meant there would always be those who would be for and those against any recommendations we made: a no-win situation.

Horsham DC are professionals and they have come down in favour of two sites but have not yet notified us of the selected sites or consulted with us on their selection.

#### **Answer (PT)**

In 2019 Horsham were reviewing the Local Plan and we would have been in a situation where we would have done the evaluation process with the risk of Horsham DC coming back and adding to it. We wanted to concentrate on the policies to make sure that HDC consider and apply our policies. Where there is any conflict we will take it up with HDC. More than half of the Parishes have not done the site evaluation themselves, we are amongst the majority. HDC have assessed 15 of those sites already via previous planning applications and have ruled them out in one way or another. I was not originally a keen advocate of Neighbourhood Plans and wanted to wait and see how they evolved. We have now seen several Neighbourhood Plans where the Parish did the evaluations and have been taken to court by developers. Our argument is:- will a developer choose to challenge HDC as easily as they will challenge us?

#### **Question**

##### **Cliff Walton:**

- Regarding the infrastructure. Road drainage in Church Street is the responsibility of West Sussex Highways and in the past we have had lots of words from them but no action. Some of the developers have done something to improve the drainage but not enough.
- Re energy – where are the new developments going to get their energy from?
- Re cars – high capacity charging is needed.
- Children's playgrounds need to be better accessed.

##### **Answer (RL)**

- We have a meeting with West Sussex Highways on Friday and will raise the issue of drainage with them again.
- With regard to energy and charging, this is difficult with housing as it is not obligatory and there is no legislation for it. All we can do is encourage.

##### **Answer (PK)**

- We have the HDC Framework as guidance and policy 35 refers to climate change. This forms the framework within which the Neighbourhood Plan has to comply with and Rudgwick does not have anything special to add. We cannot undermine any of the HDC framework but can add to it and make it more relevant to us as a village. The District Plan will now be extended to 2036 and it is anticipated that there will be more emphasis on issues relating to climate change in the HDPF2.

#### **Question**

**William Manson:** what impact would these developments have on our facilities, in particular the Doctors Surgery?

#### **Answer**

We have consulted with them and the message we have got back from the surgery is they could accommodate more people. They are currently accommodating patients from outside the area. The same applies to the school, with children enrolled from outside the area. Moving forward, village children will replace those leaving.

**Question**

**Steve Hill:** with regard to cycle paths, I understand the desire for better linkage but the Downs Link is a good cycling route and could do with making access to the Downs Link safer for cyclists.

**Answer (PK)**

It has been noted in the Plan that improvements are needed for access to the Downs Link and this would be a good candidate for CIL money. However, this does not lend itself to being a policy. It is in the report and we hope to get the funds into the Parish to facilitate those improvements.

**Additional observations made after close of the meeting**

**Question/Comment**

**Jay Webb:** provision for making land available for self-build within the village which would be more environmentally friendly.

**APPENDIX 16 – Minutes from meeting with RPS (21/02/2020)**

**Rudgwick Neighbourhood Plan  
Steering Group Meeting Minutes  
21<sup>st</sup> January 2020**

**Present:**

Ian Mac  
Richard Landeryou  
Paul Thompson  
Paul Kornycky  
Renee Fickling

**Rudgwick Preservation Society**

Roger Nash  
John Newell  
Doug Betts

The Rudgwick Preservation Society have prepared a comprehensive document entitled Pre-submission Comments Consultation addressing a number of issues, the major points were summarised below by Roger Nash:-

**Presentation Issues**

1. **Numbering** – does not work.

PT: several of the Neighbourhood Plans we have examined follow this approach to numbering. What also makes it difficult is a separate format embedded through the Design Statements. We will look to improve this.

2. Would love to see **more illustrations, tables, maps**, etc, for people not familiar with Rudgwick. Would like to see the **SHELAA map** included.

Agreed

3. A **glossary of terms** at the beginning as opposed to the end would be useful.
4. The **hyperlinks** don't work as well as they should.
5. **Front cover**: picture is a bit dated.
6. Would prefer to see **references to Rudgwick Metals**, which is still a developing site, mentioned upfront as opposed to having it pop up later on in the document.



7. **Population figures** – we are not far off the 2021 consensus so the data is very out of date. Can we get a more useful estimate?

PK – the population data has been provided to us by Southdowns Consultants and Horsham DC have said that we need to work with the 2011 figures. This is their direction. Southdowns have now been made the Neighbourhood Plan Department for Horsham DC which is useful as they will hardly contradict some of the things that they have done for us.

8. Our reference to immigrants in the document is only half right. We have Irish, and Scots in the Parish, along with EU citizens and other groups who are British citizens born abroad. The document seems to give the impression that we don't have many immigrants in Rudgwick, which we do.

### **Key issues**

1. Confused by Section 4 of the Neighbourhood Plan which deals with visions and objectives.

PK – this is the standard approach in Neighbourhood Plans where it is structured dealing with visions, objectives and then policies. It is not a statement of how the village looks now but how we are hoping it will look in the future.

2. **Linear structure** – Confused by our definition of “linear”. The layout of Rudgwick currently narrows at both ends and the developers have tried to fill in the narrow gaps to make it more linear. We feel it would be nice for Rudgwick to become more rounded in the middle and this is where developments should be centred.

PK – we are not allocating sites and if policies are too restrictive, they will be struck out of the Plan.

IM – sites will be announced before the end of the consultation period and the developers who aren't successful will want to kill the Plan. We need to be very careful that we are not too restrictive in our approach otherwise it will be struck out.

3. **More than 2 storey buildings** – having a policy that allows this is the thin edge of the wedge.

PK – this has been included as the Parish Design Statement says that we should not have any, this will be struck out. If it is struck out, it then means that buildings more than 2 storey high can go anywhere. We have acknowledged that the situation does exist and if we have to have any more, it will have to be in the same area.

Please bear in mind that the sites that are selected only means that they are “developable”. They still have to satisfy all the other planning regulations in order to get planning permission. This is only one stage of the process and they still have to go through the same system as everyone else to get planning permission.

#### 4. **Infills**

If we put a policy dealing with the infills and windfalls, they will take it out. Neighbourhood Plans are formulated for developments of 10 dwellings and above. Windfalls are counted in the number but they are not interested in anything below 10 for the purposes of the Neighbourhood Plan.

#### 5. **Verge areas** – conflict between the policies.

We could word this better because it was not our intention to put a cycle track down there. What we are saying is that if it is not feasible for the developers to assist with cycle planning through their land then it won't happen. Our audience is first the Horsham DC and then the Inspector. However, it does have to be developer proof. Policies that are too tied to the first Local Plan may fall to the wayside when the new Plan is made.

6. There appears to be some confusion between infrastructure and travel and what sections they should be in. Feel that Sections 7 and 8 need to be moved around a bit.

7. With regard to the rest of the village, does the Plan sufficiently address their issues? They do not have the benefit of a BUAB.

PK - The countryside is pretty protected and we can't do any more within the confines of a Neighbourhood Plan. The level of planning in these areas do not count as development and will fall into the category of windfalls way beyond what we are able to do.

PT – we can emphasise the rural nature of Rudgwick but think that if we focus on the countryside areas directly, they will take it out.

#### **Other issues**

1. **Transport** – would like to see this written in a more correct way.

2. **Density** – the map is not easy to follow and the small print is unreasonable..

PK – our message is that there are only a few high density areas in Rudgwick and putting in more would stand out like a sore thumb.

3. **Access to the Downs Link** – pleased to see

Pleased to see PK improvements to access and signage are matters that we can address through an increase in CILL money if we have a Neighbourhood Plan.

4. **Green spaces** – does not include the open space at Windacres.

The open space at Windacres Farm was rejected by the Consultant. We had specifically raised this land and they did not want it in.

Designated Green Spaces is like having a tiny bit of green space and we were advised that we need to advise the owners of the green space areas about the process. The owners of the green spaces have to be identified and letters sent to them. Those spaces owned by the Parish Council, we will send a letter from the Steering Group to the Parish Council. The Consultant has said that he will send a specimen letter and we will chase.

Rudgwick Preservation Society will leave this on the table and hope that there are some things in there that we can take on board which should help to make it a better document.

We have had 9 responses so far and the Consultants have suggested that we wait for Horsham DC to come back with their comments which will indicate what they are bothered by and those that they aren't. What the Preservation Society have identified are mainly presentation and typo errors and we will have a go to reduce their list and come back to them.

In the main, Rudgwick Preservation Society do support the Neighbourhood Plan and will be communicating that to their members, encouraging them to make submissions. Just wanted to share their thought processes with us.

Rudgwick Preservation Society then left the meeting which then continued.

With regard to our quest to obtaining new Consultants, PK and IM met with Andrew Metcalf of Squires Planning, who is an ex-planner and was used by Stenning and worked with Southwater in the preparation of their Neighbourhood Plan. To do our due diligence it was suggested that we ask Stenning and Southwater for a recommendation and obtain a copy of his CV.

With regard to the Consultants suggested by Southdowns, we have had no reply from one and the second cannot start work until the end of February.

Of our enquiries of Slinfold regarding the Consultants they used, they did not get back to us.

In engaging a Consultant, we need him to do the Design Statement. We will wait for Horsham to make their comments and he can then assist us to tweak the plan and help with the terminology.

**APPENDIX 17 - Photos from Village Hall Day (25/01/2020)**



## **APPENDIX 18 – Presentation to the Rudgwick Book Exchange on 12 February 2020**

### **Presentation/Talk to Book Exchange – 12<sup>th</sup> February 2020**

What is in a Neighbourhood Plan, and, what is not?

Or, perhaps better put, what can a Neighbourhood Plan control & what can it not?

Firstly, the number of Houses to be built in Rudgwick Parish is not determined by the Neighbourhood plan.

The Government impose an overall figure on Horsham District and then they tell us our share.

We have no veto on this figure, we have to work with it.

The figure we have been given is 50 houses to be built on new sites.....that's on new sites like Rudgwick Metals, Summerfold.....any infill homes, like Farn Brakes, Boreham are extra.....as are Barn Conversions in the Countryside.....and we do get quite a few of those.

So, who chooses these sites?

The Neighbourhood Plan could have done this, but because of Horsham imminently reviewing its Local Plan including an assessment of all possible sites, we determined that they should do it.

And, after all they are paid professionals who can stand-up to unscrupulous developers, better than we can.

So, what's left & why bother?

Well, the Plan can influence the type, size, design etc of housing.....and we consequently have policies preferring smaller homes, reasonably spaced, in keeping with existing style.....and others addressing safety for pedestrians & cyclists, retention of green space & trees, adequate services, allotment provision etc.

We are also specifically encouraging Bungalows and some different Sheltered Accommodation (eg. like McCarthy & Stone) to supplement the Hawkrigde offer.

We think that these are all good things for Rudgwick that should be supported, that's why they are in our plan.

And there's another very good reason to have a plan.

Developers now have to pay a tax on every house they build for the market. It is called CIL. For Horsham District it is £150 per square metre, so even a modest detached house will pay £12,500.

Rudgwick Parish gets a share of this tax to spend on our facilities.

With a Plan, we will get 25%, without a plan we get 15%. So, on just one modest house we will lose £1250, without a plan.....and if we have to have 50 houses .....you can see that the Parish will lose lots of money for community initiatives.....like traffic calming.

So, in summary, the Housing number is pre-determined by Horsham & they will allocate sites.....in fact their consultation on this starts on 17<sup>th</sup> Feb, when ours ends.

Our plan will help shape Rudgwick's housing up to 2031, we believe for the better.....and will also secure extra community funds for parish projects & facilities.

I personally believe that there is nothing bad in it for Rudgwick & urge you to read it and hopefully support it.

Any Questions ?

*Paul Kornychy*

***Afterwards: Distribute Consultation Response Forms.***





## **Rudgwick Neighbourhood Development Plan - News**

### **Chairman's Report**

I don't expect the Rudgwick Neighbourhood Plan (RNP) is at the top of your list of things to think about at the moment but since so many of you took the time to attend the public meeting in January, read the draft plan and send us your comments, I thought we should update you on the current status of the plan and what we expect to happen next.

We had well over a hundred responses from local individuals to the plan with over 75% of those declaring their support for it. In addition we had responses from a range of statutory and non-statutory consultees including the Rudgwick Preservation Society (RPS) and Horsham District Council (HDC). The input from RPS was most helpful and constructive and we have now incorporated many of their suggestions into the latest draft of the plan.

The input from HDC ran to fourteen pages, much of which focused on planning technicalities and what we can and can't say in our policies. Since the close of the public consultation period we have been working closely with the consultant who is advising the RNP Steering Group on revising the plan. The revisions are quite extensive as we have had to make changes to comply with regulations and maximise the chances of success when we get to the examination stage.

The main plan has also been made more concise, reducing its length by almost half and moving some content into the supporting evidence. This makes the plan a much more digestible read with the evidence documents available as backup.

*.....continued overleaf*

### **RNP News - Published May 2020 - Rudgwick Magazine**

The result of all these changes is that we believe the revised plan is materially different to the previous iteration and we will be recommending to the Parish Council that the Regulation 14 Consultation be re-run in line with guidance on the matter. The consultation will take a different format to the last consultation due to COVID-19 and details of the consultation will be published in due course. When the time comes, we would like as many of you as possible to read the revised plan and let us have your feedback .

The Parish Council will be asked to approve the revised plan and its supporting documents at its meeting on 11 May with the consultation starting shortly after. We intend to publish a further RNP News in the June issue of the Rudgwick Magazine, summarising the changes we have made to assist your understanding.

Thank you for taking the time to read this and we look forward to your feedback once the updated plan is published.

***Ian Maclachlan - RNP Chairman***

### **Expected Timeline of Events:**

- ◆ **4th May:** Revised draft plan and associated supporting documents published on RPC website.
- ◆ **11 May:** Rudgwick Parish Council considers approval of the Revised draft plan and associated supporting documents to go to Regulation 14 consultation
- ◆ **18th May - 13th July:** Regulation 14 consultation
- ◆ **By end of August 2020:** Plan updated in light of comments, approved by Parish Council and submitted to HDC (Regulation 15)

Following submission of the plan, HDC will conduct a consultation under Regulation 16 and then the plan will be Examined. Following that there will need to be a referendum vote, requiring a simple majority in favour, before the plan can be 'made' & carry full weight.

## **RNP News - Published May 2020 - Rudgwick Magazine**

### **A Local and Neighbourhood Planning Update**

*a personal view by Paul Kornysky, member of the RNP Steering Group*

The current Local Plan for Horsham District Council (HDC) is the Horsham District Planning Framework (HDPF). It was adopted in November 2015 and runs from 2011 to 2031. This plan contains an annual housing requirement for the district of 650 homes, plus 150 to assist Crawley BC meet its shortfall. Hence the annual requirement for Horsham district is 800, giving a 20 year total of 16,000 homes.

Under that plan, Neighbourhood Planning was meant to contribute a minimum total of 1,500 homes over the 20 year plan period throughout the district. Specific numbers were not set by the HDPF for each Neighbourhood but were to be established locally. For Rudgwick, this 'minimum fair share' was subsequently determined as 50. It was also accepted that 19 of the homes currently being developed on the Windacres Farm/Rudgwick Metals (Berkeley Homes) site could count towards this requirement. This was because the implemented site has 19 more homes than on the initial (unimplemented, but approved) plans.

HDC is required to review the Local Plan every 5 years and in 2019 alerted Neighbourhood planning groups as to its progress, advising a number of key points:

- The new Horsham District Local Plan (HDLP) would run to 2036 i.e. adding 5 years to the existing plan.
- The mandatory use of a standard formula to establish a minimum housing need figure for the district.
- A consequent step-change increase in housing numbers requiring further release of greenfield sites.
- The National Planning Policy Framework (NPPF) requiring HDC to set housing requirement figures for designated neighbourhood areas.
- The option for Neighbourhoods/Parishes to 'delegate' to HDC the site assessment and consequent site allocation process

***.....continued overleaf***

## RNP News - Published May 2020 - Rudgwick Magazine

The Rudgwick Neighbourhood Plan Steering Committee carefully assessed all of these factors. It became clear that HDC was expected to not only set Rudgwick's 'revised' housing requirement in early 2020 but also to publish its evaluation of sites, even if we also undertook a separate assessment. The committee decided that it would therefore be best to also have HDC allocate Rudgwick sites, leaving the Neighbourhood Plan to concentrate on other factors such as design, amenity and services etc.

In mid February 2020 HDC published a draft of the HDLP for a public consultation, which expired at the end of March. You may have contributed to this consultation. With specific reference to Rudgwick, the following points should be noted:

- Rudgwick remains classified as a 'medium village' in the hierarchy of settlements, with a 'moderate level of services'.
- There are proposals to extend the built up area boundary (BUAB) in Cox Green & also at Summerfold (Thakeham Homes development)
- Rudgwick has been set a ('greenfield site') housing requirement figure of 50 up to 2036. **All** existing planning permissions together with further BUAB infill and (e.g.) barn conversions, are in addition.
- Two (greenfield) sites (SA442 & SA574) have been identified as having the **potential** to be allocated for development (see below) but are not **actually** allocated at this early stage.
- All the other submitted sites have currently not been so identified.

SA442 is a 2.2Ha site, north of Furze Road estimated as 15 housing units. SA574 is a 4.9Ha site, north of the A281 in Bucks Green estimated as 120 housing units albeit with a note that a lower density is likely to be appropriate. The details of SA442 & SA574, including maps, can be found in the Reg 18 Site Assessment Report at [www.horsham.gov.uk](http://www.horsham.gov.uk).

**HDC's website states:** *"We have received thousands of comments from individuals and organisations. Once comments have been considered and the draft Plan has been further refined, we will consult on the final Submission Draft of the Local Plan (Regulation 19) in Autumn/Winter 2020, aiming for a Government inspector to examine it in 2021".*

So, it is clear that the HDLP still has some way to go. It remains the goal of the Steering Group to 'make' our Neighbourhood Plan beforehand! **END**



June 2020 (i)

## **Rudgwick Neighbourhood Development Plan - News**

### **Chairman's Report**

Due to an error at the printers, the report we inserted in last month's magazine was cut short with only half of it being printed .... twice! The first half of this report is therefore similar to what I was hoping to say to you last month regarding the Public Consultation on the Neighbourhood Plan and the resulting review and re-write of the plan.

We had well over a hundred responses from local people to the plan with over 75% of those declaring their support for it. In addition we had responses from a range of statutory and non-statutory consultees including the Rudgwick Preservation Society (RPS) and Horsham District Council (HDC). The input from RPS was most helpful and constructive and we have now incorporated many of their suggestions into the latest draft of the plan.

The input from HDC ran to fourteen pages, much of which focused on planning technicalities and what we can and can't say in our policies. Since the close of the public consultation period we have been working closely with the consultant who is advising the RNP Steering Group on revising the plan. The revisions are quite extensive as we have had to make changes to comply with regulations and maximise the chances of success when we get to the examination stage.

The main plan has also been made more concise, reducing its length by almost half and moving some content into the supporting evidence. This makes the plan a much more digestible read with the evidence documents available as backup. There are some differences in Policies between the original and the revised plan. In the second half of this newsletter a brief analysis is provided to aid your understanding.

The result of all these changes is that we believe the revised plan is materially different to the previous iteration which means we are obliged to re-run the Public Consultation which is known as Regulation 14. (cont.)

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The consultation will take a different format to the last consultation due to COVID-19 and details of how to participate in the consultation follow.

The Rudgwick Parish Council (RPC) approved the revised plan at its May meeting with a consultation period running from 18th May till midnight on Monday 13th July.

Thank you for taking the time to read this and we hopefully look forward to your support for the revised plan.

**Ian Maclachlan - RNP Chairman** *(P.S. RPC website has May Newsletter in full)*

**HOW DO YOU PARTICIPATE?****ACCESS A COPY OF THE PLAN**

***At the Parish Council Website: [www.rudgwick-pc.org.uk](http://www.rudgwick-pc.org.uk)***

(If you are unable to do this and require a paper copy to be printed off & posted to you then please contact the Parish Clerk (details below) and this will be organised. N.B. This time we do not have a supply of pre-printed booklets, they will only be printed & despatched on individual request).

**PROVIDE YOUR COMMENTS**

***Via our 'very easy to use' online survey form on the Neighbourhood Plan page at the Rudgwick Parish Council website.***

(But, if you wish, there is a comments form (pdf) there for you to print off, complete and return to the Parish Clerk).

***Please remember that you can support/object to the Plan without the need for any or extensive supplementary comments. Also note that if you feel that your previous comments are not satisfactorily dealt with in the new Plan, you must submit any outstanding concerns to us again.***

**Parish Clerk:**

clerk@rudgwickpc.co.uk - 07927 702321 - 01403 822678 (Mondays & Fridays only)

***Finally, please note that the regulation copy of the plan and all supporting documents deposited at the Parish Council Offices and normally available to view by appointment at the Rudgwick Village Hall are not currently accessible due to COVID-19 restrictions. If you do wish to attend to view these documents, please contact the Parish Clerk forthwith and you will be notified as and when the easing of restrictions will allow safe physical access to be made available.***



**RNP News** - Published June 2020 - Rudgwick Magazine (iii)

**A brief analysis of the changes to our Neighbourhood Plan**

*....a personal view by Paul Kornicky, member of the RNP Steering Group.*

**So what's changed ?**

The first thing to note is that the new plan has 17 policies compared to 15 in the old plan. This increase of 2 has been caused by the fact that we previously had 2 'design' policies and now we have 4. Before, we had Policy 3 limiting building height and Policy 7 simply invoking the existing Parish Design Statement. These have now been replaced by 4 detailed policies (numbered 6 to 9) covering Height, Materials, Style & Street Scene. We are grateful to the Preservation Society for their expertise in helping formulate the content of these design policies.

The remaining 13 policies generally cover the same subject matter as the old, but with some differences. In the analysis below, New/Old Policy numbers are shown in brackets to assist your referencing them.

**(New No.1/Old No.1) Spatial Strategy & Settlement Boundaries.** Some significant consultees (including HDC) were concerned that our plan should not be so prescriptive on settlement defensible boundaries given that we were not evaluating or allocating sites. Mindful of the fact that HDC has anyway now reviewed all Rudgwick Parish sites as part of the Local Plan review and published their findings, the Steering Group felt that this policy could consequently be 'safely' modified to simply recognise & reinforce the identities & boundaries of the parish's 6 settlements (i.e. Rudgwick, Bucks Green, Cox Green, Tisman's Common, The Haven and Rowhook). This approach, together with the aforementioned design policies, will help embrace some key components of the Parish Design Statement but now as formal planning policy, thereby carrying considerable weight.

**(2/2) Market Housing Mix.** This has been revised from 5% 4+bed, 30% 3bed, 65% 1or2bed to be 5%/40%/55% to reflect the fact that although we do require smaller homes, 3-bed are still very much needed in Rudgwick.

**(5/4) Housing Density.** A less prescriptive wording but density is still to reflect the surrounding area & now also settlement.

**(4/5) Affordable Homes.** Much as before but now recognising that there

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are now other Affordable Ownership options, not just Shared Ownership.

**(3/6) Sheltered Accommodation.** Now generalised to promote homes for older (or disabled) people (bungalows & sheltered) and that all new major developments must provide a significant proportion of such homes. Also that all new homes should be readily adaptable to make them more versatile and usable through all stages of life.

**(10/8) Local Economy.** Sensitive proposals to improve/expand businesses within our 3 designated employment areas (see map at last page of Plan) are encouraged to foster local employment. Home alterations or extensions to facilitate more home working are also generally supported.

**(11/11) Infrastructure.** The poor broadband/mobile infrastructure is recognised by a policy to support such new infrastructure. Locally we cannot have much influence on wider infrastructure (Schools, Roads, Health etc.) beyond the policies HDC already has in its local plan.

**(14/12) Sport & Recreation Facilities.** Minor change to insist that any ensuing landscape harm must be mitigated, insofar as is possible.

**(15/13) Allotments.** Modified to ensure adequate off-street parking.

**(16/14) Local Green Space.** The Holy Trinity Churchyard has been removed as it is adequately protected by its existing designation. The other six areas nominated for local green space protection are unchanged.

**(17/15) Green Infrastructure & Trees.** Reference to Ancient Woodland has been removed as it is already adequately protected. The wording for our 'tree retention policy' has been modified but has an equivalent effect.

**(12&13/9&10) Accessibility for non-car users.** These policies have been substantially rewritten. Eight sites of key local facilities have been identified as needing easy & safe non-car access from any new development. As an example proposals incorporating a safe route for pedestrian/cyclist access from Rudgwick Village to/from King George V playing fields (Bucks Green) would be supported. Other new such routes in the parish are encouraged.

***Hopefully you will concur with the view that this is a good plan for Rudgwick and will help ensure that future development respects our rural parish whilst meeting our identified needs. Please support it if you can.***

# **Rudgwick Neighbourhood Development Plan**

**Public Consultation  
18th May 2020  
TO  
13th July 2020**

Reg. 14 Plan & evidence documents at

***[www.rudgwick-pc.org.uk](http://www.rudgwick-pc.org.uk)***

**OR** please contact the Parish Clerk,

Email: [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk)

Tel: 01403 822678 (Mondays & Fridays only)

Mobile: 07927 702321



## RUDGWICK PARISH COUNCIL

Minutes of the virtual Meeting of the Parish Council held on Monday 11<sup>th</sup> May 2020 at 7 pm.

**Present:** Councillors D Buckley (Chairman), P Thompson (Vice-Chairman), M Ellis, A Haynes, S Kornycky, R Landeryou\*, I Maclachlan, W Manson\*, S Wightman.

(Joined at 7.30pm due to taking part in another meeting/ meeting time confusion respectively)

**Also, taking part:** Parish Clerk Jonna Foote and three members of the public.

**FC001-20/21 Apologies for Absence**

Apologies from Cllr Gormley were received; West Sussex County Councillor Christian Mitchell sent his apologies in consideration to the meeting being the first virtual one held by the council. This was **agreed to be noted**.

**FC002-20/21 Declarations of Interest**

No declarations of Interest as defined under the Localism Act 2011 and the Parish Council Code of Conduct were made. Cllr Manson submitted an updated Register of Interest which has been posted on the Rudgwick Parish website and submitted to Horsham District Council. This was **agreed to be noted**.

**FC003-20/21 Minutes of Council Meeting of 10<sup>th</sup> February 2020**

It was **resolved to approve** [Minutes](#) of the council meeting held on 10th February 2020 and [Electronic Decisions](#) during the Corona Virus period 30th March – 6th April 2020 as accurate records and for the chairman to sign these.

**FC004-20/21 Election of temporary Vice-Chairman**

It was **resolved** to appoint Cllr Ellis as temporary Vice-Chairman, proposed by Cllr Maclachlan seconded by Cllr Haynes an agreed unanimously.

**FC005-20/21 District and County Councillors Reports**

It was **resolved** to receive the reports and for these **to be noted**:

- The contents of County Councillor Christian Mitchell's [Report](#).
- District Councillor Richard Landeryou, arrived just prior to FC007-20/21 and immediately afterwards reported that HDC is opening up countryside car parks; the opening of the recycling centres (for garden waste and household waste that could cause harm only) initially had long queues. Depending on developments it is hoped to open Horsham Arts Centre cinema in July. Car parking charges may soon be introduced, additional costs to cover the "normal working" of the council is at a cost of £800,000 per month, covered by the Government until today. There is no information on the opening of schools.



**FC006-20/21 Public Speaking Session**

A Cox Green resident voiced his support for the Rudgwick Neighbourhood Plan consultation. Two Rudgwick residents spoke against Planning Application DC/20/0804 mentioning right of access, the proposed development being two self-contained units adding to a traffic situation that is already of concern under present conditions.

**FC007-20/21 Planning**

To report on:

- i) Current Planning Applications were **resolved** unanimously and agreed to be **noted** for comment to Horsham District Council (HDC).

| Applications for consideration at Rudgwick Parish Council Meeting 11 <sup>th</sup> May 2020 |                                                              |                                                                                                  |                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Application No                                                                              | Applicant                                                    | Reason for Application                                                                           | Recommendation                                                                                                                                                                                                                                          |
| <a href="#">DC/20/0804</a><br>30.04.2020                                                    | Chestnuts,<br>Hornshill Farm,<br>Guildford Road,<br>Rudgwick | Conversion of existing barn to ancillary accommodation subordinate to the main dwelling          | <b>No objection</b> with the following conditions:<br>The accommodation to be subordinate and tied to the main dwelling as traffic access is already reported to be an issue.                                                                           |
| <a href="#">DC/20/0539</a><br>20.04.2020                                                    | Riverside Farm,<br>Guildford Road,<br>Rudgwick               | Conversion of agricultural barn to a dwelling house (Certificate of Lawful Development Proposed) | <b>No objection</b> with the following condition: the permitted development is to be for permanent, long term residential occupancy only (and not be part of the many activities that are already taking place at the site, e.g. become a holiday let.) |

- ii) Planning Applications [comments](#) made by Rudgwick Parish Council Planning Committee to HDC under delegated powers were **agreed to be noted**.
- iii) [Schedule of Planning Decisions](#) made by HDC in respect of previous applications was **agreed to be noted**.
- iv) [Schedule of Appeal Notices and Decisions](#) lodged with HDC was **agreed to be noted**.
- v) [Enforcements](#) were **agreed to be noted** made by HDC.
- vi) There were no planning applications considered at Planning Committee North that required to be noted.

**Planning Committee**

It was **resolved** for Cllr Susan Wightman to be member on the Planning Committee. Proposed by Cllr Buckley seconded by Cllr Manson and unanimously agreed.

**FC008-20/21 Correspondence Update**

It was **agreed to note** the correspondence update regarding the Arriva 63 bus route/bus lanes. ([Letter to HDC/WSCC](#) and [Reply](#)) and for the Clerk to respond on behalf of the Council in respect of the inaccuracy regarding the meeting of the bus operator at the start of the process, as mentioned in the HDC reply.

Cllr Thompson mentioned the recent 100<sup>th</sup> birthday of a Rudgwick resident and it was unanimously agreed for the Chairman to send a letter of congratulation.

**FC009-20/21 Clerk's announcements/decisions**

Clerk's announcements/decision <http://www.rudgwick-pc.org.uk/parish-council/clerks-weekly-update/> (period 9<sup>th</sup> February–4<sup>th</sup> May 2020)/ information below were received and **agreed to be noted**:

- Rudgwick COVID 19 Community Support Group has 81 volunteers that have had contact with 79 households last week. Funding information received by the Clerk is forwarded to the group, the Clerk is acting as “banker” for Lower Beeding Hub funding;
- Tisman's Common defibrillator has been reported as non-functioning, battery and pads have been ordered. Litter Warden provided essential support in the matter;
- Rudgwick Hall (hallway and toilets) are to be painted during lockdown period.

**FC010-20/21 Parish Council representatives on outside Organisations**

It was **agreed to note** the [report](#) on the Roundtable meeting (Gatwick Airport).

**FC011-20/21 Finance**

Payments made/received/ Detailed Receipts & Payments by budget heading/Bank Reconciliation Lloyds Accounts/Monthly Bank Reconciliation were received. These are to be signed by the Chair of the Finance, Policies and Human Resources Committee at the earliest convenience, a payment of up to £950 for cemetery legal matters in connection with the extension of the burial ground as agreed by the Chairman were **agreed to be noted**.

It was **resolved to approve** payments to be made, proposed by Cllr Manson seconded by Cllr Kornysky and agreed unanimously.

- Payments made/received [February](#), [March](#) and payments made [May](#);
- [Detailed Receipts & Payments](#) by budget heading February/March;
- Bank Reconciliations: Lloyds: Business [February](#) & [March](#), [Savings](#), [KGV](#), [Deed](#) and [NS&I](#) Accounts;
- [Monthly Bank Reconciliation](#);
- [Payments](#) to be made;
- [End of Year Account Statement](#) (Summary Receipts & Payments).

**FC012-20/21 Standing Orders**

It was **resolved to approve** the amended [Standing Orders](#) proposed by Cllr Ellis seconded by Cllr Landeryou and agreed unanimously.

**FC013-20/21 Financial Regulations**

It was unanimously **resolved to approve** the amended [Financial Regulations](#) proposed by Cllr Manson seconded by Cllr Wightman.

**FC014-20/21 Rudgwick Neighbourhood Plan**

It was unanimously **resolved to agree**

- the recommendation made by the consultant regarding the Re-Consultation 14 [process](#);
- approve the Draft Rudgwick Neighbourhood Plan for Re-Consultation 14 circulated to



- councillors prior to the meeting;
- the eight-week Re-Consultation 14 to be from 18th May, with the closing date being midnight 15th July 2020;
- provide hard copies of the Neighbourhood Plan in a public place for inspection by the public can only be done when COVID-19 lockdown guidance changes allowing this to be undertaken safely.

Discussion did take place regarding the consultation being challenged if a hard copy could not be provided. Proposed by Cllr Maclachlan seconded by Cllr Landeryou.

**FC015-20/21 Rudgwick Hall – heating system**

It was **resolved to approve**:

- expenditure of up to £10,000 on the installation of a new boiler, water tank and if feasible, connection to the solar panels for hot water at Rudgwick Hall as soon as possible, and accessing S106 monies to fund this;
- To investigate and implement further effective measures to reduce carbon footprint in the next 12-24 months as part of an energy strategy.

Proposed by Cllr Landeryou seconded by Cllr Thomson and agreed unanimously.

**FC016-20/21 COVID 19 period – lease/rental payments for Council facilities**

It was **resolved\*** to agree to:

- allow Rudgwick Parish council facilities lease holders a three-month rent holiday, which is to be paid in the next 12-18 months; and to consider a re-negotiation of rent where appropriate;
- carry forward hire payments for sessions that could not be taken up at the end of March due to the COVID-19 lockdown until facilities are opened again and bookings can be taken.

\*Councillor Buckley declared an interest as a hirer and did not partake in the voting on hire charges.

**FC017-20/21 Traffic Calming Group**

It was **agreed to note** the Traffic Calming Group [report](#).

**FC018-20/21 Allotments -**

It was **resolved** for the Clerk to write to local landowners who may be willing to engage in the provision of land for the use of allotments, as under Small Holdings and Allotments Act 1908 the number of residents interested in accessing an allotment has reached the required level.

**FC019-20/21 Electric Vehicle Charging Point – Rudgwick Hall**

It was **resolved** for the Clerk to investigate the provision of Electric Vehicle Charging Point installation with Fields in Trust as well as receiving further information on type of installation, vandalism before progressing further.

**FC020-20/21 S137 Grant Applications**

It was **resolved** to allocate the following grants:

- Air Ambulance Kent Surrey Sussex Service £250.00;
- Horsham District Age UK £350.00.

And to postpone the application from the Games Hub until September/ when the group can meet again. Proposed by Cllr Landeryou seconded by Cllr Manson and agreed unanimously.

**FC021-20/21 Resolution to exclude the public and press from the business about to be transacted**

It was **resolved to exclude** the public – in accordance with The Public Bodies (admission to Meetings) Act 1960, due to the confidential nature/exempt information of the following agenda item.

FC022-20/21 **Staffing**

It was **resolved to agree** to the recommendations made in the confidential report circulated to the councillors prior to the meeting:

- Incremental salary increases for both assistant clerk/clerk;
- Unused Holiday entitlement 2019/20 for the clerk to be taken forward to 2020/21;
- For the clerk to be paid up to 5 hours over-time per week when workload demands this;
- Expenses for litter warden.

Proposed by Cllr Landeryou seconded by Cllr Ellis and agreed unanimously.

FC02320/21 **Date of next meeting:**

It was **agreed to note** the date of the next meeting as 8<sup>th</sup> June 2020, at 7.00 pm

.....  
**Councillor D Buckley**  
**Chairman**

.....  
**Date**

## 18th May 2020 - Regulation 14 Consultation

The Rudgwick Parish Council has approved the Regulation 14 consultation process for the Rudgwick Neighbourhood Plan.

This commences on 18<sup>th</sup> May 2020 and last for 8 weeks until 15<sup>th</sup> July 2020. Following the consultation the Steering Group will undertake any necessary revisions and submit the resulting document for the Regulation 15 process.

The Regulation 14 process is announced on this Rudgwick Parish Council website, on the Council Facebook page and in the Rudgwick Magazine. Appropriate material will be put on the Parish Notice Boards and Banners strategically placed around the Parish.

Download versions of the plan are available on this Website [here](#) and hard copies available from the Parish Clerk at Rudgwick Hall during the consultation period.

Please note that the copy of the plan available to view by appointment at the Rudgwick Village Hall is not currently accessible due to COVID-19 restrictions. If you wish to view this copy of the plan please contact the Clerk and you will be contacted as and when the easing of restrictions allows access to be made available.

We look forward to receiving you views and comments. If you wish to do this online please click [online survey](#). If you wish to send the clerk your information by email (on a word document, with all details as on hard copy [document](#), please ensure that you are aware of the following:

A summary of all comments made will be publicly available. Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1998 and General Data Protection Regulations. The Parish Council will process your details in relation to this preparation of this document only. As part of the Consultation and in line with the new General Data Protection Regulations (GDPR) please confirm that you are happy for the Parish Council to pass your contact details (name, address/email address) onto Horsham District Council (HDC) so that they can contact you at Regulation 16 consultation.

Please confirm that you are happy for the Parish Council to pass your details onto HDC:

## Regulation 14 Consultation Supplementary Documents

- 1) Focus Group Health & Wellbeing Committee [here](#)
- 2) Focus Group Sports & Recreation Committee [here](#)
- 3) Focus Group Sports & Recreation Committee [2 here](#)
- 4) RNP Local Green Spaces Assessment [here](#)
- 5) RNP Public Meeting [here](#)
- 6) RNP Sports & Recreation Summary [here](#)
- 7) RNP Housing Needs Assessment [here](#)
- 8) Rudgwick Parish Design Statement [here](#)
- 9) RNP Sustainability Statement [here](#)



## APPENDIX 22 – Example Regulation 14 notification email

**From:**  
**To:**  
**CC:**

**Date:** May 18, 2020 2:16:06 PM

**Subject:** Pre-Submission Consultation (Regulation 14) on the Rudgwick Neighbourhood Plan

**Attachments:** 2004202 OFFICIAL Regulation-14-Digital-Response-Form-2 (1).pdf

Good morning

Rudgwick Parish Council wishes to inform you of the Pre-Submission Consultation (Regulation 14) on the Rudgwick Neighbourhood Plan.

The details of how to make representations on the Pre-Submission Neighbourhood Plan given are below:

The Plan can be viewed in the following ways:

- On website at <http://www.rudgwick-pc.org.uk>
- The wider evidence base supporting the plan can also be viewed on the website.
- A hard copy can be obtained from the Parish Office by contacting the clerk by email [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk) or telephone 07927 702321.
- A hard copy can be accessed at Rudgwick Hall, Bucks Green, Rudgwick RH12 3JJ as soon as Government guidance on social distancing permits.

NB Following Government advice, the Parish Office is closed in adherence to social distancing advice during the Covid 19 period, council business is operating as usual.

The consultation period runs from **18<sup>th</sup> May to midnight on 13<sup>th</sup> July 2020**. No representations will be accepted after this closing date.

Representations can be made in the following ways:

- By email to [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk)
- By post to Rudgwick Parish Council, Parish Office, Rudgwick Hall, Bucks Green RH12 3JJ West Sussex
- [Survey](#)

All representations must be accompanied by a name, address and, if relevant, the organisation you are representing.

A response form is attached to this email, available from the Rudgwick Parish website or on request from the Parish Clerk.

With kind regards

*Jonna*

**APPENDIX 23 – Example Regulation 14 reminder email**

**From:** [REDACTED]  
**To:** [REDACTED]  
**CC:** [REDACTED]

**Date:** Jul 3, 2020 12:36:43 PM

**Subject:** Rudgwick Neighbourhood Plan Regulation 14 Consultation Extension

Good afternoon

**Rudgwick Neighbourhood Plan Regulation 14 Consultation**

You should already be aware of the above public consultation on the Rudgwick Neighbourhood Development Plan in accordance with Regulation 14 Neighbourhood Planning (General) Regulations 2012 which was due to end on Monday 13<sup>th</sup> July. Rudgwick Parish Council is pleased to announce that it is extending the consultation period to allow more time for people to respond to the consultation and it will now end at midnight on Sunday 19<sup>th</sup> July. Please ensure that you submit any comments by then.

A copy of the plan, together with supporting evidence documentation and details on how to respond can be found at <http://www.rudgwick-pc.org.uk/neighbourhood-plan/>

If you wish to visit Rudgwick Village Hall (Bucks Green RH12 3JJ) to inspect a copy of the documents please contact the Parish Office (between 9 am and 3 pm) on 07927 702321 on Tuesday-Thursday or on 01403 822678 on Monday/Friday to make arrangements for an appointment.

Kind regards

*Jonna*

Jonna Foote

Clerk to Rudgwick Parish Council

Telephone: 01403 822678

Mobile nr: 07927 702321 (during working hours/emergencies only)

Working hours: Monday/Tuesday and Wednesday 8.30 -16.00)

Assistant Clerk: Sarah Hall on [assistant.clerk@rudgwickpc.co.uk](mailto:assistant.clerk@rudgwickpc.co.uk)

Telephone: 01403 822678

Working hours: Monday and Friday (8.30 – 16.00)

NB: e-mail address [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk)

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## APPENDIX 24 - Regulation 14 notification to Local Green Space owners

Rudgwick Parish Council  
Rudgwick Hall  
Bucks Green  
Rudgwick  
West Sussex  
RH12 3JJ  
Tel: 01403 822678  
E-mail: clerk@rudgwickpc.co.uk



To: XXXXXXXXXXXXXXXXXXXX

May 2020

Dear Sir/Madam,

### **RUDGWICK NEIGHBOURHOOD DEVELOPMENT PLAN – LOCAL GREEN SPACE**

Rudgwick Parish Council is preparing its neighbourhood plan. Once made, the plan will be used alongside others to determine planning applications for development. As you have been previously informed, the draft plan is currently out for Regulation 14 Consultation. The draft plan includes several policies, one of which seeks to designate land as Local Green Space.

We are writing to you to advise that land within your ownership has been identified for designation as Local Green Space.

### **What is Local Green Space?**

Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities. Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city. Once designated as Local Green Space, development proposals are approached in a way consistent with those for Green Belts.

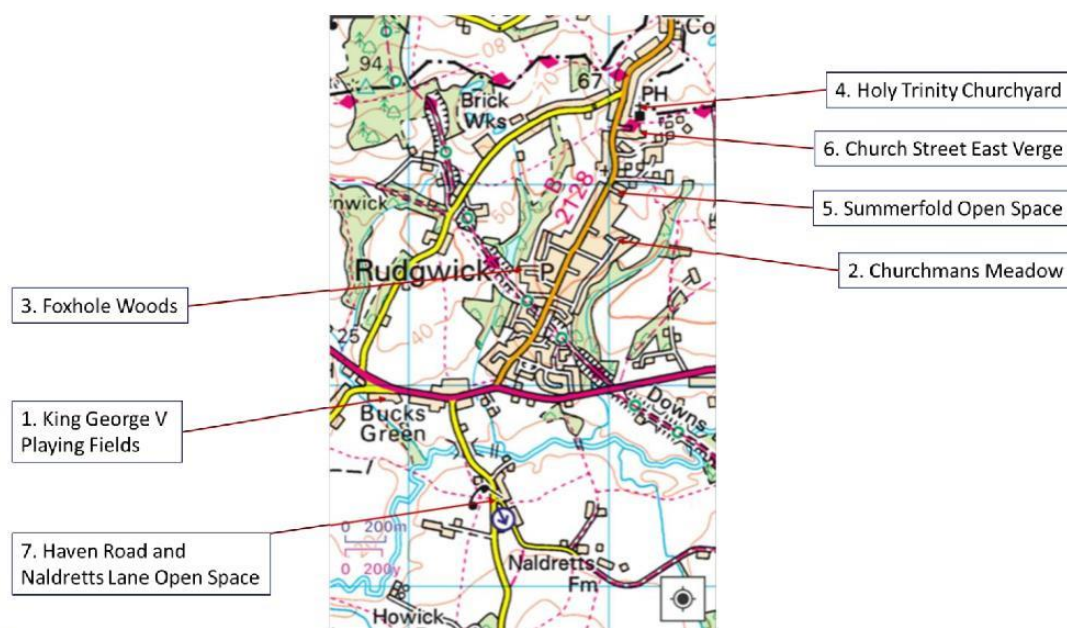
For more information please see <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation>

### **What land has been identified?**

One space under your ownership is proposed for Local Green Space designation. This is known as;

- |                                                             |
|-------------------------------------------------------------|
| 1. Summerfold Open Space - Verges (not Churchmans Meadows). |
|-------------------------------------------------------------|

A map of all the spaces is given below for reference.



1

### Where can I see the justification for the proposed designation?

A review of open spaces in the parish was commissioned by the Parish Council and this considered whether each space identified in it should be designated as Local Green Space. Of the 23 spaces considered, 7 have been recommended for designation as Local Green Space.

The full evidence report (and the draft plan itself) can be downloaded from the Parish Council's website at <http://www.rudgwick-pc.org.uk/neighbourhood-plan/> (see item 4 under Regulation 14 Consultation Supplementary Documents).

If you cannot find the document, please contact the parish clerk who will ensure you are able to access the information.

### How can I engage in the process?

Details of current consultation here <http://www.rudgwick-pc.org.uk/neighbourhood-plan/...>

Responses can be sent to the Parish Clerk or completed using an on-line survey at the website above.

Kind regards, Paul Thompson,

On behalf of Rudgwick Neighbourhood Development Plan Steering Group



## APPENDIX 25 – Regulation 14 consultation posters



**APPENDIX 26 - Regulation 14 response form****Rudgwick Neighbourhood Development Plan 2019-2031****Regulation 14 Consultation – Response Form****ABOUT THIS CONSULTATION**

This is a formal public consultation being run in accordance with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

The consultation period runs from

Monday 18th May – Monday 13<sup>th</sup> July (until midnight) 2020

Consultation documents can be viewed online at <http://www.rudgwick-pc.org.uk/neighbourhood-plan/> Please note that the copy of the plan available to view by appointment at the Rudgwick Village Hall is not currently accessible due to COVID-19 restrictions. If you wish to view this copy of the plan please contact the Clerk, on 07927 702321, and you will be contacted as and when the easing of the restrictions allows access to be made available.

All responses to this consultation must be received (preferably on this Response Form) prior to the end of the consultation period (midnight, 13<sup>th</sup> July) and must include a name, address and, if relevant, the organisation you are representing. Failure to provide this information could result in your representation being rejected.

If you require assistance with the formulation of your response, or need any other help in relation to the consultation process, please contact the Parish Clerk at [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk)

**ABOUT YOU**

Please provide your details below.  
**Anonymous forms will be REJECTED.**

|                                                 |  |
|-------------------------------------------------|--|
| <b>Full Name</b><br>(required)                  |  |
| <b>Address</b><br>(required)                    |  |
| <b>Postcode</b><br>(required)                   |  |
| <b>Telephone and/or Email</b><br>(optional)     |  |
| <b>Organisation</b><br>(required if applicable) |  |
| <b>Position</b><br>(if applicable)              |  |
| <b>Your Age</b><br>(optional)                   |  |
| <b>Completion Date</b>                          |  |

**THANK YOUR FOR TAKING THE TIME TO RESPOND TO THIS CONSULTATION – YOUR VIEWS ARE IMPORTANT****Part 1 – Overall opinion of the Draft Neighbourhood Plan****Would you support or oppose this Plan at referendum?** (Please mark one answer with an 'X')Support without modifications ☐Support with modifications ☐Not Support ☐**Part 2 – Detailed Comments**

Please use the table below to provide your comments on the consultation documents. When providing your comments please clearly state the part of the plan your comments relate to in the left-hand column.

| Paragraph/page number, & policy ref | Please give details of your reasons for support/opposition | What improvements or modifications would you suggest? |
|-------------------------------------|------------------------------------------------------------|-------------------------------------------------------|
| <br>                                |                                                            |                                                       |
| <br>                                |                                                            |                                                       |
| <br>                                |                                                            |                                                       |

*To add more than one comments please press the TAB key on your keyboard to create another row.*

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**Protecting Your Data**

A summary of all comments made will be publicly available. Please note that any other personal information provided will be confidential and processed in line with the Data Protection Act 1998 and General Data Protection Regulations. The Parish Council will process your details in relation to this preparation of this document only. The Parish Council's Data Protection Policies which are detailed on its website <http://www.itchingfieldparishcouncil.gov.uk> or can be obtained from the Clerk.

As part of the Consultation and in line with the new General Data Protection Regulations (GDPR) please confirm that you are happy for the Parish Council to pass your contact details (name, address/email address) onto Horsham District Council (HDC) so that they can contact you at Regulation 16 consultation.

If you consent to the Parish Council contacting you about your representation please mark an 'X' in this box. For example, this may be to help us understand your comments better.

☐

As part of the plan preparation process the Parish Council will pass your email address to Horsham District Council (HDC) so that they can contact you directly when they undertake the Regulation 16 stage on the final version of the Plan. Please provide consent by marking an 'X' in this box.

☐**Sending us your completed form**

Please remember, send us your response before midnight on Monday 15<sup>th</sup> July. It must include your name, address and, if relevant, the organisation you are representing. Please ensure all parts of this form are securely attached together (stapled for example). Response Forms can be submitted:

**By Email:** send your completed Response Form in word format to [clerk@rudgwickpc.co.uk](mailto:clerk@rudgwickpc.co.uk)  
Please note that this is the preferred response method and will save much volunteer/staff time collating your comments.

**In Person:** take your completed Response Form to Rudgwick Parish Council, Parish Office, Rudgwick Hall, Bucks Green, Rudgwick RH12 3JJ

**By Post:** send your completed Response Form to Rudgwick Neighbourhood Plan Consultation, Rudgwick Parish Council, Parish Office, Rudgwick Hall, Bucks Green, Rudgwick RH12 3JJ

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**APPENDIX 27 – Verbatim Regulation 14 representations**

| Ref.   | Pg. | Policy Ref.    | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                   |
|--------|-----|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| 214/6  | 1   | Front page     | As there have been two Reg 14 versions of the RNDP and there is no date on the front page – it might be useful to include this in order to help identify the latest version. It is noted that the date is inserted at the top of each page within the document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted. Document date added to front cover. |
| 88/9   | 2   |                | Message from the Chairman: His name should be spelled out in full, instead of 'Ian Mac' (Maclachlan)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - change made.                       |
| 89/9   | 2   |                | "want" should be "wants" in line 3, 2nd para (community is singular)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - change made.                       |
| 90/9   | 3   |                | Table of contents:<br>8. Infrastructure (RNP 15) – can allotments be 'Infrastructure'?<br>9. 'Green infrastructure' – we do not think 'infrastructure' is a correct word in this context.<br>Will come back to this when we get to the section later.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Changes made as necessary.                 |
| 91/9   | 4   |                | 1.3: "The RNDP is to structure development". An odd phrase and 'structure' does not sound right. Perhaps omit that phrase and just continue "The RNDP provides guidance to any interested parties..." as in the rest of the text.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - amended                            |
| 92/9   | 4   |                | 1.5: Rudgwick Parish (all references should have capital P unless used generically).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - change made.                       |
| 93/9   | 4   |                | 1.5: "via Guildford to the M25". Reason: the A3 is on the other side of Guildford.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - change made                        |
| 215/6  | 4   | Chapter 1      | It may be useful to reference within this section – the Consultation Statement (due to be submitted at Reg 15) and summary of key issues identified through the various consultation exercises, plus any Environmental Statements, the background documents and any other accompanying information that help underpin the policies within the NP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted                                      |
| 216/6  | 4   | Paragraph 1.1  | Please include the date of the adopted HDPF                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Change made.                               |
| 217/6  | 4   | Paragraph 1.5  | Please ensure there is consistency throughout the document with reference to the capital P of the word <b>parish</b> . In this paragraph it has a small 'p'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Change made.                               |
| 218/6  | 4   | Paragraph 1.5  | Make reference to Figure 1 in this paragraph.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Change made.                               |
| 219/6  | 5   | Figure 1       | Title refers to Rudgwick Neighbourhood Plan and not Neighbourhood Development Plan, the correct terms is Neighbourhood Development Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Change made.                               |
| 220/6  | 5   | Paragraph 1.11 | The details regarding a review of the RNDP could be combined with information within paragraphs 1.15 and 1.16 regarding the Local Plan review.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Change made.                               |
| 94/9   | 6   |                | 1.13: The policies [etc.]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - change made.                       |
| 95/9   | 6   |                | 1.16: "...until 2031. However, [and later] "...adopted, and content known,..." (cap and commas)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Section amended                            |
| 221/6  | 6   | Paragraph 1.13 | First bullet point has letter missing at the start of the sentence. It should read <u>the</u> (and not he).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Change made.                               |
| 222/6  | 6   | Paragraph 1.15 | It would be useful to include any reference made about Rudgwick within the HDPF.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Change made.                               |
| 223/6  | 6   | Paragraph 1.16 | It would be useful to provide an update on the Local Plan review timetable within this section. In addition, it would be useful to provide an overview on how the LP review will identify an appropriate provision of housing for the parish, and appropriate site allocations to meet that housing provision.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Change made.                               |
| 267/16 | 6   | 1.16           | The NP has a plan period of 2031, but also acknowledges that it may need to be reviewed to keep pace with the new emerging Local Plan for Horsham.<br>The National Planning Policy Guidance (NPPG) also states that, "Most Local Plans are likely to require updating in whole or in part at least every 5 years". (Paragraph: 008 Reference ID: 12-008-20140306).<br>Given the complexities and challenges involved in producing a NP, it is by no means certain that the local political will or resources will be in place to undertake a review/produce a new one. Therefore, if the residents of Rudgwick wish to continue to influence what happens in the village it is not the correct strategic approach for the NP to not allocate housing. The Plan needs to be 'future proofed'.<br>A more flexible, contingency based approach to allocation is recommended given that the NP is expected to cover the next 11 years (2 potential Local Plan reviews).<br>It is highly unlikely that no housing development will be allocated towards Rudgwick in the future given its position within the settlement hierarchy.<br><br>the plan should:<br>1. Allocate housing sites within Rudgwick to meet the 1500 unit Strategic Plan target for Horsham District. | Comments noted. We disagree.               |



| Ref.  | Pg. | Policy Ref.   | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                               |
|-------|-----|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |     |               | 2. Notwithstanding that the above is the preferred approach, should the NP forum continue with not including housing sites for allocation, at the very least there should be a mechanism within the document to guide what sites come forward in the future, in line with reviews of the Local Plan and increased numbers.<br>To achieve this housing sites could be allocated as "white land" with additional policy wording saying that it would come forward should a lack of a five year housing land supply be identified, a negative Housing Delivery Test returned or higher housing numbers identified within future reviews of the Horsham Local Plan.<br>The Land Behind Rudgwick Metals identified above would also be a suitable candidate for "white land" allocation. |                                                                                                                                                                                                                                                                                                                                                                                                        |
| 96/9  | 7   |               | 2.2: "many are now disassociated from the land". Remove "much" from "and much later an 18th century pub."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 97/9  | 7   |               | 2.2.: "The church and 18th century. pub..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 98/9  | 7   |               | 2.2: "far from being in a central location, were peripheral".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 99/9  | 7   |               | 2.3: "in the case of Rudgwick,... (comma)"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 100/9 | 7   |               | 2.3: the word "presenting" doesn't sound right, just "providing"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 224/6 | 7   | Figure 2      | The photograph is of Rudgwick's Conservation Area but there is no text or map outlining what a Conservation Area is or what it includes within the village. The RNDP appears to make little reference to the CA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted. This neighbourhood plan does not seek to duplicate policy or information included in other planning policy documents. Conservation Areas are designated by the District Council in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990 and this is why the plan is relatively silent on the matter. That said, we have included reference to the Conservation Area. |
| 101/9 | 8   |               | 2.6: "and the equally Cox Green..." - just delete "the equally"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 102/9 | 8   |               | 2.8: change to "linear village of Rudgwick"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 103/9 | 8   |               | 2.8: "Bucks Green (still with commercial...)" - do we need the word "still" and should we add "some commercial"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 104/9 | 8   |               | 2.10: does not read right because of only a slight increase in the oldest group so perhaps: "and with a slight increase..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 105/9 | 8   |               | 2.11: wouldn't "influx of immigrants" be just as good as "international migrants"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 225/6 | 8   | Paragraph 2.9 | It would be useful to clarify if the reference to Rudgwick within this paragraph refers to the parish and not just the village of Rudgwick.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - clarified                                                                                                                                                                                                                                                                                                                                                                                      |
| 38/43 | 9   |               | Point 2.22 referring to Downs Link crossing A281 East of village needs urgent attention, due to poor visibility for motorists and pedestrians, cyclists and horse riders. Current road speed sign directly on top of crossing, not only blocking views, but needs to be moved at least 100m East as traffic still doing 60pmh into and out of Rudgwick. Needs flashing crossing light installed.                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text updated.                                                                                                                                                                                                                                                                                                                                                                                  |
| 106/9 | 9   |               | 2.15: no reason for "Village Life" being in caps. Remove.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 107/9 | 9   |               | 2.16: "Rudgwick Primary School". It has not been called Rudgwick CP School for many years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 108/9 | 9   |               | 2.16: "is essential..." (delete "an")                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 109/9 | 9   |               | 2.18: the words "in England" should be moved to "Rikkyo School in England", as the full name of the school                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 110/9 | 9   |               | 2.18: "also follow GCSE..." - "also includes"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 111/9 | 9   |               | 2.19: King George V - why underlined? Same applies to all the underlinings in this paragraph.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 112/9 | 9   |               | 2.19: "tennis courts. The King George V Building provides"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 113/9 | 9   |               | 2.19: if singular, then "is well used", or if plural "playing fields are all..." singular?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 114/9 | 9   |               | 2.19: "Role Play" does not require caps.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 115/9 | 9   |               | 2.19 Parish Hall and Churchman's Meadow- why underlined?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 116/9 | 9   |               | 2.19 "ad hoc games can be played and where there is a children's..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 117/9 | 9   |               | 2.21: "(B2128 -see 2.23) shouldn't this be simply the village of Church Street (B2128)." -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 118/9 | 9   |               | 2.21: "parish which is located..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 119/9 | 9   |               | 2.21: delete the word "safe" pedestrian...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |
| 120/9 | 9   |               | 2.22: suggest reads: "including the Downs Link long-distance footpath which provides..." [that is, delete "Downs Link, The"]<br>"The Downs Link long-distance path bridleway which provides a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                   |

| Ref.  | Pg. | Policy Ref.             | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                   |
|-------|-----|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
|       |     |                         | recreational links between the towns and intervening countryside. The Downs Link..."<br>Additional changes which use the singular. As a linear path with no deviation, it can only provide one sort of link. Using "bridleway" conveys the sense of walking cycling, riding in the word "recreational".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                            |
| 226/6 | 9   | Paragraphs 2.12 onwards | This is a really useful section on infrastructure. However – there is no reference made to any maps that illustrate where these facilities/main roads are located, this will be particularly helpful for those using the plan that may not be familiar with the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted                                                                      |
| 227/6 | 9   | Paragraph 2.15          | It is not very clear what is meant by this paragraph. The words <b>village life</b> do not require capital first letters. What is meant by 'providing support for additional equipment and staff training'? What is the additional equipment? A date for the Ofsted outstanding category should be provided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - changes made                                                       |
| 228/6 | 9   | Paragraph 2.16          | The reference to 'The school has a Pupil Admission Number of 30' may be better referenced by saying the school is one form entry – this may be easier for the reader to understand.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - changes made                                                       |
| 7/24  | 10  |                         | 2.24 - spotted a typo - should be "all".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Thanks                                                                     |
| 24/33 | 10  |                         | Accessibility/Highway network. Page 10. Para No 2.24. Missing reference to shortage of accessible bus stops on south side of A281.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | noted - incorporated into plan.                                            |
| 121/9 | 10  |                         | 2.24: delete "whatsoever"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                       |
| 122/9 | 10  |                         | 2.24: "Saturday service concludes..." [or "Saturday services conclude"]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - text amended                                                       |
| 123/9 | 10  |                         | 2.24: "none at all to..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                       |
| 124/9 | 10  |                         | 2.26: delete "broadly"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - text amended                                                       |
| 125/9 | 10  |                         | 2.27: be good to know what the "pro-active" means/ has produced!<br>This section is something or nothing, adding little of substance. What is its purpose? If the pro-active measures could be spelt out it would add some meat. There is nothing about pollution, a growing concern to us. I think it is something we will wish to use against any development off the A281 in future.<br>Pollution is not currently measured in Bucks Green. We think it should be. RPC, through the plan, should be campaigning for a pollution measuring kit, such as they have in Cowfold and Storrington, which I believe are the nearest places!<br>I wish it were true the only victims are children. Anyone walking along the inadequate footways (narrow, poorly surfaced) is at risk.<br>Needs a re-think about the whole section.<br>Alternatively, delete the paragraph entirely? | Noted - text amended                                                       |
| 229/6 | 10  | Paragraph 2.25          | This needs to make reference to figure 4. Also, reference should be made as to where the source of mapping information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - changes made                                                       |
| 126/9 | 11  |                         | 2.28: explain "Gatwick Diamond Economy"? "GD Business Location" (from website).<br>However, the map shows Rudgwick to be in the fringe area, not outside. "Rudgwick lies on the western fringe of the Gatwick Diamond Business Location" (or GD initiative) is more accurate. [in case of doubt, the map clearly shows Dunsfold Park to be in the defined area as well]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - text amended                                                       |
| 127/9 | 11  |                         | 2.29: "...small traders" – perhaps such as? Pren Plants are the only representative of small businesses mentioned by name. What about Firebird? James Paul? Cnc-It?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                                       |
| 128/9 | 11  |                         | 2.30: "plants the wholesale..." was this meant to say "to the wholesale trade"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - text amended                                                       |
| 129/9 | 11  |                         | 2.33: seems to be a mix here with 2.29 above Some duplication, mixed message in 2 paragraphs. Overall farming/horticulture are given prominence. Whilst we have no issue with that, the secondary and tertiary economy needs emphasising too. A more conventional breakdown would be by sector: One para on closure of brickworks and farming/horticulture Second on manufacturing, e.g Cnc-it, Firebird Third on services, lots of examples, including in Bucks Green and Old Brickworks                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                       |
| 130/9 | 11  |                         | 2.33: "Other enterprise is also flourishing...", change to "Another enterprise which is flourishing..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - text amended                                                       |
| 230/6 | 11  | Paragraph 2.28          | Is there something missing from this paragraph? Should it end with the word economic, or is this a reference to the Local Economic Partnership? Notwithstanding this – is it relevant to include this within the RNDP? If the parish falls outside of the Gatwick Diamond area – perhaps there is no need to make reference to it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - paragraph removed.                                                 |
| 22/31 | 12  |                         | I'd just query the point in 3.8 regarding the provision of single storey accommodation:<br>"elderly downsizers have been able to stay in the village with appropriate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | This is the vision for the future you are referring to. We hope to resolve |

| Ref.  | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response                                                                                                                                                                                                                           |
|-------|-----|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |     |             | home types having been built, especially bungalows." I am struggling to think of any such provision (other than 2 chalet bungalows built at Farnbrakes) - Barleycroft doesn't seem to have included any, so I'm not sure if I've missed something? Certainly talking to older residents during lockdown this is something they still feel they'd like in order to stay in the village.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | the issue you highlight through the plan.                                                                                                                                                                                          |
| 23/32 | 12  |             | The section of the Plan relating to bus services is unhelpful. While, the village is part of Horsham District and improved bus connections there could be seen as a primary requirement, in reality the objective of adequate public transport is most likely to served by an improved connection to Cranleigh. Cranleigh has a very much better bus service than Rudgwick both in terms of frequency and the parts of the day and week that it covers. The extension of this level of service to a terminus at the Fox Inn would greatly improve the village's access to shops, and a major centre and railway station at Guildford. The inclusion of a reference in the Plan to a bus service to Billingshurst Railway Station (para 8.11) is meaningless, and the marginal cost of additional services to Horsham would be prohibitive. This, in particular, will be for ever exacerbated by the ongoing "horror story" concerning the revised road layout at Broadbridge Heath.                                                                                                                                                                         | Noted. Much of this text referred to has been removed from the plan.                                                                                                                                                               |
| 26/34 | 12  |             | Hello, thank you for pulling together such a well considered, detailed, comprehensive plan. I have two comments: 1. Point 3:15 comments that the bus service supports commuting. It does not support commuting to London. There is only one service morning and evening that enables connection to trains in London, and these do not offer the flexibility that supports the needs of someone working in London. That is : MORNING: 6:36 am at the Kings Head, arriving Horsham 7:07am connecting with the 720am train that arrives London Victoria 8:14 am....the next bus is 8:08am, too late to get to London for a 9am start; EVENING: 19:14 from Horsham Station , arriving at the Kings Head at 19:50. This connects with the 18:05 train from London Victoria, that arrives Horsham 18:57. There previous bus service at 17:58 could only be used if leaving London on the 16:35 train. While this offers a workable solution if, for instance, your car was broken down and you needed another option it is not sustainable for regular commuting (especially if trains are delayed or late.                                                       | Noted - section three includes the vision which has now been clarified as several people have misread this section in the Reg.14 plan.                                                                                             |
| 29/35 | 12  |             | P 12 para 3.2. the original paragraph has not being changed, and my original comment still stands. Knapped flint in Churchman's Meadow is definitely not part of the old village character and neither are the three-storey flats at Martletts Court. This is a misleading statement and is to be regretted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted. Section 3 includes the vision for the area looking back from the end of the plan period. This has been redrafted to provide clarity on this point.                                                                          |
| 131/9 | 12  |             | 3.3: "of around 100...", definitely not an abbreviation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text amended                                                                                                                                                                                                               |
| 132/9 | 12  |             | 3.5 "where appropriate" and "should help" doesn't fit with the hopefully achieved vision/objectives. We already have such sites now. "Where appropriate, our currently designated Sites of Nature Conservation Importance will help achieve this."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                               |
| 133/9 | 12  |             | 3.6: what does the term "sites of specific interest" mean? We are concerned that we boast of maintaining levels of biodiversity across the parish, when we patently have not, and nor has anyone else. There is a lot of similar rubbish like this in the new Horsham Plan. We should be more honest, thereby showing we recognise that development, agriculture, traffic, etc is slowly destroying habitats and biodiversity. This then becomes a stronger argument against development in the future. Rudgwick had no control or veto over development prior to writing this plan. What we should be doing is laying claim to the moral high ground in future. "Careful planning has helped to ensure that levels of biodiversity across the parish have been maintained and sites of specific interest have not been threatened." Suggest change to: "HDC Policies restricting development in the countryside have helped to limit damage to ecosystems, habitats and biodiversity in parishes like Rudgwick. In the context of this Plan's policies, we will strive to both limit and enhance biodiversity in our parish." Something along those lines? | This section relates to our vision for the Parish and looks backwards from the end of the plan period. Text amended to read: "Careful planning has ensured that biodiversity across has been greatly enhanced.' to be appropriate. |
| 134/9 | 12  |             | 3.8: first-time (add hyphen)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                                                                                                                                                                                               |
| 135/9 | 12  |             | 3.10: "high-speed" in full                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                                                                                                                                                                                               |
| 136/9 | 12  |             | 3.13: "Village Hall" caps removed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                               |
| 137/9 | 12  |             | 3.14 "station" in twice. Definitely needed once. Please do not use Americanism "train station"!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - text amended                                                                                                                                                                                                               |
| 138/9 | 12  |             | 3.14: Sunday service as well?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Text deleted                                                                                                                                                                                                                       |
| 139/9 | 12  |             | 3.15: We think the ambition is good but what development is likely to provide for cyclists (maybe car parking if we can somehow get the BT site).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                               |

| Ref.  | Pg. | Policy Ref.      | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response                                                                                                                                                  |
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| 231/6 | 12  | Chapter 3 Vision | <p>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. In detail:</p> <ul style="list-style-type: none"> <li>• SNCIs are now referred to as Local Wildlife Sites. In paragraph 3.6 – capitals are not used for SSSI but should be. In paragraph 9.1 it states that Rudgwick has no nature reserves, or other areas of special conservation such as Sites of Nature Conservation Interest. How does this tally with the vision?</li> <li>• It is not possible to guarantee that all new infrastructure will be in place before houses are built (paragraph 3.7). It is recommended that this part of the vision is amended to create a more achievable statement that can then be delivered through objectives and policies.</li> <li>• Paragraphs 3.9 and 3.11 are too detailed for a vision. These may have been issues raised through various consultation exercises and are better placed in Chapter 1 where a summary should be included of the key issues raised during consultation.</li> <li>• Similarly – paragraphs 3.14 and 3.18 are too detailed for a vision.</li> </ul> <p>There is a commitment to protect and enhance the natural environment and heritage. However, there is no mention of how these assets may be utilised in relation to developing a vibrant visitor economy which is crucial for promoting the district offer. How might residents and visitors be encouraged to stay and spend their leisure time in Rudgwick? There is a brief mention of attractions such as the café and micro-brewery, as well as the Canfields Organic Farm and Glamping Site. These are just mentioned in the introductory section. How the visitor economy may be promoted and fostered would be worth including, considering some of the businesses Rudgwick currently has.</p> | Noted - the vision has been simplified in light of these comments and text relocated within the document as appropriate.                                  |
| 30/35 | 13  |                  | Page 13. "3.16 The needs of those with limited mobility have been carefully considered with suitably designed pavements connecting key village facilities." NOT true. In reality the pavements are poorly maintained, much re-patched, in places non-existent, narrow and frequently blocked with overhanging hedges, including, on Wednesdays, wheelie bins that prevented motorised wheelchair access between Foxholes and Jubilee Hall, thus a resident was unable to attend the Book Exchange.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted. Section 3 includes the vision for the area looking back from the end of the plan period. This has been redrafted to provide clarity on this point. |
| 31/35 | 13  |                  | Page 13 "3.18 The access on the East side of Church Street from the Church to the shopping area and schools has been improved." NOT true. As I commented before This is completely untrue. No pavement has been constructed, though the Victorian footpath to the east of Church Hill and made of Horsham stone slabs has recently been restored. It has been mooted in the past to construct a new path to the east side of Church Street. This thankfully has been rejected as unnecessary in a rural community. And such a footpath would conflict with (REF RNDP) Policy Number 14, Local Green Spaces, item 6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted. Section 3 includes the vision for the area looking back from the end of the plan period. This has been redrafted to provide clarity on this point. |
| 32/35 | 13  |                  | Page 13 Para 3.21 pont 2 "...and of the Book Exchange and Games Hub (the latter two predominantly provide services to the more elderly residents)." please add " Book Exchange is a facility for residents of ANY age".<br>Whilst it is true that the Book Exchange provides services to the more elderly residents who appreciate the monthly lunches, it should be made clear that the Book Exchange is a facility for residents of every age who wish to exchange books for free, and which also offers a cafe atmosphere to encourage community spirit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted. Section 3 includes the vision for the area looking back from the end of the plan period. This has been redrafted to provide clarity on this point. |
| 140/9 | 13  |                  | 3.17: and traffic pollution?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Text deleted                                                                                                                                              |
| 141/9 | 13  |                  | 3.18: destroying what in doing so? Change wording to "from the east side"? (i.e. crossing places)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                                                                                                                      |
| 232/6 | 13  | Objectives       | Several of the objectives are not followed through as policies. For example, Objective 3 makes reference to Conservation Areas and yet there is no policy that focusses on the CA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - test added to explain this.                                                                                                                       |
| 233/6 | 13  | Objective 2      | The details of facilities are not required within the objective. The objective should read: 'To promote a balance of social mix and age distributions within the Parish. This includes the sustaining of the Youth Centre, and of the Book Exchange and Games Hub (the latter two predominantly provide services to the more elderly residents)'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted, objectives have been amended in light of your comments.                                                                                            |
| 234/6 | 13  | Objective 3      | "To safeguard conserve and enhance the character and heritage of the Parish regarding design and development in the Conservation Area and the hamlets that make up the Parish," Suggested wording should be more closely aligned to the Listed Buildings and Conservation Areas Act 1990 being to "conserve and enhance" rather than safeguard.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Noted, objectives have been amended in light of your comments.                                                                                            |

| Ref.  | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                      |
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| 235/6 | 13  | Objective 5 | The plan's objectives refer to encouraging and sustaining 'appropriate' businesses within the Parish but does not expand on what would or would not be considered an 'appropriate' business. What is to be considered an appropriate business would benefit from being clarified within the plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted, objectives have been amended in light of your comments.                                                                                                                                                                |
| 34/36 | 14  | RNP1        | RNP1.1 This ought to mention support for Local Plan policies that generally permit development in BUAB, but not outside of it unless specifically site allocated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted. This is supported in RNP1.1                                                                                                                                                                                            |
| 36/38 | 14  | RNP1        | Policy RNP 1.1, 1.2 and 1.3 are very good in their intent and will no doubt be fully supported by the majority of the parish. However, if the boundaries and features described exist, which plainly they do and which most residents could identify, why could they not be indicated on a plan? This would make it plain for anyone considering a potential development where the 'no go' areas were and save a lot of time and effort for everyone involved. A picture saves a thousand words as they say and this seems to be a pretty simple method of conveying an otherwise subjective concept.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - The policy has been updated to address this.                                                                                                                                                                          |
| 49/1  | 14  | RNP1        | The diocese welcomes the deletion of Policy 1 of the earlier draft RNP and supports the Spatial Strategy principles set out in Policy RNP1 of the revised plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted                                                                                                                                                                                                                         |
| 50/1  | 14  |             | The recognition, in paragraph 4.7 of the RNP, that development along the eastern section of Lynwick Street is similarly linear in form to that of the rest of the settlement of Rudgwick, is welcomed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted                                                                                                                                                                                                                         |
| 51/1  | 14  |             | Notwithstanding the decision not to allocate housing sites in this plan, the diocese wishes to reiterate its view that additional low density development of the glebe would contribute to meeting housing needs in a way that is consistent with the principles set out in Policy RNP1.<br><br>It would not result in any coalescence of any of the six identified settlements within the plan area and it would be consistent with the pattern of development as it has evolved in Rudgwick while preserving the character of the area (including preservation of the small woodland strip to the west of the glebe) without incursion into open countryside and within defensible boundaries.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted                                                                                                                                                                                                                         |
| 58/3  | 14  | RNP1        | RNP1 Spatial Strategy<br>2.2.2 Policy RNP1 identifies a proposed spatial strategy for the six settlements which comprise the Parish of Rudgwick. In this respect, Gladman support Policy RNP1.1, which seeks to ensure the neighbourhood plan supports the strategic development needs set out in the adopted Horsham District Planning Framework.<br>2.2.3 RNP1.2 states that development should not result in the further coalescence of the six parish settlements or the diminution of a settlement's identity or built pattern. However, as Section 2 of the RNP describes, the Parish has already experienced significant evolution in development form and pattern over the last 100 years, with a discernible "linear pattern from Tisman's church (St John's) to Cox Green, through Bucks Green and Church Street in Rudgwick". Further change in the settlement pattern is noted after 1945 with the development of new Council and private estates alongside the impact of the physical geography of the Parish, with paragraph 2.8 highlighting that Rudgwick Parish is presently a relatively nucleated but linear village, with loose knit patterns between minor clusters and various roads.<br>2.2.4 In addition to the evolving settlement patterns experienced in Rudgwick Parish, Gladman note that neither the adopted HDPF nor the Council's emerging Local Plan afford any policy protection which reflects the inclusion of RNP1.2 within the Neighbourhood Plan. Indeed, the emerging Horsham Local Plan appears to suggest that it appropriate to allocate further development and expand settlements outside of build-up areas.<br>2.2.5 In this regard, it is unclear what this aspect of the policy is trying to achieve as it is evident that the form and pattern of the settlement(s) has evolved considerably over the last century and does not have a distinct character which has been protected or requires protecting. Furthermore, the RNP evidence base provides no justification for the inclusion of this policy principle. In this regard Gladman suggest that RNP1.2 is deleted. It is clear that further development could be brought forward without resulting in the loss of any perceived or claimed sense of coalescence.<br>2.2.6 As currently drafted, Gladman believe that RNP 1.3 could act as an unnecessary constraint on sustainable development and does not provide sufficient flexibility to ensure the Plan is responsive to changes in circumstances which may occur over the plan period. As discussed previously, significant flexibility is required in the RNP to ensure that the Plan does not conflict with the emerging Horsham Local Plan.<br>2.2.7 Gladman suggest that this aspect of Policy RNP1.3 is deleted, or the wording amended to provide greater flexibility and to reflect the NPPF. | Comments noted. The policy is considered appropriate. The intention is to try and manage development, avoiding natural sprawl as has occurred historically as pointed out. Policy wording updated to provide further clarity. |

| Ref.   | Pg. | Policy Ref.                   | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                      |
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| 142/9  | 14  |                               | 4.2: "Billingshurst parish borders"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted - text amended                                                                                                          |
| 143/9  | 14  |                               | 4.7: The second 4.7 should be 4.8!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                                                                          |
| 268/16 | 14  | RNP1.3<br>Spatial<br>Strategy | This policy is overly proscriptive. It should make allowance for rounding off and infill development around the edges of the settlement. This sort of development will compliment the defensible boundaries and provide for additional windfall housing during the plan period. These are standard planning approaches appearing in the majority of development plans. Include additional policy wording in support of infill and rounding off development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comments noted.                                                                                                               |
| 273/18 | 14  | RNP1                          | Parish Spatial Strategy: Policy RNP1 – Spatial Strategy<br>We support the approach taken in part RNP1.1 of the policy. This ensures a clear framework for proposals to be considered against. We likewise broadly support parts RNP1.2 and RNP1.3 – including the policies supporting text set out in paragraphs 4.1 – 4.7, acknowledging the key characteristics of the Parish's 6 main settlements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Support noted.                                                                                                                |
| 13/26  | 15  |                               | Page 15 Footnote 1 suggest adding Rudgwick as it appears to be the South Downs National Park Housing Needs Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - changed                                                                                                               |
| 59/3   | 15  | RNP2                          | 2.2.8 In principle, Gladman support the general thrust of this policy which seeks to provide a mix of housing types. However, it is currently unclear how the proposed housing mix, which seeks to support a high percentage of 1-3 bedroom homes and minimal provision of 4-5 bed houses, has been derived.<br>2.2.9 The adopted HDPF states in Policy 16 that development should provide a mix of housing sizes to meet the needs of the community as evidenced through the latest Strategic Housing Market Assessment (SHMA). This is supported in Policy 17 of the emerging Local Plan which also adds that other factors may be taken into account such as, "...locally and robustly prepared evidence such as a 'Made' or referendum-stage Neighbourhood Plan or a local (parish) housing needs assessment".<br>2.2.10 In this regard the Parish Council have included significant statistical information in relation to housing matters within the evidence base, including the July 2017 Rudgwick Parish Council Housing Needs Assessment (HNA). Table 8 of this assessment sets out the proportion of homes in Rudgwick by the number of bedrooms, a particularly low number of one and two bedroom properties is depicted.<br>2.2.11 However, there is no analysis of current or projected demand for different sizes of housing other than a brief interview summary held with a local estate agent in which it is stated there may be a shortage of smaller properties which appeal to young families. The HNA was updated in 2019, however this does not include any reference to dwelling sizes. It is not considered that this an appropriate or sufficiently robust evidence base to justify the use of the RNP's prescriptive housing mix targets.<br>2.2.12 Housing mix needs will inevitably change over time. Therefore, it is considered that this policy should seek to secure a greater degree of flexibility going forward to ensure it does not become outdated as new evidence of local need comes to light; this is of particular relevance in Rudgwick and Horsham given the status of the emerging Local Plan.<br>2.2.13 Gladman suggest that this issue is discussed with the Council to ensure that the RNP's policies align with the Council's housing mix and tenure policies, and recommend that prescriptive reference to housing mix figures is deleted to ensure the Plan can respond positively to future changes in housing need circumstances. | Please look at the evidence base which supports the plan in more detail. The justification for the policy is clearly set out. |
| 144/9  | 15  |                               | 5.4: Just to be clear "This plan" replace with "The RNDP therefore..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                                                                                          |
| 145/9  | 15  |                               | 5.7: "occupants" We think occupants' as the possessive                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                                                                                          |
| 266/16 | 15  | 5.2                           | This approach is incorrect. Without allocations the Neighbourhood Plan (NP) fails to help boost the supply of housing and would fail the tests set down within the National Planning Policy Framework.<br>Policy 15 of the Horsham District Framework sets out that to provide future housing there should be "4. The provision of at least 1500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning."<br>The policy states the housing numbers should be allocated in Neighbourhood Plans. It does not state that this is not necessary if planning permissions has been given through appeal, outside of the strategic allocation policies. The numbers arising from such decisions should be considered under any windfall allowance, which is not capped. Paragraph 29 of the National Planning Policy Framework (NPPF) states that, "Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Comments noted. We disagree.                                                                                                  |



| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                               |
|--------|-----|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
|        |     |             | <p>There is also no indication within the NPPF that houses approved under the appeal system alleviates the duty to plan for future generations within the Development Plan system.</p> <p>There is no indication of this type of debate or assessment of numbers remaining from the 1500 within the neighbourhood plan to provide sufficient certainty that it will achieve the purposes set down within the (NPPF).</p> <p>Allocate sustainable housing sites within the settlement of Rudgwick such as:</p> <ul style="list-style-type: none"> <li>• Land Behind Rudgwick Metals – see attached plan Location Plan – LOC.01. This site is sustainably located adjoining an existing residential site and will not extend the boundary of the village beyond its defensible boundaries.</li> <li>• It is available, deliverable and developable.</li> </ul> <p>The NP should also acknowledge that Rudgwick shares a boundary with neighbouring Waverley Borough Council. Development which comes forward adjoining the boundaries should be supported if demonstrated that it is suitably located and can provide housing towards the economic growth of the settlement in a sustainable manner. Sites such as the Land at Windacres Farm (WA/2018/1458) would fall under this category. Additional text showing support for sustainably located development adjoining the boundaries of the settlement within Waverley Borough should be included.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                        |
| 274/18 | 15  | RNP2        | <p>Residential Development: Policy RNP2 – Housing Mix</p> <p>Paragraph 2.2 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.</p> <p>As set out in our representations to the preceding Regulation 14 NP document, we understand and support the approach in not seeking to allocate sites – instead taking up the opportunity presented by Horsham District Council for strategic site allocations to be identified, assessed and allocated through the review of the current Horsham District Planning Framework (HDPF) plan.</p> <p>However, we are concerned by the proposed housing mix presented in the current NP document and the evidence base upon which it has been developed. The process leading to the mix has been explained within the supporting Housing Matters (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</p> <p>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 published a Strategic Housing Market Assessment which recommends the following housing mix:</p> <ul style="list-style-type: none"> <li>• 1-bed properties: 5%</li> <li>• 2-bed properties: 30%</li> <li>• 3-bed properties: 40%</li> <li>• 4+ bed properties: 25%</li> </ul> <p>This shows a significantly higher demand for 3-4 bedroom units that Policy RNP2 in its current form, 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.</p> <p>Therefore, the conflict between the housing mix advocated by Policy RNP2, latest published evidence and the future new local plan and its</p> | Comments noted. We are content that the evidence utilised, and methodology adopted to support policies is appropriate. |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------|-----|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |     |             | <p>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:</p> <p>'Sites delivering 10 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.'</p> <p>This proposed amended wording reflects wording of housing policies in the Storrington, Sullington and Washington Neighbourhood Plan, which was recently 'made' following a successful referendum.</p> <p>In the event the current housing mix and wording of Policy RNP2 is to be retained, we would strongly urge the Parish to consider, and establish robust evidence, of the potential impacts of this mix to the viability of developments coming forward during the plan period. Likewise, to the potential conflicts that compliance with this mix may generate to other policies in this Reg.14 Plan, i.e. density of development, etc.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 25/33  | 16  | RNP3        | Cannot find any specific reference to making the Parish disabled friendly:- well maintained pavements, dropped kerbs, dedicated parking spaces etc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | the plan includes a policy requirement for new dwellings to meet M4(2) of the building regulations. This means that homes are accessible and suitable for a range of users - including some wheelchair users. Also, bungalows are promoted under RNP3 not only for the elderly, but also the disabled. Requirements regarding footpaths, parking spaces etc are dealt with by existing highway standards and requirements.  |
| 43/88  | 16  | RNP3        | Given the emphasis on increasing provision for older residents (RPN3), additional consideration could be given to meet this demographic's needs (section 8), such as improved healthcare, more structured road crossings, wider pavements, etc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted. Unfortunately, the matters you have set out are outside of the scope of this plan.                                                                                                                                                                                                                                                                                                                                   |
| 48/111 | 16  | RNP3        | I feel there should be some provision for sheltered accommodation in the village.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | This is covered in RNP 3, specifically RNP 3.3                                                                                                                                                                                                                                                                                                                                                                              |
| 60/3   | 16  | RNP3        | <p>2.2.14 Gladman support this policy in its endeavour to ensure that the housing needs of all demographics are met in new residential developments.</p> <p>2.2.15 However, whilst the Housing Matters Document within the RNP evidence base states that the Steering Group wish to encourage the provision of bungalows as suitable housing for elderly people, we submit that there is no empirical evidence or justification for RNP3.3. This states that major developments must provide a significant proportion of all new homes as bungalows or 'market based' sheltered housing.</p> <p>2.2.16 Should the Steering Group wish to secure the provision of such accommodation in the parish, we believe that it would more appropriate for the RNP to 'encourage' its delivery as part of an enabling policy framework, rather than seeking to impose unjustified policy requirements.</p> <p>2.2.17 Furthermore, RNP3.4 states that all new homes must achieve M4(2) of the optional requirements in the Building Regulations. Gladman highlight that the Written Ministerial Statement (WMS) 2015 made by Eric Pickles makes clear that optional technical standards relating to construction, internal layout or building performance can only be progressed through a Local Plan, and only then based on evidence of need and viability. The WMS specifically states that these standards should not be progressed through neighbourhood plans. In this regard, this aspect of policy RNP3 should be deleted.</p> | Comments noted. The need for homes suitable for older people is well established through evidence and the need for more bungalows is based on local knowledge and the housing need study. We believe there is evidence to support this requirement. Including a requirement for M4(2) has been accepted in other neighbourhood plans as worded and the Parish Council maintain that this is an appropriate policy response. |
| 81/7   | 16  | RNP3        | <p>Policy RNP3.2</p> <p>Response : The NDP has identified a local need for bungalows and encourages new developments to help meet this need. However, as already identified, there are no supporting policies for smaller windfall developments which could provide housing to meet this need. Therefore, this policy would conflict with RNP1.1 and local planning policy 3 of the HDPF.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - wording amended to address comments.                                                                                                                                                                                                                                                                                                                                                                                |
| 146/9  | 16  |             | 5.11: "However, intermediate" add comma                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                                        |
| 147/9  | 16  |             | 5.11: "even" is not needed before Guildford                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                                        |
| 148/9  | 16  |             | 5.12: Is "Rudgwick Metals site" the best way of describing this? Windacres Farm Lane?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted - text amended                                                                                                                                                                                                                                                                                                                                                                                                        |
| 236/6  | 16  | RNP1        | The intention of Policy RNP1 is clear, as the parish seek to manage development across the settlement of Rudgwick. However, there are parts of the policy which require review to ensure the policy provides                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1.1 Noted however this has been retained for clarity.                                                                                                                                                                                                                                                                                                                                                                       |

| Ref.   | Pg. | Policy Ref.        | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                        |
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|        |     |                    | <p>clear unambiguous guidance to the reader.</p> <p>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</p> <p>RNP1.2 seeks to resist the coalescence of individual settlements, whilst the intention is supported there is little evidence to support the policy. Reference could be made to Policy 27 in the HDPF which also considers this matter. Further evidence to support this policy could be found in the Landscape Character Assessment for Horsham district, which may identify the importance of maintaining the identity of individual settlements.</p> <p>The individual settlements should be referenced in the policy text and shown clearly on the policy map.</p> <p>RNP1.2 is not positively worded, it would be more appropriate for the policy to 'seek to maintain the individual identity of the settlements', rather than using the term 'should not'.</p> <p>RNP1.3 requires review to simplify the policy and make clear the policy intention.</p> <p>The term defensible boundary is open to interpretation (notwithstanding the information inserted regarding natural and manmade boundaries). This means that the policy is not able to provide clear advice to potential applicants. It is recommended that this policy refers to landscape/settlement coalescence/protecting countryside policy advice. Alternatively, policy maps could be provided that show the defensible boundaries referred to in the text of the policy.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>1.2 Noted - policy updated</p> <p>1.3 Noted</p>                                                                                                                                                                                                                                                                                                                                              |
| 237/6  | 16  | Paragraphs 5.1/5.2 | It may be useful to include information on 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text tweaked                                                                                                                                                                                                                                                                                                                                                                            |
| 238/6  | 16  | RNP2               | <p>It is assumed that most development of 10 units and over (reference to major development in the policy) would only be located within the Rudgwick built up area boundary. It is recommended that the policy is amended to refer to the spatial strategy and built up area boundary in addition to the housing mix.</p> <p>The background justification to this policy needs to be very clear as to where this percentage mix has come from (taking into account that the mix has changed from our previous comments provided in Feb 2020) and 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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | We do not believe it is appropriate to assume such things. The policy has been simplified to confirm that it applies to all residential development wherever it is. a table has also been added to provide assistance with interpretation of the policy. Noted re background evidence although this is already set out in the housing matters document. this will be reviewed and made clearer. |
| 275/18 | 16  | RNP3               | <p>Residential Development: Policy RNP3 - Homes for Older People</p> <p>We fully support the Parish's intention to ensure delivery of suitable new homes. We also</p> <p>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.</p> <p>Notwithstanding, there are a number of concerns with Policy RNP3, specifically RNP3.3 and RNP3.4.</p> <p>RNP3.3 states major developments must provide a significant proportion of all new homes as bungalows or 'market based' sheltered housing, or a combination of the two. Our concerns with the policy are:</p> <ul style="list-style-type: none"> <li>· no definition of 'a significant proportion' has been established by the supporting evidence base, within the policies supporting text and specifically the wording of Policy RNP3 itself.</li> <li>· No definition of "market based' sheltered housing' has been established by the supporting evidence base, within the policies supporting text and specifically the wording of Policy RNP3 itself.</li> </ul> <p>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.</p> <p>We are further concerned by the apparent omission of evidence demonstrating understanding of the impacts upon development viability that will be brought about by compliance with the policy. 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 policy is seeking to introduce a requirement not previously tested through the HDPF plan, and its evidence base, this new requirement and its implications should be clearly evidenced by the NP.</p> | Comments noted. Wording has been refined. Viability has been central to the preparation of the plan and great care has been taken to ensure that policy requirements are not onerous.                                                                                                                                                                                                           |

| Ref.  | Pg. | Policy Ref.    | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                              |
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|       |     |                | <p>We also note RNP3.4 requires 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.</p> <p>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.</p> <p>In omission of appropriate evidence to support parts RNP3.3 and RNP3.4 we recommend the policy wording be amended by full deletion of these requirements.</p>                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                       |
| 61/3  | 17  | RNP4           | <p>2.2.18 The above policy sets out the desired tenure split of affordable housing provision within new developments. In this regard, Gladman question whether it is appropriate for the RNP to depart from the tenure requirements applied by Horsham District Council, and whether the Steering Group's evidence base is sufficiently robust to justify this.</p> <p>2.2.19 Gladman recommend that the contents of this policy are discussed with HDC's Housing Enabling Team, to ensure they are reflective of the demands/waiting lists for affordable housing in this part of the district, and the application of the authority's affordable housing policies.</p> <p>2.2.20 It is also important that the RNP's affordable housing policies provide a degree of flexibility, as affordable housing needs may change as new evidence becomes available. This is particularly relevant in the case of Horsham within the context of the Council's emerging Local Plan.</p> <p>2.2.21 This should be acknowledged in RNP4, by stating that "new development will be supported where it delivers opportunities for affordable housing, in accordance with up-to-date evidence of housing needs", in addition to or in place of prescriptive policy targets.</p>                                                                                                                                                                               | Please look at the evidence base which supports the plan in more detail. The justification for the policy is clearly set out.                                                                                                                                                                                                         |
| 62/3  | 17  | RNP5           | <p>2.2.22 It is not in the remit of the neighbourhood plan to determine planning applications as this is the sole responsibility of the local planning authority, Gladman therefore recommend that reference to 'permitted' in the Plan (RNP5.2) is deleted or amended to state '...will be supported'.</p> <p>2.2.23 It is also noted that the version of this policy in the previous Regulation 14 RNP included reference to a maximum net density limit. While this has been removed, the supporting text for RNP5 and RNP5.2 still seeks to maintain the existing development densities.</p> <p>2.2.24 Gladman contend that any reference to a maximum net density limits or attempts to impose these should be removed from the RNP so as to not prejudice the master planning process, allowing flexibility and to ensure development potential of sites is optimised in accordance with national policy. In this respect, Gladman welcome the revised wording of RNP5.2, which recognises that it is more appropriate to determine density on a case-by-case basis, taking account of a site's character and its surroundings.</p> <p>2.2.25 In addition, Gladman suggest that applying strict density requirements beyond what Horsham District Council set is likely to prevent affordable housing delivery on the basis of viability and therefore the Council will be unable to achieve the affordable tenure objectives of RNP4.</p> | Comments noted. The plan has been prepared with a keen eye on viability implications to ensure that no issue arises. The policy has now been updated to potentially allow flexibility when the housing mix policy is being met.                                                                                                       |
| 149/9 | 17  |                | 5.16 "(DpH)" and "5 DpH and 15 DpH"?? [Both caps and not caps are used in a quick google search!]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                                                                                                                                                                                                                                                                                                  |
| 150/9 | 17  | RNP5           | RNP5.1: I just wonder if there is a preference in legal English for "more than two", or "three or more"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text amended                                                                                                                                                                                                                                                                                                                  |
| 151/9 | 17  | RNP5           | RNP 5.2: "AND" should be "and"; comma instead of full stop                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted - text amended                                                                                                                                                                                                                                                                                                                  |
| 239/6 | 17  | RNP3           | <p>It is recommended that the wording within the policy includes 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. Should this policy only apply to major developments? Should this policy refer to RNDP2 as some 4 or 5 bedroom bungalows will be out of the financial reach of many looking to downsize.</p> <p>Policy RNP3.2 should be reviewed, in particular reference to 'strongly' should be removed as this is unnecessary</p> <p>Policy RNP3.4 is seeking to achieve the optional aspect of building control measures. Is there evidence to support this policy requirement?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | In this instance, given the shortage of bungalows locally and the local need, it is considered appropriate to require that bungalows are not lost as a result of development. We do not believe there is a need to cross-refer as policy requirements should all be read together. other comments noted and addressed in the document |
| 241/6 | 17  | Paragraph 5.10 | Some of the comments made in February 2020 are set out below as these comments are still relevant:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text updates as considered appropriate.                                                                                                                                                                                                                                                                                       |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                             |
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|        |     |             | <p><i>It may be more appropriate to consider a policy approach which encourages development to be complimentary / in keeping or respect existing design, layout, and density. As stated previously, it may be more appropriate for this type of policy approach to be included in a more comprehensive design policy. It is recommended Policy 33 of the HDPF is reviewed to consider whether this policy is necessary.</i></p> <p>It remains that this policy would still benefit from further consideration in light of the Feb 2020 comments and those below.</p> <p>The policy should focus more on local character of the surrounding area akin to a development principles policy. 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' within RNP5.2 means, this requires revision to provide a clear and unambiguous guidance to the reader. Policies map refers to village centre but no mention of the policies map is made within policy text.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                      |
| 269/16 | 17  | RNP5.1      | <p>The policy states that, "All proposals incorporating more than two new dwellings should demonstrate how the scheme reflects the surrounding built density of the relevant settlement."</p> <p>This is not good planning and could lead to unnecessarily low development density and wastage of sustainably located land. There is nothing in the NPPF which states that land built at a low density should provide the model for future development. In fact, it states at Paragraph 127(c) NPPF (2019) that planning decisions should ensure that developments:</p> <p>"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);"</p> <p>The paragraph mentions that the Steering Group has undertaken an assessment of density within the Parish and has established that it only occasionally exceeds 20dph. This is a useful piece of research and therefore should be made available and included within the document. That said, there are clearly areas with a higher density and if appropriate to the location higher density should not be resisted. As a policy tool this is too blunt to allow for suitable analysis.</p> <p>This policy should be deleted.</p> <p>The documents demonstrating the basis for the statement of 20dph across the parish should be referenced within the NP and made available to aid in understanding the Forum's position on future development.</p>                                                                                                                                                                                                                | <p>This policy has been reviewed in light of this and other comments. A key characteristic of the Parish is its rural and relatively low-density development. That said, flexibility has now been incorporated to allow higher density in particular situations.</p> |
| 276/18 | 17  | RNP4        | <p>Residential Development: Policy RNP4 – Affordable Housing</p> <p>We have no objection to the policy per se. However, as the policy aligns to the strategic affordable housing policy set by the HDPF (and the emerging Local Plan Review) the Parish may wish to consider the need to duplicate this within the non-strategic policies of the NP.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Noted. The policy is based on locally specific evidence.</p>                                                                                                                                                                                                      |
| 277/18 | 17  | RNP5        | <p>Residential Development: Policy RNP5 - Housing Density</p> <p>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 as between 5 - 15 dpha and only occasionally exceeding 20dpha), unless providing sheltered accommodation, retirement housing, or flats AND being within Rudgwick's Village Centre, Policy RNP5 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:</p> <p>'...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);'</p> <p>*emphasis added</p> <p>A recent audit of design in England, backed by the Campaign to Protect Rural England<sup>3</sup> 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.</p> <p>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</p> | <p>Comments noted. The relevant policy has been updated to reflect this and other comments.</p>                                                                                                                                                                      |

| Ref.  | Pg. | Policy Ref.      | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|       |     |                  | <p>fixed through a detailed Development Plan Policy.</p> <p>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.</p> <p>Suggested amendments to the wording for Policy RNP5 would be:</p> <p>The density of new housing developments should:</p> <ol style="list-style-type: none"> <li>1) Be informed by the character, form, and layout of the local area,</li> <li>2) Provide an appropriate mix of housing, and</li> <li>3) Reflect the importance of making effective use of land.</li> </ol> <p>These suggested policy wordings reflect principles of achieving appropriate density referenced in the NPPF and the Government's National Design Guide.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 240/6 | 18  | RNP4             | <p>Policy RNP 4 seeks to control the tenure of affordable housing, whilst there is reference in supporting text to support this, further evidence should be provided as the proposals are in direct conflict with the emerging Horsham District Local Plan Policy 16, which is a strategic policy of the Local Plan. Whilst this plan carries limited weight currently it clearly sets out the direction of travel for affordable housing in the District. Given there is such a different approach proposed here, it would be helpful to expand upon the 'detailed analysis' described in paragraph 5.13.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Further evidence is set out in the supporting 'Housing Matters' document. We do not consider this to be in direct conflict with local planning policy.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 242/6 | 18  | Chapter 6 Design | <p>It might need clarification as to how the design guide is part of the adopted Development Plan. Is it one of the evidence documents supporting the RNDP? Should it be afforded more weight than an evidence document. As HDC previously commented in February 2020, consideration should be given to the preparation of a design code, as this is a significant aspect of the RNP. Should reference be made to the Squires Planning May 2020 document – 'Review of Rudgwick Parish Design Statement and Conformity with current National and Local Planning Policy and Guidance'? So that is clear to the reader that the Parish Design Statement has been reviewed and is compliant with current National Policy. The justification for the design policies needs to be more detailed to provide an adequate context for the policies, notwithstanding the comments made by HDC in February 2020 on the previous Reg 14 version of the RNDP – which were that consideration is given to preparing a design code or updating the Rudgwick Parish Design Statement – see below:</p> <p><i>'As there is an existing Parish Design Statement Rudgwick Parish Council may consider it appropriate to progress a Design Code or Design guide as part of their Neighbourhood Plan. There is funding available to support the preparation of design codes should this be of interest. Any future design code could incorporate relevant parts of the existing Parish Design Statement, and add more significant weight to these matters in the determination of planning applications' (extract from Feb 2020 comments). Has this comment been considered?</i></p> <p>There appears to be no reference made to Conservation Areas.</p> <p>Much of the text relating to the history of the Parish and the policies on design are similar to those in the Rudgwick Parish Design Statement, there is quite considerable detail on the history of the parish. However, there is no specific policy on heritage (referring to listed buildings, their setting and the Rudgwick Conservation Area). Also noted there are no suggestions for a local list of non-designated heritage assets which would present an opportunity to bring forward buildings/structures that are important to the community. The historic growth of the area is referred to in the history of the parish but there is a limited description of what they consider the character of the settlements to be, therefore the design policies are fairly generic.</p> | <p>The Steering Group have considered whether to progress design codes or design guides for the area in the plan. Unfortunately given time constraints there was not time to incorporate these and submit a plan under the HDPF. Instead the approach adopted is to bring key elements of the design guide into planning policy alongside the Parish Design Statement which will remain a Supplementary Planning Document in the Development Plan.</p> <p>Comments noted regarding 'generic' content. Policy relating to the Conservation Area and Listed Buildings is included in the HDPF and national policy. We see no need to duplicate this content in this document.</p> |
| 243/6 | 18  | Paragraph 6.2    | <p>This is confusing and makes no reference to materials. It is acknowledged it has been taken directly from the design guide but it provides little information to support a planning policy in a neighbourhood plan. Further details should be provided to justify the policy approach.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Noted - paragraph rewritten</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 244/6 | 18  | RNP6             | <p>Recommended amendment to RNP6.1a) – 'Barn style cladding or clapboard as an alternative to tile hanging is not out of place in Rudgwick is an acceptable alternative to tile hanging within Rudgwick village'.</p> <p>Recommended amendment to RNP6.1b) – 'New or reclaimed brickwork should match existing frontages which is typically darker than standard bricks. RNP6.2 requires the limited use of timber framing, yet there is no evidence or justification for this policy approach, further justification should be included or the policy deleted.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>Noted - document updated</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |



| Ref.  | Pg. | Policy Ref.   | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                          |
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| 64/3  | 19  | RNP8          | <p>2.2.28 It is not in the remit of the neighbourhood plan to determine planning applications as this is the sole responsibility of the local planning authority. We therefore recommend that reference to 'permitted' in this policy is deleted or amended to state '...will not be supported'.</p> <p>2.2.29 Gladman is also concerned that the requirements of this policy are inconsistent and ambiguous. In this respect, the preceding text to the policy states "Development above two-storey in height will not be permitted unless...", before criterion c) states "...the development will be in-keeping with immediately adjacent properties and be no higher than three storeys".</p> <p>2.2.30 On the one hand the policy appears to oppose development that is more than two storeys high, before identifying specific circumstances in which it would appear to be allowed. We would suggest that the wording of criterion c) could be used as the basis for the whole policy, if the policy remains in the plan.</p> <p>2.2.31 It is important that policies within the RNP are aligned and consistent with the design and build principles set out in the adopted Horsham District Planning Framework. Policy 33 of the HDPF states; "...3. Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;</p> <p>4. Are locally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments..."</p> <p>2.2.32 The emerging Local Plan also sets similar principles in Strategic Policy 33 Development Quality.</p> <p>2.2.33 As currently drafted, Gladman consider that RNP8 is too prescriptive, and fails to allow flexibility in building design and qualities which can respond to the character and needs of the local area. Gladman suggest that this policy is amended to align with the strategic policies of Horsham or deleted in its entirety.</p> | This policy has been reworded in light of this comment and other comments received to provide clarity over what new development is expected to comply with. Maintaining lower development height is considered vital to maintain the rural character of the area. |
| 74/5  | 19  | RNP7          | <p>With regard to Plan Policy RNP7: Whilst the concept of pastiche development may be frowned on, generally because of the poor quality of execution in many cases, the literal meaning of pastiche (to design with borrowed idioms) is what is required in the second sentence of this policy, which therefore contradicts itself. Much of British historic architecture, at least since the 17th century, has relied on pastiche to create new styles that, nevertheless, borrow from the past (be it past classical, vernacular or gothic styles). Where development consists of the extension of historic property, it may be appropriate to borrow the characteristics of the existing structure to ensure the new creates an harmonious addition as suggested in the second part of the policy. As such we feel it may help to rephrase the first part of the policy to be more directive than restrictive. For e.g.</p> <p>"T</p> <p>a) Rooflines with hipped, half hipped with gablets and cat-slides.</p> <p>b) Chimneys as centrally located ridge stacks and end of gable stacks.</p> <p>c) Sash windows</p> <p>d) Timber fielded panel or more simple plank doors</p> <p>"However, proposals that apply such details as a poorly integrated part of the overall design, will not be considered to have achieved a high quality of design and, therefore, will not be supported"</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted with thanks. Comments incorporated.                                                                                                                                                                                                                         |
| 152/9 | 19  |               | 6.6: "Martlets Court" should be Martlet Court; also delete "The". This error occurs twice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text amended                                                                                                                                                                                                                                              |
| 153/9 | 19  |               | 6.6: Village no cap; pharmacy no cap; hairdresser no cap.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                                                                                                                                                                                                                              |
| 154/9 | 19  | RNP8          | RNP 8.1: AND again. If it is felt appropriate to use this word, then punctuation should be a comma. If emphasis is required use underlining.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - text amended                                                                                                                                                                                                                                              |
| 245/6 | 19  | RNP7          | Recommended amendment to RNP7.1 – 'Development proposals <del>must</del> <u>should</u> not be a pastiche of the surrounding historic built environment. Instead, new structures should incorporate traditional building features commonly found across the parish which may include....' The term 'which may include' does not provide certainty to the reader in terms of what features should be included, is this list of features all that a developer should consider, are there other architectural features which should be included?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - wording amended.                                                                                                                                                                                                                                          |
| 246/6 | 19  | Paragraph 6.6 | Recommended amendment – 'Rudgwick currently has very limited development of height greater than two-storey. The only current examples are The Martlets Court and flats in The Sidings. These properties are located at the very heart of Rudgwick Village, within 50m of the shops; part of the Martlets is above two of the retail units                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - wording amended.                                                                                                                                                                                                                                          |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Response                                                                                                                                                             |
|--------|-----|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |     |             | (Pharmacy & Hairdresser). Nowhere else in Rudgwick exceeds a two-storey height.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                      |
| 247/6  | 19  | RNP8        | <p>Comments made at the Reg 14 stage in February 2020 (previous policy 3) with regard to 'clear local need' are set out below:</p> <p><i>'This statement is open to interpretation and does not provide the decision maker with clear and precise criteria to ensure consistent decisions. For example, a developer may be able to demonstrate a clear local need (using housing need evidence from a wider geographical area to demonstrate a clear local need). This would then justify going above 2 storeys although that may not be appropriate.'</i></p> <p>Comments made at the Reg 14 stage in February 2020 (previous policy 3) with regard to 'three storeys' are set out below:</p> <p><i>'Policy clause 4 applies a limit of three storeys. If a developer were able to demonstrate a clear local need and that a development was in-keeping with immediate adjacent properties could this allow a development beyond three storeys, including possible development in the roof space. As this element of the policy is open to interpretation it is recommended that the policy is redrafted.'</i></p> <p>In both cases, it is not considered the Policy RNP8 has taken on board these comments sufficiently and the recommendation to re-draft remains.</p> <p>In addition –</p> <p>Recommended amendment to RNP8.1 – 'Development above two-storey in height will <u>generally</u> not be permitted unless....'</p> <p>Reference is required as to where the boundary of the village centre is – include text regarding policies map.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - this policy has been reviewed in light of the comments received to reference the village centre and provide clearer guidance on what may be acceptable.      |
| 278/18 | 19  | RNP8        | <p>Residential Development: Policy RNP8 – Development Height</p> <p>We broadly support the policy's intention. However, as written it is overly prescriptive limiting all development beyond Rudgwick Village Centre no higher than 2 storeys.</p> <p>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:</p> <ul style="list-style-type: none"> <li>a) Development should function well and add to the overall quality of the area...</li> <li>b) Development is visually attractive as a result of good architecture, layout and appropriate and effective landscaping</li> <li>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)</li> <li>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</li> <li>e) Optimise the potential of the site to accommodate and sustain an appropriate amount of development and support local facilities and transport networks</li> <li>f) Create places that are safe, inclusive and accessible and which promote health and well-being.</li> </ul> <p>To afford more flexibility in achieving well-designed places, we would advocate the policy being amended to:</p> <p>Development above two storey in height will be permitted where they:</p> <ul style="list-style-type: none"> <li>a) Provide an appropriate relationship with existing built development in the local area,</li> <li>b) Are informed by the character and topography of the site, and</li> <li>c) Help establish a distinct character to the development, including by providing variation in form and establishing focal points.</li> </ul> | Comments noted. The SG are seeking to preserve our rural character which is considered to be predominantly a two-storey environment.                                 |
| 12/26  | 20  |             | <p>I would like to congratulate the Steering Group on the RDNP and hope that the following corrections and comments are helpful:</p> <p>4.7 should be "identity" not identify</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Comments noted with thanks. Typo corrected.                                                                                                                          |
| 65/3   | 20  | RNP9        | <p>2.2.34 Similarly, to RNP6, 7 and 8, RNP 9 is overly prescriptive in relation to street scene design principles and does not allow for flexibility in order for schemes to respond to site specific circumstances and the character of the local area. As discussed previously, there should not be a 'one size fits all' solution and sites should be considered on an individual basis.</p> <p>2.2.35 Additionally, Gladman again highlight the use of 'permitted' and remind the Qualifying Body that it is not the responsibility of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Comments noted. We consider that the design policies provide sufficient flexibility to enable site specific design to take place that responds to the local context. |

| Ref.  | Pg. | Policy Ref.   | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                         |
|-------|-----|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
|       |     |               | Neighbourhood Plan to determine planning applications and recommend that this aspect of the policy wording is amended or deleted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                  |
| 155/9 | 20  |               | 6.7: "built-up" (hyphen), "contribution to the..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                             |
| 156/9 | 20  |               | 6.7: the phrase "street scene" needs a qualifier, such as "attractive street scene", "rural street scene", or whatever was in your mind when you wrote this. The sentence is not in the Design Statement. Looking back at that document I think we were trying to avoid suburbanised street scenes, so rural might be the better adjective                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Noted - text amended                                             |
| 157/9 | 20  |               | 6.8: the street scene                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - text amended                                             |
| 158/9 | 20  | RNP9          | RNP 9.3: replace full stops after each with a comma; do the "OR"s need to be in caps? No! see our comments on "and" above                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text amended                                             |
| 159/9 | 20  | RNP9          | RNP 9.5: "and are in keeping with..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - text amended                                             |
| 160/9 | 20  | RNP9          | RNP 9.5: I have doubts about the requirement here as it is dictated by WSCC Highways who demand a certain splay etc. This plan is for big developments as well as small, where those stipulations apply most strongly. Unfortunately, they probably will be "out of scale". The Design Statement was much more nuanced on this and other matters to do with street scene and did not attempt to intrude much on highway matters. In Policy 25, it referred to property entrances, not highway entrances. This needs a re-think.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted- text amended to relate to vehicular or pedestrian access' |
| 161/9 | 20  | RNP9          | RNP 9.6: the use of the word "permitted" begs the question, by whom? RPC do not have this power!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted                                                            |
| 248/6 | 20  | Paragraph 6.7 | This section on the street scene could usefully include more supporting evidence some of which is included within the design guide 2009 and include photographs etc. As it stands – it has very little information to justify the policy (RNP9).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted                                                            |
| 249/6 | 20  | RNP9          | It is recommended that the policy is amended as set out below:<br><br>It is not clear what is meant by RNP9.1 – 'New buildings should respect existing building lines and common distances from the road in that particular street'. Please re-phrase this policy to provide clear and precise guidance for the reader.<br><br>RNP9.2 also requires re-wording – does this refer to off road parking areas only? Is it for new development or existing development?<br><br>RNP9.2 c) 'careful planting to disguise the area' Suggested wording: <u>'suitable or integrated landscape proposals to soften the appearance of the area, including tree planting where in keeping'</u> .<br><br>RNP9.2 – include the following:<br>d) <u>The use of rainwater gardens</u><br><br>RNP9.4 suggested wording: 'Panels or close boarded fences, although acceptable for boundaries with neighbours are not suitable for frontage boundaries <u>or other boundaries facing the public highway</u> '.<br><br>Other comments on the policy include:<br><br>RNP9.3 - further justification is needed to support this part of the policy. Further thought is required as to whether it is necessary to include these issues within planning policies in a NP even though they are referenced within the design guide. Does the RNDP require a standalone policy on the street scene? | Noted. Policy updated to reflect comments.                       |
| 66/3  | 21  | RNP11         | it is not in the remit of the neighbourhood plan to determine planning applications; Gladman recommend that reference to 'permitted' in the Plan is deleted or amended to state '...will be supported'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | noted                                                            |
| 162/9 | 21  |               | 7.1: "2011 census:" (not ;) Remove space                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                             |
| 163/9 | 21  |               | 7.1: approx. 100 (remove extra space)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted - text amended                                             |
| 164/9 | 21  |               | 7.1: "Parish" only needs to be used once. I suggest removing the first (and its cap!). Write approx. as full word. All these unnecessary caps!! Remove in households, businesses, parish boundary, company listings, please.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                             |
| 165/9 | 21  |               | 7.2: the address is The Old Brickworks. If you use Parish Employment Areas in Policy RNP 10.1, should you not replace "main business areas" in 7.2 with "Parish Employment Areas" (caps allowed)?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted - text amended                                             |
| 166/9 | 21  | RNP10         | RNP 10.1: AND again!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text amended                                             |
| 167/9 | 21  |               | 7.3: "moving forward, new..." What is wrong with "in the future"? Moving forward is unwarranted office jargon, not appropriate for a semi-legal document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text amended                                             |
| 168/9 | 21  |               | 7.3: It is not only how much of our entertainment is provided to our homes but also how businesses communicate, operate, bank and allow                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - text amended                                             |

| Ref.  | Pg. | Policy Ref.               | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                               |
|-------|-----|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
|       |     |                           | us to shop.<br>This sentence muddles personal and business, so could read as follows:<br>"...how businesses communicate and operate, and how householders bank and shop."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                        |
| 169/9 | 21  |                           | 7.4: "across Rudgwick" and "working in Rudgwick" reads better than "across the parish" or "in the parish".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted - text amended                                   |
| 170/9 | 21  | RNP10                     | RNP 10.3: should this mention listed buildings and Conservation Area?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | noted - incorporated into plan.                        |
| 171/9 | 21  | RNP11                     | RNP 11.1: and countryside?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | noted, policy updated in light of other comments.      |
| 250/6 | 21  | Chapter 7 – Local Economy | General Comments on the Local Economy chapter include:<br><br>There is no mention of preventing the loss of commercial floor space. The shortage of commercial space in the District poses a threat to the local economy, therefore resistance to proposals that lead to a loss is important. Reference is made to resisting the loss of employment opportunities and supporting 'improved' and additional floor space. 'Improved' would also benefit from mentioning 'high quality' as a standard, considering that much of the District's employment accommodation is outdated. Poor quality accommodation poses a threat to the local economy and attracting inward investment.<br><br>Accessibility issues are addressed from a residential and community perspective, which does address the barrier to economic growth that transport issues pose. These factors must also be considered when it comes to accessibility to employment floor space and business parks, both current and additional, which will be important for attracting inward investment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - policy has been revised.                       |
| 251/6 | 21  | RNP10                     | Is it considered appropriate to safeguard existing employment sites or to retain them as employment areas? If so – this is not made clear within the policy. What are the Parish Employment Areas, as designated on the policies map and referenced within the policy? Are these the areas to safeguard?<br><br>It is not clear what 'will not introduce, increase, or intensify uses that are incongruous with the environs' means (RNP10.1 b). This needs further justification in support for the policy. Which environs is it referring to? Surrounding businesses or residential areas? What does incongruous mean in this context?<br><br>RNP10.2 'Development proposals which would result in a reduction of local employment opportunities will be resisted'. Does this refer to loss of employment land/floor space? This may need to be made clear. Will all loss of employment land be resisted even where there is no likelihood of the employment use continuing? The loss of employment land would need to propose some degree of marketing to ensure the buildings are no longer a likelihood of employment use, this would allow an applicant to demonstrate that the loss of employment space was appropriate and necessary.<br><br>RNP10.3 - it is not considered this part of the policy can be enforced. It is assumed that any applicant will state that a proposed extension is required in order to allow the occupier to work from home. How can this be proven? It is assumed that the development would also need to comply with all the design policies within the RNDP. It is important to note that some businesses, when operated from a residential home, will require planning approval for the change of use. | Noted. Policy and supporting text updated accordingly. |
| 252/6 | 21  | RNP11                     | As currently drafted this policy only requires an applicant to avoid an unacceptable impact on residential amenity. Given the objectives of the RNP should this policy also seek to conserve , conservation areas, open countryside and important biodiversity locally?<br><br>RNP 11.1 suggested wording added: 'Proposals for the provision of telecommunication infrastructure, whether that be for fibre broadband or the mobile phone network, will be approved where they do not have an unacceptable impact on residential amenity, <u>important wildlife or biodiversity, conservation area or result in the felling of existing trees</u> '.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - policy updated.                                |
| 172/9 | 22  |                           | 8.1: Include gas and electricity supply                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - text amended                                   |
| 173/9 | 22  |                           | 8.4 "ends early evening, thus" (better than the blunt 1900 - depends where you get on/off!)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text amended                                   |
| 174/9 | 22  |                           | 8.2: "plan, either" "or by other legislation"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                   |
| 175/9 | 22  |                           | 8.5: railway station, not train station                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - text amended                                   |
| 176/9 | 22  |                           | 8.5: Cranleigh and Billingshurst are equidistant. Maybe say "...to Rudgwick in Horsham District"?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Noted - text amended                                   |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Response                                                                                                                                                        |
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| 177/9  | 22  |             | 8.5: Christ's Hospital station is used by several Rudgwick residents. Should be included.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text amended                                                                                                                                            |
| 178/9  | 22  |             | 8.6 "movements throughout the parish."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                                                                                                                            |
| 264/14 | 22  |             | <p>We consider that Neighbourhood Plan should include a policy relating to wastewater/sewerage infrastructure.</p> <p>Rudgwick drains to the Southern Water catchment for treatment. Wastewater/sewerage [and water supply] infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment [and water supply] infrastructure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...."</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in wastewater [and water supply] demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater [and water supply] infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling. From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.</p> <p>The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us.</p> | Comments noted. Whilst we appreciate the point being made, we consider this a matter that the local planning authority should address through their local plan. |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                        |
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|        |     |             | <p>The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:<br/> <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p> <p>In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage [and water supply] infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:</p> <p><b>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT</b><br/>         "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."</p> <p>"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."</p> |                                                                                                                                                                 |
| 265/14 | 22  |             | <p>Comments in relation to Flood Risk and SUDS</p> <p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development.</p> <p>Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Comments noted. Whilst we appreciate the point being made, we consider this a matter that the local planning authority should address through their local plan. |



| Ref.  | Pg. | Policy Ref.    | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                  |
|-------|-----|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |     |                | water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.<br>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan:<br>"Surface water drainage - It is the responsibility of a developer to follow the sequential approach to the disposal of surface waters with proper provision for surface water draining to ground, water course or surface water sewers being given. The discharging of surface waters to the foul sewer can be a major contributor to sewer flooding and should therefore be avoided."<br>We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries. |                                                                                                                                                                                                                                                                                                                                                           |
| 4/24  | 23  |                | 2.24, 8.5 & 8.11 Limited bus routes to Horsham and none at all to Billingshurst. With the community links to The Weald school in Billingshurst there should be easy access for the younger generation to be able to visit friends in Billingshurst and for all to have easy access to train stations and hospitals.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted. Text updated.                                                                                                                                                                                                                                                                                                                                      |
| 6/24  | 23  |                | 8.10 - Parking outside the Coop can be very dangerous as people park on blind corner of Thurne Way and reverse out into Church Street. Many 'near' misses have been witnessed with cars parked in Thurne Way while other cars try to enter and leave Thurne Way.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted. Unfortunately, the plan has limited ability to rectify existing issues which reside with the highways authority to resolve. Your comments have been passed on to the Parish Council.                                                                                                                                                               |
| 11/25 | 23  | RNP4           | 2. Affordable housing (5.10-5.14). Talks about 'affordable' housing but what about 'social' housing? Affordable housing based on market rates is likely to be unaffordable for anyone in this area unless they are a high earner.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted. Affordable housing includes social housing. The plan relies on evidence regarding the type of affordable housing provided.                                                                                                                                                                                                                         |
| 27/34 | 23  |                | Point 8:15 uses the acronym MUGA that is not defined. It would be useful to include this in the acronyms and define it in text (I'm assuming its a multi use games area).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Noted - plan updated.                                                                                                                                                                                                                                                                                                                                     |
| 33/35 | 23  | RNP12          | Page 23. RNP 12 ACCESSIBILITY. RNP 12.2 and 12.3. The only possibility of developing extra footpaths and cycle routes would be on the east side of the village through the Church Street Conservation Area Wide Verge which is protected under RNP 16.1 (e) . Thus policy number 12.3 and 12.3 are conflict with policy 16.1. It would also wipe out the ancient Victorian Horsham stone footpath. Extreme vigilance needs to be maintained in opposing any such idea.<br>Street Lighting Levels were mentioned in the earlier draft but do not appear in the second draft of the Plan. The rural nature of the village is frequently emphasised in the pre-submission document and rightfully so. The street lighting levels are set at rural village levels and they should be maintained at that level.                                             | Comments noted. There are multiple options and ways to demonstrate safe passage around the village of Rudgwick without using motorised vehicles. Concerns noted regarding the Victorian footpath and this policy would not, we believe, have any impact on this.<br>Lighting is considered in RNP9. Specific reference to street lighting added to RNP9.6 |
| 41/69 | 23  |                | The focus on safe crossing for our children is vital. We are concerned about the sports proposals at Penthorpe as we would be directly affected by floodlights if they were agreed to.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | noted                                                                                                                                                                                                                                                                                                                                                     |
| 67/3  | 23  | RNP12          | 2.2.37 Whilst acknowledging the intentions of this policy, we suggest that RNP12.1 is inconsistent with the requirements of national planning policy and sets an unrealistically high bar for accessibility.<br>2.2.38 In this respect the NPPF advises that "opportunities" to promote walking, cycling and public transport should be considered when assessing development proposals and for the purposes of plan-making, and that the ability to maximise sustainable transport solutions will vary from urban to rural areas.<br>2.2.39 We therefore suggest that this aspect of the policy is amended to state "all major residential development proposals must demonstrate how they have explored the opportunities to utilise non-motorised methods of transport to access the following important local facilities:..."                      | A sustainable rural settlement should be able to facilitate unmotorised transport to important local facilities. We do not consider the policy requirements to be unreasonable.                                                                                                                                                                           |
| 179/9 | 23  |                | 8.9: Downs Link, which... (comma)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                                                                                                                                                                                                                                                                                                      |
| 180/9 | 23  | RNP12          | RNP 12.1: church and chapel? Would not wish to offend.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - text amended                                                                                                                                                                                                                                                                                                                                      |
| 181/9 | 23  |                | 8.9 and 8.12: some duplication here re off-road cycling, and some confusion re Downs Link, which is off-road, so we do have some!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted - text amended                                                                                                                                                                                                                                                                                                                                      |
| 182/9 | 23  |                | Figure 12: should say pavements or footways, not "footpaths"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                                                                                                                                                      |
| 253/6 | 23  | Paragraph 8.10 | Typo: 'An additional car park <u>car</u> park serving the shops and school will be required to fulfil future needs'                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted- updated                                                                                                                                                                                                                                                                                                                                            |
| 254/6 | 23  | RNP12          | Comments made at the earlier Reg 14 stage include:<br><br><i>'These ambitions would be better presented as a community aim and set out in an appendix or clearly distinguishable from other policy. It may be appropriate for the RNDP to include an infrastructure delivery plan, which sets out specific infrastructure requirements to be delivered using Community Infrastructure Levy</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                         | We disagree. The policy does not contain ambitions, it contains policy requirements that new development is to achieve. The policy has been amended in light of the comments received, in particular to confirm that it relates to new development within/adjacent to the main                                                                            |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                    |
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|        |     |             | <p>It is considered that this concern remains – that Policy RNP12 seeks to try and deliver matters that are not achievable land use policies and therefore not appropriate for a Neighbourhood Plan.</p> <p>Comments on the policy as drafted are:</p> <p>RNP12.1 – it is not clear how this part of the policy can be delivered or enforced? It is relevant for the entire parish?</p> <p>RNP12.2 – this refers to linkages as outlined in RNP12.1 yet subsection 12.1 makes no reference to linkages. In addition, new development is unable to just provide new routes to existing facilities. Is the policy trying to say that each and every major development has to provide new links to all 8 of the facilities identified in the policy? This is not deliverable nor appropriate and it is recommended it is deleted.</p> <p>The facilities are shown on the policies map but the map is not referenced within the policy.</p>                                                                                                                                                                                                                                                                                                                                                                 | <p>settlement. The plan is seeking to secure sustainable development, in this context ensuring new residents are able to walk or cycle safely to important local facilities is a necessity.</p>                                                                                                                                                                             |
| 279/18 | 23  | RNP12       | <p>Infrastructure: Policy RNP12 - Accessibility</p> <p>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.:</p> <p>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...</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>We consider that the ability to travel within the village of Rudgwick and Bucks Green without using a motor vehicle is an important element. No change proposed.</p>                                                                                                                                                                                                     |
| 68/3   | 24  | RNP15       | <p>2.2.40 This policy as worded is more restrictive than national guidance in relation to parking standards contained within the NPPF, which aims to promote sustainable modes of transport.</p> <p>2.2.41 Paragraph 106 of the NPPF states: "Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport..."</p> <p>2.2.42 Gladman do not consider it is appropriate for the neighbourhood plan to preclude on-street parking to access allotment sites. Whilst we recognise the intentions of this policy and the potential benefits that specific parking facilities would offer, we recommend that the requirements of this policy are discussed with the local highway authority.</p> <p>2.2.43 In this regard, Gladman recommend that the Parish Council remove reference to parking standards within this policy. There is also an opportunity within this policy to promote non-car modes of travel, including public transport and pedestrian links, similar to the wording contained within RNP12.3.</p> | <p>Noted. We do not consider the proposal to be unreasonable or in conflict with the NPPF.</p>                                                                                                                                                                                                                                                                              |
| 183/9  | 24  | RNP13       | RNP 13.2b: delete "across the public highway" (redundant)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - text amended                                                                                                                                                                                                                                                                                                                                                        |
| 184/9  | 24  |             | 8.14: Moreover, they... (comma)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text amended                                                                                                                                                                                                                                                                                                                                                        |
| 185/9  | 24  |             | 8.15: an alternative for "super"? "would be very beneficial to have". Please also remove the word "Plus" as it adds nothing! Ditto the words "actually", and "in the village of Rudgwick". Where else would a home match be played? Whole sentence needs re-writing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text amended                                                                                                                                                                                                                                                                                                                                                        |
| 186/9  | 24  |             | 8.16: Surely the netball team's record is totally irrelevant to this document, particularly to this paragraph?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                                                                        |
| 187/9  | 24  |             | 8.16: "90 hours", not "90hrs"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                                                                                                                                                                        |
| 188/9  | 24  |             | 8.17: A "Scout movement" is not a recreational facility! Scout hut? But not vibrant! Thinking what you might have omitted in this section, should there be a mention of the King George Building, and its utility to sport and recreation?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Noted - text amended                                                                                                                                                                                                                                                                                                                                                        |
| 255/6  | 24  | RNP13       | <p>This policy seeks to deliver new non-motorised routes, or improvement to existing routes. It is our experience that this policy approach is often more appropriate set out as a community aim.</p> <p>Specific matters regarding policy wording include:</p> <p>RNP13.1 are the important facilities the ones referenced above in policy RNP12? It is not clear which facilities the policy is referring to.</p> <p>RNP 13.2</p> <p>a) 'they will not have a significant impact on residential amenity and landscape <u>character</u>'</p> <p>c) 'route is secured in perpetuity and <u>adopted as part of the rights of way network</u>'</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>Comments noted and policy tweaked. This policy is intended to provide policy support for new routes which would require planning permission. Including such support as an aim would in essence remove it from the development plan and policy consideration, considerably weakening it in the planning balance. We consider it is correct to include this as policy.</p> |

| Ref.   | Pg. | Policy Ref.   | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Response                                                                                                                                                                                                                                                                                                              |
|--------|-----|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 256/6  | 24  | RNP14         | <p>In line with our representations made in Feb 2020, it is recommended that this policy also includes reference to development that results in the loss of a sport, recreation or play facility.</p> <p>RNP14.1 – it is recommended that reference is also made to the impact on open countryside, design and character of existing settlements etc – in line with other policies in the RNDP.</p> <p>RNP14.2 states – ‘It is accepted that some harm to the landscape will be inevitable as a result of sports and recreational facilities’ why is this? And why is it included within the policy wording? This should be in the supporting text and then the policy should set out provisions that will conserve the landscape and/or enhance the surrounding landscape</p> <p>RNP 14.2 – Delete: ‘It is accepted that some harm to the landscape will be inevitable as a result of sports and recreational facilities, but proposals should include detailed landscaping proposals to mitigate this harm so far as possible’. Suggest: <u>Proposals for Sports and Recreation facilities should include a landscape and visual appraisal and accompanying landscape proposals to mitigate any possible harm to local landscape character</u>.</p> | Comments noted. The community are happy to support new facilities and accept that provision of such facilities may result in some harm. That said we have amended the policy. It is not a neighbourhood plans place to require the provision of a document - this can only be done by HDC and their validations list. |
| 257/6  | 24  | RNP15         | If this is an important matter locally should the RNDP consider the allocation of land for the purposes of an allotment? RNP15.1 – ‘A proposal for a new allotment site will be supported <del>so long as provided that</del> Include a specific requirement for any provision of allotments to be serviced appropriately                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - policy wording updated                                                                                                                                                                                                                                                                                        |
| 280/18 | 24  | RNP14         | Infrastructure: Policy RNP14 – Sports Facilities<br>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 Larger developments in particular have the potential to provide both on-site open space for leisure and recreation purposes, alongside developer contributions to off-site provision. We would be happy to discuss with the Parish Council the potential for the land near the Junction of Lynwick Street & Guildford Road to appropriately contribute to the provision and enhancement of the Village's sports and recreation facilities.                                                                                                                                                                                         | Noted                                                                                                                                                                                                                                                                                                                 |
| 189/9  | 25  |               | 9 Green Infrastructure<br>'Infrastructure' is the wrong term to use here, surely. Use Open Spaces or Green Space as heading? See 9.3 below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 190/9  | 25  |               | 9.1: "open space" repeated, so change to "those in the control..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 191/9  | 25  |               | 9.1: I think you meant SSSIs, not SNCIs (Sites of Special Scientific Importance), which are a national designation, which we do not have.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 192/9  | 25  |               | 9.2: "2013. Its purpose..." Full stop.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 193/9  | 25  |               | 9.2: "on" is not needed – "deliver its aspirations" is fine.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 194/9  | 25  |               | 9.3: So, this is where "Green Infrastructure" comes from! If HDC use it perhaps we should? I googled it, and I found it originates in an EU body, The European Environment Agency. 'A strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services in both rural and urban settings.'<br>Given that, perhaps it should stay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 195/9  | 25  |               | 9.4: "Spaces are afforded"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 196/9  | 25  | RNP16         | RNP 16.1e – "Historical" not "history"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Noted - text amended                                                                                                                                                                                                                                                                                                  |
| 258/6  | 25  | Paragraph 9.2 | Reference should be made to any updated or revision documents to the adopted Green Space Strategy 2013 – 2023.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted - updated                                                                                                                                                                                                                                                                                                       |
| 259/6  | 25  | Paragraph 9.6 | Reference is made to consultants. It is assumed that their recommendation is endorsed by the Parish Council? It would be useful to include this if it is necessary to make mention at all.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted                                                                                                                                                                                                                                                                                                                 |
| 5/26   | 26  |               | Fig. 9 a picture of Churchmans Meadow with the new play area would have been nice                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                       |
| 17/26  | 26  |               | 8.6 further development to the east and west of Rudgwick will result in additional traffic movements on the A281 and modifications to junctions may be needed to facilitate access                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted.                                                                                                                                                                                                                                                                                                                |
| 69/3   | 26  | RNP17         | 2.2.44 Gladman supports RNP17.1 which encourages the enhancement of Rudgwick's Green Infrastructure, in line with national guidance.<br>2.2.45 Whilst it is often possible to mitigate the loss of trees with new or enhanced tree planting, Gladman consider that as currently worded RNP17.2 is more restrictive than guidance set out in the NPPF and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Comments noted. This policy has been reworded in light of this and other comments.                                                                                                                                                                                                                                    |

| Ref.   | Pg. | Policy Ref.   | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                |
|--------|-----|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |     |               | Planning Practice Guidance. This may therefore prevent sustainable development opportunities from coming forward.<br>2.2.46 In this respect, although strict restrictions are afforded to irreplaceable habitats such as ancient woodland and veteran trees in paragraph 175 of the NPPF, there is no guidance that states that developments must not result in the net loss of trees. The neighbourhood plan should recognise that the loss of trees can sometimes be preferable in the interests of good arboriculture practices, and that it is desirable to retain some categories of trees more than others.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                         |
| 197/9  | 26  |               | Figure 13: "part of building now leased"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - text amended                                                                                                                                    |
| 198/9  | 26  |               | 9.8: "that our trees", not "out", and "but preferably increased" (add "but")                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - text amended                                                                                                                                    |
| 199/9  | 26  | RNP17         | 9.7/8: Have you considered whether hedgerows should be included here? If there is no mention of hedges, it rather gives carte blanche to remove them, including the mature trees they may contain. Be careful! One possibility might be to say, 9.7, "Trees and hedges...", and 9.8, "trees and hedges...".<br>RNP 17.2, "where there is no net loss of trees, including those in hedges..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted. This policy has been reworded to include reference to hedging and provide clearer guidance on the need for new trees as part of any development. |
| 260/6  | 26  | Paragraph 9.8 | Typo: 'In positively planning for new development we want to ensure that <del>out</del> <u>our</u> trees remain unaffected...'                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted -corrected with thanks.                                                                                                                           |
| 261/6  | 26  | RNP17         | This policy requires further consideration following the comments set out below<br><br><ul style="list-style-type: none"> <li>• The statement - 'unless unavoidable' requires clarification. Tree loss is usually avoidable and this is a matter the LPA would be considering as part of any application as part of its statutory function. By including it within a policy, it provides an 'easy get out clause' for an applicant to simply say the loss of a tree was unavoidable.</li> <li>• 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.</li> <li>• Stating that replacement trees on site for where 'dead, dying and dangerous' trees have been removed is not reasonable in a policy, as any tree that fits this description would be classified as category 'U' within BS 5837 'Trees in relation to design, demolition, and construction - Recommendations' (2012). This is not material to the planning process.</li> <li>• Further consideration should be given to referencing 'native' trees within the policy. The number of true native species (about 6) are insufficient for most schemes. It is recommended this is either removed from the policy or further details are given to ensure it is clear what is meant by native.</li> <li>• It is recommended the reference to 'suitably mature' is deleted as it is difficult to quantify and no relevant to be included within a policy.</li> </ul> <p>RNP17.1 states that development that enhances Rudgwick's Green Infrastructure will be positively supported. It is recommended that the term 'green infrastructure' is defined or explained within the supporting text or within the glossary.</p> <p>It is recommended that comments made in Feb 2020 are considered. It is acknowledged that some of the recommended changes have been taken into account but not all.</p> <p>In order to satisfy this policy, planning applications for development that result in the loss of a tree should be accompanied by a tree report undertaken by a qualified person. It should also be stated that this policy is in addition to the protection afforded to trees covered by a TPO and/or within a Conservation Area.</p> | Policy has been revised in light of this and other comments.                                                                                            |
| 270/16 | 26  | RNP17.2       | This policy is overly proscriptive and does not allow professional judgment to take place. It is also vague and difficult to comply with e.g. trees that are "suitably mature" is not a recognised standard. Delete policy RNP17.2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted. This policy has been reviewed and reworded.                                                                                                      |
| 15/26  | 27  |               | 6.5 no need for "from" before henceforth                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - changed                                                                                                                                         |
| 16/26  | 27  |               | 6.7 needs "to" before the character                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | noted                                                                                                                                                   |
| 200/9  | 27  |               | 10.1: "Rudgwick Parish Council" Put the "g" back in Rudwick!                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted - text amended                                                                                                                                    |
| 201/9  | 28  |               | Policy map: the hall is Rudgwick Hall, not Parish Hall. "Kinnd George's Field" interesting spelling! Chapel (if added in RNP12).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted- amended.                                                                                                                                         |
| 262/6  | 28  | Policies Map  | The village centre is shown on the policies map. The key to this refers to policies RNP5 and RNP9. Policy RNP5 makes no reference to the policies map within the policy text. Policy RNP9 makes no reference to a village centre or the policies map within the text.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted. Updated.                                                                                                                                         |
| 18/26  | 31  |               | 10.1 the Design Statement was prepared by the Parish Design Statement Steering Group and not the Parish Council                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted- changed                                                                                                                                          |

| Ref.  | Pg.     | Policy Ref.        | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                      |
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| 10/25 | 37      | RNP16              | 1. Local Green Spaces (9.6) and Green Space Assessment: The tract of grass/trees between Pathfield Road and Queen Elizabeth Road has not been assessed as a possible designated green space. To my mind, it fulfils all the criteria. It is very much seen as a community asset by the surrounding housing and a haven for wildlife. (I'd love the grass cutters to just come once a year in Sept so it becomes a permanent meadow).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted. Unfortunately, the assessment work was prepared by an external party and there is not time to add this space to the assessment. Its suggestion has however been noted and will be considered in any future review of the plan.                         |
| 1/21  | 17 & 19 | RNP5 & RNP8        | Strongly object to permitting higher densities and higher than 2 storey buildings in village centre. Either allow for all the parish or not at all. Therefore delete village centre references for RNP5.2 and RNP8.1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted. Unfortunately, such a such a position would not be in compliance with national or local policy and therefore such a requirement cannot be included. We believe that the village centre is potentially a location for modest and in keeping development |
| 63/   | 18 & 19 | RNP6 & RNP7        | 2.2.26 These policies set out a number of prescriptive design requirements to ensure developments reflect the local character and style of Rudgwick. While the Government has shown support for good design principles, Gladman would note that the Framework also states: "To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place and should allow a suitable degree of variety where this would be justified."4<br>2.2.27 Gladman recognise the importance of achieving high quality design, however, in accordance with the requirements of the NPPF, design and material policies should not be overly prescriptive and require some flexibility in order for schemes to respond to site specifics and the character of the local area. In summary, there should not be a 'one size fits all' solution to design and sites should be considered on a site by site basis with consideration given to various design principles. | Noted. We consider the policies relating to design to comply with the NPPF.                                                                                                                                                                                   |
| 82/7  | 18 & 19 | RNP6 & RNP7 & RNP8 | RNP6.1/RNP6.2, RNP7 and RNP8<br>Response : Planning design policies should not be overly prescriptive to ensure design innovation is not stifled. The policies proposed are overly restrictive and are in conflict with the objectives of chapter 12 of the NPPF and emerging design policy of the HDLP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted - the policies are not overly prescriptive. They are designed to deliver beautiful and in keeping development.                                                                                                                                          |
| 5/24  | 23 & 24 | RNP12 & RNP13      | 8.9 & 8.12 - there are no dedicated cycle paths, making it difficult for people to safely go from the village centre to the King George V field.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted. The plan includes policy support for the provision of new non-vehicular routes.                                                                                                                                                                        |
| 28/35 | 9 & 12  |                    | Page 9. para 2.19 The King George V playing field. the 'smaller playing field' in bullet point 4 should be clearly be noted as part of The King George V playing field.<br>ditto bullet point 3. "The village halls in Bucks Green and Church Street (Jubilee Hall) are used extensively and are well maintained." NOT true. Jubilee Hall lean-to kitchen in a poor state and needs restoration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted - text updated. Also, the comment in 3.13 about both village halls being well-maintained is the future vision. This will be made clearer as others have been confused.                                                                                  |
| 19/27 | n/a     |                    | Please do NOT agree to potential development West Side of Church Street behind the old stores. This area is like a green lung and should be preserved at all costs.<br>Development on the old pig farm on the A281 on the other hand is sensible. It has direct access to the 281.<br>Development within the village will cause even more traffic and dangerous speeding which is a very great issue. Spoiling the village centre which is becoming too busy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted - the Rudgwick Neighbourhood Plan does not propose to allocate any land for development.                                                                                                                                                                |
| 20/30 | n/a     | RNP2 & RNP3        | I would like to ensure that any further development suits the needs of accessibility to encourage older people to stay in the village whilst also providing accommodation affordable for younger people. Traffic continues to increase particularly articulated lorries .Should a weight limit be reconsidered ?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted. The plan includes policy to deliver homes suitable for older people and those just starting out. Unfortunately, weight limits on roads fall outside of the neighbourhood plan.                                                                         |
| 21/30 | n/a     | RNP5 & RNP6        | I also think further development s should be sympathetic to surrounding properties, particularly as Rudgwick has a wealth of listed properties. Access into Church Street from the latest housing development has already increased traffic so careful consideration needs to be given to traffic calming measures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted. Careful consideration has been given to design policies. Traffic concerns are noted.                                                                                                                                                                   |
| 52/2  | n/a     |                    | Comments in relation to site CFS 1 Off Church Street behind existing properties.<br>§ The site is available and deliverable.<br>§ The site adjoins the settlement boundary of Rudgwick and Bucks Green, which is classified as a medium village, having a moderate level of services and facilities. The area has a good bus service linking the village to Horsham and Guildford.<br>§ The site has no specific environmental designations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comments noted. However, the Rudgwick Neighbourhood Plan is not allocating any sites for development. Site allocations in the parish will be dealt with by Horsham District Council.                                                                          |

| Ref.  | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                  |
|-------|-----|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |     |             | <p>§ The site doesn't contain or isn't adjacent to any listed buildings, ancient monuments or archaeological sites. It doesn't lie within or adjoin a conservation area. There would be no impact on Listed Buildings.</p> <p>§ There would be a 15m buffer to ensure that there would be no impact on the Ancient Woodland (Greathouse Hanger).</p> <p>§ The site has no issues with surface water drainage. A Sustainable Drainage Systems could discharge to the ditch running along the northern boundary.</p> <p>§ There are no covenants or legal restrictions on the land, which preclude development.</p> <p>§ The site is not contaminated and there is no potential for contamination from a previous or nearby use.</p> <p>§ There are four landowners, who have all agreed to make the site available for development. They have instructed an agent/promoter to act on their behalf.</p> <p>§ The site can be safely accessed by pedestrians and by vehicles, via Rosemary. Satisfactory sight lines/visibility splay are available without the need to secure third party land.</p> <p>§ The site could provide much needed affordable housing and improved transport links</p> <p>§ A significant proportion of the trees are in a dead dying or dangerous condition (as defined by British Standards) and should/will be removed.</p> <p>§ There are no public rights of way such as footpaths and bridleways, which cross the site or run adjacent to it.</p> <p>§ The site slopes from east to west but wouldn't have any implications for development.</p> |                                                                                                                                                                                                                                                                                           |
| 75/5  |     |             | We would also question whether the housing pictured at Figure 10. has managed to achieve the high standard of design, or in fact represents the sort of unconvincing use of pastiche that the steering group are trying to avoid? A clearer caption could help to avoid the illustration creating confusion within the document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                           |
| 2/22  |     |             | I am unable to locate details of a housing development which I understand has been proposed in fields behind my house. My neighbour says it is on your site but I have looked a number of times. Can you help?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The Rudgwick Neighbourhood Plan does not propose to allocate any land for development - we suggest that you contact Horsham District Council regarding this.                                                                                                                              |
| 3/23  |     |             | Rudgwick has undergone a considerable amount of new development in recent years in and around its centre. It is concerning that there is a suggestion of further development within the village. This would lead to even more traffic on Church Street with the building work and following that with more residents. If more development is absolutely necessary, the site on the A281 would be far more suitable and far less impact on the village.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The Rudgwick Neighbourhood Plan does not propose to allocate any land for development. It should be noted however that a neighbourhood plan is used to guide development and determine planning applications, as a result wording is geared towards new development that may be proposed. |
| 8/24  |     |             | Just wondered what is happening to the pig farm that was on the A281? Often seen rats running around. Is this land to be considered for any thing?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The plan includes no specific provisions for this site.                                                                                                                                                                                                                                   |
| 9/24  |     |             | <p>Narrow bridge on Church Street causes a few issues. Cars coming up the hill assume they have right of way even when they are not close, but then speed up to stop traffic coming through. This causes many confrontations. It is their right of way, but it needs to be considered reasonably within the speed limit (should be 30mph). Maybe more signs or other controls to be considered.</p> <p>Not sure if this is what you are after as feedback, but hope it helps!</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted. Unfortunately, the plan has limited ability to rectify existing issues which reside with the highways authority to resolve. Your comments have been passed on to the Parish Council.                                                                                               |
| 35/37 |     |             | THIS PLAN HAS BEEN EXCEPTIONALLY WELL THOUGHT OUT TAKING INTO CONSIDERATION THE FEEDBACK OF RESIDENTS OVER MANY YEARS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted, thank you.                                                                                                                                                                                                                                                                         |
| 37/39 |     |             | Very sensible plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted, thank you.                                                                                                                                                                                                                                                                         |
| 39/54 |     |             | The plan represents accurately the views of the community and should, if adopted, allow our village to develop in the way most of us want to see whilst acknowledging our responsibilities as a community to accept change.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted, thank you.                                                                                                                                                                                                                                                                         |
| 40/60 |     |             | I have watched the Berkeley Homes development take place next to my house and, no doubt eventually they will build units next to Rudgwick Metals. I approve of the addition of the shared and rental homes, but at the same time the owner of the land has been told to pull down the overlarge barn he had built and quit the container in which he has been living. Then the decision was suddenly reversed, and he was allowed to keep the barn and remain in his container because of COVID. I would suggest that further development on his land should not be allowed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | noted                                                                                                                                                                                                                                                                                     |
| 42/71 |     |             | Urgently required, hope it can be implemented quickly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted, thank you.                                                                                                                                                                                                                                                                         |
| 44/93 |     |             | I fully support this plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted, thank you.                                                                                                                                                                                                                                                                         |



| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response          |
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| 45/94  |     |             | I fully support this plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted, thank you. |
| 46/103 |     |             | The plan represents accurately the views of the community and should, if adopted, allow our village to develop in the way most of us want to see whilst acknowledging our responsibilities as a community to accept change.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted, thank you. |
| 47/108 |     |             | I am very happy with the plan and its contents. thank you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted, thank you. |
| 53/3   |     |             | <p>i. This report provides Gladman's representations in response to the second draft version of the Rudgwick Neighbourhood Plan (RNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>ii. Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs and recognise the role of neighbourhood planning as a tool for local people to help shape such development in their community.</p> <p>iii. Gladman are promoting land in the Rudgwick Neighbourhood Plan Area at Guildford Road, Rudgwick. The site is capable of accommodating a number of dwellings and could make a significant contribution to the housing needs of the area including through the provision of 35% affordable housing. Further details of this site are provided in Section 3 of these submissions.</p> <p>iv. Through these representations, Gladman provides an analysis of the RNP and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the RNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG1.</p>                                                                                                                                                                                                     | Noted             |
| 54/3   |     |             | Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the Rudgwick Neighbourhood Plan (RNP) must meet are as follows (where applicable): (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order, (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order, (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order, (d) The making of the order contributes to the achievement of sustainable development, (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area), (f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and (g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).                                                                                                                                                                                                                                                                                                              | Noted             |
| 55/    |     |             | <p>1.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.</p> <p>1.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed housing needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>1.2.3 The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence of housing needs in order to assist Horsham District Council in delivering sustainable development, thus meeting the neighbourhood plan basic conditions (basic condition (d)).</p> <p>1.2.4 The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> | Noted             |

| Ref. | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                  |
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|      |     |             | <p>1.2.5 Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>1.2.6 Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                           |
| 56/3 |     |             | <p>1.3.1 Following the impact of COVID-19, new legislation was introduced through the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020. This legislation came into force on 7 April 2020.</p> <p>1.3.2 In the Planning Practice Guidance, the Government explains how the legislation impacts upon Neighbourhood Plans:<br/>         "What changes have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic?<br/>         The government has been clear that all members of society are required to adhere to guidance to help combat the spread of coronavirus (COVID-19). The guidance has implications for neighbourhood planning including: the referendum process; decision-making; oral representations for examinations; and public consultation. This planning guidance supersedes any relevant aspects of current guidance on neighbourhood planning, including in paragraphs 007, 056, 057, 061 and 081 until further notice.<br/>         Referendums: All neighbourhood planning referendums that have been recently cancelled, or are scheduled to take place, between 16 March 2020 and 5 May 2021 are postponed in line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020 until 6 May 2021".2</p> <p>...</p> <p>1.3.3 A referendum for the Rudgwick Neighbourhood Plan therefore will not be able to happen until at least 6 May 2021 in accordance with the legislation.</p> <p>1.3.4 This will be more than five years after the Horsham District Planning Framework (HDPF) was adopted, and at a time when the Horsham District Council are in the process of reviewing the housing requirements and planning policies for the wider district.</p> <p>1.3.5 There is strong likelihood that the District Council's housing needs in particular will be revised upwards before the RNP plan can proceed. The inevitable consequence is that the neighbourhood plan's policies may become 'out-of-date' shortly after or before they can come into effect, unless they are reviewed or are sufficiently flexible to take the emerging Local Plan's policies into account.</p> | Noted                                                                                                                                                                                                                                                                     |
| 57/3 |     |             | <p>2.1 Relationship to the Local Plan</p> <p>2.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.</p> <p>2.1.2 Rudgwick falls within the administrative boundary of Horsham District Council and therefore the RNP will be tested against the Horsham District Planning Framework (HDPF), adopted in November 2015. The HDPF provides the vision, objectives, and spatial strategy for the district over the period 2011-2031.</p> <p>2.1.3 The housing requirement set out in the strategic housing policy requires the Council to deliver at least 16,000 dwellings over the plan period. This figure is reliant on the delivery of large strategic sites, 750 windfall units and neighbourhood plans allocating sites for a combined total of 1,500 dwellings. This policy does not set specific targets for neighbourhood areas and as such to meet the requirements of the Framework the plan should not seek to constrain potential sustainable development opportunities from coming forward.</p> <p>2.1.4 Rudgwick is identified as a 'medium village' within the adopted settlement hierarchy for the district. Medium Villages are considered to have a moderate level of services, facilities, and community networks with some access to public transport.</p> <p>2.1.5 Horsham District Council is currently in the process of undertaking a review of the HDPF which will guide development between 2018 and 2036. The recently closed Regulation 18 consultation identified significantly greater housing needs than the HDPF is currently planning for. Using the standard methodology, it is anticipated that HDC will need to plan for 17,370 new homes between 2019 and 2036, before even</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted. The Steering Group are mindful of the emerging local plan and implications of COVID-19. The plan will be prepared in accordance with the adopted development plan primarily as legislation requires, but in complete awareness of emerging policies and proposals. |

| Ref. | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                             |
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|      |     |             | <p>considering any unmet needs from neighbouring Crawley and wider unmet needs from the Coastal Sussex area.</p> <p>2.1.6 It is clear that the current approach to the spatial distribution of housing within neighbourhood plan areas (including the amount of housing expected to be delivered by neighbourhood plans) is no longer fit for purpose and not in line with the requirements of the NPPF (2019). Instead, the Council will now need to allocate an individual number to designated neighbourhood plan areas in order to help to meet the housing numbers arising from the Standard Method.</p> <p>2.1.7 In this regard, it is clear that the RNP will need to provide a degree of flexibility to ensure that it is effective for the duration of the plan period and not ultimately superseded under the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004. As discussed previously, Neighbourhood Plan referendums have been postponed until at least 6 May 2021 and it is important consideration is given to how the emerging Horsham Local Plan progresses in this time to ensure the Neighbourhood Plan does not risk becoming out-of-date even before it has reached referendum.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                      |
| 70/3 |     |             | <p>3.1 Land to the south of Guildford Road, Rudgwick</p> <p>3.1.1 Gladman are promoting land in the Rudgwick Neighbourhood Plan Area at Guildford Road, Rudgwick, as shown on the Location Plan attached at Appendix 1 of this submission.</p> <p>3.1.2 Land at Guildford Road, Rudgwick would represent a logical location for further residential development. There are no technical or environmental constraints that would preclude the site's delivery or prevent a sustainable residential proposal from coming forward in this location:</p> <ul style="list-style-type: none"> <li>• The site is sustainably located adjacent to the existing edge of Rudgwick, and benefits from good access to the settlement's existing range of services and facilities by walking and cycling. These include Rudgwick Primary School, Co-op and Post Office, Village Hall and Sports and Community Centre.</li> <li>• The nearest bus stops are located immediately adjacent to the sites' northern boundary at the junction of Guildford Road, and provide regular services to destinations including Horsham town centre and train station (direct route via the 63 bus service), and Guildford.</li> <li>• The site could be safely accessed from a new vehicular access point from Guildford Road, with an additional pedestrian connection provided to west of the site's northern boundary to enhance accessibility for pedestrians. This could be supplemented by off-site improvements to the existing pedestrian crossing points at the Guildford Road/Church Road, and upgrades to the existing bus stops on Guildford Road, to further encourage the uptake of sustainable modes of travel.</li> <li>• The site is enclosed by a strong framework of tree and hedgerow planting, helping to assimilate any future development into its landscape setting and providing the site with a limited visual envelope. All existing tree and hedgerow planting would be retained wherever possible and enhanced with new green infrastructure. This would also help to secure net biodiversity gains.</li> <li>• The development of the site would not have detrimental effect on any perceived or claimed sense of coalescence. For the reasons explained in Section 2 above, Gladman believe that references to coalescence in the RNP are unfounded and should be removed from the document. The development of the site would be no different to the allocation that has been proposed to the north of Guildford Road in Horsham's emerging Local Plan (Site reference SA574).</li> <li>• There are no infrastructure constraints that would preclude the site's delivery, whilst proportionate developer contributions would be provided to address any infrastructure deficiencies directly arising from the site's development.</li> </ul> <p>3.1.3 Gladman would be eager to discuss with the Parish Council how delivery of the site can make an important contribution to the supply of market and affordable homes in the parish of Rudgwick in a sustainable location, at an appropriate scale.</p> <p>3.1.4 Land at Guildford Road represents a deliverable location for further residential development, as it is available now, suitable, and achievable.</p> | Comments noted. However, the Rudgwick Neighbourhood Plan is not allocating any sites for development. Site allocations in the parish will be dealt with by Horsham District Council. |
| 71/3 |     |             | <p>4.1 Conclusion</p> <p>4.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community.</p> <p>4.1.2 It is clear from national guidance that the RNP must be consistent with national planning policy and needs to take account of up-to-date evidence. If the Plan is found not to meet the Basic Conditions at Examination, then the Plan will be unable to progress to referendum.</p> <p>4.1.3 Gladman has sought to clarify the relation of the Rudgwick Neighbourhood Plan as currently proposed with the requirements of national planning policy and the strategic policies for the wider area and</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Noted                                                                                                                                                                                |

| Ref. | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                     |
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|      |     |             | <p>has recommended changes to wording and/or deletion of policies to meet with these.</p> <p>4.1.4 Included within our submission is the identified land south of Guildford Road which is a sustainable location for new development. Gladman would be eager to discuss the opportunity this site represents for the Rudgwick Neighbourhood Plan in delivering the housing needs of the Parish, led by the Parish Council.</p> <p>4.1.5 We hope you have found these representations helpful and constructive. If you have any questions do not hesitate to contact the Gladman team.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                              |
| 72/4 |     |             | <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We note that the Housing Needs Assessment update of Spring 2019 identified a revised housing requirement of 31-41 new homes in the Rudgwick Neighbourhood Plan area to 2031. The Rudgwick Neighbourhood Plan does not allocate any housing development sites because this has been delegated to Horsham District Council as part of the emerging Horsham District Local Plan review to 2036. The Draft Horsham District Plan 2019-2036 identifies potential development in addition to any Made Neighbourhood Plan in Rudgwick Parish for 50 dwellings at the Land to the West of Church Street and Land north of Guildford Road sites.</p> <p>The Regulation 18 consultation Draft Horsham District Local Plan 2019-2036 document gives a range of housing targets for the District, all of which exceed the current target of 800 homes per year, ranging from 1000 to 1400 homes per year. Therefore the level of housing required to be delivered through Neighbourhood Plans across the District could increase from the current requirement.</p> <p>Highways England is working with Horsham District Council to agree the transport modelling and assessment of the development proposals within the emerging Horsham District Local Plan review to 2036. We wish to ensure the impacts on the SRN of future development in the emerging Local Plan to 2036, and associated Neighbourhood Plans, are assessed and mitigated appropriately.</p> <p>Any development that comes forward in Rudgwick parish would potentially add to the cumulative impacts of the development within the Local Plan across the District upon the SRN. Consequently, there may be a need for developments across the whole District, including within Rudgwick parish, to make a proportional contribution towards the SRN improvements required to deliver the full quantum of development in Horsham District. This approach has been adopted by other local authorities in the southeast region. In order to manage expectations, we recommend that developers are made aware of this potential contribution requirement towards cumulative impacts upon the SRN for sites that may not have a serious impact upon the SRN if considered in isolation.</p> <p>We recommend that the Neighbourhood Plan includes a requirement for any housing development proposal to provide a Transport Assessment/Statement and a note that a proportionate contribution towards SRN improvements may be required to deliver all the development in the Horsham Local Plan due to the cumulative impacts of individual developments.</p> | Noted. The neighbourhood plan is unable to require specific documentations to accompany a planning application. This can only be done by HDC in their local validation list. |
| 73/5 |     |             | <p>Thank you for consulting Historic England on the pre-submission version of the Rudgwick Neighbourhood. Historic England's remit is for the historic environment, including advising on policies to promote the conservation and enjoyment of heritage assets and to champion good design in historic places. As such our review of the plan is limited to those areas that fall within our areas of interest. Silence on other matters should not be taken as agreement.</p> <p>In general we feel that the plan's policies fall outside our remit and that, as such we do not need to comment on them.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted                                                                                                                                                                        |
| 76/5 |     |             | <p>We have no further comments to make on the plan and wish the steering group well in taking the plan to the next stage of consultation.</p> <p>Nevertheless should you wish to discuss are comments with us we would be pleased to be contacted.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted.                                                                                                                                                                       |

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| 77/7 |     |             | <p>Procedure for Neighbourhood Planning</p> <p>The NPPF provides guidance on the preparation of Neighbourhood Plans at paragraph 29-30 and associated footnote 16. Furthermore, the National Planning Practice Guidance (NPPG) to the NPPF further clarifies the role of Neighbourhood Plans in supporting strategic development needs and planning positively .</p> <p>Basic Conditions</p> <p>To proceed to a referendum, a Neighbourhood Plan needs to meet the 'basic conditions' set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the NPPG. The basic conditions have been provided under appendix A of this letter for ease of reference.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Noted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 78/7 |     |             | <p>Strategy for Housing Provision</p> <p>Rudgwick Parish Council undertook a Call for Sites in February 2019. As part of the call for sites, the NDP stated:</p> <p>'The Neighbourhood Plan is focusing on potential local - as opposed to strategic - scale allocations so this is particularly important for small (non strategic) sites. If you do not submit your site to the Rudgwick Neighbourhood Plan Call for Sites process then there is no guarantee that it will be considered through this process'.</p> <p>However, Horsham District Council (HDC) had separately begun a review of the HDPF and shortly after the NDP call for sites, agreed with the Parish that HDC would allocate sites to meet the housing requirement for Rudgwick, rather than allocations coming through the neighbourhood plan. These allocations would need to conform with the requirements of the Local Plan allocation process in terms of unit numbers and size (i.e. minimum of 6 units and 0.5Ha or more). No further action was taken on smaller sites submitted as part of the NDP's call for sites in February 2019.</p> <p>Response to Housing Provision Strategy</p> <p>Plainview Planning Ltd considers the housing provision strategy to be a flawed approach to housing development and in conflict with the basic conditions outlined at the start of this letter. The reasons are as follows:</p> <p>Policy Gap for Smaller Sites</p> <p>The NPPF emphasises the important contribution small and medium sites can make in meeting housing requirements in a local area and places great weight on neighbourhood plans to deliver on the provision of small and medium sites (paragraphs 68 &amp; 69 of the NPPF). Paragraph 69 of the NPPF specifically notes that neighbourhood planning groups should consider the opportunities for allocating small and medium sized sites suitable for housing in their area. This is particularly significant in Horsham, as sites suitable for 6 units of under cannot be allocated within the Local Plan.</p> <p>Pre-application advice from Horsham District Council (HDC) in 2019 in relation to our client's site advised that the scale of the site is entirely appropriate for Neighbourhood Plan allocation (a copy can be provided on request). We duly submitted the site for allocation in response to the NDP call for sites in April 2019 noting that the site could provide for the identified need for smaller homes within the village.</p> <p>We also submitted the site for consideration and allocation in the call for sites undertaken by HDC in June 2019 given the position with the NDP was unknown. The conclusions drawn (with reference to the HDC Regulation 18 Site Assessment Report February 2020) was that development of the site would result in 'neutral impact' but given the number of units that might be delivered, was too small for LP allocation. Again advice stated that allocation should be directed to the NDP for consideration.</p> <p>However:</p> <ul style="list-style-type: none"> <li>• the NDP as drafted does not allocate smaller sites for development;</li> <li>• there are no windfall policies to capture smaller sustainable sites;</li> <li>• given the above, smaller developments cannot meet the criteria's listed under emerging local planning policy 3 in the HDPF.</li> <li>• this means that it will not be possible to deliver ANY homes other than those allocated in the LP, in Rudgwick in accordance with emerging Local Plan strategic policy 3 throughout the plan period.</li> </ul> <p>This is a wholly untenable situation and is unduly restrictive. It means that sites which are otherwise suitable for sustainable development cannot be brought forward. This is fundamentally at odds with the NPPF paragraph 13, 35a), 38 (plans to be positively prepared, with a full range of planning tools being made available to ensure decision makers can approve applications for sustainable development where possible.) 68a and 69 (small sites).</p> <p>There must be flexibility applied to consideration of sites which lie directly adjacent to the built up area boundaries (BUAB). There are many small scale sustainable sites located adjacent to the BUABs which could have</p> | Comments noted. The Rudgwick Neighbourhood Plan is not allocating any sites for development. Site allocations in the parish are being progressed by Horsham District Council and this approach has been adopted across many neighbourhood plan areas in the district. We note the potential absence of policy support for or allocation of smaller sites but stress that it will be for the District Council to include set out planning policies in relation to the provision of new housing, whether that be in allocations made or edge of settlement windfall sites. |

| Ref. | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|      |     |             | <p>been allocated.</p> <p>The overly restrictive approach in both the proposed NDP and lack of smaller site allocations means that the NDP conflicts with emerging Strategic Policy 3 in the emerging HDLP and the NPPF. Furthermore, this means that the NDP wholly in conflict with basic conditions A, E and D under paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the PPG.</p> <p>Moving forward, it is respectfully requested that the neighbourhood plan actions one of the following:</p> <ol style="list-style-type: none"> <li>1. Include suitable planning policies to support/control the provision of edge of settlement windfall sites; or</li> <li>2. Proceed with allocating smaller sites to avoid the above identified conflicts with local and national planning policies.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 79/7 |     |             | <p><b>Examination and Reserve Sites</b></p> <p>Based on the introduction (paragraph 1.1), the NDP intends to come forward in line with the emerging Horsham HDPF (2019-2031). This approach means that the NDP is vulnerable to changes in local planning policy wording and potential changes to proposed allocation during the examination process. If changes were proposed as part of the Local Plan examination, it is inevitable that the NDP would need to be amended.</p> <p>This again raises questions about the approach adopted by the NDP on housing allocations.</p> <p>The PPG states:</p> <p>'Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination.</p> <p>Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan'.</p> <p>As the emerging Local Plan review timetable suggests the Local Plan will not be adopted before earliest 2022, the NDP has sufficient time to undertake another call for sites to ensure reserve sites are allocated in the interest of ensuring a robust NDP is submitted for examination.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 80/7 |     |             | <p><b>Local Housing Need</b></p> <p>Following a review of the initial housing needs assessment undertaken by South Downs National Park for Rudgwick Parish Council in 2017 and the amendments made in the Spring of 2019, we would like to pose some important questions to the NDP:</p> <ol style="list-style-type: none"> <li>1. The amended housing figure taken by the NDP not only reduces the local need to 50 units (rather than the 71-100 identified in the housing needs assessment), this figure is also the minimum of the recommended number provided by HDC. Yet, the parish council's housing needs assessment states:</li> </ol> <p>'Housing completions: New dwellings between 2011-2016 low compared with 2011-2031 projection and with surrounding area generally, so a possibility of some level of pent-up local need as a result'.</p> <p>Can the NDP explain why the absolute minimum housing figure has been taken, given the context of low housing completions and local demand? At the heart of the NPPF is the presumption in favour of sustainable development. There is not a cap on housing development or numbers - we are in the midst of a National Housing crisis and at a local level problems with access and affordability of housing. By placing restrictions on unit numbers, this will only worsen the situation.</p> <ol style="list-style-type: none"> <li>2. Whilst the NDP claims that they are not using the "fair share" NP allocation approach to reduce the NDP's housing requirement, there is no other rationale provided. Furthermore, in the HNA review (Spring 2019), no consideration is given to the context of the findings of the HNA (2017). For example, the review does not account for the high demand for new housing identified, the high need for starter homes or the historic under-completion of homes in the parish area. Can the NDP explain why no reserve allocations have been considered or brought forward?</li> <li>3. Without any reserve housing allocations, how does the NDP intend to be sound, should the housing numbers increase during the HDPF review examination process?</li> <li>4. As the NDP cannot come forward until the HDLP review has been completed (anticipated to be completed in 2022), how does the NDP seek to support smaller housing developments from coming forward</li> </ol> | Comments noted. There is no requirement for a neighbourhood plan to allocate land for development. The plan will not be tested for soundness, at examination it will be considered whether the plan meets the basic conditions. The Rudgwick Neighbourhood Plan is not allocating sites for development and as a result no views have been formed on the benefit of any sites over another. Site allocations in the parish are being progressed by Horsham District Council. |



| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Response                                                                                                       |
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|        |     |             | without suitable draft windfall policies? The NDP in its current draft is stifling development and wholly conflicts with the objectives of the NPPF. 5. The two allocations proposed for Rudgwick in the HDPF review (ref: SA442 and SA574) were classed by HDC as being 'unfavourable impacts', due to the impact on local character and settlement character (please see Horsham's housing assessment outcomes, pages 87-90). How can the NDP support these allocations, when smaller and more sustainable developments came forward through the Call for Sites in February 2019?                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                |
| 83/7   |     |             | Plainview Planning Ltd do not consider the NDP in its current form to be in compliance with the emerging HDPF and with the basic conditions:<br>(a) regarding national policies and advice in the form of the NPPF;<br>(e) It must be in general conformity with the strategic policies contained in the development plan for the area of the authority;<br>(d) contributing towards the achievement of sustainable development. As detailed through these submissions, we suggest that greater flexibility must now be built into the NDP. Should the NDP proceed and fail to plan for this flexibility, there is a real risk that its proposals will need to be reviewed upon the adoption of any revised LP, to remain an up-to-date part of the Development Plan for the parish.<br>We hope the above comments and recommendations are taken into consideration and look forward to seeing how the NDP progresses moving forward. | Noted - the plan has been amended in light of comments, but we consider the plan to meet the basic conditions. |
| 84/8   |     |             | Natural England does not have any specific comments on the draft Rudgwick Neighbourhood Plan.<br>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Noted                                                                                                          |
| 85/9   |     |             | The document is the Rudgwick Neighbourhood Development Plan defined with the acronym RDNP. However, there is also NDP defined as Neighbourhood Development Plan (but not in the Glossary). Also, "Rudgwick Neighbourhood Plan" is widely used and sometimes "Neighbourhood Plan". They all represent the same thing. It might be better to use Rudgwick Neighbourhood Development Plan and its acronym RDNP throughout.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - change made                                                                                            |
| 86/9   |     |             | Both km and miles are used in the document. It would be best to settle on one or the other.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Noted - change made                                                                                            |
| 87/9   |     |             | It seems odd to label something as 2019-2031 in a document which will be dated 2020. It may be better to write "up to 2031" without putting a start date as HDC have done in their plan document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Noted - change made.                                                                                           |
| 202/10 |     |             | Not sure if my message got thru. Anyhow regarding my comments upon the neighbourhood plan... they still stand.. particularly in view of Boris Johnsons advice regarding that brown field sites should be developed as a priority... rather than ,what appears to be a more lucrative option... green field sites where contractors do not have to be involved in demolition. .I feel that it is socially, ethically and conservational immoral to dig up green fields where there are plenty of sites available that have been developed previously. If necessary, they should be compulsorily purchased as they are not being used for anyone's benefit... save for the owners who perhaps are waiting for land prices to rise even more.                                                                                                                                                                                            | Noted                                                                                                          |
| 203/11 |     |             | Slinfold PC has nothing further to add (other than our previous comments) to your plan. Previous comments were:<br>1. Should the NP show ambition to move towards renewable energy or carbon reduction?<br>2. Rudgwick may want to guard against speculative C2 (care home) development as per Lyons Farm and Wellcross                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted - this has been discussed by the SG and no changes are proposed.                                         |
| 204/12 |     |             | Thank you for your email below, inviting Southern Water to comment on the Pre-Submission Rudgwick Neighbourhood Plan I confirm we have reviewed the document and have no comments to make. We look forward to being kept informed of the Plan's progress.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted                                                                                                          |
| 205/13 |     |             | Thank you for consulting Surrey County Council on the Rudgwick Neighbourhood Plan Regulation 14 Consultation. We do not have any comments to make on the plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted                                                                                                          |
| 206/15 |     |             | Thank you for giving Waverley Borough Council the opportunity to comment on the above consultation.<br>We have concluded that we do not wish to comment on any specific issues presented in this consultation particularly as you are not allocating housing, as the you stated specific site allocations will be made by Horsham District Council who will lead the allocation of any sites in the parish to meet any revised housing numbers through the Local Plan Review, whilst consulting with the community.                                                                                                                                                                                                                                                                                                                                                                                                                   | Noted                                                                                                          |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                       |
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| 207/20 |     |             | UK Power Networks - Thank you for sharing the Rudgwick Neighbourhood plan with us. Having reviewed it, we do not anticipate any impact on our assets. Should you see a need for additional network capacity in a specific area, please do not hesitate to contact our Connections department.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted                                                                                                                          |
| 208/6  |     |             | Thank you for consulting Horsham District Council (HDC) on the Pre-Submission (Regulation 4) Rudgwick Neighbourhood Development Plan (RNDP) and allowing officers an opportunity to comment on the emerging neighbourhood plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | n/a                                                                                                                            |
| 209/6  |     |             | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted, we too would like to thank all who have inputted into the process to date.                                              |
| 210/6  |     |             | The Council's comments are from the Strategic Planning team and are listed in the schedule attached to this letter. 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. The parish council has informed Horsham District Council on the 16 September 2019 that the parish has decided Horsham District Council would endeavour to meet local housing needs in the parish through the local plan review process to ensure the district has an up to date plan in place.                                                                             | Noted. This is correct, the neighbourhood plan is not allocating homes to meet this need.                                      |
| 211/6  |     |             | Following the adoption of the emerging new Horsham Local Plan, there will be an opportunity for a full or partial review of the Rudgwick Neighbourhood Plan to ensure policies within the plan are up to date. The parish could also choose to allocate additional housing sites on top of those identified in the Local Plan if it wishes to do so. This will bring reassurance to the Examiner that the plan has been positively prepared and every endeavour has been made to ensure the plan is in general conformity with national planning policy which as you are aware is one of the key Basic Conditions by which the Neighbourhood Plan will be assessed against.                                                                                                                                                                                                                              | Noted                                                                                                                          |
| 212/6  |     |             | HDC made representations to the previous Pre-Submission (Reg 14) version of the Plan in February 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted - these comments were very helpful and were used to inform the revised Reg.14 plan.                                      |
| 213/6  |     |             | Local Green Space<br><br>The submission Rudgwick NDP proposes six parcels of land as potential Local Green Spaces (LGS). HDC supports the principle of LGS designations. However, it is acknowledged that strict criteria must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. For information, we have provided this advice to local community groups, and have also explained that an examiner of the plan will be required to consider if the proposal designation meets the requirements set out by national planning policy and may ultimately recommend alterations or deletion of the site to ensure the plan meets the basic conditions.                                                                            | Noted. LGS have been considered by an external consultancy to ensure the assessments against the relevant criteria are robust. |
| 263/14 |     |             | Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.<br>Thames Water are the sewerage undertaker for the north eastern corner of the Horsham District and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Southern Water are the Water Supply undertaker. We have a number of comments on the consultation document as set out below:                                                                                                                                                                                                                                                                                                                                                                                                                                                    | noted.                                                                                                                         |
| 271/19 |     |             | Thank you for consulting Sport England on the above neighbourhood plan.<br>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process.<br>Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.<br>It is essential therefore that the neighbourhood plan reflects and | Comments noted.                                                                                                                |

| Ref. | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     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|      |     |             | <p>complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#playing_fields_policy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p><a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p><a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthycommunities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthycommunities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p>(Please note: this response relates to Sport England's planning function</p> |          |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                    |
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|        |     |             | only. It is not associated with our funding role or any grant application/award that may relate to the site.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                             |
| 272/18 |     |             | <p>On behalf of our client, Welbeck Strategic Land IV LLP (Welbeck Land), I'm pleased to provide comments on your Pre-Submission Rudgwick Neighbourhood Plan (RNP), and hope these will be of assistance to you in preparing the plan for submission.</p> <p>First, it is evident the Parish Council, and in particular the Neighbourhood Plan Steering Group, are continuing to employ considerable energy, thought and time into the preparation of the document.</p> <p>Reflecting your awareness of the distinctive characteristics of the Parish and seeking to ensure future development makes a positive contribution to the community.</p> <p>With this in mind, we would make the following specific comments on the latest Pre-Submission RNP and accompanying evidence documents:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Comments noted with thanks. |
| 281/18 |     |             | <p>The Land Near the Junction of Lynwick Street and Guildford Road Welbeck Land are promoting the land near the junction of Lynwick Street and Guildford Road (Horsham SHELAA Reference SA574) for allocation for residential development. As you will be aware the site has been included on a shortlist of potential site allocations in the Horsham Local Plan Regulation 18 Consultation (February 2020) document.</p> <p>The site is comprised of a 4.9ha land parcel situated on the A281 Guildford Road, immediately to the north of the Village Hall.</p> <p>Development of the site would reflect the historic linear pattern of development in the Village, whilst the site is sustainably located within practical walking distance of village facilities.</p> <p>Development of the site is capable of delivering a number of benefits including:</p> <ul style="list-style-type: none"> <li>· Potentially up to approximately 120 new homes, including much needed affordable housing in accordance with adopted policy.</li> <li>· A high quality and well-designed residential development set within a landscaped setting.</li> <li>· Provision of multifunctional on-site open space for use by residents, to manage water, and to support biodiversity.</li> <li>· The retention of and provision of new trees and hedgerows and other green infrastructure to protect the privacy and amenity of residents and integrate the development into the Village and its rural setting.</li> <li>· Pedestrian improvements along the Guildford Road, providing improved linkages to the village centre and nearby facilities including the Village Hall, playing fields, and the Fox Inn public house.</li> </ul> | Noted.                      |
| 282/18 |     |             | <p>We remain supportive of the Parish Council in the preparation of the Rudgwick Neighbourhood Plan and hope these comments and recommendations will be of assistance as the Plan progresses.</p> <p>In particular, we hope the Parish Council will give consideration to the benefits development can bring to the Village and assist in achieving goals such as ensuring a safe and attractive walking and cycling environment within the Village, and improvements to community facilities, including sports and recreation.</p> <p>We encourage the Parish Council to ensure the policies in the RNP, particularly relating to mix, density, and design are sufficiently flexible to adapt to change and not inhibit innovation and sustainable development where this represents good design, in accordance with national policy and guidance.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted                       |
| 283/17 |     |             | <p>1.1 Henry Adams LLP act on behalf of West Sussex County Council Asset Management and Estates Department (WSCC) in respect of Land on the corner of Church Street (B2128) and Guildford Road (A281), Rudgwick (the Site).</p> <p>1.2 WSCC recognise the importance of localism and thus support the Parish Councils approach to drafting a Neighbourhood Plan. Whilst this is the case, we do feel, on behalf of our client, that there are a number of elements that should be considered further. Our primary concern relates to the Parish Councils approach to housing allocations. Whilst Horsham District Council are looking to allocate sites within the Local Plan Review, there are a number of benefits for the community when sites are allocated through Neighbourhood Plans and thus we feel that the chosen approach should be given further consideration.</p> <p>1.3 Within the following sections we intend to set out our thoughts on this matter alongside the consideration of other policies within the draft plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted                       |
| 284/17 |     |             | <p>2.1 It must be demonstrated that a Neighbourhood Plan conforms to the 'basic conditions' as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (TCPA 1990) and is legal in every other respect.</p> <p>2.2 Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted                       |

| Ref.   | Pg. | Policy Ref. | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response |
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|        |     |             | <p>conditions are:</p> <p>a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p> <p>b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</p> <p>c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</p> <p>d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p> <p>5</p> <p>e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |          |
| 285/17 |     |             | <p>2.3 National Planning Policy Framework (Feb 2019) sets out the Government planning policies for England and how these are applied. The NPPF sets out the standards for neighbourhood plan steering groups when residents are preparing the plan. On examining the NPPF there are specific paragraphs relating to Neighbourhood and Sustainable Planning. Paragraphs 7, 8, 9, 10, 11, 15, 16, 18 and 29 for reference are copied below</p> <p>2.4 A neighbourhood plan or Order must not constrain the delivery of important national policy objectives. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11). Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development.</p> <p>For plan-making this means that:</p> <p>a) plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change;</p> <p>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</p> <p>i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting overall scale, type or distribution of development in the plan area; or</p> <p>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</p> <p>2.5 Paragraph 13 of the National Planning Policy Framework is clear that neighbourhood plans should support the delivery of strategic policies contained in local plans and spatial development strategies. Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside these strategic policies. More specifically paragraph 29 of the National Planning Policy Framework states that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.</p> <p>2.6 Paragraph 16 goes on to confirm that Plans should:</p> <p>a) be prepared with the objective of contributing to the achievement of sustainable development;</p> <p>b) be prepared positively, in a way that is aspirational but deliverable;</p> <p>c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</p> <p>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</p> <p>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</p> <p>2.7 Paragraph 29 states that Neighbourhood Plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.</p> <p>2.8 These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or</p> | Noted    |

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|        |     |             | should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account to reflect the character, needs and opportunities of each area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                              |
| 286/17 |     |             | <p>3 Section 5: Residential Development</p> <p>3.1 Rudgwick Parish Council have decided to let Horsham District Council and the Local Plan Review allocate the necessary housing sites within the Parish whilst the Neighbourhood Plan will seek to guide any residential development that does take place over the neighbourhood plan period to ensure it addresses existing deficiencies in the local housing stock. We would question whether this is the most efficient and effective approach given both the Local Plan Review and the Neighbourhood Plan are at relatively early stages in the process.</p> <p>3.2 Allocating sites for housing will provide a number of benefits to the local community and the wider District including;</p> <ul style="list-style-type: none"> <li>➤ Sites to be allocated will be chosen by the community, those most effected, and a public referendum will provide the chance for a final casting vote;</li> <li>➤ The allocation of smaller sites, that would otherwise slip through the net, will allow for sustainable sites to deliver housing and community benefits;</li> <li>➤ The NPPF (para 68) requires Local Authorities to accommodate at least 10% of their housing requirement on sites of less than 1 hectare. The Local Plan Review seeks to allocate sites larger than 1 hectare and thus the allocation of smaller, deliverable sites within the Neighbourhood Plan will help Horsham adhere to this requirement; and</li> <li>➤ Allocations will allow for the potential to accrue capital receipts from New Homes Bonus providing additional money to be spent on local projects to benefit the Rudgwick community.</li> </ul> <p>3.3 Not allocating sites for housing development also provides a clear disbenefit in respect of the NPPF para 11 and the 'presumption in favour of sustainable development'. If the District fall behind on housing land supply, the Neighbourhood Plan as written without allocations will not prevent the submission of speculative applications within the Parish.</p> <p>3.4 The Draft Local Plan Review (Feb 2020) identifies Rudgwick as a Medium Village with a moderate level of services and facilities that provide some day-to-day needs for residents. As such, the draft plan proposes allocations to deliver 50 dwellings within the Parish. When paying regard to these proposed allocations, site ref. SA574; Land north of Guildford Road, would be contrary to draft NP Policy RNP1 Spatial Strategy. Supporting para. 4.6 notes that Bucks Green is a linear community with the best road accessibility but that there is considerable noise and traffic problems as a result. There is limited development to the north of Guildford Road, Bucks Green, and the site has no clear defensible boundary to the north. A strong treed boundary runs along the Guildford Road boundary creating a clear defensible boundary to the north of the village. Development beyond this would be contrary to draft Policy RNP1 in that it would result in diminution of the settlements' identity creating development that is not linear in nature, whilst also breaching a defensible boundary along the Guildford Road contrary to RNP1.3.</p> | Noted. This plan does not seek to allocate housing. This is an agreed strategy with the LPA. |
| 287/17 |     |             | <p>4 The site and its suitability</p> <p>4.1 The site is located on the junction of Church Street and Watts Corner, Rudgwick. It is a greenfield site and currently comprises grazing land. It is bound by residential development to the north, a residential property to the east, Guildford Road to the south and Church Street to the west with established residential development beyond. The residential property to the east is 'Green Lanes' which is a Grade II listed building. Current boundary treatments comprise a combination of post a wire fencing, trees and hedging.</p> <p>4.2 Initial feasibility studies determine the site to be capable of up to 13 dwellings. This feasibility study considers any potential impact on Green Lanes to the east, the potential for a new point of access off Guildford Road or Church Street, and an appropriate density as to respect the existing properties to the north and ensure the proposal retains a rural style approach into the village.</p> <p>4.3 The site has been promoted through the district wide Call for Sites. The Strategic Housing Land Availability Assessment (2018) considers the site to be developable within the next 10 years and capable of delivering up to approximately 12 dwellings.</p> <p>4.4 The allocation and development of this land would provide a number of benefits to the local community;</p> <ul style="list-style-type: none"> <li>➤ The development will include a mix of high-quality homes, including affordable to meet the varying needs of the community;</li> <li>➤ The site is well-connected to local services and facilities, within walking distance of the co-op, the pharmacy, schools and village</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted. This plan does not seek to allocate housing. This is an agreed strategy with the LPA. |



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|        |     |             | <p>facilities;</p> <ul style="list-style-type: none"> <li>➤ The site is also within walking distance of the Downs Link;</li> <li>➤ Being in such close proximity to the Guildford Road minimises additional traffic through the village;</li> <li>➤ The majority of the village is located north of the Guildford Road, the sites location on the corner of Church Street and Guildford Road means the site reads as part of the existing village envelope and existing defensible boundaries would be respected;</li> <li>➤ Development would not comprise backland development;</li> <li>➤ The site is not within or within close proximity to the Conservation Area;</li> <li>➤ Existing, natural buffers on all boundaries would retain the rural, village feel and additional enhancements will ensure net biodiversity gain; and</li> <li>➤ The site is not constrained and does not rely upon infrastructure improvements in respect of delivery.</li> </ul> |                                                                                              |
| 288/17 |     |             | <p>5 Summary</p> <p>5.1 In summary, whilst our client supports the Parish in their approach to devising a Neighbourhood Plan for the area, we do not feel that the plan as a whole reflects the character, needs and opportunities within the area.</p> <p>5.2 Whilst we recognise that Neighbourhood Plans are not required to allocate sites for housing, we feel that there are a number of benefits to doing so and would therefore question whether the chosen approach is the most appropriate for the village. Leaving the District Council to make site allocations does not allow the community, who know the local area better than anyone, to have the final say. It also opens up the chances of speculative applications should the District Council fall behind on their housing land supply.</p>                                                                                                                                                     | Noted. This plan does not seek to allocate housing. This is an agreed strategy with the LPA. |