

**ECE Planning**

**Planning and Affordable Housing  
Statement**

**Land North of Guildford Road, Rudgwick**

**August 2025**



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Project Name: Land North of Guildford Road, Rudgwick

Location Land North of Guildford Road, Rudgwick, RH12  
3JJ

Client: Welbeck Strategic Land IV LLP

File Reference: P2016

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# ECE Planning

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## Contents

Figures .....	5
1. Introduction.....	6
2. The Site .....	8
2.1. Site and Surroundings .....	8
2.2. Flood Risk and Drainage .....	9
2.3. Heritage .....	10
3. Planning History .....	11
3.1. Planning History – The Site.....	11
3.2. Pre Application – Horsham District Council (Reference: PE/21/0224) .....	11
3.3. Pre Application- West Sussex County Council Highways.....	12
3.4. Pre Application Meeting with Rudgwick Primary School.....	12
3.5. Pre Application Meeting with Rudgwick Parish Council .....	12
3.6. Public Consultation – April 2025 .....	13
3.7. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19).....	13
3.8. Planning History – Surrounding Applications .....	15
4. The Proposal .....	16
5. Policy Overview.....	18
5.1. Introduction.....	18
5.2. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19 Version) .....	18
5.3. National Planning Policy Framework (NPPF) .....	18
5.4. Planning Practice Guidance (NPPG) .....	19
5.5. Horsham District Planning Framework (2015) .....	19
5.6. Rudgwick Neighbourhood Plan (2021) .....	20
5.7. Facilitating Appropriate Development .....	20
5.8. Supplementary Planning Documents .....	20
5.9. Community Infrastructure Levy (CIL) .....	21
6. Planning Appraisal.....	22
6.1. Introduction.....	22
6.2. Principle of Development .....	22
Five-year housing land supply, FAD and the emerging local plan .....	23
Conclusion on principle.....	25
6.3. Scale, Appearance and Layout .....	25
6.4. Landscape .....	27
6.5. Heritage .....	28
6.6. Housing Mix and Affordable Housing .....	29
6.7. Residential Amenity .....	30

# ECE Planning

---

6.8. Access, Transport and Parking .....	32
6.9. Ecology and Biodiversity Net Gain .....	33
6.10. Trees .....	33
6.11. Sustainability .....	34
6.12. Drainage & Flood Risk .....	34
6.13. Air Quality .....	35
6.14. Noise Impact .....	36
6.15. Archaeology .....	36
6.16. Water Neutrality .....	37
7. Conclusions .....	38
Appendix A – Pre Application Response 105 Unit Scheme PE/21/0224 .....	40

# ECE Planning

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## Figures

Figure 1- Site Location Plan (Red Line).....	8
Figure 2- Built Up Area Boundaries .....	9
Figure 3- Government Flood Maps for Planning .....	9
Figure 4- Government Flood Maps for Planning (Surface).....	10
Figure 5- Listed Buildings (Historic England).....	10
Figure 6- Pre Application Layout (105no units).....	11
Figure 7- Horsham District Council: Regulation 19 Local Plan Portal .....	14
Figure 8 - Regulation 18 (2020) Site Boundary .....	14
Figure 9- Approved Site Location Plan .....	15
Figure 10- Illustrative Masterplan.....	16
Figure 11 - Housing Mix .....	17
Figure 12- Housing Mix .....	29
Figure 13- Indicative Site Plan reference DC/24/1811 .....	31

# ECE Planning

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## 1. Introduction

1.1. This Planning and Affordable Housing Statement has been produced by ECE Planning on behalf of Welbeck Strategic Land IV LLP ("Welbeck Strategic Land") in support of an Outline Application for the development of the Land North of Guildford Road, Rudgwick ('the Site') to provide 90no. new dwellings. The description of the development for the proposal reads:

*'Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access'*

1.2. The Applicant has previously undertaken Pre-Application discussions and a meeting with Horsham District Council which culminated in a response dated 5 January 2022 (reference PE/21/0224). Refer to Appendix A for the Pre-Application response. Please note that the pre-application proposal was a for a larger scheme of 105 dwellings. Significant design changes to the scheme have taken place following the feedback received.

1.3. The Site has been previously promoted for inclusion as a new residential allocation through the District's ongoing Local Plan Review. The site was identified in the Regulation 18 document as one of two potential allocations at Rudgwick and was included within the Regulation 19 consultation document (Policy HA14) for 60no. new dwellings. The site remained a proposed allocation in the submission version of the plan.

1.4. The site abuts the defined settlement edge of Rudgwick and is unconstrained in terms of landscape designations. Its use can meaningfully assist in addressing the continuing housing shortfall in Horsham, including the delivery of much needed affordable housing.

1.5. This statement sets out relevant background for determination of the planning application, including a description of development of the Site and its surroundings, the relevant planning history and planning policies, details of the proposed development, and an assessment of the planning merits of the site.

1.6. The proposals have also been informed by the National Planning Policy Framework (2024 version), the Planning Practice Guidance, Horsham Local Plan, and Rudgwick Neighbourhood Plan.

1.7. The application should be considered with full regard to the following suite of supporting documents, drawings, and plans:

**Planning Application and Notice Forms**

**Planning Statement**

**Statement of Community Involvement**

**Location and Indicative Site Plan**

**Design and Access Statement**

**Landscape and Visual Impact Assessment**

**Landscape Masterplan**

**Arboricultural Impact Assessment**

**Ecological Impact Assessment**

**Preliminary Ecological Appraisal**

**Dormouse Survey Report**

**Breeding Bird Surveys**

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- Bat Activity Surveys**
- Biodiversity Net Gain Metric**
- Biodiversity Net Gain Feasibility Assessment**
- Habitat Management and Monitoring Plan**
- Transport Assessment (inc Appendices)**
- Flood Risk Assessment and Drainage Strategy**
- Water Neutrality Statement**
- Heritage Impact Assessment**
- Air Quality Assessment**
- Phase I Geo-Enviro Desk Study**
- Noise Impact Assessment**
- Energy and Sustainability Statement**

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## 2. The Site

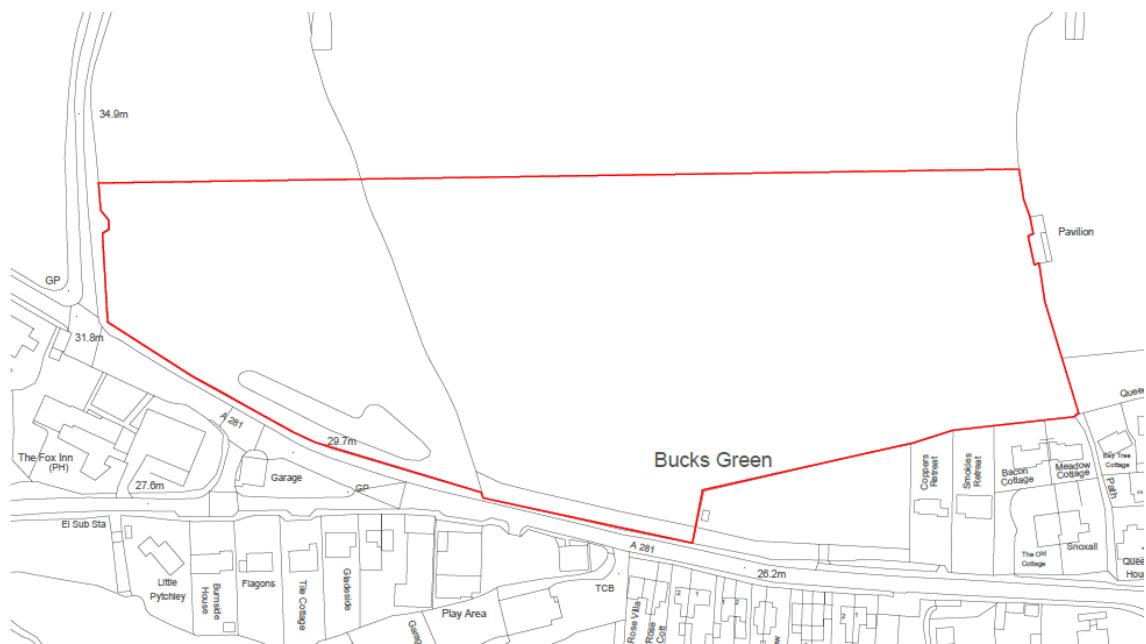
### 2.1. Site and Surroundings

2.1.1. The Site relates to land located to the north of Guildford Road at Bucks Green which lies adjacent and to the north of the existing built-up area. The site is divided into two grassed fields and is approximately 4.41 hectares in size. Lynwick Street adjoins the site to the west. Refer to Figure 1.

2.1.2. The site primarily comprises open fields and rises gently from the south to the north. Mature trees and hedges line the south, west and eastern boundaries of the site with a belt of mature trees marking the field boundary in the eastern part of the site.

2.1.3. For the surrounding area, the southern side of Guildford Road is comprised of buildings fronting the road in a linear fashion. The site is adjacent to a row of dwellings which back on to the application site and a triangular piece of land, called Bucks Green Pig Farm (which has been proposed for allocation in the emerging local plan under Strategic Policy HA14 for 6 dwellings).

2.1.4. Open fields lie to the north and the village of Rudgwick is to the east of the site. Directly to the east of the site are playing fields. Several listed buildings are within the wider area of the site.



**Figure 1- Site Location Plan (Red Line)**

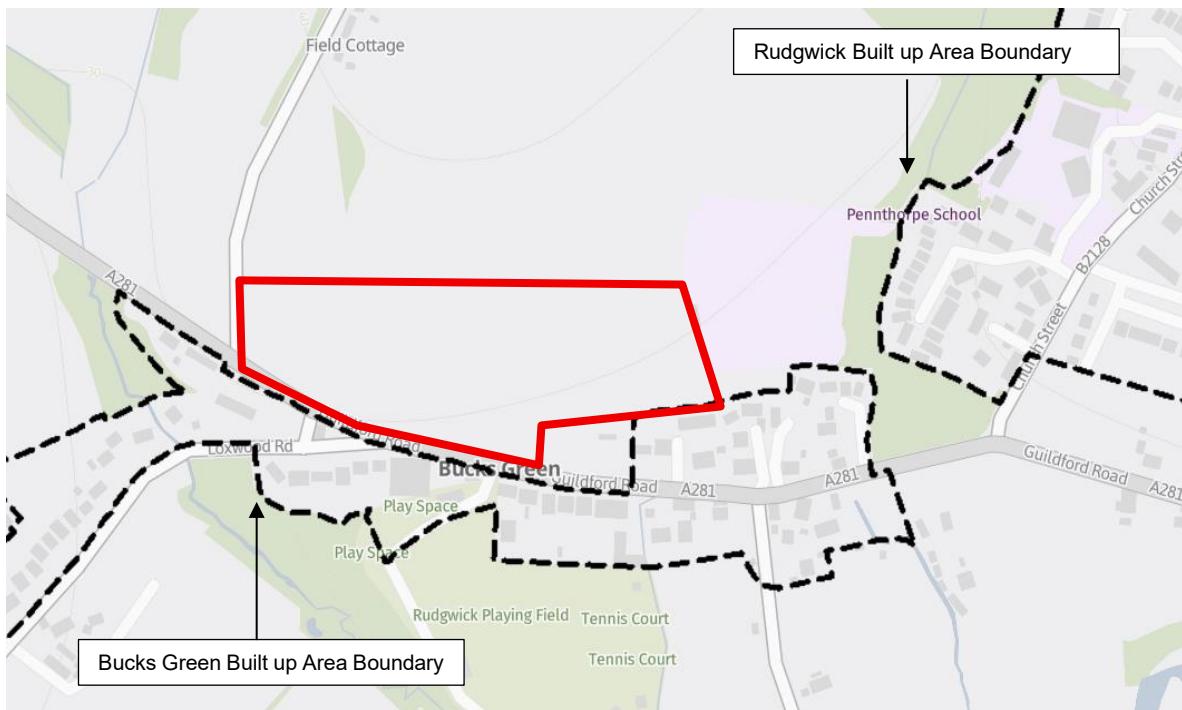
2.1.5. Vehicular access to the site is present via Lynwick Street. There is also pedestrian access via a public right of way passing along the eastern site boundary from Guildford Road to the south to Lynwick Street to the north.

2.1.6. The site is in a highly sustainable location, with the centre of Rudgwick located some 500m from the site. The site lies close to village schools, childcare facilities, pharmacy, pub, hairdressers, convenience store, children's play area and church. Bus stops are also located approx. 50m to the south of the site on Guildford Road and on Church Street in the village centre providing services to Horsham and Guildford.

2.1.7. The site is also located approximately 10km from Horsham to the east with the large village of Cranleigh approximately 5km to the north.

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2.1.8. The site abuts the built-up area boundary of Bucks Green to the south of the site. Refer to Figure 2.



**Figure 2- Built Up Area Boundaries**

## 2.2. Flood Risk and Drainage

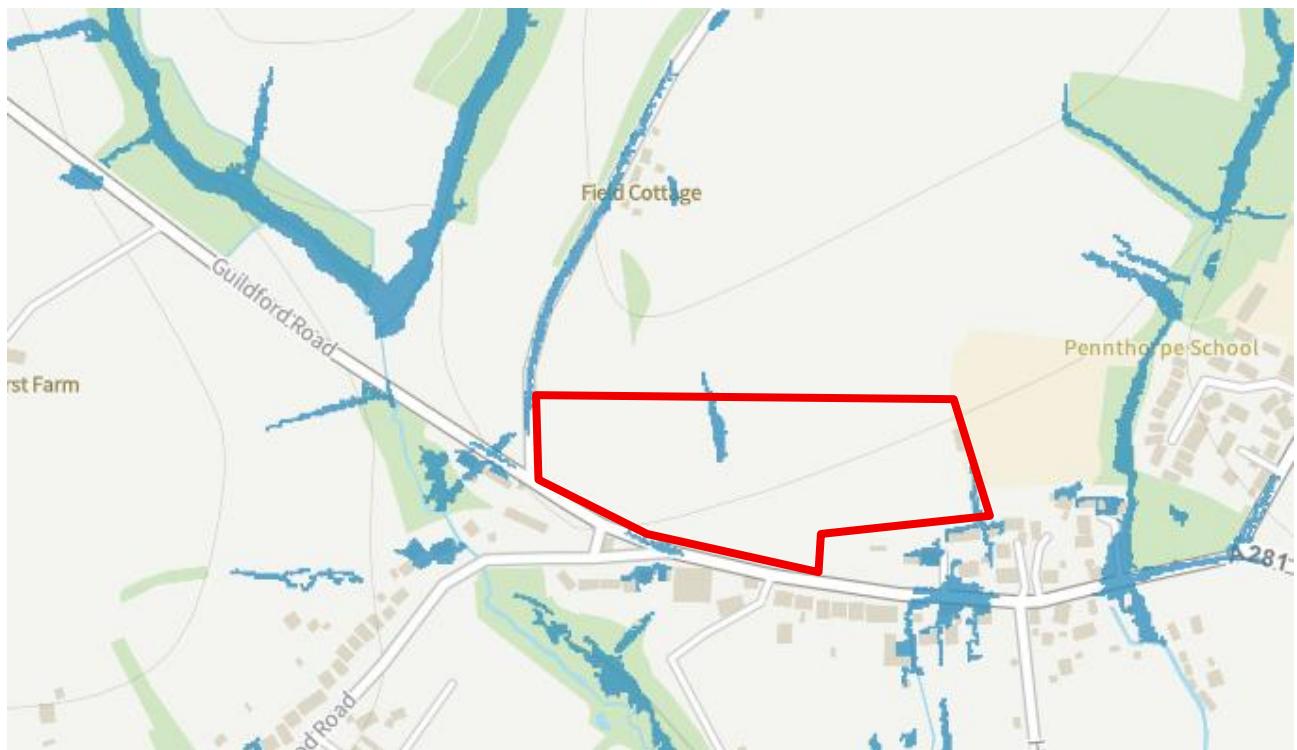
2.2.1. The Government's Flood Maps for Planning demonstrate that the site is situated in Flood Zone 1, which means that the land has a low probability of flooding. Refer to Figure 3.



**Figure 3- Government Flood Maps for Planning**

2.2.2. There are localised areas of low-risk surface water flooding associated with depression in the land. Refer to Figure 4.

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**Figure 4- Government Flood Maps for Planning (Surface)**

## 2.3. Heritage

2.3.1. There are no listed heritage assets on the site itself, though several are located within the wider vicinity, including The Fox Public House opposite the site to the south-west and residential dwellings fronting Guildford Road approx. 25m to the south-east. Refer to Figure 5.



**Figure 5- Listed Buildings (Historic England)**

2.3.2. Horsham Policy Maps also demonstrate that the site is not within a Conservation Area and is not restricted by any other heritage designation.

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## 3. Planning History

### 3.1. Planning History – The Site

3.1.1. There is no formal planning history recorded on the planning register for this site. However, the scheme has been promoted through Pre Application and within the Horsham emerging local plan.

### 3.2. Pre Application – Horsham District Council (Reference: PE/21/0224)

3.2.1. Reference PE/21/0224. Development of up to 105 dwellings (Class C3), including 37 (35%) affordable homes, with landscaping, open space, parking, provision of new vehicular and pedestrian accesses to Guildford Road and Lynwick Street, new pedestrian access to the existing Public Right of Way (PROW) to the east, sustainable urban drainage attenuation pond and all other associated development works at Land at 508047 133039, Bucks Green, Rudgwick, West Sussex. Advice was received on 5 January 2022.

3.2.2. The proposal was the development of the site for 105 residential units, including 37 units of affordable housing. The scheme includes a vehicular access off Guildford Road and retained farm access via Lynwick Street, which is indicated as an emergency access.



**Figure 6- Pre Application Layout (105no units)**

3.2.3. The advice provided from the Officer for the 105no. unit scheme included,

*The July 2021 Regulation 19 draft Plan allocates this site for development under Policy HA16: Rudgwick and Bucks Green Housing Allocations. The policy states that this site is allocated for 60 homes and should come forward with the adjacent site at the Former Pig Farm for 6 homes.*

*Given the delay to the Local Plan Review and the fact that this plan has yet to receive Full Council authorisation to proceed, no weight can be given to this draft allocation in the determination of this application. Notwithstanding this, it is noted that the current proposal for 105 units would not be in accordance with draft Policy HA16.*

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*The proposal would nevertheless also result in significant landscape harm, with the development of the western field, and would also result in a significant effect on a habitats site, in the likely event that the proposal is not considered water neutral.*

*As such, the presumption of sustainable development does not apply in this proposal and the principle of the development would be contrary to Policies 1, 2, 3, 4, 25 and 26 of the Horsham District Planning Framework, and paragraphs 2, 11, 12, 47 & 182 of the NPPF.*

3.2.4. The scheme has been revised following receipt of the above advice, focusing on minimising and mitigating any perceived landscape and visual impact.

## 3.3. Pre Application- West Sussex County Council Highways

3.3.1. The applicant has engaged West Sussex County Council (WSCC) in pre-application discussion regarding highways matters at the site.

3.3.2. The Highway Authority had no objection to the proposed access subject to the conclusions of a Stage 1 Road Safety Audit (RSA). The RSA has been undertaken and is submitted as part of the Transport Statement.

3.3.3. Junctions to be modelled were also agreed with WSCC as part of this process together with provision of the documentation required to support the submission.

3.3.4. The applicant's transport consultants have remained in contact with WSCC officers regarding the site since the original pre-application advice was provided.

## 3.4. Pre Application Meeting with Rudgwick Primary School

3.4.1. The applicant and some members of the project team met with the head teacher and business manager of Rudgwick Primary School on Wednesday 11<sup>th</sup> June 2025.

3.4.2. The meeting was an opportunity for the applicant to engage with an important local stakeholder to explain the proposed development and answer any questions.

3.4.3. Several matters were discussed, primarily related to educational infrastructure in Rudgwick and how this may be impacted by the proposed development in the future. Further detail on this meeting can be found in the Statement of Community Involvement (SCI).

## 3.5. Pre Application Meeting with Rudgwick Parish Council

3.5.1. The applicant and key members of the project team met with the Rudgwick Parish Council working group (Bucks Green Housing Development Task and Finish Group) on Wednesday 11<sup>th</sup> June 2025.

3.5.2. The discussion touched on a range of topics including:

- Clarification on the details of the proposals, given previous versions previously presented.
- Comment that smaller homes and bungalows would be welcomed.
- Discussion regarding the placement of 2.5 storey apartment buildings within the site.
- Concern over the safety of Guildford Road generally, with local instances of speeding and recent accidents. Comment that the existing pedestrian crossing could be moved closer to the main access point given greater activity there.

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- Queries relating to capacity of the sewage treatment centre to support the new homes.
- Discussion regarding drainage, especially surface water runoff along Guildford Road and the impact of increasingly heavier rainfall.
- A desire for improved pathways along Guildford Road and traffic calming measures to improve safety.

3.5.3. Further detail on this meeting and responses to the matters raised can be found in the Statement of Community Involvement (SCI).

## 3.6. Public Consultation – April 2025

3.6.1. A pre-application online public consultation event took place during April 2025. The consultation sought the views of local residents and stakeholders on two proposed development scenarios:

- Design option 1: 105 high quality new homes alongside associated infrastructure,
- Design option 2: 71 high quality new homes alongside associated infrastructure.

3.6.2. A community newsletter was posted to more than 1,000 local addresses on 4<sup>th</sup> April to publicise the online consultation.

3.6.3. The consultation received 143 feedback responses through the various available communication channels including 138 online feedback submitted via the project website and five email responses.

3.6.4. The SCI reports on the comments received during the consultation and includes the project team response where relevant.

## 3.7. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19)

3.7.1. The Horsham District Local Plan 2023-2040 (HDLP/Local Plan) sets out planning policies and proposals to guide development in the district, excluding the South Downs National Park, up to 2040. Examination hearings started in December 2024, however the remaining hearings were then cancelled by the examining Inspector in a Holding Letter dated 16 December 2024. On 22 April 2025 the Council published the Inspector's subsequent Interim Findings Letter which has recommended that the Plan be withdrawn, principally due to his view that the Council had failed to satisfactorily comply with the legal Duty to Co-operate.

3.7.2. The HDLP, through Policy HA14, allocates the application site for 60 dwellings, with the adjoining land to the south allocated for 6 dwellings. The policy for the application site states that development will be supported where proposals:

1. *Are limited to the southern part of the site as shown on the Policies map, with an agreed landscape treatment in the northern part of the site to minimise landscape impacts; and*
2. *Ensure that appropriate regard is had to the impact on nearby Grade II Listed Buildings (Fox Inn, Guildford Road and The Old Cottage and Field Cottage, Lynwick Street).*

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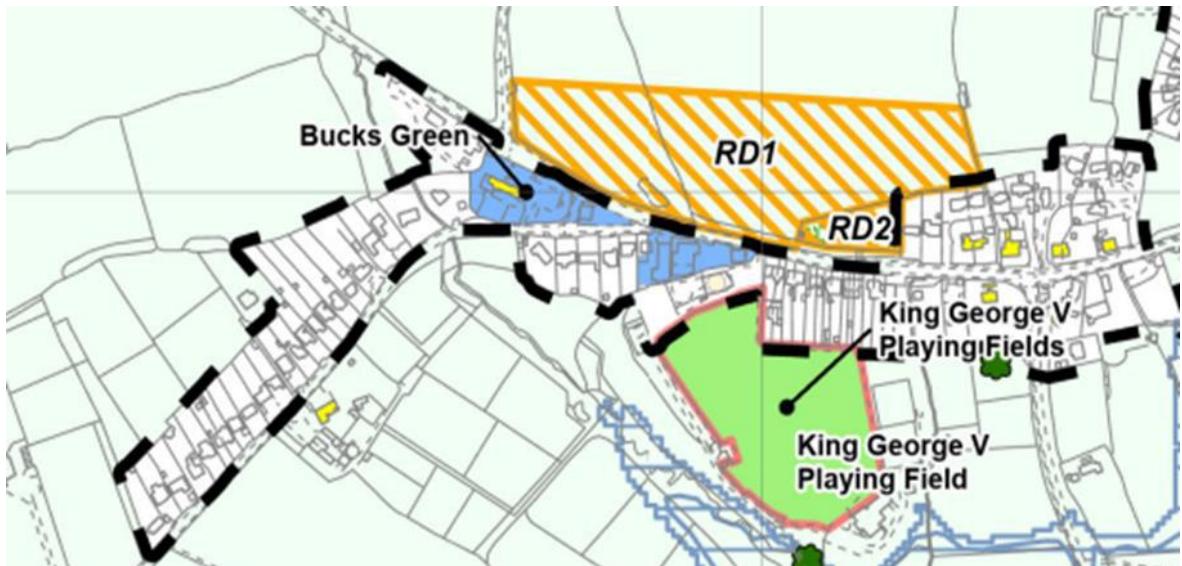


Figure 7- Horsham District Council: Regulation 19 Local Plan Portal

3.7.3. The Inspector's Report does not indicate that there were any concerns over the proposed allocation of this site.

3.7.4. It is further of note that the Application Site has been included as a proposed housing allocation throughout the emerging local plan process. The site (then known as SA574) was included in the Regulation 18 plan as a potential allocation. The supporting Site Assessment document included a larger site area and considered the delivery of approximately 120 homes was possible. The site boundary at Regulation 18 stage is shown below:

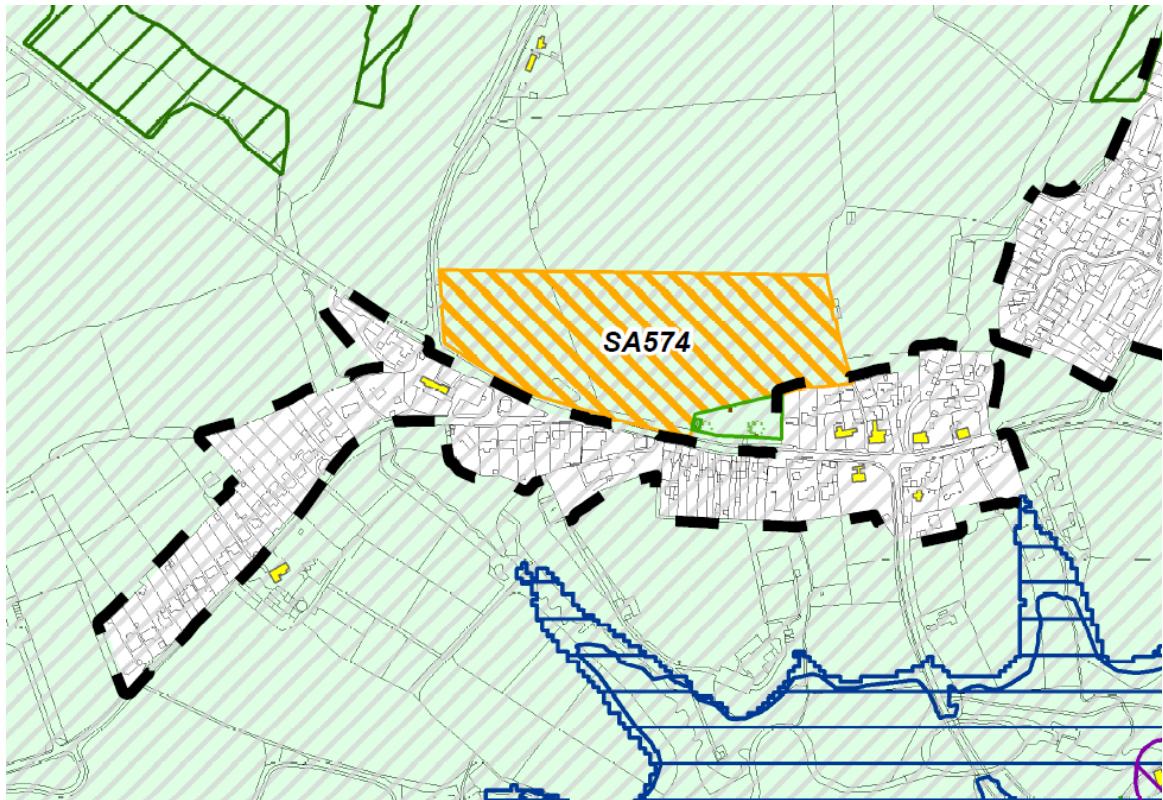


Figure 8 - Regulation 18 (2020) Site Boundary

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## 3.8. Planning History – Surrounding Applications

3.8.1. Reference DC/24/1811. Outline application for the erection of dwellings with associated garages, parking and landscaping with all matters reserved at Bucks Green Pig Farm, Bucks Green, Rudgwick, West Sussex, RH12 3JJ.

3.8.2. This application is on the southern boundary of the site and has recently been given planning permission. It can be seen within Figure 7 above under reference RD2 and in the site plan below outlined in red.

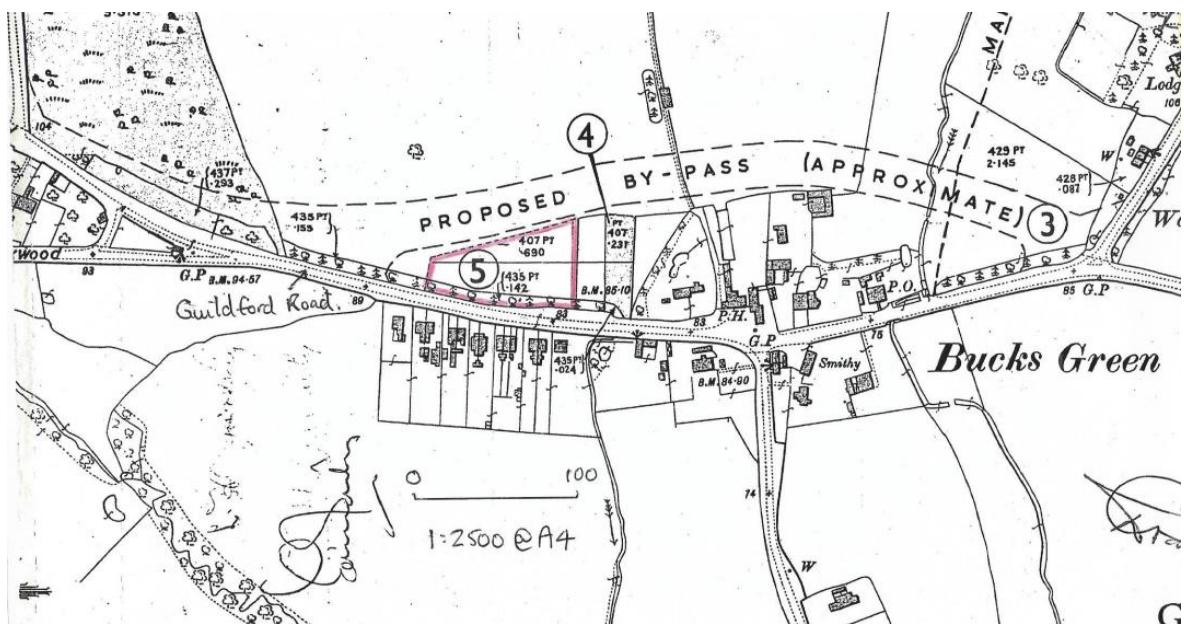


Figure 9- Approved Site Location Plan

## 4. The Proposal

4.1. This Outline Planning Application seeks permission for the development of up to 90 residential units on the application site, as illustrated in the accompanying illustrative layout plan (Ref: WELB90309SL02 P5 – please see Figure 10 below).



**Figure 10- Illustrative Masterplan**

4.2. Access to the site is a detailed matter in this Outline Application. Vehicular access is proposed via a new junction onto Guildford Road, designed in accordance with relevant highways standards. The proposed access strategy ensures safe ingress and egress for vehicles, pedestrians and cyclists, with appropriate visibility splays and capacity to accommodate predicted traffic flows associated with the development.

4.3. Internal circulation has been designed to ensure clear and legible movement across the site, incorporating dedicated pedestrian footways and shared surface areas that encourage walkability and prioritise sustainable, non-car modes of travel where appropriate.

4.4. The proposed development comprises up to 90 residential units across three tenures: Private, Affordable Rented, and Shared Ownership. The scheme provides a range of 1 to 4-bedroom homes, including flats, maisonettes and houses.

4.5. Private tenure makes up the majority of the development, offering 54 units (60%). The Affordable Rented element provides 25 units (28%), while Shared Ownership accounts for 11 units (12%). This mix aligns with the emerging local planning policy objectives and helps address housing need.

4.6. A breakdown of the accommodation mix by bedroom number and tenure is provided below:

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Tenure	1 Bed	2 Bed	3 Bed	4 Bed	Total Units	% of Total
<b>Private</b>	0 (0%)	18 (20%)	23 (26%)	13 (14%)	54	60%
<b>Affordable Rented</b>	12 (13%)	7 (8%)	6 (7%)	0 (0%)	25	28%
<b>Shared Ownership</b>	4 (4%)	5 (6%)	2 (2%)	0 (0%)	11	12%
<b>Total</b>	16 (18%)	30 (33%)	31 (34%)	13 (14%)	90	100%

Figure 11 - Housing Mix

- 4.7. The scheme includes a network of public open spaces and green infrastructure, offering recreational opportunities and supporting biodiversity. A series of landscape character areas are proposed to help structure the development and create a sense of place, including green streets, play spaces, fitness trails, and landscape buffers.
- 4.8. A Sustainable Urban Drainage System (SuDS) will be integrated into the development to manage surface water runoff, reduce flood risk and enhance water quality. An attenuation basin will form part of this strategy, with surface water discharged at greenfield rates into a nearby watercourse.
- 4.9. All matters other than access are reserved at this stage and will be addressed through subsequent Reserved Matters applications. Nonetheless, the submitted illustrative layout plan and supporting documentation demonstrate that up to 90 dwellings can be appropriately accommodated on site.
- 4.10. Please refer to the submitted drawings and Design and Access Statement for further information on the scheme.

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## 5. Policy Overview

### 5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Horsham District Planning Framework (2015) and Rudgwick Neighbourhood Plan (2021).
- 5.1.3. The National Planning Policy Framework (The Framework), the Planning Practice Guidance (PPG) and Supplementary Planning Guidance are material considerations, together with local guidance documents.
- 5.1.4. It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years and therefore the Council are currently in the midst of preparing a new Local Plan for the District.

### 5.2. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19 Version)

- 5.2.1. The Regulation 19 Local Plan was published for a six-week period of representation from 19 January 2024 to 1 March 2024. The Regulation 19 Local Plan has since been formally submitted to the Planning Inspectorate on 26 July 2024 and the examination hearings commenced in December 2024.
- 5.2.2. At the time of writing this Statement, the Local Plan hearings have been cancelled by the Inspector due to '*significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas*'.
- 5.2.3. On 7 April 2025, a Letter was published by the Inspector which recommended to Horsham that the Local Plan should be withdrawn from examination and a new Local Plan should be prepared.
- 5.2.4. Horsham District Council (HDC) has not, at the time of writing, made a formal decision on how to proceed following the publication of the Inspector's letter.
- 5.2.5. The site is proposed for allocation in the emerging plan under Policy HA14. We understand that the Council considers its evidence base on proposed allocations to be robust, and the Inspector has not queried this element of the plan. The site remains a proposed allocation at the time of writing, and at worst represents the direction of travel in terms of sites the Council considers can be developed for housing.

### 5.3. National Planning Policy Framework (NPPF)

- 5.3.1. The NPPF was adopted in 2012 with many revised versions, the most recent of which being updated in February 2025.
- 5.3.2. As explored in further detail later in this Statement, the National Housing Target has recently been increased from 300,000 new homes a year to 370,000 new homes a year. As a result, the NPPF has been updated to try and further boost the delivery of housing to meet the amended target.

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5.3.3. The relevant sections of the NPPF in relation to this application are summarised below and explored in further detail later in this Statement.

- **Section 2 - Achieving sustainable development**
- **Section 5 - Delivering a sufficient supply of homes**
- **Section 7 - Ensuring the vitality of town centres**
- **Section 8 - Promoting healthy and safe communities**
- **Section 9 - Promoting sustainable transport**
- **Section 11 - Making effective use of land**
- **Section 12 - Achieving well-designed places**
- **Section 14 - Meeting the challenge of climate change, flooding and coastal change**
- **Section 15 - Conserving and enhancing the natural environment**
- **Section 16 - Conserving and enhancing the historic environment**

## 5.4. Planning Practice Guidance (NPPG)

5.4.1. The PPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework. The guidance provided by the PPG has been fully considered in the creation of this application and the proposed development is seen to be fully compliant with it.

## 5.5. Horsham District Planning Framework (2015)

5.5.1. The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District outside the South Downs National Park (SDNP) and replaces the Core Strategy and General Development Control Policies documents which were adopted in 2007.

5.5.2. Although the HDPF is out of date by reason of it being over 5 years old, the following policies are considered to be relevant to the application and have been given full consideration in the preparation of this application.

- **Policy 1 - Strategic Policy: Sustainable Development**
- **Policy 2 - Strategic Policy: Strategic Development**
- **Policy 3 – Strategic Policy: Development Hierarchy**
- **Policy 15 - Strategic Policy: Housing Provision**
- **Policy 16 - Strategic Policy: Meeting Local Housing Need**
- **Policy 24 - Strategic Policy: Environmental Protection**
- **Policy 25 - Strategic Policy: The Natural Environment and Landscape Character**
- **Policy 26 - Strategic Policy: Countryside Protection**
- **Policy 31 - Green Infrastructure and Biodiversity**
- **Policy 32 - Strategic Policy: The Quality of New Development**
- **Policy 33 - Development Principles**
- **Policy 35 - Strategic Policy: Climate Change**
- **Policy 36 - Strategic Policy: Appropriate Energy Use**
- **Policy 37 – Sustainable Construction**
- **Policy 38 - Strategic Policy: Flooding**
- **Policy 39 - Strategic Policy: Infrastructure Provision**
- **Policy 40 - Sustainable Transport**
- **Policy 41 - Parking**

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## 5.6. Rudgwick Neighbourhood Plan (2021)

5.6.1. The Rudgwick Neighbourhood Plan was formally made on 23 June 2021. It does not include housing allocations. The policies of relevance are as follows:

- **RNP1: Spatial Strategy**
- **RNP2: Housing Mix**
- **RNP4: Homes for Older People**
- **RNP5: Housing Density**
- **RNP6: Materials**
- **RNP7: Architectural Style**
- **RNP8: Development Height**
- **RNP9: Street Scene**
- **RNP17: Green Infrastructure and Trees**

## 5.7. Facilitating Appropriate Development

5.7.1. The Council is presently unable to demonstrate a 5-year land housing supply, with the Council's latest Authority Monitoring Report acknowledging a 5-year land housing supply of 1 years.

5.7.2. In the context of the Authority's inability to demonstrate a 5-year land housing supply and delays to the emerging local plan, HDC has published the Facilitating Appropriate Development (FAD) document to clarify the approach that it will pursue in respect of spatial matters in the circumstance that existing and emerging policy is attributed greatly reduced weight. The provisions of the FAD represent a material consideration.

5.7.3. In respect of proposals for the development of unallocated land adjoining a settlement boundary the FAD confirms that the Council will positively consider applications which meet all of the following criteria:

- The site adjoins the existing settlement edge as defined by the BUAB;
- The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
- The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;
- The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and
- The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.”

## 5.8. Supplementary Planning Documents

5.8.1. The following documents have been considered in the preparation of this application:

- **Rudgwick Parish Design Statement 2009**
- **West Sussex County Council Guidance on Parking at New Developments 2020**
- **Facilitating Appropriate Development**
- **Authority Monitoring Report 2022/23 Chapter 3 Housing Land Supply**
- **Biodiversity and Green Infrastructure**

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## **5.9. Community Infrastructure Levy (CIL)**

5.9.1. CIL was adopted by HDC in October 2017 and is a charge placed on new development. In accordance with the adopted CIL Charging Schedule, residential development in (Zone 1) is charged at £135.00 per sqm plus indexation.

## 6. Planning Appraisal

### 6.1. Introduction

6.1.1. The principal issues in relation to this development are as follows:

**Principle of Development**

**Scale, Appearance and Layout**

**Landscape**

**Heritage**

**Housing Mix and Affordable Housing**

**Residential Amenity**

**Access, Transport and Parking**

**Ecology and Biodiversity Net Gain**

**Trees**

**Sustainability**

**Drainage**

**Air Quality**

**Noise Impact**

**Archaeology**

**Land Contamination**

**Water Neutrality**

### 6.2. Principle of Development

6.2.1. The proposals seek outline consent for up to 90 no. residential dwellings (including 40% affordable) with all matters reserved apart from access.

6.2.2. Policy 3 of the adopted Local Plan (Horsham District Planning Framework dated 2015) states that '*development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement*'.

6.2.3. The site is located outside of, but adjacent to the built-up area of Rudgwick and Bucks Green which is categorised as a "*Medium Village*" within Policy 3 of the Local Plan. The site is therefore located adjacent to a settlement which has a moderate level of services and facilities and community networks, together with some access to public transport. Medium settlements provide "*some day-to-day needs for residents but rely on small market towns and larger settlements to meet a number of their requirements*."

6.2.4. Policy 4 of the adopted Local Plan states that the growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;

1. *The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.*
2. *The level of expansion is appropriate to the scale and function of the settlement type.*

# ECE Planning

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3. *The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.*
4. *The impact of the development individually or cumulatively does not prejudice comprehensive long-term development, in order not to conflict with the development strategy; and*
5. *The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.*

6.2.5. The application site, as noted above, immediately adjoins but is outside of the built-up area boundary of Rudgwick. It is not allocated in the HDPF or the Rudgwick Neighbourhood Plan (RNP) and therefore does not comply with Policy 4. Neither does it accord with Policy 26 (Countryside Protection) of the HDPF in terms of housing considered appropriate in the countryside.

**Five-year housing land supply, FAD and the emerging local plan**

6.2.6. The council is currently only able to demonstrate a 1-year supply of housing (as of May 2025). This is a significant shortfall in housing land supply which, when considered with the age of the adopted local plan, significantly reduces the weight which can be applied to Policies 4 and 26 of the HDPF. This position has been confirmed by planning inspectors at a number of appeals within Horsham District.

6.2.7. In addition, the Council has failed its most recent Housing Delivery Test. An updated Housing Delivery Test was published in December 2024 and demonstrates that HDC only delivered 62% of its housing target.

6.2.8. In such cases the Presumption in Favour of Sustainable Development as set out in Paragraph 11(d) of the NPPF is engaged. It states that:

*'d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*

*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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.'*

6.2.9. Footnote 7 of the NPPF notes that the policies referred to in 11(d)(i) are those relating to: "habitats sites (and those sites listed in paragraph 194 of the NPPF) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change."

6.2.10. The documents submitted in support of this application demonstrate that the Application Site is not located within any of the protected areas outlined in Footnote 7. Further, policies relating to matters such as heritage and flood risk do not indicate a reason for refusal.

# ECE Planning

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6.2.11. Footnote 8 of Paragraph 11(d) notes that a development plan policy is considered out of date where:

*'This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years..'*

6.2.12. It is clear that the Council's inability to demonstrate a five-year housing land supply and its failure to meet the housing delivery test trigger the presumption under Paragraph 11 and the application of the tilted balance. The proposed development of up to 90no. dwellings would make a significant and valuable contribution towards meeting the district's significant housing need and weighs heavily in favour of approving the application upon application of the tilted balance.

6.2.13. The Council's Facilitating Appropriate Development (FAD) document is also a material consideration in the determination of this application.

6.2.14. The FAD recognises that the Council is likely to receive applications outside of defined BUAB and on unallocated sites given its poor housing land supply position. The FAD confirms that applications which meet all the following criteria will be positively considered where all of the following are met:

- *"The site adjoins the existing settlement edge as defined by the BUAB."*
- *The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;*
- *The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services.*
- *The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and*
- *The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced."*

6.2.15. The application site directly adjoins the BUAB of Bucks Green and is well located for access to local facilities, including public playing fields, a public house, garage and primary school within walking distance. The locale and quantum of development proposed is commensurate with the scale and infrastructure provision of Rudgwick and Bucks Green, designated as a medium village in the HDPF and therefore an appropriate location for growth.

6.2.16. Future occupiers of the development would be able to access local recreation facilities, services and employment opportunities.

6.2.17. The development would be well contained within an existing defensible field boundary to the south, west and east. The landscape proposals to the northern boundary would supplement and enhance these boundaries to ensure the site is well contained in the wider landscape.

6.2.18. Development of the site would not individually or cumulatively prejudice comprehensive long-term development in Rudgwick. Indeed, as noted earlier in this report, the site is a proposed housing allocation in the emerging plan. Its development is therefore integral to long term development aspirations.

# ECE Planning

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- 6.2.19. The proposal therefore meets the criteria for settlement expansion as set out within the FAD.
- 6.2.20. It is also an important material consideration that the Application Site is proposed for allocation in the emerging plan. The future of the emerging plan is unclear at the time of writing. However, the Inspector's letter to the Council noted the "*good and comprehensive work*" in respect of the evidence base supporting much of the plan. Indeed, any further revision of the plan is likely to include an increase in housing sites in Horsham rather than a reduction. The proposed allocation is therefore considered robust in this context.

## Conclusion on principle

- 6.2.21. The absence of a 5YHLS means the conflict with HDPF Policies 4 and 26 is significantly diminished and the weight afforded these policies appropriately reduced as a result. The tilted balance (NPPF Para 11d) towards a presumption in favour of sustainable development is engaged (provided water neutrality is demonstrated) and the provision of up to 90 houses weighs heavily in favour of approval.
- 6.2.22. Further, the proposed development accords with the Council's FAD document and is a proposed allocation in the emerging local plan.
- 6.2.23. As such, the principle of development on the site is acceptable, subject to the detailed considerations as set out below to any site-specific constraints, and any other policy compliance, conflict and harm.

## 6.3. Scale, Appearance and Layout

- 6.3.1. The application is seeking outline planning permission for up to 90 dwellings. Access will be a detailed consideration as part of the application. Appearance, landscaping, layout and scale are reserved and will be considered in a subsequent Reserved Matters Application.
- 6.3.2. The application is accompanied by an indicative Site Plan showing how the quantum of development can be accommodated at the site together with the associated access. This plan indicates that 90no. dwellings is feasible on the site which is split into three main development clusters separated by new open spaces and green corridors.
- 6.3.3. Policy 32 of the HDPF states that good design is a key element in sustainable development and seeks to ensure that development promotes a high standard of urban design, architecture and landscape.
- 6.3.4. Policy 33 of the HDPF states that development proposals should make efficient use of land, integrate effectively with the character of the surrounding area, use high quality and appropriate materials, retain landscaping where feasible (and mitigate loss if necessary) and ensure no conflict with the character of the surrounding town or landscape.
- 6.3.5. Policies RNP2, RNP6, RNP7, RNP8 and RNP9 of the RNP require new development to positively respond to the established character and density of its immediate locality, use materials and be designed to reference surrounding architecture, including being of an appropriate height and being placed to form consistent building lines.

## Scale & Appearance

- 6.3.6. This outline application is not accompanied by any detailed design of the proposed buildings, with both scale and appearance reserved for future consideration. However, an illustrative layout is provided to demonstrate that an attractive landscape led development can be delivered. This is supported by parameter plans detailing land use, green and blue infrastructure, building heights and access and movement.

# ECE Planning

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6.3.7. The immediate site surrounds feature significant variation in building type and appearance, with consistent two-storey semi-detached pairs to the south and bungalows, chalet bungalows and two-storey houses to the east.

6.3.8. The proposed illustrative architectural character draws inspiration from the traditional forms and detailing found throughout the village, helping to create a distinct and authentic sense of place. Buildings will predominantly be two storeys in height, featuring steeply pitched roofs that reflect an informal cottage style and contribute to a cohesive village character.

6.3.9. A limited number of apartment buildings will be located at the centre of the development. These will have a maximum height of 2.5 storeys and will be designed as articulated forms, resembling large country houses to blend seamlessly with the surrounding context. These are included in the areas of the site least sensitive to building heights as shown on the submitted parameter plan.

6.3.10. The illustrative design material features steeply pitched roofs with hipped forms with clipped gables. Half-hipped roofs with gables could also be used to add variation and interest. We have also shown a design with a range of architectural elements to further enrich the façades, including:

- Chimney stacks, which would help define the rooflines and could be positioned on gable ends or main elevations to create focal points.
- Traditional enclosed or open side porches, contributing to the village character.
- Vertically proportioned windows, typically in sash or casement styles, consistent with traditional detailing, occasional bay windows on prominent façades, such as those terminating key vistas or located at important corners.

6.3.11. The design of planted frontages and their boundaries would play an integral role in shaping the character of the streetscape, drawing on local vernacular influences. Open-plan frontages would be avoided where possible, in favour of defined boundaries that provide a sense of enclosure while still allowing for overlooking and maintaining an overall sense of spaciousness.

6.3.12. The illustrative design uses soft landscaping to reinforce the semi-rural character of the development, contributing to its integration with the surrounding landscape.

6.3.13. The proposed design is illustrative given the application is in outline. Nevertheless, it demonstrates how an attractive development can be provided at the site with a design which references the existing context of Rudgwick and Barns Green and integrates appropriately in the landscape. The detailed design would be secured as part of a later reserved matters submission.

## Layout

6.3.14. The final site layout will be considered at reserved matters stage. The illustrative layout provided as part of this outline application demonstrates how the site can be appropriately developed to make the most effective use of the land in a manner which reflects the character and appearance of the area.

6.3.15. In terms of the wider context, the surroundings are characterised primarily by linear residential development which fronts, or is set back from, the public highway. It is recognised that most of the residential dwellings to the south of the site have laid hardstanding over the front gardens to provide parking areas. The dwellings to the east are set back at a greater distance from the highway and incorporate landscaped front gardens.

# ECE Planning

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6.3.16. The submitted information demonstrates that 90 dwellings can be comfortably accommodated within the site. Although the site was allocated under the Regulation 19 Plan for approximately 60 dwellings, the proposed illustrative layout reflects a landscape-led design approach which enables a higher number of dwellings to be achieved without compromising quality, amenity, or landscape character.

6.3.17. The density proposed equates to approximately 26 dwellings per hectare (dph), which is considered appropriate in the context of an edge of settlement site. The scheme retains and strengthens existing landscape features, including mature trees, boundary hedgerows, and the introduction of new green infrastructure and open spaces throughout the site. These landscape buffers also help define the site edge and provide a transition to the surrounding countryside, consistent with the aims of the site allocation.

6.3.18. The uplift in unit numbers is also consistent with the wording of the draft allocation, which refers to “*approximately 60 dwellings*”, allowing for a degree of flexibility were supported by good design and site capacity.

6.3.19. The current proposal makes an efficient use of land in line with the NPPF’s objectives and helps to respond positively to identified local housing needs, including the delivery of affordable homes.

## 6.4. Landscape

6.4.1. Whilst reserved for later consideration, the application includes a Strategy which sets out how a landscape-led scheme can be delivered at the site.

6.4.2. The Landscape Strategy has been carefully developed by Scarp Landscape Architects to respond sensitively to the sites rural setting and to integrate the scheme within the existing village context.

6.4.3. The site comprises gently sloping pastureland, bounded by established hedgerows and mature trees, with open countryside to the north and west, and existing residential development to the south. A key objective of the landscape approach is to retain and enhance these natural features, using them to structure the development and reinforce local landscape character.

6.4.4. The landscape design is structured into a series of character areas, including:

- Green Streetscapes with tree-lined routes for orientation and amenity
- Orchard and Open Spaces to provide places for social engagement and informal play;
- Fitness and Play Trails encouraging healthy lifestyles and exploration;
- SuDS Features and Wetland Habitats, integrated into the green infrastructure;
- Structural Vegetation along site boundaries, ensuring strong definition between village expansion and the wider countryside

6.4.5. New tree and shrub planting is proposed along the site’s northern boundary to create a green edge and reduce visual impact on the adjacent countryside. The eastern and western boundaries will be supplemented with native species to reinforce existing hedgerows and soften views. Along the southern boundary, the hedgerow with Guildford Road will be retained.

6.4.6. The landscape design ensures that development edges are visually contained and filtered from surrounding views, minimising any adverse visual impacts and ensuring that key views, particularly from the public realm and heritage assets, are preserved.

# ECE Planning

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- 6.4.7. The proposal integrates an extensive green and blue infrastructure network. Sustainable drainage systems (SuDS) such as swales and retention basins are sensitively incorporated within open spaces to manage surface water while enhancing biodiversity.
- 6.4.8. The landscape proposals support biodiversity through native planting, the creation of wildlife corridors, and ecological enhancements such as bat boxes, bird nesting habitats, and insect hotels.
- 6.4.9. A Landscape Management Plan (LMP) will be put in place to manage the quality and upkeep of the landscape over the long term. It includes a five-year maintenance plan, with regular reviews, and the responsibility will potentially transfer to a Community Management Company (CMC) once the development is complete. This will help make sure the outdoor spaces stay attractive, useful for residents, and supportive of local wildlife.
- 6.4.10. The landscape proposals have been shaped by a thorough understanding of the site's constraints and opportunities, and the approach taken delivers multiple benefits including visual, ecological, and social.
- 6.4.11. The scheme is considered to accord with local planning policy and national guidance on landscape-led development. It offers a sensitive and well-considered response to the site's semi-rural setting and supports the creation of a high-quality place for future residents.
- 6.4.12. Please refer to the Landscape Strategy which has been produced by Scarp Landscape for further information on the scheme.

## 6.5. Heritage

- 6.5.1. A Heritage Impact Assessment has been produced by HCUK in support of the Outline Application.
- 6.5.2. The site comprises undeveloped pastureland with no heritage assets within its boundaries. However, several Grade II listed buildings are located in the vicinity, namely: Goblin's Pool Hotel, The Queen's Head Public House, The Fox Inn, Field Cottage, and The Old Cottage.
- 6.5.3. The identified heritage assets derive their significance predominantly from their architectural and historic interest, with some archaeological and communal value. Importantly, none of the assets are directly impacted by the development, and the site does not contribute significantly to their immediate settings. The design has been informed by pre-application advice and adopts a sensitive illustrative layout that reflects the local village character.
- 6.5.4. Visual separation from heritage assets has been preserved through existing modern development and landscaping. For those assets with partial intervisibility, such as The Fox Inn, design mitigation measures including setbacks and reinforced boundary planting effectively preserve key views and the rural character of the surroundings. For others, such as Field Cottage and The Old Cottage, the distance (over 230m) and lack of experiential connection ensure no effect on their setting or significance.
- 6.5.5. The proposed development would result in a change within the wider setting of nearby listed buildings but would not lead to any harm to their significance or special interest. There is no physical or visual isolation of any asset, no loss of historic fabric, and no alteration to important views or their appreciation.
- 6.5.6. Accordingly, the proposal is compliant with the statutory duty under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, relevant local planning policies including Horsham District Planning Framework Policy 34, and guidance set out in the NPPF (2024).

# ECE Planning

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6.5.7. Please refer to the Heritage Impact Assessment has been produced by HCUK for further information on the scheme.

## 6.6. Housing Mix and Affordable Housing

6.6.1. As set out in Section 5 of this Statement, the Emerging Local Plan has not yet been adopted and therefore the current Horsham District Planning Framework (HDPF) remains the principal planning policy for determining affordable housing requirements. Under Policy 16 of the HDPF, the development is required to deliver a minimum of 35% affordable housing, with a tenure split of 70% Affordable Rent and 30% intermediate housing.

6.6.2. While the Emerging Local Plan proposes a higher affordable housing target of 45% on greenfield sites, the proposed development delivers 36 affordable units, equating to 40% of the total, thereby exceeding the current HDPF requirement and reflecting a balanced response to the direction of travel in emerging policy. The delivery of a higher proportion of affordable units than required by policy is also consistent with the requirements of the FAD document.

6.6.3. The tenure mix comprises 25 Affordable Rent homes (28%) and 11 Shared Ownership homes (12%), reflecting the 70/30 tenure split prescribed by the HDPF.

6.6.4. The market housing component accounts for 54 units (60%) of the overall scheme. The development delivers a varied mix of unit sizes, including 1, 2, 3 and 4-bedroom homes, meeting a range of housing needs within the parish.

6.6.5. A breakdown of the accommodation mix by tenure and bedroom number is set out below:

Tenure	1 Bed	2 Bed	3 Bed	4 Bed	Total Units	% of Total
Private	0 (0%)	18 (20%)	23 (26%)	13 (14%)	54	60%
Affordable Rented	12 (13%)	7 (8%)	6 (7%)	0 (0%)	25	28%
Shared Ownership	4 (4%)	5 (6%)	2 (2%)	0 (0%)	11	12%
<b>Total</b>	<b>16 (18%)</b>	<b>30 (33%)</b>	<b>31 (34%)</b>	<b>13 (14%)</b>	<b>90</b>	<b>100%</b>

**Figure 12- Housing Mix**

6.6.6. In relation to local housing needs, Policy RNP2 of the Rudgwick Neighbourhood Plan supports the provision of 1, 2, and 3-bedroom homes that reflect the findings of the *Housing Matters Paper* and *Housing Needs Analysis*. The proposed mix responds positively to these objectives, with 84% of all dwellings being either 1, 2 or 3-bed units. Only 14% of the homes are 4-bed, ensuring larger units remain subservient to the provision of smaller homes, in accordance with RNP2.2(b).

6.6.7. For market housing specifically, the *Housing Matters Analysis* (para 2.10) identifies an indicative target mix of:

- 1 or 2 beds – 55%
- 3 beds – 40%
- 4+ beds – 5%

6.6.8. The proposed private housing mix delivers:

# ECE Planning

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- 1 or 2 beds – 33%
- 3 beds – 43%
- 4+ beds – 24%

6.6.9. While the proportion of 4-bedroom units is above the target, the overall mix still provides a strong focus on 2- and 3-bed family homes and remains broadly reflective of local needs. Importantly, the larger dwellings help ensure overall scheme viability and have been carefully balanced in the context of the site and policy RNP2.2(b).

6.6.10. In terms of affordable housing, there is strong alignment with the need for smaller units, particularly 1-beds (16 units) and 3-beds (8 units in total). The proposals also respond to the shortfall in intermediate housing identified in Policy RNP3 by including 11 Shared Ownership homes. This provides meaningful choice for residents who may not qualify for Affordable Rent but cannot access the open market.

6.6.11. Overall, the proposed housing mix is considered to be well-balanced, compliant with the HDPF, aligned with the direction of the Emerging Local Plan, and reflective of the specific housing needs of Rudgwick Parish as set out in the Neighbourhood Plan and supporting evidence base.

## 6.7. Residential Amenity

6.7.1. Policy 33 of the Horsham District Planning Framework (HDPF) emphasises that new development should consider the scale, massing and orientation of buildings, ensuring that it respects the amenity of existing neighbouring occupiers. This includes minimising potential impacts such as overlooking, overbearing presence, and loss of privacy or daylight. This principle has been embedded into the design approach for the proposed development.

6.7.2. As shown on the submitted illustrative site layout, the scheme has been carefully arranged to ensure appropriate separation between new dwellings and surrounding properties, particularly those to the south of the site along Guildford Road. The illustrative layout has been designed to respond sensitively to the surrounding residential grain, with dwellings located and orientated to avoid direct overlooking of existing properties.

6.7.3. The illustrative layout achieves separation distances in excess of 20m between new homes and existing properties, including those to the south-east corner of the site. The illustrative masterplan further shows that tree and vegetation planting around the site, together with the attenuation basins which form part of the surface water drainage strategy, can provide an attractive and pleasant residential environment for future occupiers of the site.

6.7.4. Tree planting to the south eastern site boundary will further reduce the potential for overlooking between the site and neighbouring existing dwellings (including those to be developed at the former pig farm site).

# ECE Planning



6.7.5. It is important to note that the parcel of land to the southeast boundary of the site has gained outline planning permission under reference DC/24/1811 (subject to legal agreement) for 6 dwellings on the boundary. Please refer to the Indicative Plan submitted with the application below.



**Figure 13- Indicative Site Plan reference DC/24/1811**

6.7.6. The development has been designed to provide a sensitive transition between new and existing residential uses. The scheme is naturally separated from surrounding built form through a combination of retained vegetation, new planting, internal access roads and SuDS features, including attenuation basins and landscaping. The presence of the SuDS infrastructure to the southern edge, particularly in the south-east corner of the site, further ensures a defensible and landscaped buffer to the neighbouring development at DC/24/1811.

6.7.7. Overall, the scheme has been carefully designed to provide a well-balanced, landscape-led illustrative layout which respects both the amenities of future occupants and those of surrounding residents. The combination of spatial separation, green infrastructure and thoughtful building orientation ensures the proposals are fully compliant with the amenity objectives of Policy 33 of the Horsham District Planning Framework.

# ECE Planning

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- 6.7.8. In addition, proposed dwellings benefit from private rear gardens that are well sized and positioned to provide usable outdoor space for future residents. In addition to private amenity space, the proposals incorporate high-quality landscaped public open space throughout the scheme, including a central green space and three distinct SuDS attenuation areas which double as informal recreational areas. A Local Equipped Area for Play (LEAP) is also provided adjacent to the largest green space in the south-eastern part of the site, offering accessible play opportunities for children.
- 6.7.9. The overall illustrative layout demonstrates strong regard to existing residential amenity, with a considered use of boundary landscaping, sensitive positioning of buildings, and the retention of trees where possible to the north and west providing further visual buffering between existing development and the new homes
- 6.7.10. In conclusion, the proposed development has been designed to uphold high standards of amenity for both existing and future residents. The design achieves a balance of privacy, outlook and usable amenity space, and is considered to fully comply with the requirements of Policy 33 of the HDPF.

## 6.8. Access, Transport and Parking

- 6.8.1. A Transport Assessment (TA) has been prepared by Motion and submitted to support the outline application. Site access is the only matter covered in detail as part of this outline application. The TA has been informed and prepared in accordance with the guidance provided by WSCC at pre-application stage.
- 6.8.2. The proposed development will be accessed via a new priority junction from Guildford Road, designed in accordance with West Sussex County Council (WSCC) standards. Visibility splays have been calculated using speed survey data and meet the requirements set out in Manual for Streets 2. A Stage 1 Road Safety Audit has been undertaken, and all recommendations have been addressed. The access design ensures safe and suitable entry and exit for all vehicles, including emergency and service vehicles.
- 6.8.3. The site is located within walking and cycling distance of a range of local amenities, including schools, shops, healthcare, and recreational facilities. It is well served by the local footway network and has access to Public Rights of Way and National Cycle Network Route 223. A number of local bus services are available nearby, offering sustainable travel options to Horsham, Guildford and surrounding settlements. These connections support reduced reliance on the private car.
- 6.8.4. Trip generation has been calculated using the TRICS database, providing a robust assessment of the likely impact. The development is expected to generate 49 vehicle movements during the AM peak and 47 during the PM peak. Distribution analysis based on Census data shows these trips will disperse across multiple routes. Traffic modelling demonstrates that all local junctions will continue to operate within capacity in 2030, with no severe impact on the surrounding road network.
- 6.8.5. Car and cycle parking provision will comply with WSCC's adopted standards. The illustrative layout shows 187 car parking spaces, which is sufficient for the proposed mix of housing. Each dwelling will benefit from cycle storage, either within the plot or in secure communal facilities. Refuse collection and servicing can be accommodated safely within the internal road layout, with swept path analysis confirming vehicle manoeuvrability.
- 6.8.6. The proposals comply with national and local transport policies and offer a sustainable, well-connected residential development. No highways or transport-related reasons have been identified that would justify refusal of the application.

# ECE Planning

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6.8.7. The proposed internal movement strategy is included in the submitted access and movement parameters plan. The plan shows that the site can be developed so that it encourages walking and cycling with a network of well connected, safe, attractive streets and routes. New routes will connect with the wider network of footpaths outside of the Application Site, improving public access in the local area.

6.8.8. Please refer to the submitted Transport Assessment by Motion for further information on the scheme.

## 6.9. Ecology and Biodiversity Net Gain

6.9.1. Policy 31 of the HDPF states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.

6.9.2. A series of ecology reports have been produced by Ecology Partnership in support of the Outline Application including Preliminary Ecological Appraisal (PEA), Bat Report, Breeding Bird Survey and Dormice Report.

6.9.3. The proposed development site near the junction of Lynwick Street and Guildford Road lies over 4km from the nearest designated ecological sites, including Slinfold Stream and Quarry SSSI, Chiddington Forest SSSI, and The Mens SAC/SSSI. Due to this separation and the presence of intervening habitat and infrastructure, it is not anticipated that these designations will be directly impacted by the development. However, early consultation with the Local Planning Authority (LPA) is recommended to confirm whether a Habitat Regulations Assessment (HRA) is necessary.

6.9.4. On-site habitats are typical of the wider landscape and dominated by modified grassland, which is generally of low ecological value. More valuable features include hedgerows, treelines, scrub, and scattered mature trees, which offer potential habitat for a range of protected species including bats, badgers, dormice, nesting birds, and hedgehogs. These boundary features are to be largely retained and enhanced, aligning with ecological best practice and policy.

6.9.5. Several trees contain potential roost features for bats and will be retained; if any require removal, further surveys and mitigation will be implemented. Although the site has low suitability for great crested newts and reptiles due to current intensive grazing, boundary habitats could support dormice and will be subject to further targeted surveys. Nesting bird and mammal protection measures have also been recommended.

6.9.6. The site is within the NatureSpace 'green zone' for GCN, and the proposed design incorporates appropriate habitat retention and biodiversity enhancements. With the application of recommended mitigation and ecological improvements, the development is unlikely to result in significant ecological harm and offers the potential for net gains in biodiversity.

6.9.7. All additional ecological surveys have been submitted with the application, please refer to these for further detail on the scheme.

6.9.8. The proposed development will deliver the mandatory 10% Biodiversity Net Gain (BNG) as required under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This will be achieved through a mix of on-site provision and off-site credits.

## 6.10. Trees

6.10.1. An Arboricultural Impact Assessment has been produced by Aspect Partnership in support of the Outline Application.

# ECE Planning

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- 6.10.2. To ensure compliance with Horsham District Council's adopted and emerging policies, the development proposals have been guided by a tree survey in accordance with BS5837:2012. The design seeks to retain all moderate and high-quality trees within the application area, with removals limited to one group of scrub, parts of a low-quality vegetation group, and sections of hedgerow. These removals have been minimised through an iterative design process and will be offset through appropriate replacement planting.
- 6.10.3. Some minor encroachment into root protection areas (RPAs) is required to accommodate new footpaths, but this will be carried out using sensitive, above-ground construction methods to protect tree roots. A tree protection strategy has been established, supported by recognised construction techniques and on-site arboricultural auditing to oversee works near retained trees.
- 6.10.4. Overall, the development is considered acceptable from an arboricultural perspective, subject to the implementation of the proposed protection measures. The scheme aligns with the requirements of both local planning policy and national guidance set out in the NPPF.
- 6.10.5. Please refer to the Arboricultural Impact Assessment has been produced by Aspect Partnership for further information on the scheme.

## 6.11. Sustainability

- 6.11.1. An Energy and Sustainability Statement has been produced by Daedalus Environmental in support of the Outline Application.
- 6.11.2. The statement outlines how the proposed residential development north of Guildford Road, Rudgwick will incorporate sustainable design and construction principles in line with national and local planning policy. The scheme has been designed to exceed current Building Regulations and align with future standards, particularly the proposed Future Homes Standard.
- 6.11.3. Key measures include delivering 'zero-carbon ready' homes with no reliance on natural gas, high thermal performance fabric, and low-carbon air source heat pumps. Renewable energy generation, primarily via photovoltaic panels, will be integrated where necessary. Climate adaptation is a core part of the design, with effective overheating mitigation, extensive tree retention, new planting, and a multifunctional landscape strategy.
- 6.11.4. All dwellings with associated parking will include electric vehicle charging infrastructure in line with Approved Document S. Construction and operational waste will be managed in accordance with the Waste Hierarchy, prioritising prevention, re-use, and recycling.
- 6.11.5. Overall, the proposals demonstrate a clear commitment to sustainability and meet the relevant policy objectives of the Horsham District Planning Framework. The approach will be refined as the project progresses, with final details to be provided at the Reserved Matters stage. The development represents a responsible and forward-thinking design that maximises environmental performance and long-term resilience.
- 6.11.6. Please refer to the Energy and Sustainability Statement has been produced by Daedalus Environmental for further information on the scheme.

## 6.12. Drainage & Flood Risk

- 6.12.1. A Flood Risk and Drainage Strategy has been produced by Paul Basham Associates in support of the Outline Application.

# ECE Planning

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- 6.12.2. The site lies wholly within Flood Zone 1, indicating a low probability of fluvial or tidal flooding. A comprehensive review confirms that residual flood risk from all other sources including reservoirs, groundwater, surface water, and public sewers is also considered low to very low. Localised surface water risk within the site, primarily caused by low spots in topography, will be mitigated through ground regrading and SuDS integration.
- 6.12.3. Infiltration testing and BGS mapping confirm that the site is underlain by Weald Clay with minimal permeability and no suitable superficial deposits. Consequently, infiltration is not a viable drainage option. Instead, the proposed strategy includes capturing runoff at source, storing it in attenuation basins and crates, and discharging to an existing watercourse approximately 170m west of the site via a Hydrobrake flow control, limiting discharge to the greenfield Qbar rate of 17.8 l/s.
- 6.12.4. The proposed drainage system has been designed to accommodate rainfall events up to the 1-in-100-year event, including a 45% allowance for climate change. The development is split into two surface water catchments, each served by separate attenuation and control features, ensuring controlled discharge rates in line with the SuDS Manual (CIRIA C753).
- 6.12.5. Foul drainage will connect via a gravity-led network to an existing Southern Water manhole (Ref: 9901) on Guildford Road, subject to a Section 106 agreement. A non-return valve is also proposed to prevent surcharge-related flooding. Southern Water has confirmed that there is capacity in its network to accommodate the development.
- 6.12.6. In summary, the proposed development adopts a robust, policy-compliant approach to flood risk and drainage, incorporating SuDS principles, climate adaptation, and future resilience. The strategy aligns with national, regional, and local planning policy, including the NPPF and Horsham District Council's Policy 38, and ensures flood risk is not increased on-site or elsewhere.
- 6.12.7. Please refer to the Flood Risk and Drainage Strategy has been produced by Paul Basham for further information on the scheme.

## 6.13. Air Quality

- 6.13.1. An Air Quality Assessment has been produced by Redmore Environmental in support of the Outline Application.
- 6.13.2. The assessment considered both the construction and operational phases of the scheme. During construction, potential impacts from fugitive dust emissions were evaluated using IAQM methodology. The site was assigned appropriate risk ratings and corresponding site-specific dust mitigation measures were recommended. Subject to their implementation, construction-related air quality impacts are predicted to be not significant.
- 6.13.3. For the operational phase, potential air quality effects arising from road traffic emissions were assessed. Due to the relatively low volume of vehicle movements expected from the development, impacts were also found to be not significant.
- 6.13.4. An Emissions Mitigation Assessment, in line with the Sussex Air Quality and Emissions Mitigation Guidance, was completed to determine the necessary mitigation for the proposed development.
- 6.13.5. Overall, the results indicate that the development will not result in significant adverse effects on air quality. As such, air quality is not considered a constraint to the granting of planning permission.
- 6.13.6. Please refer to the Air Quality Assessment has been produced by Redmore Environmental for further information on the scheme.

# ECE Planning

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## 6.14. Noise Impact

- 6.14.1. A Noise Impact Assessment has been produced by Acoustic SE in support of the Outline Application.
- 6.14.2. A noise assessment was undertaken between 19th and 24th March 2025 using two unattended Class 1 sound level meters. One was located near the A281 (LT1) and the other adjacent to the school sports field to the east of the site (LT2). The A281 was identified as the dominant source of environmental noise affecting the site.
- 6.14.3. Noise modelling was carried out using IMMI software, applying the highest measured daytime and night-time levels in line with best practice. A worst-case scenario assessment identified Plot 29, located nearest to the A281, as requiring enhanced acoustic mitigation. To meet internal noise criteria, a Sound Reduction Index (SRI) of 32dB on the southern façade was determined, achievable through enhanced glazing (Pilkington 10/12/6) and an acoustic wall vent. Other façades, such as the northern elevation, require minimal mitigation (SRI 14dB).
- 6.14.4. The modelling confirms that only a limited number of plots near the A281 (notably Plots 20 and 29) require specific enhanced measures, allowing for value-engineered acoustic design elsewhere on site. All external amenity areas meet the recommended noise level threshold of below 50dB LAeq,16hr.
- 6.14.5. A preliminary site risk assessment under ProPG (2017) indicates a low to medium risk, and the site layout can be further refined at detailed design stage to locate sensitive rooms on quieter façades. Additionally, the assessment demonstrates that overheating mitigation strategies can accommodate openable windows at night without breaching internal noise limits.
- 6.14.6. In conclusion, the site is suitable for residential development from a noise perspective. With appropriate acoustic design and targeted mitigation, planning permission should not be withheld on noise grounds.
- 6.14.7. Please refer to the Noise Impact Assessment has been produced by Acoustic SE for further information on the scheme.

## 6.15. Archaeology

- 6.15.1. An Archaeological Desk Based Assessment has been produced by HCUK Group in support of the Outline Application.
- 6.15.2. A review of the West Sussex Historic Environment Record (WSHER) and historic mapping indicates that the site has a low potential for archaeological remains dating from the Prehistoric through to the Medieval periods. This assessment likely reflects the lack of previous archaeological investigation in the surrounding area rather than a definitive absence of past activity.
- 6.15.3. The site's only features of moderate archaeological interest relate to former almshouses and associated gardens situated along the southern boundary, which were demolished in the mid-20th century. These are assessed as having low archaeological importance, should remains survive.
- 6.15.4. Despite this, the lack of prior development across the site suggests a relatively undisturbed landscape, indicating any surviving archaeological remains could be well preserved. However, if such remains are present, they may be impacted by groundworks associated with the proposed development.

# ECE Planning

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- 6.15.5. Given these factors, any need for further archaeological investigation would be subject to agreement with the local planning authority. This could potentially involve targeted evaluation or mitigation in the form of a watching brief during construction. Overall, archaeology is not considered a constraint to development, subject to any appropriate mitigation secured through planning.
- 6.15.6. Please refer to the Archaeological Desk Based Assessment has been produced by HCUK Group for further information on the scheme.

## 6.16. Water Neutrality

- 6.16.1. The application site falls within the Sussex North Water Supply Zone as defined by Natural England and which includes supplies from groundwater abstraction which cannot, with certainty, demonstrate no adverse impacts upon the defined Arun Valley SAC, SPA and Ramsar sites.
- 6.16.2. An advice note from Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.
- 6.16.3. On this basis, a Water Neutrality Statement has been produced by Daedalus Environmental in support of the Outline Application.
- 6.16.4. This Water Neutrality Statement sets out Welbeck Land's proposed strategy to address water consumption associated with the development of 90 dwellings at Rudgwick, in line with the Natural England Position Statement (2021) for developments within the Sussex North Water Supply Zone.
- 6.16.5. While the development will increase water usage compared to the existing greenfield baseline, implementation of water-efficient fixtures and fittings is expected to reduce consumption to 85l/p/d in line with best practice.
- 6.16.6. To offset this increase and achieve water neutrality, the Applicant will utilise the Sussex North Offsetting for Water Scheme (SNOWS), expected to launch in Summer 2025 (though it is noted that the start date has been subject to repeated delays). The required offsetting credits will be secured through a 'Grampian-style' planning condition, ensuring no development proceeds until sufficient credits are in place.
- 6.16.7. By committing to this recognised and deliverable approach, Welbeck Land demonstrates its alignment with the requirements of Horsham District Council and Natural England. Water neutrality, therefore, is not considered a constraint to the development coming forward.
- 6.16.8. Please refer to the Water Neutrality Statement has been produced by Daedalus Environmental for further information on the scheme.

## 7. Conclusions

- 7.1. This Planning Statement has been prepared in support of an outline planning application for the development of up to 90 residential dwellings on land north of Guildford Road, Rudgwick. All matters will be reserved except from access.
- 7.2. The proposed development, while located outside the defined Built-Up Area Boundary (BUAB) of Rudgwick, aligns with the spatial growth objectives of Policy 4 of the Horsham District Planning Framework (HDPF) when assessed under Paragraph 11(d) of the NPPF and the application of the tilted balance in respect of the presumption in favour of sustainable development.
- 7.3. The significant housing land supply shortfall (only 1-year as of May 2025) and the Council's Housing Delivery Test figures (62%) trigger the presumption. In this context, the location of the site outside the BUAB and the resultant conflict with HDPF Policies 4 and 26 is substantially reduced.
- 7.4. Furthermore, the site meets all criteria within the Council's Facilitating Appropriate Development (FAD) document and is proposed for allocation within the emerging Local Plan. This further demonstrates the acceptability of the principle of development.
- 7.5. Although in outline form, the illustrative layout and supporting documents demonstrate that the site can accommodate up to 90 dwellings in a manner that respects local character, landscape, and residential amenity. The design approach is consistent with HDPF Policies 32 and 33, and Rudgwick Neighbourhood Plan Policies RNP2, RNP6–9, ensuring future reserved matters can deliver a well-integrated, high-quality scheme.
- 7.6. The scheme delivers 40% affordable housing, exceeding the 35% requirement of Policy 16 of the HDPF and aligning with the direction of travel in the emerging Local Plan. The mix provides a broad range of unit sizes with 84% being 1, 2 or 3-bedroom homes, in line with local needs and RNP2. The tenure split reflects HDPF expectations, and Shared Ownership units respond positively to RNP3's objectives.
- 7.7. The proposals are underpinned by a robust landscape-led strategy which enhances existing features and integrates the scheme with its rural surroundings. The retention and reinforcement of boundary planting, combined with green infrastructure and SuDS, support the aims of HDPF Policy 25 and Policy 32, ensuring the visual containment of the site and contributing positively to biodiversity and local distinctiveness.
- 7.8. The Heritage Impact Assessment concludes that the development would result in no harm to the setting or significance of nearby listed buildings, with separation distances and screening preserving their heritage value. The proposals are therefore fully compliant with Policy 34 of the HDPF, the statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990, and Paragraphs 206–208 of the NPPF.
- 7.9. The Archaeological Desk-Based Assessment indicates low potential for significant remains, with mitigation (e.g. watching briefs) recommended as appropriate. The proposals therefore comply with HDPF Policy 34 and Paragraphs 211–214 of the NPPF.
- 7.10. The indicative layout demonstrates adequate separation distances, strategic planting and SuDS infrastructure to safeguard the amenity of existing and future occupiers. The scheme adheres to HDPF Policy 33, ensuring privacy, outlook and usable outdoor space are maintained.

# ECE Planning

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- 7.11. The proposals are supported by a comprehensive Transport Assessment and safe access design in accordance with WSCC and Manual for Streets 2. The site is sustainably located, with strong pedestrian and cycle connectivity and no highway capacity concerns. Parking and servicing arrangements meet adopted standards. The scheme is consistent with HDPF Policies 40 and 41.
- 7.12. Ecological assessments confirm that the development avoids significant ecological harm and secures a minimum 10% biodiversity net gain in accordance with HDPF Policy 31 and the Environment Act 2021. Protected species mitigation and native habitat enhancements are integral to the layout.
- 7.13. The Arboricultural Impact Assessment supports the retention of high-quality trees, with losses limited and compensated through robust new planting. Tree protection measures and construction methodologies comply with BS5837:2012, aligning with HDPF Policy 33 and NPPF paragraph 131.
- 7.14. The proposed homes are designed to be 'zero-carbon ready' and incorporate renewable energy, EV charging, and climate resilience measures. These commitments ensure compliance with Policy 37 of the HDPF and the aims of the Future Homes Standard.
- 7.15. A detailed drainage strategy confirms that the site lies entirely within Flood Zone 1 and incorporates SuDS to manage surface water sustainably. Discharge rates are controlled to greenfield levels, and foul water will be served by existing infrastructure. The scheme complies with HDPF Policy 38 and the NPPF (2024).
- 7.16. The Air Quality Assessment confirms that both construction and operational phases would not result in significant effects. Mitigation measures are in line with IAQM and Sussex Air guidance, satisfying HDPF Policy 24.
- 7.17. Noise modelling demonstrates that mitigation, where necessary, ensures compliance with ProPG and BS8233 standards. The layout and acoustic strategy ensure a suitable noise environment for future residents, consistent with HDPF Policy 33.
- 7.18. A Water Neutrality Statement confirms compliance with Natural England's guidance for the Sussex North Water Supply Zone. Through SNOWS offsetting and best practice measures (85l/p/d target), the development meets the requirements of HDPF Policy 37 and water neutrality obligations under the Habitats Regulations.
- 7.19. The proposal complies with existing local and national planning policy and therefore should be approved accordingly.

# **ECE Planning**

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## **Appendix A – Pre Application Response 105 Unit Scheme PE/21/0224**



Stuart Crickett  
Strutt and Parker  
9-11 Chertsey Street  
Guildford  
Surrey  
GU1 4HD

Our ref: PE/21/0224  
Your ref:  
Officer: Jason Hawkes  
Email: Jason.Hawkes@horsham.gov.uk  
Tel: 01403 215162  
Date: 5th January 2022

Dear Sir/Madam,

**Location:** Land at 508047 133039, Bucks Green, Rudgwick, West Sussex

**Details:** Development of up to 105 dwellings (Class C3), including 37 (35%) affordable homes, with landscaping, open space, parking, provision of new vehicular and pedestrian accesses to Guildford Road and Lynwick Street, new pedestrian access to the existing Public Right of Way (PROW) to the east, sustainable urban drainage attenuation pond and all other associated development works.

Your enquiry has been considered and I can advise as follows:

Site and Surrounds:

The application site relates to a rectangular piece of land located to the north of Guildford Road at Bucks Green in a countryside location. The site is divided into two grassed fields and is approximately 4.9 hectares in size. Lynwick Street adjoins the site to the west. The site is divided by a belt of trees running north to south. There is also a belt of trees and hedgerow along the south, west and eastern boundaries of the site. The site is on a gentle slope, north to south and a public right of way runs along the eastern boundary.

For the surrounding area, the southern side of Guildford Road is comprised of buildings fronting the road in a linear fashion. The site is adjacent to a row of dwellings which back on to the application site and a triangular piece of land, called Bucks Green Pig Farm. Open fields lie to the north and the village of Rudgwick is to the east of the site. Directly to the east of the site are playing fields. Several listed buildings are within the proximity of the site.

Proposed Development:

The proposal is for the development of the site for 105 residential units, including 37 units affordable housing. The scheme includes a vehicular access off Guildford Road and retained farm access via Lynwick Street, which is indicated as an emergency access. A central green space is proposed including a Local Area for Play (LAP). The proposal includes a landscaped buffer to the north and also retains the central line of trees running through the site. Allotments are proposed within the site to the northern section. Two attenuation ponds are also shown to the southern section, either side of the main access.

Planning History:

None

Development Plan Policies

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Horsham District Planning Framework [HDPF], adopted in November 2015 is relevant and remains the starting point for the assessment of this proposal, with specific reference to the following policies:

Policy 1 - Strategic Policy: Sustainable Development  
Policy 2 - Strategic Policy: Strategic Development  
Policy 3 - Strategic Policy: Development Hierarchy  
Policy 4 - Strategic Policy: Settlement Expansion  
Policy 15 - Strategic Policy: Housing Provision  
Policy 16 - Strategic Policy: Meeting Local Housing Needs  
Policy 24 - Strategic Policy: Environmental Protection  
Policy 25 - Strategic Policy: The Natural Environment and Landscaper Character  
Policy 26 - Strategic Policy: Countryside Protection  
Policy 31 - Green Infrastructure and Biodiversity  
Policy 32 - Strategic Policy: The Quality of New Development  
Policy 33 - Development Principles  
Policy 34 - Cultural and Heritage Assets  
Policy 37 - Sustainable Construction  
Policy 38 - Strategic Policy: Flooding  
Policy 39 - Strategy Policy: Infrastructure Provision  
Policy 40 - Sustainable Transport  
Policy 41 - Parking

West Sussex Joint Minerals Local Plan (2018)

Policy M9 - Safeguarding Minerals

Relevant Neighbourhood Plan:

The Rudgwick Neighbourhood Plan 2018-2031 was formally made at Full Council on 23 June 2021. The relevant policies are as follows:

Policy RNP1 Spatial Plan for the Parish  
Policy RNP2 Housing Mix  
Policy RNP5 Housing Density  
Policy RNP6 Materials  
Policy RNP7 Architectural Style  
Policy RNP8 Development Height  
Policy RNP9 Street Scene  
Policy RNP13 New Non-Motorised Routes  
Policy RNP15 Allotments  
Policy RNP17 Green Infrastructure & Trees

Other Guidance:

National Planning Policy Framework [NPPF] (2021)

Planning Practice Guidance [PPG]

Planning Obligations and Affordable Housing Supplementary Planning Document 2017

CIL Charging Schedule 2017

Supplementary Planning Guidance (September 2020) - revised county parking standards and transport contributions methodology  
Air Quality and Emissions Mitigation Guidance for Sussex (2020)  
Rudgwick Parish Design Statement

### Planning Assessment.

#### Principle

The Statutory basis for decision taking in planning is Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The site is located outside a defined Built-up Area Boundary and not allocated for development within the Horsham District Planning Framework (HDPF) or the Rudgwick Neighbourhood Plan. Development in this location at this time therefore conflicts with the sustainable development principles set out in Policies 1 and 2 of the HDPF as well as with Settlement Expansion Policy 4 and Policy RNP1 of the Rudgwick Neighbourhood Plan. The principle of the proposed development would therefore remain contrary to Policies 1, 2, 3, 4 and 26 of the Horsham District Planning Framework, and paragraphs 2, 11, 12 and 47 of the NPPF which requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, by virtue of its location outside a BUAB, the proposal would conflict with the HDPF's countryside protection policy (Policy 26) as the development is not considered to be 'essential' to this countryside location and results in landscape harm (as outlined below).

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan. However, at this stage the emerging policies do not carry any weight in decision making. As the HDPF is now over 5 years old, the relevant policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). Recent appeal decisions have indicated that the Council does not have a five year land supply therefore Paragraph 11d of the NPPF will be engaged in decision making on this proposal and the benefits of the additional housing given significant weight. The protections afforded by paragraph 14 of the NPPF do not apply to potentially override paragraph 11d as the recently made Rudgwick Neighbourhood Plan does not include allocations to meet its identified housing need.

However, as stated in the NPPF at paragraph 182, the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. As explained in our meeting, the proposal, as currently submitted, would result in significant landscape harm as well as substantial ecological harm, resulting from the water neutrality issue adversely affecting the habitat sites in the Arun Valley. These issues are expanded upon below. The impact of the proposals on the Arun Valley sites, in the absence of a credible and deliverable water neutrality strategy, would fail to comply with Paragraph 182 and would therefore constitute a clear reason to refuse planning permission applying footnote 7 and Paragraph 11d (i).

In relation to the Local Plan Review, a Cabinet meeting in July approved recommendations for the Regulation 19 draft Plan to progress to Full Council for authorisation to proceed. However, the Plan was not able to progress following sudden amendments to the NPPF and then subsequently the water neutrality issues raised by Natural England. The NPPF amendments have been addressed and work is ongoing with the relevant authorities to seek a solution to the water

abstraction issues raised by Natural England. This may though have implications for the quantum of development that can come forward in the plan and consequently which sites remain as draft allocations.

The July 2021 Regulation 19 draft Plan allocates this site for development under Policy HA16: Rudgwick and Bucks Green Housing Allocations. The policy states that this site is allocated for 60 homes and should come forward with the adjacent site at the Former Pig Farm for 6 homes. Given the delay to the Local Plan Review and the fact that this plan has yet to receive Full Council authorisation to proceed, no weight can be given to this draft allocation in the determination of this application. Notwithstanding this, it is noted that the current proposal for 105 units would not be in accordance with draft Policy HA16.

#### Affordable Housing and Mix

The housing mix proposed for this development of 105 homes is 68 market dwellings and 37 affordable units. This equates to 35% affordable housing, in accordance with Policy 16 of the HDPF. Policy 16 requires a 70/30 split in favour of affordable rented units.

It should be noted that if this scheme were to come forward and given weight under the Local Plan Review, Policy 16, as currently drafted, requires greenfield sites providing self-contained dwellings (houses and / or flats) to provide a minimum of 45% affordable housing.

In terms of housing mix, Policy RNP2 of the Rudgwick Neighbourhood Plan housing states that '*proposals for new housing development should deliver homes which address local housing needs in the parish as set out in the Housing Matters Paper and the Housing Needs Analysis. Proposals for the development of 1, 2 or 3-bedroom houses which comply with the spatial strategy of the Plan (Policy RNP1.1) will be particularly supported.*'

Policy RNP2.2 (a) states that '*proposals for four-bedroom houses (or larger houses) on developments of less than ten houses should demonstrate the way in which they complement the development of smaller homes on the site and, where appropriate, contribute towards overall development viability.*' RNP2.2 (b) states that '*proposals for four-bedroom houses (or larger houses) on developments of ten or more houses should be subservient to the overall development of smaller houses and demonstrate the way in which they address the housing needs of the parish.*'

In accordance with paragraph 2.10 of the Rudgwick Parish Housing Matters Analysis (<http://www.rudgwick-pc.org.uk/media/21766/rndphousingmatters18052020.pdf>), the market housing mix should be as follows:

- 1 or 2 bed – 55%
- 3 bed – 40%
- 4+ bed – 5%

For the affordable housing mix, there is again a need for smaller units within Rudgwick, particularly for 1 bed and 3 bed affordable rented units. Policy RNP3 of the Rudgwick Plan also states that there is currently a shortfall in provision of intermediate affordable housing. In this context you are advised to consider the benefit of including First Homes and/or other intermediate housing products in your affordable housing offer, alongside a suitable quantum of affordable rent properties.

#### Water Neutrality:

Horsham District Council, Crawley Borough Council and Chichester District Council received a Position Statement from Natural England in September relating to water usage, which is a material

consideration for all HDC planning decisions. The statement along with the accompanying map is available on our website: <https://www.horsham.gov.uk/>.

Horsham District is situated in an area of serious water stress, as identified by the Environment Agency. The District is supplied with water by Southern Water from its Sussex North Water Resource Zone. This site is within the area identified as being affected by the water neutrality issue.

Water supply in the water stress area is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the Arun Valley sites. It advises that development within this zone must not add to this impact.

You should note that given the details of the position statement HDC are currently unable to determine current planning applications positively unless it can be demonstrated they are 'water neutral' and/or that they do not result in a significant effect.

The proposal for 105 units would need to demonstrate water neutrality if it is to be taken forward. Where an increase in water consumption is likely (as is the case with this proposal), we will require a water neutrality statement setting out the strategy for achieving water neutrality within the development, to be considered through Appropriate Assessment.

Water neutrality can be achieved by developers building significant water efficiency measures into new development and by providing offsetting measures to reduce water consumption from existing development, so the development becomes water neutral. The statement will need to calculate the water balance and we will be providing some further guidance on what should be included in a water neutrality statement. Unfortunately, it is not just a case of providing water efficiencies measures onsite as this will not make the development water neutral.

Failure to achieve water neutrality will mean the development does not comply with s.63 of the Conservation of Habitats and Species Act 2017. As such any development any development which does not achieve water neutrality, will be considered contrary to Policy 31 of the HDPF and paragraph 182 of the NPPF.

As I have set out above, Paragraph 182 states that 'the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.' Paragraph 11d(i) of the NPPF states that for applications involving the provision of housing, in situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites and there are no relevant development plan policies, permission is to be granted, unless there clear reasons for refusing permission, such as impacts on a habitats site (footnote 7). This would be the case if water neutrality is not achieved for a proposal for this site.

#### Landscape Impact, Layout & Design:

An outline Landscape and Visual Appraisal has been submitted as part of the pre-application query by Scarp Landscape Architecture. This identifies the site as having a low to moderate sensitivity when assessed against the criteria in the Horsham Landscape Capacity Study (2014). The report states that this site is considered to have a moderate landscape value with moderate levels of distinctiveness in terms of landscape character and quality.

The proposed draft policy for this site under the Local Plan Review (named RD1) states that development be 'limited to the southern part of the site with an agreed landscape treatment in the northern part of the site to minimise landscape impacts.' This is indicated in your proposal with a northern landscape buffer, however at this stage I am not fully convinced the draft policy has been met in the plans submitted.

As discussed at our meeting, the HDC Landscape Architect has queried the northern boundary of the site. The boundary does not appear to follow an existing established hedge or field boundary. As a general rule, development should respect and retain existing field boundaries. This is in order to be landscape led and respond positively to the characteristics of the site. The Landscape Architect has also expressed concern to the quantum of development for this site. The western part of the site is more open due to the openness of this part of the site and the lack of a dense hedgerow to these boundaries. Development to this field would therefore result in a visually inappropriate impact on this countryside site. As such, it is felt that the western field should not be developed and development limited to the eastern field. Alternatively, the western field could be used for additional open amenity space for the proposal.

The inclusion of a LAP and allotments is welcomed. Any proposal would need to explain how the allotments would be delivered, managed and maintained. The retention of all the existing trees on site is also appropriate and in accordance with Policy RNP17 of the Rudgwick Neighbourhood Plan. Any proposal would need to include details of how existing trees would be retained and protected during works. A full landscape scheme would also be required outlining all additional trees and planting for a proposal.

No objection is raised in principle to the access and layout of the proposal. It is unclear from the proposal where the proposed parking areas for the units would be. Large parking courts to the rear of units should generally be avoided. More details would be required of the layout of the proposal for further advice. No objection is raised to the proposed density and buildings heights. As explained at our meeting, the rationale of the suburban layout in contrast to the linear character of Bucks Green would need to be explained in a submission.

For the design of the dwellings, your attention is drawn to the Rudgwick Parish Design Statement and chapter 6 of the Rudgwick Neighbourhood Plan. The Design Statement states that '*developers should avoid too much extra detail on new house frontages which some might describe as pastiche, that is to say, an incongruous hotchpotch, too often poorly finished in modern materials. When imitating historical styles, of which Rudgwick has plenty, from medieval to Edwardian, developers should use architectural details which complement the whole and which sit well in the overall street scene. Some variety of complementary styles in a street is also desirable, rather than rows of identical houses. Colour of materials is important too, as is any landscaping, including climbing plants which enhance the frontage and add biodiversity.*'

The Statement continues: '*Brick should be our main building material complemented by tile-hanging. Wealden bricks are darker than average, which complement our landscape but, new or reclaimed brickwork should match existing frontages. A number of houses in Rudgwick display an attractive chequered pattern of darker and lighter brick.*'

The Neighbourhood Plan also states that '*brick should be the main building material complemented by tile hanging on the upper floor where appropriate. Barn style cladding or clapboard is an acceptable alternative to tile hanging in Rudgwick.*'

In terms of architectural style, the Neighbourhood Plan states new development proposals should be designed with reference to the surrounding architecture, paying particular attention to features of the local vernacular and locally characteristic details which may include:

- a) Rooflines with hipped, half hipped with gables and catslides.

- b) Chimneys as centrally located ridge stacks and end of gable stacks.
- c) Sash windows
- d) Timber fielded panel or more simple plank doors

The proposed layout plan shows a proposed farm access to the north. You are advised to include evidence in any proposal as to why this has to be included in a proposal. Ideally, it would be better not to include this access as it suggests further development to the north.

In terms of the retained right of way, it is likely that WSCC will require a contribution towards improvements to the right of way, given the increase of its use due to development of this site.

#### Impact on Amenity:

The development would be immediately adjacent to properties to the south eastern corner of the site. These properties have rear gardens facing north and would be most affected by this proposed development of this field. It is noted that the proposed layout includes an attenuation pond which would act as buffer between the properties and proposed dwellings. Attention should also be given to the amenity of these properties during construction works. Measures would need to be outlined in a Construction Environment Management Plan.

The Council's Environmental Health Officer has commented that the main areas of interest with respect to environmental quality are as follows:

1. A Preliminary Environmental Risk Assessment of the site
2. Impact of road traffic noise from the A281 Guildford Road.
3. Impact of noise from established commercial and industrial premises. including the Fox Inn and Rudgwick Garage.
4. Impact of development on established commercial and industrial premises
5. Air quality exposure of the development
6. Air quality Impacts arising from the development and limited opportunities for sustainable travel afforded by the location.
7. Lighting impacts of the development given the relatively dark village fringe location.

#### Heritage Impact

There are several listed buildings nearby the site. The Council's Conservation Officer has commented that the proposed development of this site will lead to change within the settings of these listed buildings. However, these listed buildings are experienced within a village setting. He has commented the development should be designed to reinforce the character of a Sussex village then the impact will not be harmful from a heritage perspective. He has further clarified that the important matter is to design the layout to create a pleasant place following the principles of garden suburb design.

#### Transport

It is important that refuse storage is accessible for a refuse vehicle or large delivery vehicle without hindrance. It is noted that refuse and services have been considered in your submission. It is equally important that parking provision on site is appropriate as there is little capacity for on-street parking on the surrounding highway network.

West Sussex County Council as Local Highway Authority sets out car and cycle parking provision standards and electric car charging points provision, and compliance with these standards is expected in this proposal:- <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/>

Advice can also be sought separately from West Sussex County Council on other highway matters such as access and road layouts. In advance of any superseding requirements brought in by the government, for electric charging points, the West Sussex County Council minimum standards for provision in 2022 would be 37% coverage with cable-ducting provided at all remaining spaces to provide 'passive' provision for these spaces to receive electric vehicle charge points in the future.

#### Ecology and Climate Change:

A Preliminary Ecological Appraisal was submitted with the pre-application query. The Council's Ecological Consultant has commented that the appraisal is detailed and provides a comprehensive assessment of the species and habitats likely to be affected by the proposals. The appraisal highlights the need to carry out additional survey work in order to fully inform an Ecological Impact Assessment that can be submitted in support of a planning application and outlines mitigation and risk avoidance measures that will be necessary. A full suite of ecological surveys and appropriate mitigations and enhancements measures should accompany any application submission, including clarity on the extent of net gain to be achieved.

In seeking to mitigate against climate change, it is important that a statement is submitted with any application which fully sets out how the proposal will address climate change including sustainable construction techniques to reduce carbon emissions.

Paragraph 181 of the NPPF and Policy 24 of the HDPF seek to maximise opportunities to improve air quality through the effective mitigation of impacts caused by new development. The application site is not located within either of the District's two Air Quality Management Areas (AQMA's) but due to the traffic increases resulting from this development, there is a requirement to make reasonable endeavours to minimise emissions, in accordance with Policy 24 of the HDPF.

The current guidance on how this can be achieved is set out in the Air Quality and Emissions Mitigation guidance for Sussex (2020):

[https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0011/67691/Sussex-AQ-Guidance-V.1.1-2021.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0011/67691/Sussex-AQ-Guidance-V.1.1-2021.pdf)

#### Drainage:

Horsham Council has no historical flooding information for this site. It would be expected that the detailed design and layout of such areas will embrace Sustainable Urban Drainage Systems (SUDS). It is noted that your submission includes details of drainage for the site with two attenuation ponds.

#### Minerals:

In accordance with Policy M9 - Safeguarding Minerals of the West Sussex Joint Minerals Local Plan (2018), any proposal for this site would need to include Minerals Resource Statement regarding the existing safeguarded minerals on site.

#### Summary:

The application site has been included as a proposed site for development in the Local Plan Review. However, given the delay to the Review and the lack of certainty at this stage as to its final adopted policies, no weight can be given at this time to the Review in the determination of planning applications. That said, the clear aspiration of the draft policy for this site in the draft July 2021 Plan was for this site to accommodate at least 66 dwellings to the southern part of the site. Both the quantum of development and its proximity to the northern boundary would not best reflect these policy aspirations, which would likely be retained in the next draft Plan if this site is retained as a draft allocation.

The proposal would nevertheless also result in significant landscape harm, with the development of the western field, and would also result in a significant effect on a habitats site, in the likely event that the proposal is not considered water neutral.

As such, the presumption of sustainable development does not apply in this proposal and the principle of the development would be contrary to Policies 1, 2, 3, 4, 25 and 26 of the Horsham District Planning Framework, and paragraphs 2, 11, 12, 47 & 182 of the NPPF.

The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/21/0224 in your submission.

Yours faithfully

Jason Hawkes  
Principal Planning Officer

### **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

Horsham District Council implemented a Community Infrastructure Levy (CIL) Charging Schedule on 1st October 2017.

The Community Infrastructure Levy is a charge placed on new development. The funds raised will help to pay for a wide range of infrastructure to support development across Horsham District.

Most new development which creates net additional floorspace of 100m<sup>2</sup> or more, or creates a new dwelling, (including permitted development), is potentially liable for the levy.

#### **How does it affect you?**

Applications for CIL liable development which are determined on or after 1st October 2017 are required to pay the Community Infrastructure Levy (unless the development qualifies for relief or exemption).

Further information and the rates charged by Horsham District Council are set out in the CIL Charging Schedule which can be viewed online at [www.horsham.gov.uk/planning/apply/cil](http://www.horsham.gov.uk/planning/apply/cil)

#### **General Consent e.g. Permitted Development**

Developments which are permitted by way of a general consent (such as permitted development) may still be liable to pay the Community Infrastructure Levy if they meet the above criteria.

In these circumstances, you must submit a Notice of Chargeable Development (CIL form 5), notify us of the person who will assume liability to pay the CIL and make any applications for relief or exemption, before the development is commenced.