

PLANNING STATEMENT

IN RELATION TO:

‘Permission in Principle for the erection of 6-9 dwellings, with access from Loxwood Road’

**Land East of Woodfalls Manor, Loxwood Road,
Rudgwick, West Sussex, RH12 3DW**

April 2026

1.0 INTRODUCTION

- 1.1 This Planning Statement is prepared on behalf of Greenplan Designer Homes in support of an application for Permission in Principle (PiP) pursuant to section 58A of the Town and Country Planning Act 1990 and the Town and Country Planning (Permission in Principle) Order 2017 for the erection of 6-9 dwellings on Land East of Woodfalls Manor, Loxwood Road, Rudgwick.
- 1.2 Access to the site is to be achieved via a new access, taken from Loxwood Road. The detail of this access would be determined as part of the Technical Details application were the PiP to be granted; however, the proposed access has been well thought out and informed by speed surveys and has pre-app approval from the Highway Authority.
- 1.3 This Planning Statement is submitted in support of the above planning application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal in light of the relevant policy and all other material planning considerations.
- 1.4 This statement should be read in conjunction with the following application documents, which accompany this Permission in Principle application: -
- Application Form
 - Site Location Plan, prepared by OSP Architecture
 - Indicative Site Plan, prepared by OSP Architecture
 - Transport Statement, prepared by Motion

2.0 SITE CIRCUMSTANCES

- 2.1 The application site comprises an area of undeveloped land, to the north west side of Loxwood Road. It is positioned between the dwelling at Little Orchard and Woodfalls Manor - a building comprising of 6 No. flats, set back from the road.

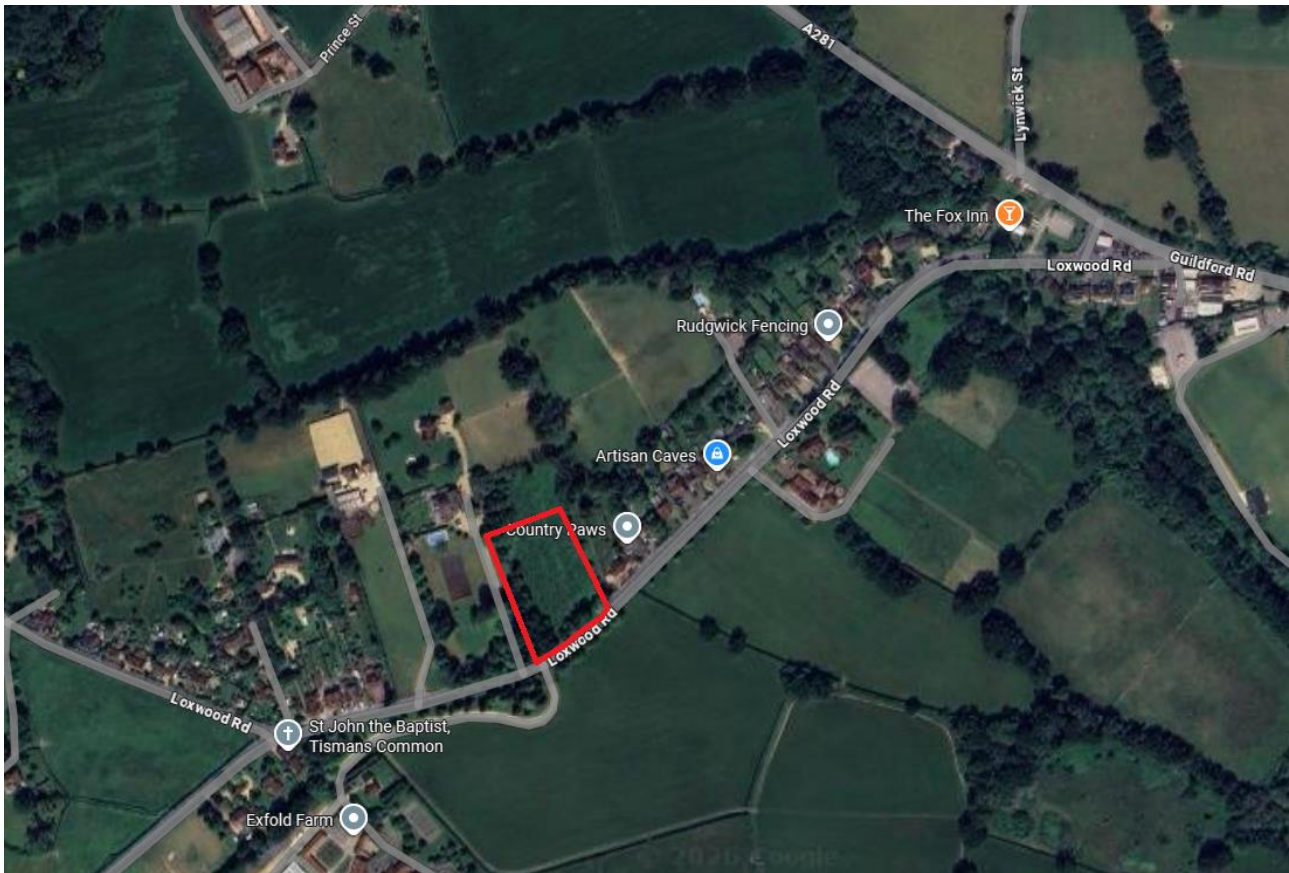


Fig 1. Aerial map showing the Site and its surroundings
(courtesy of Google Maps – the red line shown above is indicative only)

- 2.2 The site is located adjacent to the settlement of Buck's Green. Buck's Green is formed mainly of ribbon development along Loxwood Road and Guildford Road (A281). Rudgwick, the adjacent settlement, runs along the B2128 north of the A281. The site slopes up from Loxwood Road.

- 2.3 There is a line of trees running along the site frontage, which are protected by a Tree Preservation Order. These are shown broadly in green outline on **Fig 2** below. The Horsham District Policy Interactive Map (see below) confirms that the site is outside of (albeit immediately adjacent to) the defined built-up area. The site is also identified as being within a Bat Sustenance Zone (**Policy 31**).
- 2.4 The site is not within the South Downs National Park or a designated National Landscape (formerly the High Weald Area of Outstanding Natural Beauty). There are no Listed or locally listed buildings on-site or nearby, and nor is the site located within a Conservation Area.

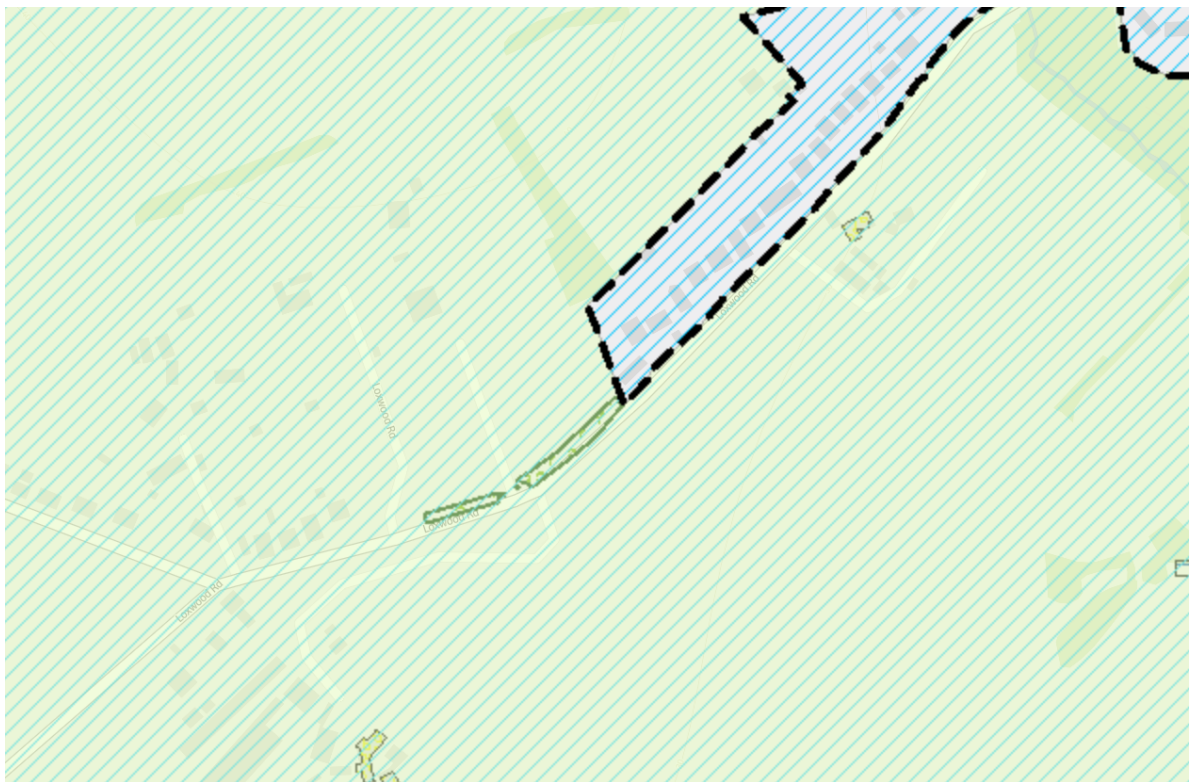


Fig 2. Extract from the HDPF Local Plan Interactive Mapping

- 2.5 According to the Gov.uk online resources, the site is not located within an area identified at being at risk of flooding (please refer to **Figures 3** and **4** below).



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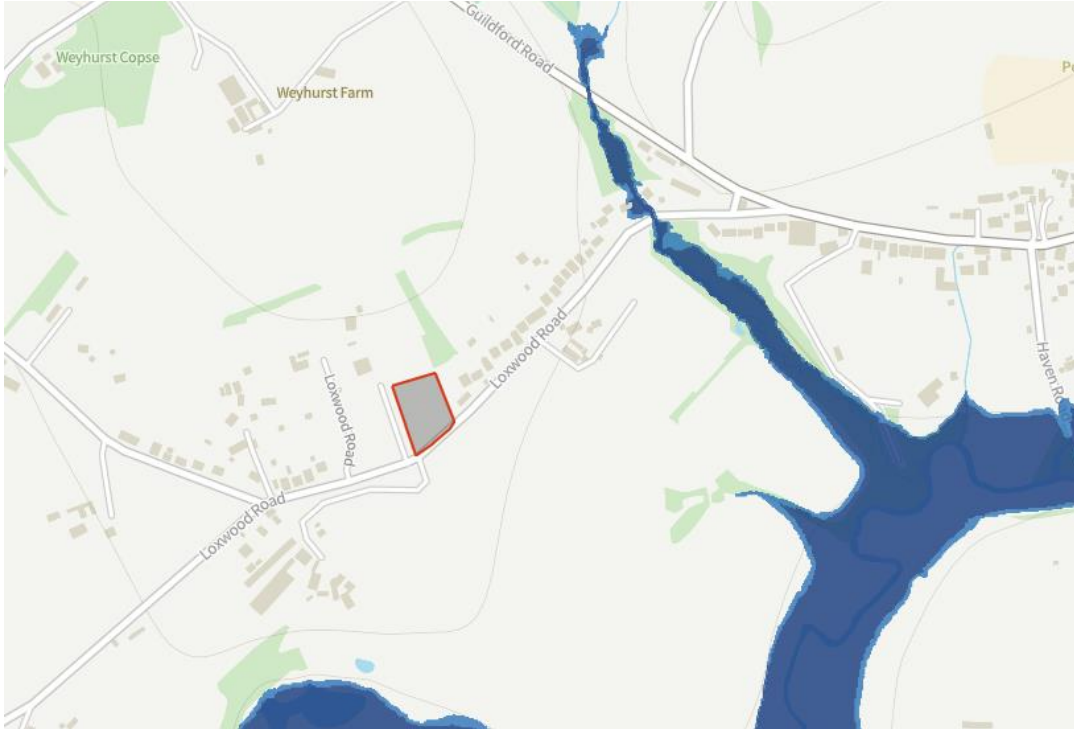


Fig 3. Extract from Gov.uk Flood Map for Planning (Flood Zones 2 and 3)

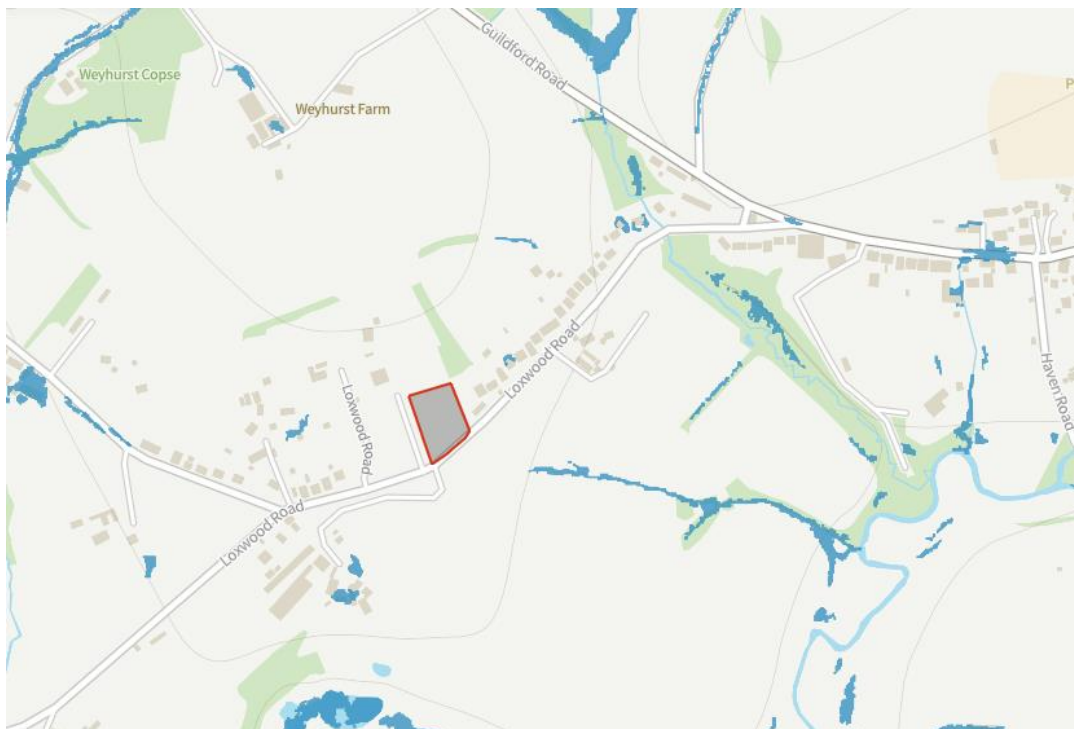


Fig 4. Extract from Gov.uk Flood Map for Planning (Surface water flooding)

3.0 THE PROPOSAL

- 3.1 This planning application seeks Permission in Principle for 6-9 dwellings on land East of Woodfalls Manor, Loxwood Road, Rudgwick. An indicative plan accompanies this application, which shows how the development of 7 new dwellings *could* be achieved on site.



Fig 5. Extract from Indicative Site Plan

- 3.2 The indicative plan shows 7 No dwellings on site (5 No. detached and a pair of semi-detached dwellings). The site is shown as being accessed from the northwest side of Loxwood Road, leading to a turning head and parking to the front of each property. There would be ample space on site for secure cycle parking provision.

- 3.3 The precise details of layout, scale, appearance, access and landscaping will be considered at the second stage (Technical Details Consent). Great care will be taken at this stage to ensure that the scale, form, design and use of materials reflect the local vernacular in Rudgwick. However, an indicative mix of units based on the submitted 7 dwelling layout is set out below:

Size of Dwelling	Number of Dwellings
2-bedroom dwelling	3
3-bedroom dwelling	2
4-bedroom dwelling	2
Total	7

- 3.4 The proposal meets the Planning in Principle application criteria, in that the application proposes less than 10 units on a site that measures below 1 hectares in size.

4.0 PLANNING POLICY

National Planning Policy Framework (NPPF)

- 4.1 The National Planning Policy Framework (NPPF) was first published on 27th March 2012 and updated on a number of occasions, the most recent version being December 2024. This sets out the government's planning policies for England and how these are expected to be applied.
- 4.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.3 The focus of the revised NPPF continues to be achieving sustainable development. At paragraph 8 the Framework sets out that in planning terms, and in order to achieve sustainable development there are *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”*. These objectives are economic, social and environmental, which *“should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”* (paragraph 9).
- 4.4 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development*

plan policies, or the policies which are most important for determining the application are out-of-date⁸, 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”.

4.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”.*

4.6 Section 4 of the Plan refers to Decision-making. At paragraph 39 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.*

- 4.7 Section 5 relates to delivering a sufficient supply of homes. It reiterates at paragraph 61 that the Government's objective is to significantly boost the supply of new homes. Paragraph 65 confirms that non-major development schemes should not have to provide affordable housing (although a lower threshold is applicable in designated rural areas). Paragraph 73 identifies the important role small and medium sized sites can make to meeting the housing supply of an area. It states that local planning authorities should *"support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes..."*.
- 4.8 At paragraph 78 the NPPF sets out that *"Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
- a) 5% to ensure choice and competition in the market for land; or*
 - b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or*
 - c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance".*

- 4.9 It continues at para 79 that *“to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences should apply:*
- a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years;*
 - b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;*
 - c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer”.*
- 4.10 Paragraph 82 states that *“in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this”.*
- 4.11 Paragraph 83 refers to rural housing, noting that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local*

services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”.

4.12 Paragraph 84 states that *“planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

c) the development would re-use redundant or disused buildings and enhance its immediate setting;

d) the development would involve the subdivision of an existing residential building;
or

e) the design is of exceptional quality, in that it:

i. is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and

ii. would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area”.

4.13 Section 9 discusses promoting sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.

- 4.14 Paragraph 113 states that *“maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists”*.
- 4.15 Paragraph 116 goes on to state that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”*.
- 4.16 Section 11 is entitled ‘Making effective use of land’. Paragraph 119 confirms that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*.
- 4.17 Paragraph 120 sets out that decision makers are required to give regard to benefits of development, including environmental gains, and should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;...(and) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”*.
- 4.18 Paragraph 127 states that *“decisions need to reflect changes in the demand for land... applications for alternative uses on the land should be supported, where the*

proposed use would contribute to meeting an unmet need for development in the area”.

- 4.19 Paragraph 129 discusses the need to achieve appropriate densities. Account needs to be given to the identified need for different types of housing and the availability of land suitable for accommodating it, local market conditions, sustainability, existing character and setting, and *“the importance of securing well-designed, attractive and healthy places”.*
- 4.20 Paragraph 130 states that *“area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for 37 meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site...local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”.*
- 4.21 Section 12 refers to achieving well-designed places. Paragraph 131 states “the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development”.
- 4.22 Paragraph 130 sets out that *“decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

4.23 Paragraph 139 confirms that “development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”.

- 4.24 Further parts of the Framework that are of particular note include Section 14, which relates to matters of climate change, and flooding; and Section 15, which refers to conserving and enhancing the natural environment.

Planning Practice Guidance

- 4.25 The Planning Practice Guidance (PPG) advises that *“the permission in principle consent route is an alternative way of obtaining planning permission for housing-led development which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle consent route has 2 stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle and the second (‘technical details consent’) stage is when the detailed development proposals are assessed.”*
- 4.26 In terms of timescales, the PPG advises as follows *“Once a valid application for permission in principle has been received, the local planning authority should make a decision on the proposal as quickly as possible, and in any event within the statutory time limit unless a longer period has been agreed in writing with the applicant. The statutory time limit is 5 weeks, counting from the day after the local authority has received a valid application.”*
- 4.27 In terms of the matters to be considered as part of a PiP application, the PPG says *“The scope of permission in principle is limited to location, land use and amount of development. Issues relevant to these ‘in principle’ matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. In addition, local authorities cannot list the*

information they require for applications for permission in principle in the same way they can for applications for planning permission.”

The Horsham District Planning Framework, 2015

- 4.28 On 27th November 2015 Horsham District Council adopted the Horsham District Planning Framework (HDPF). With the exception of land within the South Downs National Park, the HDPF replaces the policies contained in the Horsham District Core Strategy and General Development Control Policies which were both adopted in 2007. The HDPF is now more than 5 years old.
- 4.29 The HDPF sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs for the district (outside the South Downs National Park).
- 4.30 The following policies and text are considered relevant to the consideration of this Planning Proposal: -
- 4.31 **Policy 2** – *“The spatial strategy is to... (5) Continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period. (6) Manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape. (8) Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. (11) Support the provision of rural housing which contributes towards the provision of affordable housing where there is a demonstrable need...”*
- 4.32 **Policy 3** sets out the settlement hierarchy for Horsham District and confirms that *“Any infilling or redevelopment will be required to demonstrate that it is of an appropriate nature and scale”*.

- 4.33 **Policy 4** - Strategic Policy: Settlement Expansion – *“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.*
 - 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.”*
- 4.34 **Policy 15** sets out the housing needs for the District. It makes an allowance of 750 units throughout the plan period for ‘windfall development’. The Glossary for the plan specifies that ‘windfalls’ are described as: *“A site not specifically allocated for development in the Local Development Framework which unexpectedly becomes available for development during the lifetime of a plan.”*
- 4.35 **Policy 16** refers to Meeting Local Housing Needs. With regard to affordable housing, it notes that *“on sites providing between 5 and 14 dwellings, the Council will require 20% of dwellings to be affordable or where on-site provision is not achievable a financial contribution equivalent to the cost of the developer of providing the units on site”*.

- 4.36 **Policy 26** sets out that the rural character and undeveloped nature of the countryside will be protected and that outside of built-up areas, proposals must be essential to a countryside location, be of a scale appropriate to its countryside character and location, and meet one or more criteria which include enabling the sustainable development of rural areas.
- 4.37 **Policy 27** relates to Settlement Coalescence, stating that *“landscapes will be protected from development which would result in the coalescence of settlements”*.
- 4.38 **Policies 32 and 33** together seek high quality design and include requirements that the scale, massing and appearance of development relates sympathetically to its surroundings and that it provides an attractive environment which complements locally distinctive character.
- 4.39 The following policies are also considered to be of relevance: -
- **Policy 1** - Strategic Policy: Sustainable Development
 - **Policy 17** - Exceptions Housing Schemes
 - **Policy 24** - Environmental Projection
 - **Policy 25** - District Character and the Natural Environment
 - **Policy 31** - Green Infrastructure and Biodiversity
 - **Policy 34** - Heritage Assets and Managing Change within the Historic Environment
 - **Policy 35** - Strategic Policy: Climate Change
 - **Policy 36** - Strategic Policy: Appropriate Energy Use
 - **Policy 37** - Sustainable Construction
 - **Policy 38** - Flooding
 - **Policy 39** - Strategic Policy: Infrastructure Provision
 - **Policy 40** - Sustainable Transport
 - **Policy 41** - Parking

Rudgwick Neighbourhood Development Plan

- 4.41 The application site is located within Rudgwick Neighbourhood Development Plan (RNP), which was formally 'made' on 23rd June 2021. The following policies are considered to be of relevance to the proposed development at this Site:
- **Policy RNP1** – Spatial Strategy
 - **Policy RNP2** – Housing Mix
 - **Policy RNP5** – Housing Density
 - **Policy RNP6** – Materials
 - **Policy RNP7** – Architectural Style
 - **Policy RNP8** – Development Height
 - **Policy RNP9** – Street Scene
 - **Policy RNP17** – Green Infrastructure and Trees

Emerging Policy

- 4.42 In terms of emerging planning policy at the District level, the Horsham District Local Plan 2023-2040 has been submitted for examination. Following initial Hearings, the examination was paused for a significant period due to a number of concerns that were raised by the Planning Inspector in respect of the Plan's soundness.
- 4.43 Following the withdrawal of the Natural England Position Statement relating to water neutrality (and other changes), the examination hearings have now recommenced, with a new examining Inspector (Mr. Jonthan Bore). Part 1 Examination Hearings took place during April 2026, and the Inspector has provided a clear steer on the further work that is needed to allow the Plan to progress, including:
- An increase in the Plan's housing requirement;
 - An emphasis on meeting housing pressure during the first 5 years of the plan period;
 - Confirming deliverability of sites, through trajectories, site mix, and viability;

- A resultant need for further work relating to the Plan's spatial strategy and site allocations;
- Changes to policies, particularly relating to affordable housing; and,
- A need for the reassessment of sites, including those previously discounted and smaller sites.

4.44 It is understood that the District Council's Planning Officers now need to produce a draft timetable detailing next steps. The focus is now firmly on refining the evidence base and identifying deliverable sites to meet the District's housing needs, which will require adding further deliverable site allocations, to include more small sites.

4.45 Additionally, it is also understood that due to the District Council's emerging plan meeting less than 80% of the housing need required when calculated using the Standard Method, the Council have been directed to start working on a new Plan (under the new Local Plan making system), to commence by June 2026.

Supplementary Planning Guidance

- Planning Obligations and Affordable Housing SPD (2017)
- Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes

- Shaping Development in Horsham (SDPAN – Sept 2025)
- Biodiversity and Green Infrastructure

5.0 PLANNING HISTORY

(i) Application Site

5.1 According to the Council's online planning records, the application site ('Land East of Woodfalls Manor, Loxwood Road') has the following planning history: -

- **Planning ref: DC/14/1292:** The erection of 25 dwellings with associated reserved matters detail relating to access (Outline).
Application Withdrawn - 20th February 2015.
- **Planning ref: DC/15/1649:** Outline application for erection of 6 dwellings. All matters reserved except for Access.
Application Refused - 16th November 2015. Appeal Dismissed - 27th July 2016.

5.2 The above planning application (**ref: DC/15/1649**) was refused for the following two reasons:

1. *"The application site is located outside of the defined built up boundary of Rudgwick and is thus located within the countryside. The application site is not allocated for development within the emerging Horsham District Planning Framework, or an adopted Neighbourhood Plan. In the absence of any exceptional circumstances that would justify new residential development in such a location, the proposal is considered contrary to policy CP5 and CP19 of the Horsham District local Development Framework: Core Strategy (2007) and policies DC1 and DC40 of the Horsham District Council Local Development Framework: General Development Control Policies (2007), Policies 1,2,3,4, and 15 of the HDPF and Paragraphs 7 and 55 of the National Planning Policy Framework 2012.*
2. *The submitted Ecology - Phase 1 Habitat Survey by John Wenman Ecological Consultancy dated April 2014) is considered out of date and as such provides insufficient information on which to assess the applications site. The proposal is therefore considered contrary to policy CP5 and CP19 of the Horsham District local Development Framework: Core Strategy (2007) and policies DC5 of the Horsham District Council Local Development Framework: General Development Control Policies (2007) the National Planning Policy Framework 2012".*

- 5.3 At the time of the Appeal Decision, the Inspector considered the main issue to be whether *“the development would constitute sustainable development in a rural area taking into account national and local policies”*.
- 5.4 The Inspector concluded that *“the proposal would result in new homes in the countryside in an unsustainable location, with a heavy reliance on the private car and it would not comply with the spatial strategy. As such it would conflict with the development plan and would not accord with the environmental dimension of sustainable development. When assessed against the Framework taken as a whole that harm would outweigh the limited benefits associated with the development...Given that the three roles of sustainability are mutually dependent and should not be undertaken in isolation, I conclude that the proposal would not comprise sustainable development for which the Framework indicates there is a presumption in favour... As such, on the basis of the evidence before me I conclude that the proposal would conflict with the development plan as a whole and, having had regard to all other matters raised, I dismiss the appeal”*.
- 5.5 It is particularly pertinent to point out that the Appeal Decision was issued in July 2016, at which point the HDPF had been adopted and the District were understood to be able to demonstrate a 5-year housing land supply. Therefore the NPPF’s presumption in favour of sustainable development was not engaged, and the Inspector’s assessment and decision was an un-tilted one. This differs from the current situation, where Horsham District do not have a 5-year supply of housing, and the HDPF is out of date, and the requirements of the NPPF paragraph 11(d) are engaged.

6. PLANNING ASSESSMENT

- 6.1 The concept of 'Permission in Principle' (PiP) was introduced by the Housing and Planning Act 2016, the Town and Country Planning (Brownfield Land Register) Regulations 2017, and the Town and Country Planning (Permission in Principle) Order 2017 (SI 2017/402), since amended in 2018 by SI 2017/1309.
- 6.2 Article 5D of the Town and Country Planning (Permission in Principle) (Amendment) Order 2017 states that the requirements to validate a PiP application are:
1. Completed application form.
 2. A plan which identifies the land to which the application relates.
 3. The correct application fee.
- 6.3 PiP can only be used for application submissions that are for:
- developments of between 1 and 9 dwellings;
 - a total development of under 1,000 square metres; and,
 - a site of under 1 hectare.
- 6.4 This application is for the first stage to establish whether the site is suitable for a minimum of 6 dwellings and a maximum of 9 dwellings. The site area is 0.49ha. The application therefore complies with the requirements of the Regulations and is suitable for consideration for permission in principle.
- 6.4 The permission in principle consent route has 2 stages: the first stage (or 'permission in principle' stage) establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed. The PPG states that *"the scope of permission in principle is limited to location, land use and amount of development. Issues relevant to these 'in principle' matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage"*.

Policy Assessment

- 6.5 Policy 1 of the HDPF reflects the presumption in favour of sustainable development contained within the NPPF. Policy 2 of the HDPF sets out that the spatial strategy is to, amongst other things, focus development in and around the key settlement of Horsham and allow for growth in the rest of the District in accordance with the identified settlement hierarchy. Policy 3 of the HDPF identifies the settlement hierarchy and the settlements which have defined built-up areas. Rudgwick and Bucks Green are identified as ‘medium villages’ with built-up area boundaries (BUAB).
- 6.6 Policy 4 of the HDPF supports the growth of settlements in order to meet identified local housing, employment and community needs. Outside of BUAB the expansion of settlements is supported where, amongst other things, sites are allocated in the Local Plan or in a Neighbourhood Plan and adjoin an existing settlement edge.
- 6.7 The Site is located outside of (albeit immediately adjacent to) the defined BUAB for Rudgwick and therefore lies within designated countryside. The Site is not allocated in the HDPF or within the Rudgwick Neighbourhood Plan. The site does not physically adjoin the settlement edge as there is an existing farm track in the intervening area.
- 6.8 HDPF Policy 26 (‘Countryside Protection’) sets out that the rural character and undeveloped nature of the countryside will be protected and that outside of built-up areas, proposals must be essential to a countryside location, be of a scale appropriate to its countryside character and location, and meet one or more criteria which include enabling the sustainable development of rural areas. It must also be accepted that if the Local Authority are going to meet their housing needs, then the existing BUABs will need to be breached by new development. Further, given the Sites location, proximity to existing development (including adjacent Woodfalls to one side, and the BUAB to the other), and the scale of the proposals (i.e. 6-9 dwellings), the proposal is not considered to conflict with the essential countryside protection and sustainability aims of Policy 26. The rural character and visual quality

of the countryside will not be significantly affected by the introduction of new housing on this Site.

- 6.9 We are aware that the Council are unable to demonstrate a five year housing land supply at this time. The Council's recent 'Authority Monitoring Report 1st April 2024 - 31st March 2025', which was published on 19th December 2025, confirms that the Council can demonstrate a 1.7 years housing land supply when measured against their housing requirements.
- 6.10 Given the absence of a 5-year housing land supply, Paragraph 11(d) of the NPPF is engaged. This advises that where there are no relevant development plan policies, or the policies which are most important for determining the applications are out of date (which in this case includes those policies referred to above – i.e. Policies 2, 3, 4 and 26 of the HDPF), planning permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a 'strong reason' for refusing development, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF when read as a whole. The presumption in favour of granting planning permission under Paragraph 11 of the NPPF does not automatically apply where Footnote 7 of the NPPF applies. But in this case, as the Application Site is not affected by any of the constraints or designations (i.e. AONB) that are listed, Footnote 7 is not applicable. Therefore, the shortfall in the supply of housing land in Horsham District, and the engagement of para 11(d) are significant material considerations, which weigh heavily in favour of approving the proposed development.
- 6.11 Further, NPPF paragraph 14 notes that *"In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan*

is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70)." The Rudgwick Neighbourhood Plan does not include allocations to meet the Parish's housing needs. It is noted that the emerging Local Plan does include two draft housing allocations in Rudgwick (draft Strategic Policy HA14 refers), with two adjoining sites identified to provide a total of 66 dwellings. These draft allocation sites are positioned approximately 500 metres north of the PiP Application Site. This confirms that not only is Rudgwick accepted as suitable for housing growth, but this part of the settlement is sustainable and identified as being suitable for the provision of new housing. Below is an extract from the current draft Local Plan policy map, which shows the proposed BUAB (broken black line), and the two allocated sites (hatched in orange):

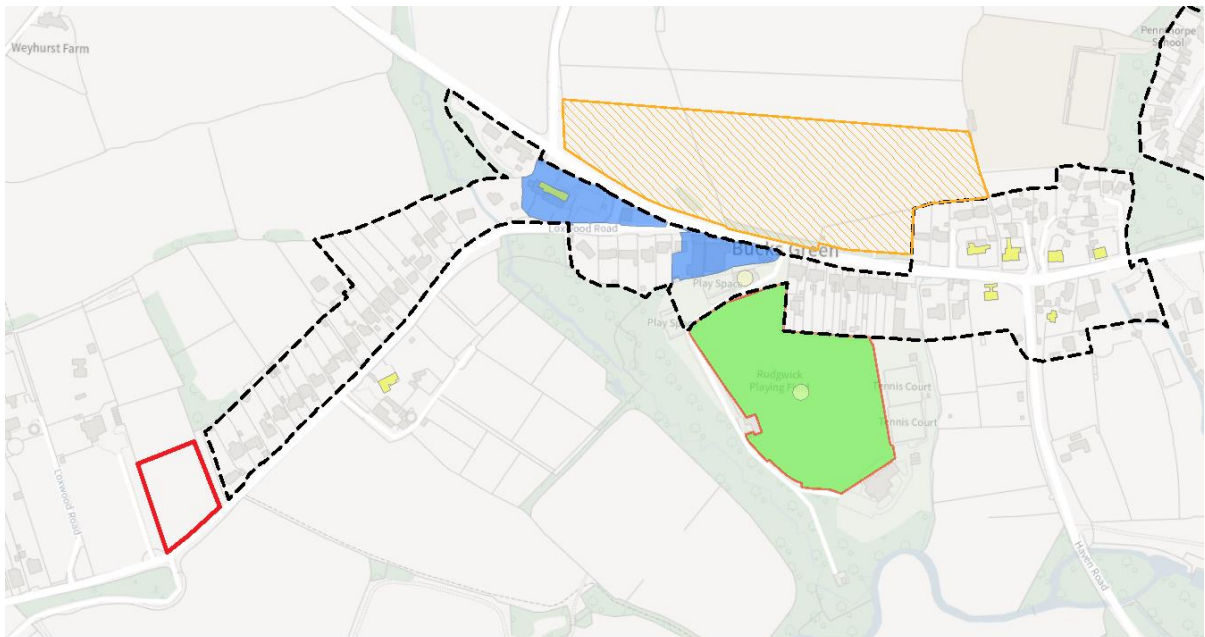


Fig 6. Extract of the Draft Local Plan: Policy Map – Rudgwick, Bucks Green & Cox Green (*indicative red line added for ease of identifying the Application Site*)

6.12 In addition, due to the Council's housing land position, HDC have published guidance in the form of a Facilitating Appropriate Development (FAD) document. At paragraph 5.7, this document states that *"the Council recognises that it is likely to receive applications outside of defined BUABs and on unallocated sites as it is unable to demonstrate a five-year housing land supply. Given this position and the principles behind HDPF Policy 4, it will consider positively applications that meet all of the criteria below:*

- *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".*

6.13 It is our opinion that the proposed development would be fully compliant with all the above criteria. Although the site boundary does not physically adjoin the settlement edge as defined by the BUAB (criterion i), the previous Planning Inspector confirmed in July 2016 that ***"as the site is close to the edge of the settlement I consider that it can be treated as adjoining the settlement edge."*** Additionally it is our opinion that development of the site with between 6 and 9 dwellings would be wholly appropriate to the scale and function of the settlement that the proposal relates to (criteria ii), and it would have no impact upon long term development opportunities (criteria iv). Further, the application site is located within a well contained defensible boundary, with mature trees and established planting to its boundaries. Existing landscaping will be retained and enhanced (criteria v).

- 6.14 It is noted that within the previous Appeal decision relating to 6 units at this site the Inspector said *“The proposal would provide six new dwellings which would increase the choice and add to the mix and range of housing within the area. The development... would be consistent with the Government’s objective to boost significantly the supply of housing... These social benefits can be given moderate weight.”* More recently the Parish has published a ‘made’ Neighbourhood Plan, and at policy RNP 2.2a it identifies the need for smaller (1, 2, or 3 bedroom) properties. The indicative 7 unit scheme that is submitted with this PiP application suggests that 5 of the 7 units would be 2- or 3-bed units. Therefore, the proposals would meet local housing needs (criterion iii of the FAD). In this respect it is noted that not only does the District have a worsening housing supply position, but the HDPF (2015) is out of date, and the Rudgwick Neighbourhood Plan (2021) does not allocate any new housing sites. Paragraph 1.16 of the Neighbourhood Plan confirms *“Horsham District Council and the Parish Council agreed in September 2019 that Horsham District Council would allocate sites as appropriate to meet local housing needs through the local plan review process. As a result, this plan does not seek to allocate land for new residential development.”*
- 6.15 Therefore there is currently no development plan document that provides for new housing in Rudgwick. Having reference to paragraph 14 of the NPPF, it is our opinion that the housing and strategic policies contained in the Rudgwick Neighbourhood Plan do not carry material weight in respect to the current development proposals. Therefore, the presumption in favour of sustainable development is unaffected by the Neighbourhood Plan.

Locational Sustainability

- 6.16 The Application Site is located on the north side of Loxwood Road, with a pedestrian footpath that links the Site to the Guildford Road/A281 to the northeast. There is street lighting attached to the telegraph poles that align Loxwood Road. The Guildford Road/A281 has a signalised pedestrian crossing, which provides ease of

access to the centre of Rudgwick, which contains a number of village shops and services including a Co-op food store.

- 6.17 The closest bus stops are located on Loxwood Road approximately 500 metres northeast of the site. The bus stops (known as ‘The Fox’ bus stops) comprise of simple ‘flag and pole’ bus stops which provide access onto the 63 bus service which routes between Guildford and Horsham.
- 6.18 The site is situated approximately 1.5 kilometres southwest of Rudgwick village centre, where there are a number of local amenities. Key amenities include two primary schools, two nurseries, a convenience store, a public house, a village hall, a pharmacy, a dentist and a number of recreation grounds.
- 6.19 The NPPF recognises that development in rural areas is important in supporting local services. Paragraph 110 of the Framework states that *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*
- 6.20 In their Statement that supports this PiP application, Motion explain that *“The proposed development comprises the construction of between six and nine residential dwellings, which within the context of current planning policy is not considered ‘significant development’. Whilst some amenities and facilities would potentially need to be accessed via private car, it is envisaged that the trips would occur over a relatively short distance given the proximity of Rudgwick village centre and Horsham town centre. Notwithstanding this, it is noted that the existing footway*

on the north side of Loxwood Road does provide a continuous route towards the 'The Fox' bus stop approximately 500 metres northeast of the site."

- 6.21 In their 2016 Appeal Decision the Inspector confirmed that the Site is not 'isolated' in NPPF para 80 terms (then para 55). However, and despite acknowledging the very close proximity to the BUAB, the Inspector said that they "consider that the location is not well served in terms of provision for either walking or cycling, particularly for more vulnerable groups of road users such as children. I acknowledge that it does not need to be demonstrated that the site is the most sustainable location for development in the surrounding area and that the Highway Authority considered that *"due to the amount of surrounding dwellings the situation was not materially altering" in relation to sustainability. However, based on the evidence before me, I consider that for the majority of the time and for convenience reasons, occupiers would tend to be highly dependent on travel by the private car to access services and facilities. As such I do not consider that the development would be in a sustainable location.*"
- 6.22 However, it is important to reiterate that the 2016 Appeal Decision was issued at a time when the Local Authority had a 5YHLS and also an up to date Local Plan, and therefore the presumption in favour of sustainable development was not engaged. These circumstances differ from the position today, with Horsham District having a very poor housing land supply position and no up to date Local Plan. Although there is a Neighbourhood Plan, paragraph 14 is not engaged. Instead the position is that the tilted balance set out within the NPPF applies. It is in this context that Planning Permissions for housing sites have been issued on sites to the north of Rudgwick, as set out below.
- Horsham District
- DC/18/0316 – New dwelling on Land north of Jasmine House, Cox Green
- DC/23/0235 – New dwelling on Land north of Oakfield, Cox Green

DC/24/0462 – New dwelling on Land south of Sailtops, Cox Green

- Waverley Borough

WA/2024/00030 – Three terraced dwellings on Land north of Maybanks, Cox Green Road (allowed on Appeal 3rd March 2025 – see attached Appeal decision APP/R3650/W/24/3345689)

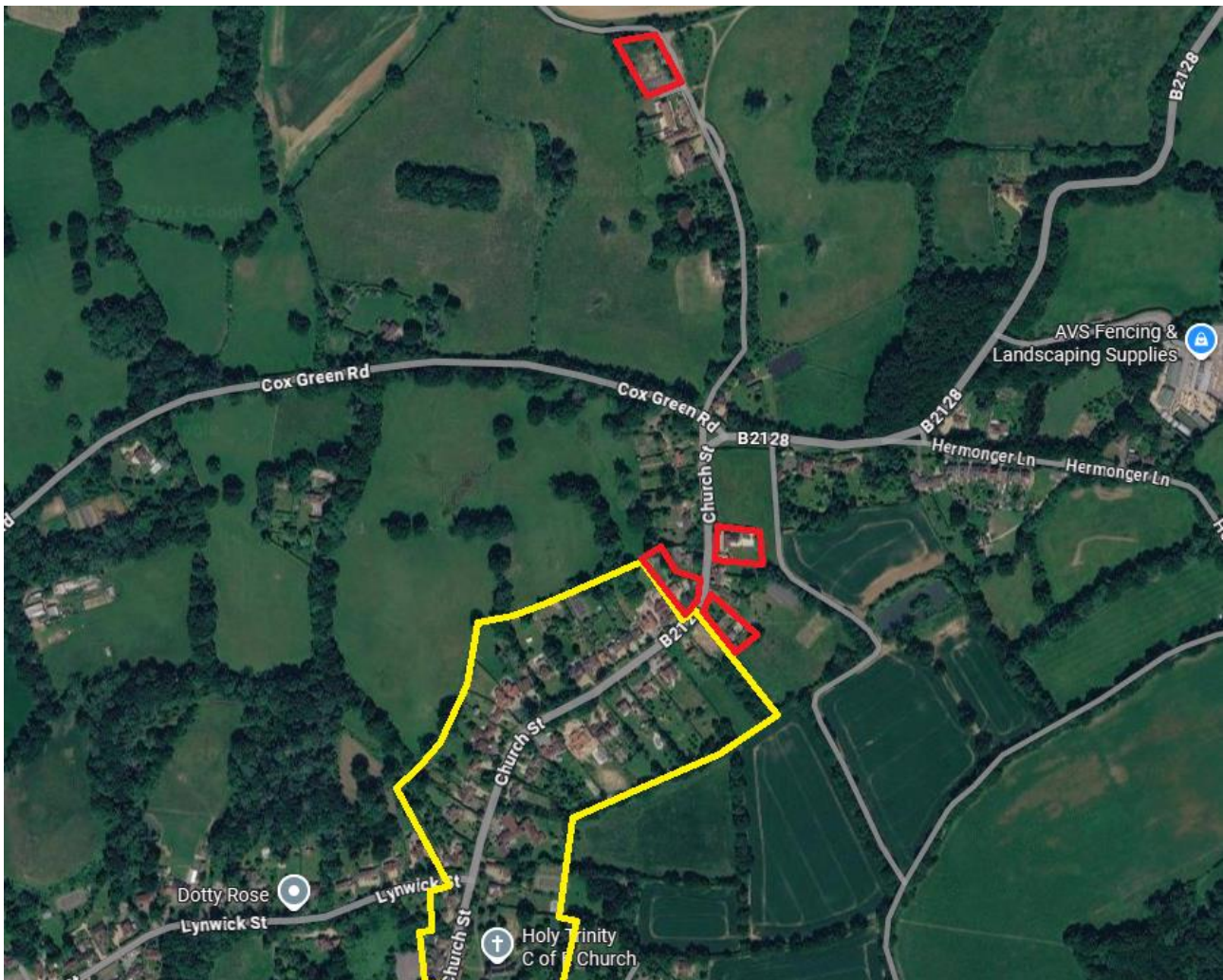


Fig 7. Annotated Google Maps image, showing the HDPF BUAB for Rudgwick (yellow outline), and the location of the four approved sites referred to above (red outline)

- 6.23 The location of these approved sites for housing are shown at **Fig 7** above. With respect to the 3 Horsham District permissions, these were all acknowledged as falling outside of the BUAB of the medium settlement, as identified in the HDPF and emerging Local Plan, with the Planning Officers report on the latest Sailtops permission confirming that “the application site is considered to be a sustainable location for residential development.”
- 6.24 The Maybanks appeal scheme (3 dwellings) is considerably detached from the BUAB of Rudgwick. This site lies within Waverley Borough (part of Surrey County), and is outside of any settlement with a BUAB within this neighbouring Authority area. Notwithstanding this, the circumstances of this recent Appeal being considered are similar to those that apply now to the Application Site – i.e. although referred to in the Inspector’s decision, the presumption in favour of sustainable development was engaged, with the Planning Officer’s report on the original Planning Application confirming that *“the Council cannot currently demonstrate a 5-year supply. At 3.89 years of supply the Council accepts that the tilted balance is engaged.”*
- 6.25 Within the subsequent Appeal Decision, the Inspector said as follows: *“The appeal site is located approximately 500m from the edge of the settlement of Rudgwick and approximately 1.8km from the shops and schools within it. Rudgwick has a good-sized supermarket, church, post office, hair salon, school, pub and MOT centre. The church and pub are the closest facilities to the appeal site and are located just over 1km from it. A public footpath runs along the length of Church Street to the centre of Rudgwick and can be accessed close to the access lane serving the appeal site. The nearest bus stop is just over 500m from the appeal site in close proximity to the access of the private driveway serving the proposal.”* The Maybanks Appeal site is located at the end of a private drive/track which is unlit. This PiP application site is situated along an adopted road with a pavement and street lighting, lying adjacent to existing ribbon development within the BUAB. Clearly when compared with our PiP site, the Maybanks site, which is detached from the BUAB by some 500 metres, is

located in a more rural location and distant from the centre of Rudgwick. However, it was still considered to be a suitably sustainable location for new housing by the Inspector. It is noted that the Appellant provided e-bike chargers, and this is something that the Applicant in our case is also intending to provide.

6.26 Below is a comparison table that identifies the distances between certain everyday services and the sites that are discussed above. The Horsham District/Cox Green measurement is taken from the Sailtops site.

Service/facility	Horsham Green Sites	Cox Maybanks Site	Appeal The PiP Application Site
Co-op Convenience Store	1.45 km	2.0 km	1.6 km
Rudgwick Primary School	2.05 km	2.6 km	1.46 km
Closest bus stop	310 metres	500 metres	500 metres
Rudgwick Village Hall	2.41 km	3.03 km	635 metres
Closest Public House	500 metres (Kings Head PH)	1.1 km (Kings Head PH)	450 metres (Fox Inn PH)

**** All measurements taken from Google Maps ****

6.27 In summary, the scheme would provide new dwellings in a sustainable location, contributing positively to the area's housing supply and helping to address a significant shortfall. Having considered all of the above, it is considered that when taking into account the heightened need for housing in the District and the engagement of the presumption in favour of sustainable development, the above demonstrates that the Application Site is a suitable location for new housing, and the first criteria of the PiP application ('location') is satisfied.

Land Use

- 6.28 The site is located outside, but at the edge of the defined BUAB of a medium village, as identified in the District's settlement hierarchy. The Site is identified as being within a Bat Sustenance Zone (**Policy 31**). The Applicant has engaged with Ecology Consultants, and the subsequent Technical Details submission will be accompanied by Ecology Assessment and Survey reports. In addition, Biodiversity Net Gain will be confirmed at that subsequent application stage.
- 6.29 There are also a line of trees running along the site frontage, which are subject to a Tree Preservation Order. At the Technical Details stage, the site layout would be informed by a full Arboricultural Impact Assessment, with related Tree Protection Plan.
- 6.30 The site is not within the South Downs National Park or a designated National Landscape (formerly the High Weald Area of Outstanding Natural Beauty). In their decision dated July 2016 in respect of the previous scheme for 6 houses at this Site, the Inspector said, *"I acknowledge that the site is not within the South Downs National Park or the High Weald Area of Outstanding Natural Beauty and that there is no objection to the development in relation to the character and appearance of the surrounding area."*
- 6.31 There are no Listed or locally listed buildings on-site, and nor is the site located within a Conservation Area. Within the 2016 Appeal decision, the Inspector commented in this respect as follows: *"The Council stated within its statement that there are listed buildings close to the site and the significance and setting of these listed buildings is not considered to be affected. I have no reason to dispute this and I noted on site that the proposal would have a neutral impact on the setting of Exfold Farm, Exfold Manor and the Red House due to the considerable distance between the appeal site and them. Therefore their settings would be preserved."*

- 6.32 Finally, the site is not located within any statutory protected biodiversity sites and is outside of any flood zone. There are no National and Local Level Policy constraints, which identify the land as being unsuitable for residential use.
- 6.33 The site is immediately adjoining ribbon development on the north side of Loxwood Road. If the HDPF was up-to-date, and the District were able to demonstrate a 5YHLS, then new housing development within the immediately adjacent BUAB would be found to be sustainably located and acceptable in principle. As identified above, Rudgwick is a settlement that is described a 'medium village' within the District's settlement hierarchy, and the allocation of housing (66 dwellings) within the emerging Local Plan a relatively short distance to the north confirms that the village is an appropriate location for further residential development. It is also note that the examining Inspector has recently directed the District Council to increase the Plan's housing requirement, to include further site allocations following reassessment of discounted and smaller sites. The Inspector also emphasised meeting housing pressure during the first 5 years of the plan period.
- 6.34 There is nothing to suggest that the proposed use of the site for housing would lead to significant harm. Housing could be delivered within a relatively short timeframe, following the approval of the subsequent technical matters. This would positively contribute to the significant housing shortfall in Horsham District. The proposed residential use would not be at risk from any conflicting use, and nor would it result in any significant amenity issues to other existing near residential uses.
- 6.35 The site is closely related to existing housing on Loxwood Road. New development would be appropriately located and proportionate to the scale and function of the settlement of Rudgwick. The proposals would be consistent with the residential character of the immediate locality. It is therefore clear that the site is suitable for a residential use from a 'Land Use' perspective, and the second criteria of the PiP application process is therefore satisfied.

Amount of Development

- 6.36 This application seeks to consider whether the site is suitable for a minimum of 6 dwellings and a maximum of 9 dwellings.
- 6.37 The Application Site area measures 0.49 hectares, and at the upper end of the proposed level of development (9 units) this would equate to 18 dwellings per hectare, whilst 6 houses would be 12 dwellings per hectare. This residential density is fairly low by modern standards, and is considered to be entirely appropriate for this edge of settlement location.
- 6.38 The indicative site layout drawing that accompanies this PiP application demonstrate that a mixture of 7 dwellings can be accommodated on the Site comfortably, whilst retaining ample buffer space to side boundaries, including the protected trees along the Site frontage. There is space for new planting that will positively contribute to achieving biodiversity net gain (BNG).
- 6.39 It is noted that the previous Planning Inspector for the Application Site said in their decision in July 2016 that *“The proposal would provide six new dwellings which would increase the choice and add to the mix and range of housing within the area. The development would make a contribution towards affordable housing and would be consistent with the Government’s objective to boost significantly the supply of housing. Whilst the scheme is not required to address any shortfall in the supply of housing, there is no upper limit to the provision of housing as Policy 15 of the HDPF makes clear. These social benefits can be given moderate weight.”*
- 6.39 Within the site the new dwellings would be provided with good sized and well-spaced plots, which would include ample private garden space, garaging and driveways. Although this indicative plan provides an illustrative layout at this stage, it does confirm that the level of development that is proposed can be provided within the

Site area in a manner that is consistent with the residential character of Rudgwick, which includes a mixture of road fronting ribbon development and cul-de-sacs.

- 6.40 The scale of the development would not cause any demonstrable harm to any neighbouring properties, in terms of overlooking effect, overbearing effect, loss of privacy or loss of light or through the creation of any undue noise or disturbance. Further, the development would not result in the erosion of the character of the wider landscape, subject to appropriate details that are to be secured at the Technical Details Stage. Any limited and localised visual impact arising from a modest housing development in this location, which would be designed sensitively and subject to conditions to secure appropriate landscaping and appearance at the Technical Details stage, would not result in demonstrable harm to the countryside. The amount of development proposed (6-9 dwellings) is considered to be entirely appropriate in this location.

Other Matters

- 6.41 As set out above, at the Permission in Principle stage, the only considerations are the location, land use and amount of development. Matters such as detailed design, landscaping and mitigation are appropriately addressed at the Technical Details stage. Reliance on perceived landscape harm at this early stage, without the benefit of detailed assessment, is premature and inconsistent with the staged nature of the PiP process. The PiP process is intentionally designed to establish the principle of development first, with detailed environmental and technical considerations deferred to the subsequent Technical Details stage. The absence of such reports at this point does not constitute a valid reason for refusal unless there is compelling evidence of a fundamental constraint or habitat designation that would prevent the principle of development. As explained above, that is not the case with this Site.
- 6.42 Further it is relevant to note that the previous Planning Inspector, when dealing with a proposal for 6 houses at this Site in July 2016, did not identify any technical reason

for dismissing the Appeal. Indeed, the Inspector's reason related only to conflict with the spatial strategy set out within the (then) up-to-date HDPF.

- 6.43 This PiP Application is supported by a Transport Statement, which has been prepared by Motion. This follows the conclusion of a Pre-application enquiry submission to the Highways Authority (West Sussex County Council [WSCC]).
- 6.44 Within their pre-application advice, WSCC advised that *"An hourly bus service is available from The Fox public house adjoining Guildford Road to the northeast. This provides a route between Guildford and Horsham. An option to explore may be providing improvements to the existing facilities to further encourage its use. One way in which this could be achieved may be to consider looking to upgrade the bus stop- for example with a real time information board. This could be secured within any subsequent planning application through a S106 obligation."* The Applicant would be open to further discussions in relation to this suggestion.
- 6.45 Motion's Transport Statement concludes that *"Access to the site is to be achieved via a new access taken from Loxwood Road. Car and cycle parking are to be provided in accordance with local policy standards... This Transport Statement, which has been prepared having regard to current best guidance practice and takes into account advice received at pre-application stage, demonstrates that:*
- *The site accords with national and local policies that are considered pertinent to transport;*
 - *A review of personal injury collision information has identified no significant issues associated with the local highway network which are detrimental to the existing standard of road safety;*
 - *Safe and suitable vehicular access to the site can be achieved from Loxwood Road via a new access which has been designed in accordance with relevant design guidance;*

- *The site layout has been designed to take account of relevant design guidance;*
- *Appropriate provision is made for car and cycle parking, based on local parking guidance; and*
- *The development proposals will result in an imperceptible increase in vehicle movements during both the morning and evening peak hour periods and will not adversely interfere with the safety or operation of the highway network local to the site...*

On the basis of the above, it is therefore concluded that there is no reason as to why the proposed development should be resisted on traffic or transportation grounds."

- 6.46 In response to a pre-application enquiry submission, within their response dated 17th March 2026, the Highways Authority have not raised any objections to the proposed development of this site, with specific reference to access, vehicle tracking, visibility, parking, capacity and sustainability.
- 6.47 Following the Natural England's statement issued in October 2025 which confirms that its Water Neutrality Position Statement of September 2021 has been withdrawn, it is now understood that there are no Water Neutrality requirements for this development proposal. It is further understood that HDC will now be using the 2024/25 water efficiency savings made by Southern Water to allow all development to move forward as water neutral from 1st November 2025. The District Council's website confirms that for planning applications there is no longer a requirement for a Water Neutrality Statement, and no payment into Sussex North Water Certification Scheme will be needed. However, it is further noted that the Council's website advises that *"given the area remains at significant water stress, all applications for new housing will be required by condition to comply with the Building Regulations Part G Optional Technical Standard (currently 110 l/p/d) as required by Policy 37 of the Horsham District Planning Framework. We would welcome and support any applicant who still wishes to include water efficiencies below this standard."*

7. CONCLUSIONS

- 7.1 With a housing land supply of less than 2 years, the relevant policies restricting development outside BUABs are out of date and the presumption in favour of sustainable development applies. The test under paragraph 11(d) of the NPPF is therefore whether any identified harm would significantly and demonstrably outweigh the proposal's benefits of providing housing. In this case, no such harm will be evident.
- 7.2 The HDPF is out of date, and the Neighbourhood Plan does not allocate new housing Sites. The emerging Local Plan, which is at examination stage, is acknowledged as requiring significant work to increase its housing figure, with the likely need for additional site allocations, for which the Inspector has directed the Council to reassess previously discounted and smaller sites. There is an identified need to deliver housing quickly, and we consider that this readily available site can deliver 6-9 houses within the short term.
- 7.3 The current planning context of the HDPF being out of date and there being no 5YHLS represents a significant materially different situation to that which applied in 2016, when the previous Planning Inspector found a proposal for 6 units to be unacceptable (DC/15/1649 refers).
- 7.4 The Site lies within an established ribbon of development on Loxwood Road, neighbouring existing dwellings. The Site benefits from a continuous pavement link to the centre of Rudgwick, where there is a variety of services and facilities including shops, public houses, community facilities and schools. The pavement provides safe and convenient access to public transport, which provides regular services to major towns of Horsham and Guildford. In this context, the site cannot reasonably be described as isolated and clearly represents a sustainable and proportionate location for a modest new development of 6-9 dwellings.

- 7.5 Further the evidence of recent permissions to the north of Rudgwick confirm that this Sites distances to services and facilities is entirely appropriate in the context of this 'medium village' location.
- 7.6 The proposal would deliver tangible economic and social benefits, positively contributing to housing supply, and meeting local needs with a mix of housing sizes. The proposals will sustain nearby services and community life via a modest built addition at the edge of the settlement. Any landscape effects would be limited and capable of being addressed at the Technical Details stage through careful design and landscaping.
- 7.7 In summary, the proposal would constitute sustainable development, with compliance with the economic, social and environmental objectives of the NPPF. In the absence of an up-to-date Local Plan and a lack of a deliverable 5YHLS, a presumption in favour of sustainable development should be applied. Therefore, as the proposal accords with the aims and objectives of national and local guidance, the application site is a suitable for the proposed development and permission should therefore be granted.

April 2026