

Horsham District Council
Planning Department (FAO Sam Nye)
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB
(Sent via email only)

29th June 2026

Dear Sam,

Application reference: DC/26/0737 - Permission in Principle for the erection of a minimum of 6 and maximum of 9 dwellings.

Site Address: Land East of Woodfalls Manor, Loxwood Road, Rudgwick

We refer to the above application for Permission in Principle, which is currently under consideration by Officers.

We have been monitoring the online application file, and note that a number of comments have been received from consultees, plus two letters of representations from local residents. With respect to the comments that have been received to date, we would like the Planning Officers to consider the following responses:

Rudgwick Parish Council

The Parish Council object to the application. They say that the site does not adjoin the built-up area boundary (BUAB), and that the emerging Local Plan does not include an amendment to the BUAB to encompass this site.

It is relevant to note that 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.”*

As Officers are aware, the new Local Plan is at examination stage, and is subject to change. Therefore it cannot be afforded significant weight. In any case, the current position is that the District does not have a 5-year housing land supply, and the policies which are most important for determining the application are out-of-date. Paragraph 11(d) of the NPPF is engaged, and therefore the planning test is whether the granting of planning permission would lead to *“adverse impacts”* that *“would significantly and demonstrably outweigh the benefits”* of approving the new housing. Our position is that there would be no adverse impacts arising from the development, and even if there were harm identified by breaching the BUAB, this would be minor and would certainly not significantly and demonstrably outweigh the benefits of providing much needed housing in this location. On this basis the application should be approved.

The Parish say that even 6 dwellings *“would not reflect the character of the area, and would be out of step with the local street scene.”* They refer to the previous Appeal for 6 dwellings at this site (DC/15/1649), which was dismissed due to the site being outside the BUAB in conflict with the spatial strategy contained within the adopted HDPF, at a time when the District did have a 5-year housing land supply. It is significant that when reaching that decision, the presumption in favour of sustainable development was **not** engaged. In reaching that decision the Planning Inspector made reference to sustainability – see below. What is noteworthy is that during their consideration of the previous 6-dwelling scheme, the HDC Landscape Officer confirmed that *“The site sits adjacent to an existing settlement and the proposals would not harm the perception of the wider landscape and townscape character. The principle of development on the site on landscape and visual grounds is considered acceptable.”* The Planning Inspector acknowledged this, commenting 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.”* The Parish refer to the existing allocation for at least 66 dwellings on two sites in Bucks Green, with one site (DC/25/1269) having outline approval for up to 90 dwellings. The Parish comment that these commitments *“fully meet its [the Parish’s] share of the current district housing allocation... There will then be no unmet housing need for the parish.”*

The submission version of the Local Plan, which includes the two allocated sites in Bucks Green, is based on a housing figure 13,212 homes at an average delivery rate of 777 homes per year. The current position is that the draft Local Plan remains subject to change, with the April 2026 hearings resulting in the Inspector asking the District Council to increase their housing figure and find more allocated sites.

It is noted that the Planning Inspector has confirmed that the District’s housing requirement for the Plan period (2023-2040) is now 14,071 dwellings, plus an allowance for Crawley’s unmet housing need, which amounts to an additional 3,757 dwellings during the Plan period, resulting in a total of 17,828 dwellings. This is a significant increase from the submission version of the Local Plan.

Therefore it is reasonable to assume that the Parish’s share of the District’s housing needs is also increased. In any case, there is no cap to the amount of housing for the Parish, and the current position is that the District’s housing needs are significant given a woeful undersupply. Now that water neutrality restrictions have been lifted, there is a need to deliver housing as quickly as possible, and it is seen that smaller sites (like the Woodfalls site) will provide significant opportunities for the delivery of new housing within the shorter term.

The Parish Council also refer to sustainability. It is acknowledged that this was also referred to in the Planning Inspector’s decision in 2016 in relation to this Site. The Parish say that *“The 2 allocated sites are in a far more sustainable location...”* The issue of sustainability is assessed in great detail within our Planning Statement (see Section 6), which formed part of the original suite of documents that supported this application for Permission in Principle. With respect to the draft allocation sites, these are positioned approximately 450 metres north of the Woodfalls 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. The Site benefits from a continuous pavement link to the centre of Rudgwick, where there is a variety of services and facilities. The pavement provides safe and convenient access to public transport, which provides regular services to major towns of Horsham and Guildford. Given also the site’s close relationship

with adjacent housing that is within the BUAB, we consider that the site is a sustainable location for new housing.

It is noted that the Parish Council, when commenting on a previous (subsequently withdrawn) Outline application for 25 dwellings (see DC/14/1292) commented that *“some small development on the proposed site in plausible [but]... the number of proposed dwellings [25] far exceed the number expected for such a location...”* Considerations such as the existing characteristics of the area and the protected trees have influenced the current plans, which are illustratively shown as 7 dwellings. We consider that the range of dwellings (6-9 units) that is proposed by this Permission in Principle application is entirely appropriate for this Site.

NatureSpace

We note that comments have been received from NatureSpace which advice that the site lies within the amber impact risk zone for Great Crested Newts. As a consequence NatureSpace comment that *“as part of any future application, it is recommended that information regarding the suitability of the site to support great crested newts is obtained to rule out any impacts as part of the proposal.”* These comments are noted, and the Applicant has confirmed that the necessary ecology surveys are in hand, and the relevant reports will be provided with the subsequent Technical Details Consent application.

It is relevant to note that the previous application (DC/15/1649) was subject to a Phase 1 Habitat Survey, which resulted in the Council withdrawing their second reason for refusal which related to ecology.

Arboriculture

We are encouraged that the Council's Arboricultural Officer confirms that *“Overall, the site would be capable of accommodating 6 units, whilst mostly respecting the constraints the trees around the fielded edge represent in terms of tree-to-build relationships; subject to good design which follows the key principals of BS 5837 (2012)”*.

Further comments are provided in relation to the potential for overshadowing of some plots from protected trees. It is important to acknowledge that OSP's proposed site layout plan, which accompanies this Permission in Principle application, is illustrative in nature. As suggested by the Arboricultural Officer, this matter can be dealt with at the subsequent Technical Details Consent stage. We are confident that a layout can be provided that would ensure satisfactory living conditions for future residents are achieved, and no future pressure for tree works would result.

The importance of the 'G2' group of protected trees is noted. The Arboricultural Officer comments on the proposed access position, and that consideration should be given to moving this further west. This would likely align with the access position that was proposed as part of the previous application for this site. The details provided by Motion with this Permission in Principle application actually reflects this advice (the OSP site plan is illustrative), and consequently this arrangement would likely be proceeded with as part of the Technical Details Consent application.

Highways

The representations received from the occupiers of No.1 Woodfalls Manor raises concerns relating to highway safety, although they do confirm that they *“do not in principal object to the construction*

of 6 to 9 dwellings in the plot". This is a view also confirmed by the occupiers of No.6 The Riddens, who comment that they "accept that some level of development on this site may be appropriate, and recognise that a small number of dwellings could be successfully accommodated". The latter go on to explain that they consider the higher number of units proposed by this Permission in Principle application to not be "proportionate to the size of the plot or in keeping with the character and scale of the surrounding village... we would strongly recommend that the number of dwellings be limited to a maximum of six..."

With respect to the highway safety comments it is relevant to note that the West Sussex County Council (WSCC) Highways Officer confirm that they have no objections to the proposed development. They have set out a number of requirements for the Technical Details Consent application, and the Applicant and their transport consultants will ensure that these matters are robustly dealt with at the time of that future application submission.

The representation from the occupiers of No.1 Woodfalls Manor query the drawings as they *"do not show the full development of the site. The plans show a road that could be extended to the north for additional development. The full proposals should be shown on the drawings."* We can advise that the area to the north is not currently proposed for development, and is likely to be utilised for Biodiversity Net Gain purposes (subject to further ecology survey work).

Environmental Health

The comments from the Council's Team Leader (Pollution) are noted. The conditions suggested all appear to be of a standard nature, and their requirements are agreed by the Applicant.

We trust that this information is of assistance. Should Officers wish to discuss this Application, or if any further information or clarification is required, then please do not hesitate to contact us.

Yours sincerely,

Rodway Planning Consultancy Limited

c.c. Greenplan Designer Homes