



29th September 2025

Planning Department
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Dear Sir/Madam

DC/25/1269 – Land North of Guildford Road Bucks Green
Outline – All matters reserved apart from Access

Summary

Whilst Rudgwick Parish Council (RPC) has previously expressed that it is content with HDLP Strategic Policy HA14 (see Footnote A) and thereby site allocations RD1 and RD2, it strongly objects to the above application for the following reasons:

- The proposals for development on the site are not compliant with key aspects of HA14, in particular the land to be used for development and the land to be used to create a landscape buffer to separate it from farmland. ***N.B. This potentially has significant implications regarding SNWCS eligibility (see later)***
- The access proposals for Vulnerable Road Users (VRU) are inadequate, potentially dangerous, and do not follow Active Travel principles nor even adequately mesh with the RPC initiative to better link Bucks Green and Rudgwick.
- The A281 in Bucks Green is known to RPC and Sussex Police as an area where speeding vehicles are both dangerous and intimidating to VRU. In the proposals there is no attempt to introduce any traffic calming measures which will be essential given that the Bucks Green settlement will (at least) have its housing units doubled.

Also, despite the advisory on Permitted DC/24/1811 and local plan documentation, site assessments, and specific requests from RPC, there appears to have been little attempt to explore the possibility of a single access onto the A281 to serve both sites RD1 and RD2. Locally, having 2 x A281 new accesses with one affecting capacity on a much used and valued layby, would be viewed by residents and RPC as a failure of Town & Country Planning.

Red Line Site Boundary

The R18 Site Assessment Report for SA574 dated February 2020 noted that 'the site is relatively open, particularly to the north' and that 'any development would need to respect the existing linear development pattern (of Bucks Green) and avoid extending onto the higher and more open land beyond'. It concluded 'The site is large in comparison with existing built development in this location. Development in this location has the potential to impact landscape and settlement character'.

In January 2022 HDC gave pre-app advice referencing the July 2021 R19 draft plan which had a site allocation for 60 homes under Policy HA16 which stated 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'. The advice summarised that 'both the quantum of development and its proximity to the northern boundary would not best reflect these (HA16) policy aspirations'.

In January 2024 HDC published for consultation an R19 draft plan (2023-2040) that was subsequently submitted for Examination. Site SA574 was allocated therein but Strategic Policy HA14 by clear reference to the Policies Map, limited the development to south of an east/west line just reaching the Pennthorpe Sports Pavilion. The remainder of the 4.9 hectares lying to the north of this line was reserved for landscape treatment, presumably to provide a (future) defensible barrier to the farmland to the north.

The Site was assessed in the Site assessment Report dated December 2023, with the following conclusion: 'Overall, it is considered there is potential for development on this site. Development should however be confined to the southern portion of the site to retain the linear settlement pattern in this area and enable landscaping to be provided which protects the more open character of the site to the north. The site could have potential for allocation if the overall number of dwellings proposed is limited to around 60. Development would also need to take account of biodiversity and heritage constraints. The site is adjacent to SA794 which has also been assessed as suitable for allocation. The potential to deliver these sites as part of a comprehensive scheme should be considered'.

This outline application is not therefore in accordance with these important principles as set out in the R19 HA14 allocation, backed up by the site allocation evidence itself. It attempts to establish the principle of housing on a **significantly greater footprint** of the site, than the allocation directs. It would cause significant landscape damage, disrespect the linear development pattern of Bucks Green (recognised by RNP Policy 1), and introduce a site completely out of scale with the existing Bucks Green settlement (up to 90 new homes v (less than) 60 within its existing settlement boundary).

The intended site allocation of circa 60 homes under RD2 would increase the number of homes within the settlement boundary by 100%. If, by extending the developable area northwards to incorporate even more agricultural land (in contravention of HA14), this number became circa 90 then that would increase the number of homes within the BUAB of Bucks Green by 150%. This is surely further justification to show that Policy HA14 should be fully complied with.

Water Neutrality & SNWCS

Rudgwick Parish Council asserts that the site is NOT eligible for SNWCS as the proposals are NOT in accordance with a post-submission local plan (i.e. the HDLP). The HDLP does not allocate housing development on the northern part of the site, reserving it for a significant landscape buffer, with a clear demarcation line shown in the Policies Map and with this restriction referenced in Strategic Policy HA14.

So, the submitted application cannot achieve water neutrality via SNWCS and consequently, in the absence of a demonstration of water neutrality without accessing SNWCS, the application cannot be assessed as having reasonable certainty of no impact on protected habitats in the Arun Valley i.e. there would be a breach of the Habitats Regulations (2017).

Rudgwick Parish council therefore strongly challenges the apparent submission by the case officer to SNWCS of 2nd September, with the SNWCS response dated 4th September stating 'By consulting us with this application, you are confirming that the application meets the SNWCS access criteria'.

Simply put, this outline application proposes housing development that extends (significantly) beyond that part of the site specified for development in HA14 and so is in clear contravention of the SNWCS eligibility criteria.

A281 Traffic in Bucks Green

With the ever-increasing traffic flows on the A281 (National Lorry route) in Bucks Green, the frequency of speeding traffic, has attracted the attention of Sussex Police and the local Speedwatch group, with both the current and previous MP attending a Speedwatch session. Sussex Police has accepted that there is a speeding issue there with numerous penalty notices issued and periodically deploys a mobile speed camera unit to the site. The parish council has written to Sussex Police requesting that it inputs information relevant to this planning application to evidence the extent of speeding traffic.

In order to attempt to calm traffic entering Bucks Green from the West, a Community Highways Scheme was requested by RPC to implement a buffer 40mph speed limit on the A281 approaching Bucks Green. The parish council has a speed indicator device (SID) on the A281 within the 30mph limit but west of the Lynwick Street junction. Prior to the buffer limit installation, the V85 (for traffic both entering and leaving the village) was tracked as 44mph. Since the installation (June 2024) the V85 for traffic entering the village has reduced to 42mph but the V85 for traffic exiting the village has remained at 44mph (N.B. all measurements taken within the 30mph zone at SID location W3W hiding.brave.blip).

The applicant has submitted ATC data for Northbound (Westbound?) traffic only showing a V85 of 34mph. The ATC data for Eastbound traffic is therefore awaited albeit the report notes a V85 of 32.4mph.

The submitted ATC (Westbound) shows daily traffic movements of approaching 5000 per day with 550 of those vehicles travelling in excess of 35 mph.

So, when the ATC (Eastbound) figures are submitted then the total (both directions) existing vehicle movements per day can be expected to be near 10,000, with approaching 1000 vehicle movements per day **exceeding** 35mph.

According to the Collision Survival Rates Chart in the West Sussex Speed Limit Policy presentation (Chris Stark 13th January 2023) the probability of a fatality for a VRU being hit by a vehicle travelling at 35mph is 95%.

Because of the significant traffic volume on the A281 in Bucks Green, and the speed data recorded by the ATC (presumably near the proposed site access point), this shows that there are 1000 'opportunities' per day for a VRU to be involved in a collision, and with a **minimum** 95% chance of it being fatal.

RPC considers that some form of traffic calming is therefore necessary to reduce traffic speeds through Bucks Green. The new housing with its associated additional traffic movements will make matters even worse. Access arrangements for VRU will also need to reflect the volume and speed of traffic.

VRU detailed Access proposals

The text in para 10.150 prefacing HDLP Strategic Policy HA14: Rudgwick and Bucks Green, states that 'support will be given to proposals that seek to achieve community aspirations as set out in the Neighbourhood Plan, including improving pedestrian safety and access on the local highway network and in particular enhanced connectivity between community facilities in Bucks Green (south of the A281) and the built form Rudgwick and Cox Green (north of the A281).

With this in mind, and wishing to ensure that parish concerns and material considerations were discussed with the applicants prior to the submission of this proposal for a significant development for the parish, a Rudgwick Parish Council (RPC) group held a meeting in June with the applicants and where the following points were noted:

- The need to calm traffic, improve safety and reduce speeds on the A281 in Bucks Green and suggested engineering possibilities for the area to be investigated. (*No measures suggested in current proposal – e.g. Mini Roundabout, Pedestrian Refuge Islands etc.*).
- Safety for Vulnerable Road Users (VRU) is paramount and the issues as to why an uncontrolled crossing is considered inadequate for the busy road, particularly as the number of pedestrian and cyclist users will increase owing to the development. (*RPC agrees strongly with WSCC that this must be fully addressed before any proposal can be accepted*).
- Adequate safe pavement links are required along the A281 (north side) to/from the main village facilities (including schools). RPC has an extant Active Travel Initiative intending to increase the width of existing pavement from an inadequate 1.5m to 3m. (*So, the 1.5m suggested by the applicant for such new pavement provision would be a retrograde step in conflict with this initiative*).
- Applicants were made aware of all facilities at KGV fields opposite the site: Village Hall, Playing fields, Playground, Skate Park, Rudgwick Youth Centre (after school and evening activities currently 4 x weekly for ages 11- 18 years), Tennis Club, Football and Cricket clubs (including junior teams), Spin Cycling and exercise studio, Little Streets Role Play

franchise business. (*Hence they should be fully aware of the likely VRU wishing to cross the A281 from the new development*).

- Information/awareness raising concerning the serious RTA in May 2024 when 2 pedestrians (HDC waste operatives) were injured whilst working close to the Fox pub/Lynwick Street junction on A281 (one had life threatening injuries and was hospitalized for many months), in the area west of the site access where a 2nd crossing is now being proposed by the applicant. (*This crossing point is dangerous and unnecessary and should be removed from the proposal. Again, RPC agrees with the WSCC response on this aspect*).
- Safety concerns about the Lynwick Street junction with A281, and the proposal to remove the 'Stop' signs. (*RPC didn't comprehend the objective of the changes proposed and thereby aligns with the WSCC feedback*).

Additional feedback was given to the applicants after discussion with full parish council. Response was promised by the applicant, but none was forthcoming, despite several follow up communications and offers to meet to discuss further. The information submitted in this proposal is the same as that in the June presentation to RPC and therefore the parish council must object to the detailed access arrangements currently proposed by the applicant on the grounds that it does not adequately meet the needs or safety requirements of VRU.

Further points.....After considering the current proposal, RPC believes access onto Lynwick Street (a rural lane) for pedestrians and cyclists is necessary to reach the Downs Link/Milk Churn/Firebird Brewery via Lynwick Street without having to cross/navigate the A281.

The submitted Transport Assessment states, 'Safe and suitable access to the site can be achieved for all users' and 'the proposal is acceptable in transport terms and meets with local and national policy criteria'. RPC believes that the proposal, having not taken on board or used important information and considerations that were provided, does not improve or increase safety in terms of VRU, rather than mitigating issues raised continues to add to them and does not promote Active Travel. Therefore, it does not meet the requirements to sufficiently satisfy NPPF paras 109,110 and 117, HDPF Policy 40, emerging HDLP policy 24, RNP policies 12 & 13.

FOOTNOTES

A. October 2021 - RPC comments to HDC re potential site allocations RD1 and RD2

The allocations of RD1 and RD2 are noted and accepted. RPC considers that it is absolutely essential that the 2 sites come forward as a comprehensive scheme, as it considers that only one new access onto the A281 should be allowed. RPC is aware that the site promoters of RD1 were proposing a secondary access onto Lynwick Street. These accesses need to serve both sites, as one. In addition, the existing (rarely used) agricultural access for site RD2 would be wholly inappropriate to upgrade as it would interfere with the parking layby (used by houses opposite) and the bus stop. Also, RPC would like a new single A281 junction to be designed to facilitate a reduction in traffic speeds through Bucks Green on the busy A281; perhaps a mini roundabout, if feasible.

These two sites have a strong tendency to cause serious flooding, due to rain, onto the A281 and RPC is concerned that appropriate land drainage must be provided at the time of construction.

Whilst agreeing with comment 3 (a) in respect of RD1, RPC would prefer to be more precise in noting that existing development in the linear settlement of Bucks Green on the north side of the A281 extends only 2 or 3 (max.) properties deep and so it is essential that any new scheme complies with that pattern. This would facilitate the northern part of the site being landscaped both to minimise landscape impacts (as stated), but also to create a defensible boundary to prevent further development creep into agricultural fields.

B. Rudgwick Parish – Site Allocations

Rudgwick Parish Council (RPC) did not allocate sites in its Neighbourhood Plan ('made' June 2021) having taken up the 'offer' made by HDC to include any such site allocations for the parish in the local plan review extant at that time.

The Regulation 18 plan version indicated an allocation for the parish of 50.

The (now submitted) Regulation 19 allocated 2 sites; RD1 for at least 60 homes and adjacent RD2 for at least 6 homes.

Site allocation RD1 relates to this application.

Site RD2 has secured outline planning permission (all matters reserved) under DC/24/1811 with an advisory regarding the desire for a single access onto the A281.

RPC accepts, in principle, that these sites can be developed for housing, subject to any requirements set out in the relevant strategic policies.

Yours faithfully
Sarah Hall

Sarah Hall
Assistant Clerk to Rudgwick Parish Council Clerk