Mermaid Cottage
Fox Hill
Haywards Heath
West Sussex
RH16 4QY
29th September 2025

Planning application DM/25/0827

Dear Mr King

I wish to object to planning application DM/25/0872 on the grounds that the transport input data supplied, through no fault of their own, to RPS by Stantec for the Air Quality Assessment, as mentioned in paragraph 2.37, are flawed, rendering the predicted air quality at 1, 2, 4 and 6 residential receptors and the proposed residential receptors 1, 2, 3 and 4 meaningless. The speed limit for links 1 and 2 is 60 mph (96.56 km/hr.) and not 48 km/hr, as indicated in Table 2.2.

Table 2.2

Road Link ID	Road Link Name	Speed ($km.hr^{-1}$)	Daily Two Way Vehicle Flow			
			Without Development		With Development	
			Total Vehicles	HDV	Total Vehicles	HDV
1	B2112 Lunce's Hill- between Green Road and Site Access	48	14,019	1,558	14,191	1,577
2	B2112 Lunce's Hill - between Site Access and Hurstwood Lane	48	14,452	1,606	14,984	1,665
3	B2112 Fox Hill - between Hurstwood Lane and Rocky Lane	48	11,626	1,292	12,158	1,351
4	B2112 Wivelsfield Road / Sussex Road - between Rocky Lane and B2272	48	16,090	1,788	16,323	1,814
5	A272 Rocky Lane - between B2272 and B2112	96	12,130	887	12,130	887
6	A272 Rocky Lane - between B2112 and Highbank	96	20,128	1,472	20,402	1,492

Like it or not, Hurst Farm is a committed development whereby Hurstwood Lane is closed to through traffic that Stantec claim to have taken into account regarding cumulative developments of DM/18/5114, DM/19/1898, DM/22/0733 and LW/21/0729. which WSP did not or could not take into account. Sadly, their research failed to include traffic flows for the 2027 Base+Development as part of the operational phase data published by WSP within the Environment Statement Volume 1, Chapter 13-Traffic and Transport, July 2022, where Table 13-6 is displayed.

Table 13-6 - Operational Phase Traffic Flows (Two-Way)

Link	Sensitive?	2027 Base				2027 Base + Development				% Change			
		AM	PM	AAWT	AADT	AM	PM	AAWT	AADT	AM	PM	AAWT	AADT
A272 Rocky Lane (West of B2112)	No	1,858	1,551	16,120	16,295	2,042	1,671	17,554	17,745	10%	8%	9%	9%
B2112 Wivelsfield Road	No	1,399	1,446	13,446	13,593	1,500	1,491	14,138	14,291	7%	3%	5%	5%

Kennard Lane	No	56	57	538	544	56	57	538	544	0%	0%	0%	0%
A272 Rocky Lane (between B2112 and Hurstwood Lane)	No	1,170	1,058	10,536	10,651	1,475	1,365	13,426	13,572	26%	29%	27%	27%
A272 Rocky Lane (between Hurstwood Lane and B2272)	Yes	1,670	1,349	14,270	14,425	1,707	1,379	14,589	14,748	2%	2%	2%	2%
B2112 Fox Hill (between A272 and Hurstwood Lane)	**Yes**	**1,019**	**1,082**	**9,930**	**10,038**	**1,549**	**1,487**	**14,352**	**14,508**	**52%**	**37%**	**45%**	**45%**
B2112 Fox Hill (South of Hurstwood Lane)	Yes	1,278	1,344	12,393	12,528	1,349	1,373	12,864	13,004	6%	2%	4%	4%
Hurstwood Lane (Southern Section)	**Yes**	**295**	**291**	**2,771**	**2,801**	**383**	**195**	**2,734**	**2,763**	**30%**	**-33%**	**-1%**	**-1%**
Hurstwood Lane (Northern Section)	**No**	**312**	**316**	**2,973**	**3,005**	**82**	**108**	**895**	**905**	**-74%**	**-66%**	**-70%**	**-70%**
Hurstwood Lane (Link to A272)	**No**	**403**	**406**	**3,825**	**3,867**	**171**	**208**	**1,793**	**1,813**	**-57%**	**-49%**	**-53%**	**-53%**
B2272 Franklynn Road	No	1,236	1,308	12,026	12,157	1,245	1,317	12,112	12,244	1%	1%	1%	1%
B2272 South Road	Yes	1,114	1,355	11,670	11,797	1,148	1,381	11,956	12,087	3%	2%	2%	2%
B2112 Hazelgrove Road	Yes	1,503	1,606	14,697	14,857	1,578	1,634	15,188	15,354	5%	2%	3%	3%
B2112 Sussex Road	Yes	1,271	1,625	13,690	13,839	1,372	1,670	14,381	14,538	8%	3%	5%	5%
A272 Lewes Road	No	1,459	1,332	13,191	13,335	1,465	1,338	13,250	13,395	0%	0%	0%	0%
B2272 Lewes Road	Yes	1,432	1,516	13,936	14,087	1,463	1,540	14,196	14,350	2%	2%	2%	2%

The difference between RPS and WSP traffic flows is thought to be attributable to one applicant considering the effects of the Northern Arc, Wivelsfield and Springbank developments whilst the other, who is the custodian of the Strategic Plan used by WSCC who undertook the traffic modelling on behalf of EACOM for the Northern Arc developments, chose to ignore the significant effects arising from it upon existing and future residents of properties abutting Fox Hill. The effects of traffic flow as a consequence of the Northern Arc upon the highway network were dealt with in an earlier submission, dated 28th April 2025.

Receptors and pollutant concentrations
The location of six residential and four proposed receptors is indicated in Table 2.4 Modelled Sensitive Recptors.

Table 2.4

ID	Description	x	y
1	Residential 1	533728	121941
2	Residential 2	533360	122581
3	Residential 3	533355	122600
4	Residential 4	533433	122640
5	Residential 5	533355	122664
6	Residential 6	533627	122109
7	Proposed residential 1	533822	121744
8	Proposed residential 2	533870	121658
9	Proposed residential 3	533891	121725
10	Proposed residential 4	533877	121949

Table 5.1 Predicted Annual-Mean NO2 Impacts at Existing Receptors.

Concentration (μg.m^{-3})

Receptor ID	Without Development	With Development	With - Without Dev as % of the AQS Objective	Impact Descriptor
Residential 1	15.0	15.1	0	Negligible
Residential 2	13.2	13.3	0	Negligible
Residential 3	13.1	13.3	0	Negligible
Residential 4	15.4	15.5	0	Negligible
Residential 5	13.7	13.8	0	Negligible
Residential 6	12.1	12.2	0	Negligible
Maximum	**15.4**	**15.5**	0	-
Minimum	**12.1**	**12.2**	0	-

At first glance, the predicted concentrations could be mistaken for background concentrations instead of typical roadside concentrations for this locality submitted in previous planning applications. Further investigation revealed that the nearest residential receptor to the roadside is 10 metres at receptor 6, with the furthest being 18 metres at receptor 4 which equates to 18.5 and 32.3µg/m^3 respectively at the roadside, both of which are influenced by incorrect traffic flow input data.
The proposed receptors, however, are not influenced by incorrect traffic flow data, but will be influenced by the incorrect speed being utilised. Predicted concentrations appear to indicate that the proposed development site will result in an increase in background emissions within the site; for example, at proposed residential 4, which is 86 metres distant from the nearest carriageway, the increase in NO_2 concentrations will be 0.8µg/m^3 (9.5%). The concentrations for NO_2 in Table 5.1 have been calculated using the Bureau Veritas tool, the result of which forms part of the addenda. The NO_2 concentration of 24.9µg/m^3 at residential receptor 3 compares favourably with the average annual mean (road increment) at MSAQ28 of 25.0µg/m^3 on the opposite side of the road. A concentration of 24.9 may seem an acceptable healthy level for a daily traffic flow of 20,402 vehicles but sadly it is the average for a 24-hour period being higher during daytime and lower at night. Table 13-6 indicates that the AM peak of 2042 equates to 11.5% of the daily total of 17,745 vehicles, which is 2.76 times greater than the hourly traffic flow of 739 vehicles. The road increment = measured concentration + background concentration, i.e. (24.9 - 8.4) = 16.5 which when multiplied by 2.76 = 45.54. The roadside concentration during AM peak (0745-0845) is 45.54 + 8.4 = 53.94µg/m^3 in the vicinity where members of the public will be walking or congregating. Subject to all residential receptors being of similar concentration to residentials 1 and 2, then during the AM peak, all other links are expected to exceed the annual mean objective of 40.0µg/m^3.

Traffic congestion
Studies carried out by Transport for London dealt with the effects of NO_2 concentrations close to schools from idling vehicles which found that NO_x concentrations increased significantly. UK Health Security Agency published, Transport interventions at schools: health impacts and benefits wherein it is stated, *"Children spend a significant proportion of their time at school – in the UK, the proportion is estimated at 25%. The BREATHE project reported that children spent on average 6% of the daytime in commuting, which resulted in about 20% of the daily dose of black carbon. Hence, mitigating children's exposure to air pollution at schools and during the school run represents an important way by which children's overall exposure to harmful pollutants can be reduced."*
Unfortunately, the effects from idling vehicle engines will not only affect children and are not unique to London, but will occur to some extent in the proximity of Hustwood Lane and Fox Hill during the AM and PM peaks that are not restricted to 60-minute periods as indicated in Table 13-6. Mid Sussex need to recognise that the exposure to pollutants affecting those, by necessity rather than choice, who commute on foot between Springbank and South Road needs to be seriously addressed by Mid Sussex Environmental Health Officer. Recourse to Mid Sussex 2025 Air Quality Annual Status Report demonstrates that NO_2 concentrations in November were 34% higher than in April and 21% higher than the annual average at MSAQ28, one of just two monitoring points in Haywards Heath. Historically the NO_2 concentration at MSAQ28 could have attained 64µg/m^3 during the AM peak in November 2024 (45.54 x 1.21 = 55.1 + 8.4 = 63.99). Applying the annualised and bias adjusted factor of 0.84 would result in a concentration of 53.74µg/m^3 which is of little comfort to those suffering from respiratory conditions.

Table 5.4 Predicted NO2, PM10 and PM2.5 Concentrations (µg.m^{-3}) at Proposed Receptors

Receptor ID	Annual-mean NO_2	Annual-mean PM_{10}	Annual-mean $PM_{2.5}$
Proposed residential 1	13.1	13.5	8.0
Proposed residential 2	12.1	12.9	7.6
Proposed residential 3	9.7	11.5	6.9
Proposed residential 4	9.2	11.1	6.7
Maximum	**13.1**	**13.5**	**8.0**
Minimum	**9.2**	**11.1**	**6.7**

XXXXXXXX

Addenda

Enter data into the pink cells

Site Name/ID	Distance (m)		NO_2 Annual Mean Concentration ($\mu g/m^3$)			Comment
	Monitoring Site to Kerb	Receptor to Kerb	Background	Monitored at Site	Predicted at Receptor	
Residencial 1	0.1	13.0	8.4	15.0	28.5	
Residencial 2	0.1	15.0	8.4	13.2	23.9	
Residencial 3	0.1	18.0	8.4	13.1	24.9	
Residencial 4	0.1	17.0	8.4	15.4	32.2	
Residencial 5	0.1	15.0	8.4	13.7	25.5	
Residencial 6	0.1	10.0	8.4	12.1	18.5	
Proposed 1	0.1	10.0	8.4	13.1	21.2	