

Evaluation of Millers Homes' Framework Travel Plan (FTP) and Transport Assessment (TA)

Land North of Colwell Farm (DM/25/0445)

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1.Summary of findings

Proposed Pedestrian Crossings are dangerous

- Crossing by site entrance breaches Department for Transport advice - crossing should not be located at a junction
- Crossings proposed where 40% of vehicles drive 10mph over limit with maximum speeds of 53mph recorded
- Numerous pedestrian fatalities recorded on A272
- Unrestricted crossing means pedestrians more at risk - children and elderly particularly vulnerable
- Road has high proportion of HGVs, which have longer stopping distances than cars
- Poor street lighting on A272 will make crossing even more hazardous at night

Speeding Data significantly lower than West Sussex County Council Data

- Millers Homes states 85th percentile speeds of 42.5mph in 40mph zone
- West Sussex County Council (WSCC) monitored speeds by Birch Close and found
 - Top speeds of 53mph
 - 40% of vehicles drove 10mph over the speed limit
 - A speeding offender was recorded every minute
- Persistent speeding issues on the A272 - WSCC reported 742 vehicles speeding in one year (from a limited number of monitoring sessions)
- Police reluctant to reduce speed limit as unenforceable without speed cameras
- Vehicle Activated Sign installed by site entrance recently (indicator of persistent speeding issues)
- High speeds impacts pedestrian safety and safety of vehicles accessing proposed site

Incomplete Traffic Accident Data

- Traffic accident hotspot is under 1km from site (junction between A272 and Bedales Hill) – there have been 12 crashes reported to police in 5 years
- 5 fatal crashes on the A272 within 2.5km radius of the site (over last 25 years)
- Number of crashes involving HGVs - 4 crashes involving HGVs in last 5 years within 2.5km radius of the site
- Site access point likely to become new accident hotspot due to an estimated 1500 trips using junction

Incorrect Pedestrian Distances

- Millers Homes has understated pedestrian distances
- None of the local amenities are located within 800m of the site (as recommended by Active Travel England)
- Pedestrian distances even longer if using an accessible path that has street lights

Usage of Inaccessible, Unlit Footpaths

- Suggested footpath is narrow and dark throughout, is unpaved and uneven in sections
- Suggested footpath is unsuitable for the elderly, disabled, pushchair and wheelchair users, and cannot be used at night time (before 8am and after 4pm in winter)
- If paved, lit footpaths are used, pedestrian distances to local shops and GP double (distances to school and Northlands bus stop increase by over 50%)

Incorrect Pavement and Street Lighting Information

- Pavement adjacent to proposed crossing has pinch points of 0.75m (1.7m claim by developer inaccurate)
- Lewes Road has minimal street lighting - not sufficient for pedestrians or pedestrian crossing

Incorrect Bus Data

- All 3 local bus stops are further than recommended 500m walk (recommended by Chartered Institution of Highways & Transportation)
- Northlands Avenue is a 1.6km walk from the site (if using paved, lit paths)
- Bedales Hill bus stop is not suitable for pedestrians - there is no footpath for the final 550m (only an overgrown verge directly adjacent to 50mph road)
- Princess Royal Hospital bus stop is a 1.4km walk and requires using unrestricted crossings 4 times over busy roads and junctions
- Millers Homes repeatedly overstates the frequency and time window of local bus services (buses run less frequently and fewer morning and night services than claimed)
- Millers Homes mistakenly lists school buses as public buses

2. Proposed Pedestrian Crossings are dangerous

Millers Homes' submitted a proposal for a pedestrian crossing at Birch Close (see "Proposed Uncontrolled Crossing Across Lewes Road ITB19597-GA-011 rev A" submitted by developer) where the speed limit is 30mph.

They also propose a pedestrian crossing directly opposite the access road to the development where the speed limit is 40mph (Figure 5.1 in the FTP), and adjacent to where cars will be turning in and out of the proposed site access road onto the A272/Lewes Road.

The developer has only filed documentation for the proposed pedestrian crossing at Birch Close, and has not included separate documentation for the proposed pedestrian crossing outside the site access road – this is an error in omission and is misleading for the public and respondents.

Pedestrians wishing to walk to the services in the Walnut Park area (shops, primary school and GP) will need to cross the A272 at the pedestrian crossing outside the development (across the 40mph road).

Pedestrians wishing to walk to Princess Royal bus stop will need to use both crossings – first to cross to the northern side of the A272 (across the 40mph road) and then back to the southern side of the A272 (across the 30mph road).

Their proposal for an unrestricted pedestrian crossing adjacent to the proposed access road is in direct conflict with Department for Transport advice. The Department for Transport's The Design of Pedestrian Crossings¹ guidance states:

"2.1.1.1 Crossings should be located away from conflict points at uncontrolled junctions. This will give drivers an adequate opportunity to appreciate the existence of a crossing and to brake safely."

In addition, at this proposed crossing the speed limit of cars is 40mph – but 40% of cars have been monitored speeding, with top speeds of 53mph recorded (see Section 3). Also cars are permitted to overtake in this section of road (dashed centre line). Both these factors make this an extremely hazardous location to cross the A272.

There have been 5 pedestrian fatalities on the A272 in the last 25 years, according to data from CrashMap², which uses published data from the Department for Transport (DfT), and local news services.

On 31/8/2024, a pedestrian was killed on the A272 near the village of Cowfold³. As this is too recent to have been included in DfT records, information is only available from local news sources.

On 29/7/2018, a pedestrian was killed by a car while walking along the A272 carriageway near Bolney where the speed limit is 40mph.

On 16/11/2005, a pedestrian was killed while walking along the A272 near Ansty; on 9/7/04 a pedestrian was killed crossing the A272 near Midhurst; on 10/7/1999 a pedestrian was killed crossing the A272 carriageway near Midhurst.

In addition to pedestrian fatalities, three years ago on 19/12/2022 a pedestrian was seriously hurt crossing the A272 junction with the B2272 (Birch Hotel roundabout). This is

¹ The Design of Pedestrian Crossings
Department for Transport (April 1995)
https://assets.publishing.service.gov.uk/media/5a7d5cc0e5274a3356f2bc27/ltn-2-95_pedestrian-crossings.pdf

² www.crashmap.co.uk

This website uses data from the Department for Transport (currently 1999 – 2023)

All accidents that happened on the public highway, involved at least one vehicle, resulted in an injury to at least one person and were reported to the police are included.

³ Pedestrian killed near village of Cowfold

The Argus (31/8/2024)

<https://www.theargus.co.uk/news/24554499.pedestrian-killed-a272-cowfold-crash-mercedes/>

approximately 800m from the site entrance, and this roundabout crossing will need to be navigated by pedestrians walking to the Princess Royal bus stop.

It is noted that the A272/B2272 crossing where the accident occurred is an unrestricted crossing by a roundabout at the boundary of Haywards Heath with a speed limit of 30mph – 10mph lower than it is at the proposed site pedestrian crossing (which is considered a rural road by drivers), and 22mph less than the top speeds recorded at the site (see Section 3).

According to the Department for Transport's 'Reported road casualties in Great Britain: pedestrian factsheet'⁴, *"the most common contributory factor allocated to pedestrians in fatal or serious collisions (FSC) with another vehicle was 'Pedestrian failed to look properly'. The most common factor allocated to the vehicles involved was 'Driver or rider failed to look properly'"*

With an unrestricted road crossing, the onus is on the pedestrian to "look properly", while drivers will not be expecting people to cross the road as there is no obvious road crossing (only a dropped kerb).

The third most common contributory factor allocated to pedestrian fatalities was *"Pedestrian failed to judge vehicle's path or speed"*. This is likely to be an issue on the A272, as the higher overall speed of cars will make it harder to judge.

According to The Highways Code, children and older pedestrians are "particularly vulnerable" as they find it hard to judge the speed of cars. It states⁵: *"children and older pedestrians who may not be able to judge your speed and could step into the road in front of you. At 40 mph (64 km/h) your vehicle will probably kill any pedestrians it hits. At 20 mph (32 km/h) there is only a 1 in 20 chance of the pedestrian being killed."*

Research published by national road safety organisation Road Safety GB⁶ has found that primary school aged children cannot judge the speed of vehicles travelling faster than 20mph.

Road Safety GB states: *"Primary school children cannot accurately judge the speed of vehicles travelling faster than 20mph, according to a study carried out by researchers at Royal Holloway, University of London."*

"These findings provide strong evidence that children may make risky crossing judgements when vehicles are travelling at 30 or 40mph. In addition they are more likely to step in front of the faster vehicles, which therefore increases the risk fatality."

There is a lot of data on the impact of higher car speeds on pedestrian fatalities.

According to Roadwise (York and North Yorkshire Road Safety Partnership)⁷: *"If you hit a pedestrian they have a much greater chance of surviving if your speed is lower."*

⁴ Reported road casualties in Great Britain: pedestrian factsheet, 2023

(Department for Transport, 26 September 2024)

<https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-pedestrian-factsheet-2023/reported-road-casualties-in-great-britain-pedestrian-factsheet-2023>

⁵ The Highway Code - Pedestrians (205-210)

<https://www.highwaycodeuk.co.uk/pedestrians.html>

⁶ Study claims children cannot judge speeds above 20mph

Road Safety GB (30 November 2010)

<https://roadsafetygb.org.uk/news/study-claims-children-cannot-judge-speeds-above-20mph-1334/>

⁷ The chance of a pedestrian surviving

If you hit a pedestrian:

*at 40 mph there is a 90 percent chance they will be killed.
at 35 mph there is a 50 percent chance they will be killed.
at 30 mph there is a 20 percent chance they will be killed.
at 20 mph there is a 2.5 percent chance they will be killed.”*

Given that cars have been monitored driving at 53mph and approximately 40% of vehicles were driving 10mph over the speed limit (see Section 3), it would be extremely dangerous to allow an unrestricted pedestrian crossing – just one collision would almost certainly result in a fatality.

Not only do car stopping distances and pedestrian fatalities go up dramatically with the speed of a vehicle, there is also an additional hazard in poor weather, at night (reduced visibility) and for different vehicle types. A substantial proportion of the vehicles using the A272 are heavy goods vehicles (HGVs) as it is a major arterial route between West and East Sussex. HGVs have been involved in a number of accidents on the A272 within a 2.5km radius of the site (see Section 4).

Table 1: Information on stopping distances (from The Highway Code⁸)

Speed	Stopping distance for a car	Stopping distance for a car in rain	Stopping distance for a car in ice/snow	Stopping distance for an HGV
20mph	12m	24m	120m	18m
30mph	23m	46m	230m	45m
40mph	36m	72m	360m	54m
50mph	53m	106m	530m	79.5m

With the proposed crossings in a 30mph and 40mph zone, and evidence that cars reach speeds of 53 mph in this section of road (See Section 3), it is highly unlikely that pedestrians will be able to safely cross the A272 with an unrestricted road crossing.

The safety of the unrestricted crossing will also be reduced at night time due to the limited street lighting on the A272 (see Section 7).

3. Speeding Data significantly lower than West Sussex County Council Data

Millers Homes carried out a traffic survey during an unspecified week during December 2023. They state the average weekday speeds as 35.9 – 38.5mph, with 85th percentile speeds of 40.1 – 42.5mph. Millers Homes did not provide data on the top 15th percentile speeds, which are likely to have been significantly higher.

<https://www.roadwise.co.uk/using-the-road/speeding/the-chance-of-a-pedestrian-surviving/>
⁸ The Highway Code - Typical stopping distances; Rule 227 (wet weather); Rule 230 (ice weather)
<https://www.gov.uk/guidance/the-highway-code>
<https://assets.publishing.service.gov.uk/media/559afb11ed915d1595000017/the-highway-code-typical-stopping-distances.pdf>

It is noted that the visibility splay of the proposed A272 crossing was based on an 85th percentile speed of 42.5mph.

These speeds are far lower than West Sussex County Council (WSCC) data, which found top speeds of 53mph in the 30mph section near Birch Close, and found that 40% of vehicles were driving at 10mph over the speed limit. An offender was recorded every minute!

Speeds may be even higher 200m down the road by the site entrance, where another crossing is proposed.

An email from Stephen Hillier, County Councillor for Haywards Heath East, to a Lewes Road/A272 resident on 5/11/2021 (see Appendix A for the full email), states:

"In relation to speeds, I can confirm that when we have done sessions in the 30mph section near Birch Close, the maximum speed we have recorded in the 30mph has been 53mp (!) and this would likely to have been higher but drivers tend to slow because we were in sight! A final bit of data is that on the occasions when we have been able to count the total number of vehicles passing, 8-12% of them have been 5mph or more above the speed limit and over 40% have been travelling at over 40mph!. We tend to find we record at least one offender per minute."

In an earlier email sent by County Councillor Stephen Hillier on 3/11/2021 (see Appendix B), he discusses the persistent issues of speeding down the A272 with 742 vehicles reported for speeding in the last year (this is data from a limited number of monitoring sessions). He also says that a change in the speed limit from 40mph to 30mph would likely have no impact (without a speed camera or other enforcement measure). His email states:

"As you may be aware there is a long history associated with this section of road and speeding. A number of years ago the speed limit was reduced to 30mph, in the face of the police objecting because they felt it was unenforceable, to reflect the wishes of local residents."

"Since then you may be aware that I have set up a Speedwatch campaign and have been out with three similarly concerned residents on a number of locations and, to-date, we have reported 742 vehicles for speeding in the last year."

The persistent issues with cars speeding on this section of the A272, has resulted in West Sussex County Council recently installing a Vehicle-Activated Sign (VAS) approximately 150m before the site entrance (see Figure 1 below).

Figure 1: Vehicle-Activated Sign installed on A272



Issues with speeding on the A272 have also been raised by local residents in the local press⁹.

The persistent speeding of vehicles on the A272, which were underestimated by Millers Homes, raises serious questions about not just pedestrian safety, but the safety of drivers accessing the proposed site via the access road (where the speed limit is 40mph).

4. Incomplete Traffic Accident Data

Millers Homes reports only three accidents have occurred in the last 5 years between “*The Ridings to Oldfield Drive*” (Section 4.5.2 of TA).

The area surveyed is only a short section of the A272. According to data from CrashMap¹⁰ (which uses published data from the Department for Transport), less than 1km from the site entrance - at the junction between the A272 and Bedales Hill - is a traffic accident hotspot. At this junction, there have been 12 crashes where someone has been injured, in the last 5 years, 3 of these involved serious injuries. One of these crashes (on 6/6/2022) involved an HGV and a motorcycle, resulting in a serious injury to the motorcycle rider.

The Department for Transport (DfT) only logs accidents that have been reported to the police and resulted in an injury to at least one person, therefore the actual number of accidents is much higher. I travel through this junction regularly for the school run and to visit local shops and see traffic accidents regularly.

⁹ Call for speed cameras on Lewes Road in Haywards Heath: concern about speeding cars putting residents at risk

Sussex Express (8/11/2021)

<https://www.sussexexpress.co.uk/news/politics/call-for-speed-cameras-on-dangerous-road-in-haywards-heath-3449725>

¹⁰ www.crashmap.co.uk

This website uses data from the Department for Transport (currently 1999 – 2023)

All accidents that happened on the public highway, involved at least one vehicle, resulted in an injury to at least one person and were reported to the police are included.

According to DfT data, in the last 25 years within a 2.5km radius of the site, there have been 5 fatal crashes on the A272, including:

- 1 fatal crash near The Ridings - approx 500m from proposed site (2012) - 1 fatality
- 1 fatal crash near Scaynes Hill (2009) - 1 fatality, 1 serious injury
- 1 fatal crash on Rocky Lane bypass (2006) - 1 fatality, 1 serious injury
- 1 fatal crash near Scaynes Hill (2005) - 3 fatalities, 2 serious injuries
- 1 fatal crash near Slugwash Lane – approx. 700m from proposed site (2002) – 1 fatality

Due to the high proportion of HGVs using the A272, there have been a number of crashes involving HGVs. Within a 2.5km radius of the site, there have been 4 crashes on the A272 involving HGVs in the last 5 years and 23 crashes involving HGVs in last 25 years.

The number of crashes is likely to increase with an additional 80 homes, and an estimated 111 additional cars¹¹ as well as numerous delivery drivers, making potentially thousands of journeys in and out of the site onto the 40mph section of the A272.

As the site is not pedestrian/public transport friendly (see Sections 2, 5, 6, 7 & 8) – the daily number of car journeys is likely to be high. I live on the A272 and make approximately 12 trips in and out of my house daily – school run, shops, the gym and work. If the residents of the development made a similar number of journeys, along with at least one delivery a day, the estimated number of trips is around 1500 daily.

With this high usage of the site access junction, which will have poor visibility compared to the Bedales Hill junction, it is highly likely the site access point will become a new accident hot spot.

5. Incorrect Pedestrian Distances

Millers Homes quotes incorrect pedestrian walking distances at various points within the FTP and TA.

In the FTP and TA, i-Transport claims: *“The core local amenities and services are presented in Figure 3.1/6.1 (along with walking catchment isochrones) ...”*

“Primary school – the main primary school is Northlands Wood Primary Academy to the north west, circa 840m from the centre of the site ...”

“Supermarket or local grocery shop (selling fresh food) – Tesco Express at Walnut Park is the closest at circa 790m from the centre of the site ...”

“Doctor’s surgery – Northlands Wood Practice, at Walnut Park, with a Pharmacy (Kamsons) adjacent, these are circa 800m from the centre of the site.”

“The nearest bus stops to the site are located on Northlands Avenue (via Footpath 29CU) circa 1km walk distance from the centre of the site.”

¹¹ On average, there are 1.39 cars per household in West Sussex
https://www.westsussex.gov.uk/media/tabhq1di/census_briefing_2021_travel.pdf#:~:text=The%202021%20Census%20for%20West%20Sussex%20recorded,1.34%20in%202011%2C%20following%20an%20increase%20from

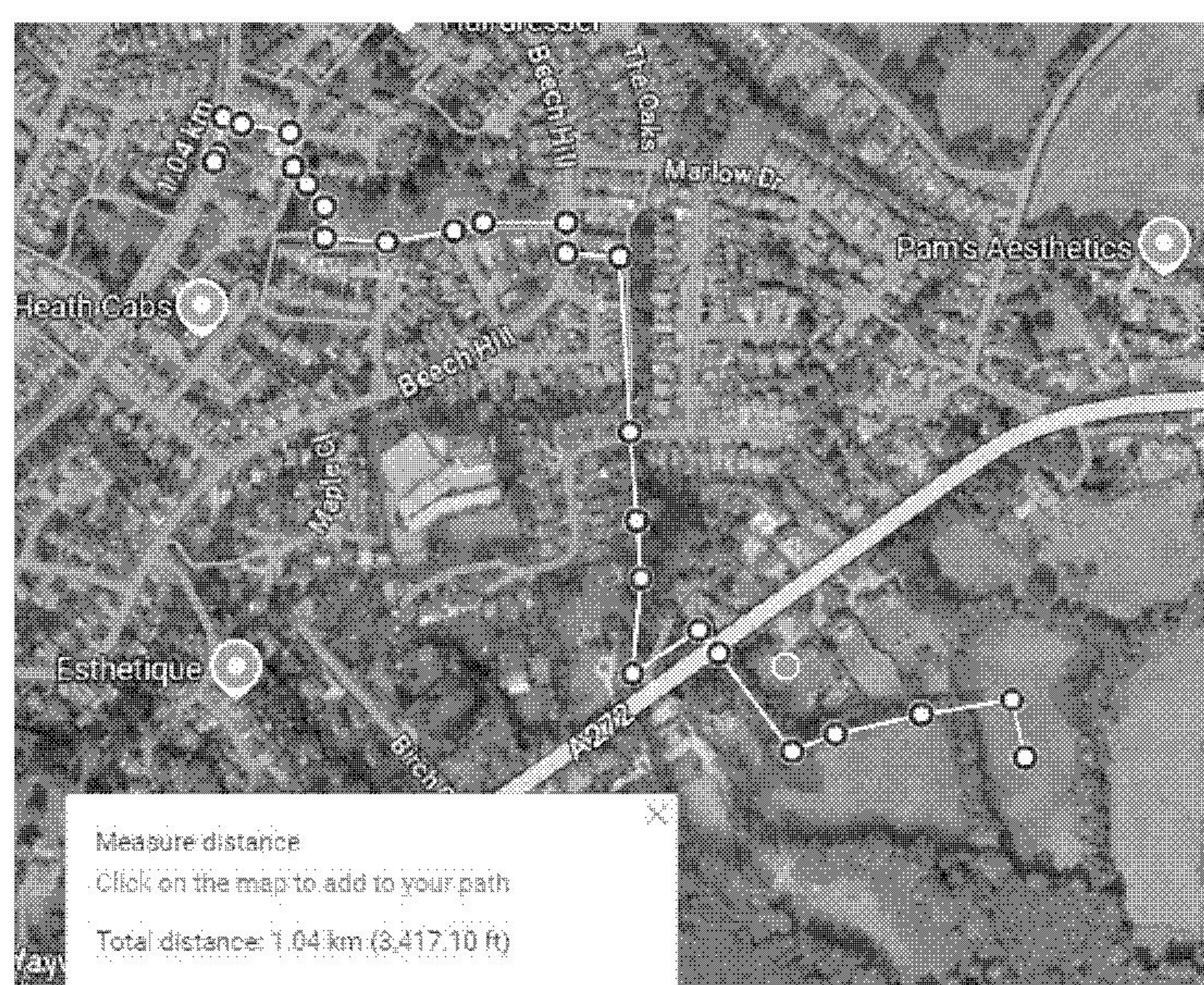
(Section 3.1.2 & 3.3.1 of FTP; Section 6.1.2 of TA)

The developer claims *“The main target of the TP in line with WSCC guidance is to achieve a reduction 10% in vehicular trips during a 12-hour weekday period (7am – 7pm).”* (FTP Section 4.2.1)

All these distances are incorrect. When measured on Google Maps, using the shortest walking route, the actual distances are up to 200m greater than claimed by the developer.

Figure 2 shows the 1040m walking distance from the centre of the proposed site, along 2NCU footpath to Northlands Primary School (the developer incorrectly claimed this was 840m).

Figure 2: Shortest pedestrian route to Northlands Wood GP surgery (via 2NCU)



According to Active Travel England's Standing Advice Note: Active Travel & Sustainable Development¹² (June 2014):

“A mix of local amenities should be located within an 800m walking and wheeling distance (using well-designed routes) of all residential properties or staff entrances for workplace facilities.”

None of the local amenities are within this recommended distance, therefore it is highly unlikely the developer will achieve the proposed reduction of 10% vehicular trips.

The pedestrian distances to each of the sites is even longer, if using an accessible path. As detailed in Section 6, the closest path to the local services is unsuitable for many pedestrians and cannot be used at night as there is no street lighting.

¹² Active Travel England Standing Advice Note: Active travel and sustainable development (June 2014)
<https://assets.publishing.service.gov.uk/media/667ace3fc7f64e234208ffb5/ate-travel-sustainable-development.pdf>

6. Usage of Inaccessible, Unlit Footpaths

Millers Homes proposes the use of 29CU public right of way (PROW) to access the local school, shops, doctor surgery and bus stops at various points within the FTP and TA.

“Many of the local facilities are located within the Walnut Park area within a reasonable walking distance of the site, accessible via existing footways on the northern side of Lewes Road and Public Right of Way 29CU.” (Section 3.1.3 of FTP)

“The nearest bus stops to the site are located on Northlands Avenue (via Footpath 29CU) circa 1km walk distance from the centre of the site.” (Section 3.3.1 of FTP & Section 6.3.1 of TA)

The developer claims *“The main target of the TP in line with WSCC guidance is to achieve a reduction 10% in vehicular trips during a 12-hour weekday period (7am – 7pm).”* (FTP Section 4.2.1)

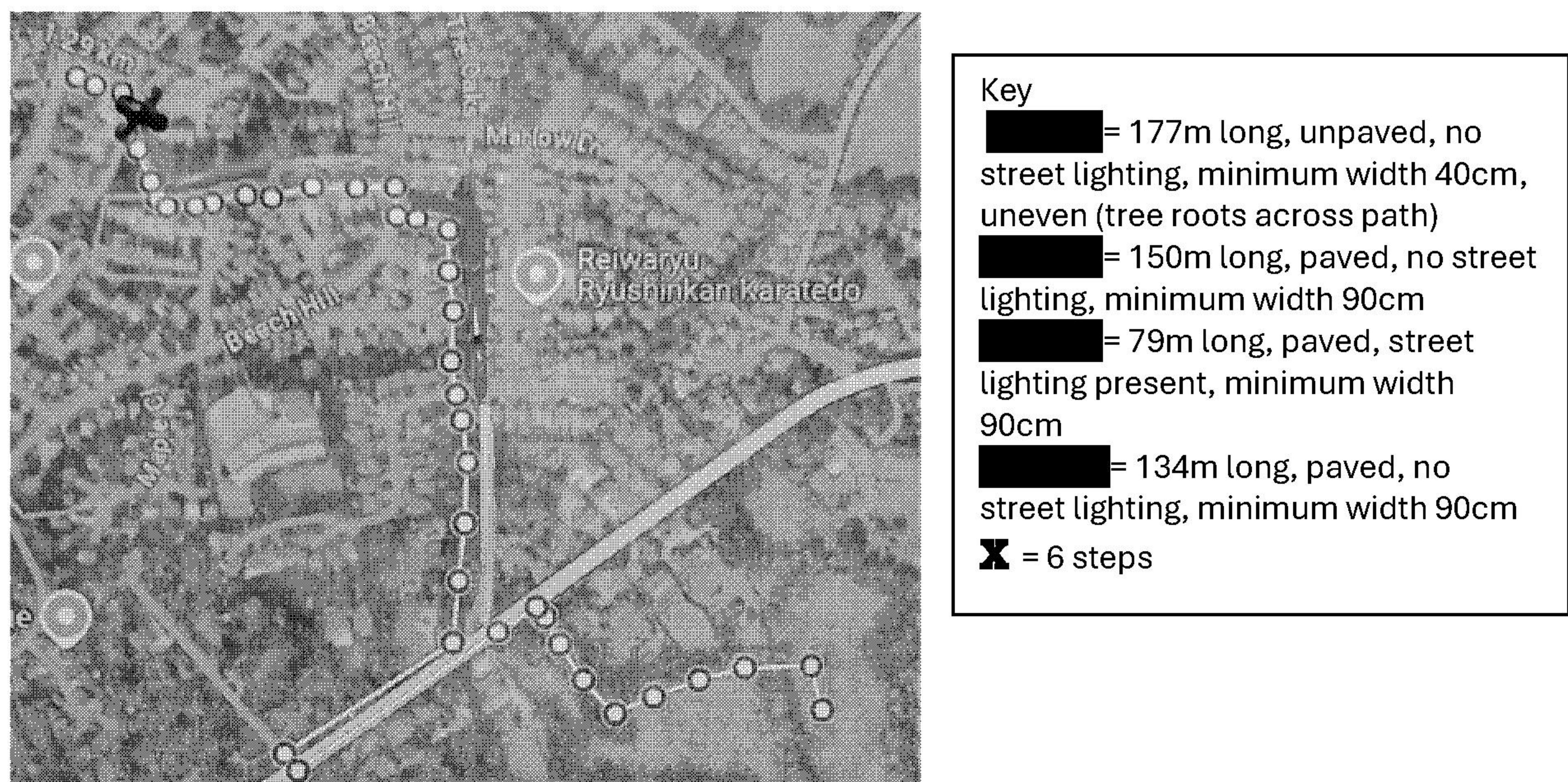
29CU is unsuitable for some pedestrians and is unsafe for all pedestrians after dark. Key features of 29CU:

- No street lighting for the majority of 29CU
- First 177m of 29CU is unpaved and impassable in wet weather
- Pinch points of 40cm
- 6 steps to access shops
- Elevation gain of 72m (when walking from Walnut Park to Lewes Road)

Therefore 29CU is unsuitable for the elderly, disabled, pushchair and wheelchair users, and cannot be used at night time (before 8am and after 4pm in winter).

For the full features of 29CU footpath see Figure 3, an illustrated map of 29CU footpath demonstrating the features of this path.

Figure 3 – Illustrated map of 29CU footpath to Walnut Park



The 29CU section between Lewes Road and Orchid Park (indicated as yellow in the map) is completely dark at night (see Figure 4) and has various uneven sections (see Figure 5), so is hazardous to navigate even in daylight.

Figure 4: Entrance to 29CU footpath off Lewes Road at night



Figure 5: Uneven sections of 29CU footpath



As detailed in the Active Travel England's Standing Advice Note: Active Travel & Sustainable Development¹ footpaths should have a minimum width of 2m, be step free, have a smooth, even surface and have streetlighting. The document states:

"2.6 Footpaths/ways to local amenities should conform to the National Design Guide standards of being safe, direct, convenient and accessible for people of all abilities, which includes but is not limited to routes that:

- *have a minimum width of 2m, with limited pinch points no less than 1.5m;*
- *are step-free;*
- *have a smooth, even surface;*
- *have seating at regular intervals;*
- *are uncluttered;*
- *have good natural surveillance and clear lines of sight;*
- *have street lighting;*
- *have wayfinding; and*

- *have crossing points suitable for the speed and traffic flow of the road(s).*”

The only lit, paved route to the Walnut Park development is significantly longer, which results in walking distances that are nearly double those quoted by Millers Homes. See Table 2 and Figure 6 below.

Table 2 – Distance to local services along paved lit footpath (compared with Millers Homes’ distance)

Route	Millers Homes’ stated distance (m)	Distance along paved, lit footpath (m)	Difference between Millers Homes’ distance and paved footpath (m) (Percentage increase on Millers Homes stated distance)
Centre of site to Northlands Primary	840	1260	420 (150%)
Centre of site to Tesco Express	790	1530	740 (194%)
Centre of site to Doctors surgery	800	1550	750 (194%)
Centre of site to Northlands Avenue bus stop	1000	1630	630 (163%)

Figure 6: Pedestrian route to Northlands Primary School via paved, lit paths



The 1.2km – 1.6km pedestrian distance from local amenities means it is highly unlikely the developer will achieve the proposed 10% reduction of vehicular trips.

7. Incorrect Pavement and Street Lighting Information

Millers Homes quotes incorrect pavement widths and street lighting information at various points within the FTP and TA.

“Lewes Road includes a footway...along the southern side of the carriageway. The footways are approximately 1.7 metres wide with street lighting present.” (Section 3.2.2 of FTP)

“Within the vicinity of the site, Lewes Road, includes a footway on the northern side of the carriageway between the junctions with Birch Close and Snowdrop Lane. Either side of these junctions, the footway terminates on the northern side but continues along the southern side of the carriageway. The footways are approximately 1.7 metres wide with street lighting present.” (Section 4.4.2 of TA)

This is incorrect – the width of pavement directly opposite the proposed site entrance is 1.15m (see Figure 7). 10 metres down the road the pavement narrows and is approximately 75cm (see Figure 8).

Figure 7 – Lewes Road pavement opposite proposed site entrance (tape measure is set on 1m)



Figure 8 – Lewes Road pavement 10m down from proposed site entrance (tape measure is set on 1m)



Although there is street lighting present on the Lewes Road, it is not sufficiently lit for pedestrians. The Lewes Road is poorly lit at night (see Figure 9 below) due to the wide spacing of lampposts.

I am a resident of Lewes Road and always use a torch when I walk in the evening, but this isn't ideal if walking with children or a dog by a 50mph road.

Figure 9: The Lewes Road at night – photo taken facing proposed site entrance



8.Incorrect Bus Data

Millers Homes includes various information on local bus stops and routes in its TA.

“The nearest bus stops to the site are located on Northlands Avenue (via Footpath 29CU) circa 1km walk distance from the centre of the site.” (6.3.1 in TA)

“Further bus stops with additional services are located on Bedales Hill (B2111), the B2272 Lewes Road and on Franklynn Road, circa 1.3km to the east and 1.4km to the west of the site access respectively.” (6.3.2 in TA)

The developer provides information on local bus services – times and frequencies - in Table 6.1.

The developer claims *“The main target of the TP in line with WSCC guidance is to achieve a reduction 10% in vehicular trips during a 12-hour weekday period (7am – 7pm).”* (FTP Section 4.2.1)

Northlands Avenue is actually a 1.6km walk from the site (if using paved, lit paths – see Section 6), this is an extra 600m to the distance stated by Millers Homes.

The Bedales Hill bus stop is not suitable for pedestrians - there is no footpath for the final 550m, so the only option is to walk on a sloped, overgrown verge and cross the A272 at the busy junction with Bedales Hill, which is an accident hotspot (see Section 4).

The majority of the bus routes in the area run from Princess Royal Hospital bus stop. This is a 1.42km walk from the development and requires using unrestricted crossings 4 times over the A272 and the busy junction with B2272.

- Crossing 1 – unrestricted crossing proposed by developer outside access road
- Crossing 2 - unrestricted crossing proposed by developer by Birch Close
- Crossing 3 – unrestricted crossing by “Birch Hotel” roundabout (A272/B2272 junction) with pedestrian refuge island (site of a serious pedestrian crash, see Section 2)
- Crossing 4 – unrestricted crossing by “Shell Garage” roundabout (B2272/Frankton Avenue junction) with pedestrian refuge island

All three bus stops are far beyond the distance people are willing to walk for a bus. According to Chartered Institution of Highways & Transportation’s Buses in Urban Development (2018)¹³, the maximum distance people are willing to walk for a bus is 500m.

Inaccuracies in bus timetables

There are numerous inaccuracies in the bus timetable listed by Millers Homes. They have repeatedly overstated the frequency and time window of the bus services. Buses run less frequently and with fewer morning and night services than claimed.

¹³ Buses in Urban Development

Chartered Institution of Highways & Transportation (January 2018)

https://www.ciht.org.uk/media/4459/buses_ua_tp_full_version_v5.pdf

The Millers Homes data in Table 6.1 was compared with publicly available data on Bus Times, a website that collates bus information from different providers, and the Compass Travel website, one of the main bus operators in the area¹⁴.

Only the 270 and 271 (from Princess Royal) run a Sunday service, with 4 services in each direction on a Sunday.

The distance to the bus stops, combined with the infrequency of the buses and the lack of morning and evening services, mean it is highly unlikely that the development will support the suggested 10% reduction in car usage. Instead they are likely to be 100% car dependent.

School buses – 33A, 149 and STP1/STP2

There are various buses listed in Table 3.1 of the Travel Plan that are only for school children. It is misleading that Millers Homes has included these in the Travel Plan

Bus 33A – is a once a day service between Haywards Heath and Warden Park Secondary School

Bus 149 – is a once a day service between Haywards Heath and Chailey School

STP1/ STP2 - is a once a day service between Haywards Heath and St Pauls Catholic College

Bus services from Northlands Avenue (weekday information):

Incorrect information for route 31 and 31A in Table 3.1 – incorrect first and last bus times; service is less frequent than claimed.

31 - To Uckfield

first bus from Northlands Avenue is at 9:59

service operates every 2 - 5 hours

31 - To Cuckfield

first bus from Northlands Avenue is at 6:11

service operates every 1 - 3 hours

31A To Uckfield

first bus from Northlands Avenue is at 8:59. Last bus is at 17:09

Service operates every 2-3 hours

31A to Cuckfield

First bus from Northlands Avenue is at 9:13. Last bus is at 13:13.

Service operates 3 times a day only (9:13, 11:13, 13:13)

Bus services from Princess Royal (weekday information):

Information correct on table 3.1 for route 3, 33, 39, 166

Incorrect information for route 30, 89, 270, 271 and 272. See below:

¹⁴ See <https://bustimes.org> and <https://compass-travel.co.uk/bus-timetables/>

30 - operates hourly in each direction from Princess Royal Hospital between 9:00 and 15:00. Apart from that it operates one service at 6:27 and two services between 16:25 and 17:40.

62 - 3 services on Tuesday and Thursday, 2 services on Monday, Wednesday & Friday. Also a school bus to Warden Park Secondary School

89 - 15:20 bus does not exist (other times are correct)
Buses going other direction (from Horsham to Princess Royal) less frequent - 11:46, 14:01, 17:25

270 - first bus from Princess Royal is at 7:10 (to East Grinstead) or 7:06 (to Brighton).

271 - first bus from Princess Royal is at 6:46. Bus service is actually every 1-3 hours

272 - first bus to Crawley Bus Station is at 10:00 (first bus to County Hospital is at 6:31). Bus service is actually every 1-3 hours (There is a more than 2 hour gap between five of the services - across both directions)

Appendix A – Email 1 from County Councillor Stephen Hillier to local resident regarding speeding

[REDACTED]

Good evening [REDACTED]

You are very welcome and I am sorry again that it took so long. Alas I get a ridiculous volume of emails and don't have the benefit of a number of staff that our MPs do!

In relation to your further queries, I provided a little data to the Middy and thought I'd reproduce it here for your benefit:

In relation to the speed camera matter, it is my understanding that national guidelines mean that these can only be installed in proven accident blackspots. In relation to your rapid maths, I'm afraid that the people we "catch" on Speedwatch don't get any fine etc and therefore there is no income pot. They get a letter from the police and if they are recognised as repeat offenders then on occasion they may get some "personal attention" from an unmarked car. Our work on Speedwatch, whilst very useful to the police and helps pick up things like uninsured vehicles, carries no criminal punishment.

In relation to speeds, I can confirm that when we have done sessions in the 30mph section near Birch Close, the maximum speed we have recorded in the 30mph has been 53mp (I) and this would likely to have been higher but drivers tend to slow because we were in sight! A final bit of data is that on the occasions when we have been able to count the total number of vehicles passing, 8-12% of them have been 5mph or more above the speed limit and over 40% have been travelling at over 40mph! We tend to find we record at least one offender per minute.

Finally, thank you for your pragmatic comment around the lack of value in reducing the 40mph to a 30mph.

I wish you well for the weekend and perhaps may bump into you some day (btw – we are doing a Speedwatch session near Sussex Gardens on Monday 2.30 – 4pm if you'd like to come up and meet us)

Kind

Regards

Stephen R Hillier

County Councillor for Bentswood & Franklands Wards (Haywards Heath East)

Appendix B – Email 2 from County Councillor Stephen Hillier to local resident regarding speeding

[REDACTED]

Dear [REDACTED]

I am truly sorry that you have had to chase me three times now, which is of course unacceptable.

As you may be aware there is a long history associated with this section of road and Speeding. A number of years ago the speed limit was reduced to 30mph, in the face of the police objecting because they felt it was unenforceable, to reflect the wishes of local residents.

Since then you may be aware that I have set up a Speedwatch campaign and have been out with three similarly concerned residents on a number of locations and, to-date, we have reported 742 vehicles for speeding in the last year. If you would like to get involved then may I suggest that you register for our group (Haywards Heath Lawes Rd A272 CSW) at www.communityspeedwatch.org.

The police and WSCC Highways are, therefore, fully aware of the situation but there is limited action they can take, particularly as thankfully there is little data about casualties on this section of road. Nonetheless, only a couple of weeks ago I was successful in getting our police contact to recommend the location for consideration in their "Speed Management Programme" where they liaise with the various agencies involved to see if they can come up with an action plan to improve matters.

I have also had several discussions with our local WSCC Highways Manager but, again due to the lack of accident data, he is unable to prioritise diverting the considerable amount of funding that would be necessary to try and implement an engineering solution. The fact that this is a significant "A road" and route to traverse the County also limits what can be done. The installation of speed humps, as you alluded to in your missive, is a non-starter for this kind of road I'm afraid. Similarly, the restrictive rules around the installation of speed cameras also mean they are a non-starter at this time. What we are looking at, though, is trying to find funding to install one or more VAS (vehicle-activated signs) that will notify drivers when they are in excess of speeds but they have historically cost in the region of £13k-15k each but I believe this has reduced a little.