

Mermaid Cottage
Fox Hill
Haywards Heath
West Sussex
RH16 4QY
19th July 2026

Planning application DM/26/0682

Dear Mr. King

I wish to comment upon the content of the Transport Statement. Fellow residents have already raised legitimate concerns about the contradictory text regarding footways and access arrangements which are not being repeated. Instead, I wish to focus on what is missing, such as traffic volume, infrastructure improvements, and cumulative developments that have an adverse, significant impact upon the neighbourhood and wider highways network that hitherto has been overlooked by the planning department in deference to policy DP4. The perception is that some within the planning department stop reading the District Plan beyond DP4, meaning other District Plan policies appear to be being ignored in pursuit of ever more development, the scale and location of which will ultimately result in parts of Haywards Heath becoming unsustainable, making it an undesirable area in which to reside. Fortunately, Scott Wakely, Emily, Jane Cooper and others are trying to redress the situation and restore some credibility to a planning application tainted by sleaze. DP42, the one policy that deals with the resource necessary to support all forms of life remains ostracised despite South East Water, who are struggling to maintain adequate supply currently in Royal Tunbridge Wells, and still sending emails to customers about moving our area to a Red water status, effectively a hosepipe ban.

Milestone has produced a creatively written lightweight Transport Statement, prepared by highly qualified people who appear to have not noticed that the deckchairs have been rearranged in the interim. The Transport Statement fails to designate the empty space in Figure 2 where the primary school was scheduled to be built, which may no longer form part of what would be a wrongly titled planning application DM/26/0682. At the time of going to press, SK was unable to confirm the primary school status. However, since April 2024, reputable broadsheets have published articles claiming that the government plans to close primary schools due to the declining birth rate, which is forecast to fall from 4.42 in this academic year to 3.95 million by 2031. A primary school at Hurst Farm could therefore be surplus to requirements, with most of the schools with high vacancy rates being in the south-west and south-east, which may or may not accurately reflect the availability of primary school places within the Haywards Heath catchment area. There is no commitment in the Design and Access statements to build a primary school prior to the completion of the residential units.

Cumulative development.

As stated previously, WSP failed to include (DM/18/5114 and DM/18/0509) and the effects of generated trip numbers on the wider traffic network system. Milestone has also not considered the Northern Arc or the East or West Sussex County Council traffic modelling, or the interpretation of these in the Lewes Local Plan 2020-2040 Forecasting Report. The latter shows that the B2112 onto which the larger part of the proposed site would exit is one of the busiest roads in the County, flowing towards choke points at Wivelsfield Green (village), Ditchling and Worlds End junction. There is no mention of the Fox Hill roundabout exceeding the RFC during peak hour periods, or the necessary interventions to remediate traffic congestion as proposed by WSP in Chapter 13, paragraph 7 of the Transport Assessment. In order to avoid accusations of scaremongering, recourse to the Mid Sussex Transport Study prepared as part of the District Plan review by Systra in January 2022 will confirm that the Scenario 3 report indicates severe congestion at various junction roundabouts as previously mentioned, in the letter dated 8th July 2026, as indicated below.

5.4.6 The 23 junctions with 'severe' impacts are:

N8	Turners Hill	B2110 / B2028 Turners Hill
N11	Crawley	A2220 / B2036 (CRAWLEY)
N16	Crawley	B2036 Balcombe Rd / B2037 Antlands Ln (CRAWLEY)
C10	Bolney	A23 / A272 Bolney Road
C12	Haywards Heath	A273 / Isaac's Lane / Traustein Way
C13	Haywards Heath	Haywards Heath - B2112/A272
C14	Haywards Heath	Haywards Heath - A272/Rocky Lane
C15	Haywards Heath	Haywards Heath - B2272/Bolnore Road
C16	Haywards Heath	Haywards Heath - A272/B2272
S2	Burgess Hill	A23 / A2300 Eastern Roundabout

S3	Burgess Hill	A2300 / Cuckfield Road
S4	Burgess Hill	Junction Road / B2113, Burgess Hill
S8	Hassocks	A273 / B2116 Hassocks (Stonepound)
S9	Pyecombe	A23 / A281 Southbound On-Slip
S18	Hassocks	A273 / B2112
S21	Burgess Hill	B2112 / Green Road (LEWES DISTRICT)
S22	Burgess Hill	Valebridge Road / Junction Road / Leylands Road
S26	Burgess Hill	A273 / York Road
S3	Sayers Common	A23 / B2118 Sayers Common
S36	Burgess Hill	Wivelsfield Green (LEWES DISTRICT)

To their credit, Stantec did observe the Elephants that have long been in the room by including the Northern Arc, DM/18/5114, as a cumulative development, unlike other applications relating to large-scale developments submitted to Mid Sussex DC, who gave WSP an easy ride during DM/22/2272. Planning application LW/21/0729 (DM/25/0827) for 96 dwellings currently under construction in Wivelsfield together with LW/25/0071 (130) not yet committed and DM/22/0233 (25), do or will front onto the B2112, which, together with the closure of Hurstwood Lane, increases traffic flow towards and away from Haywards Heath via the Fox Hill roundabout. DM/25/0827 (LW/25/0071) is on the cusp of being granted permission despite objections from all other locally elected bodies. Expect serious legal action if it refused.

Other flaws in the Transport Statement.

Trip rates.

Recourse to TRICS which is avidly supported by Tim Townend and others, indicates that it has evolved since 2022 as follows;

The 2022 TRICS Good Practice Guide provides guidance on the selection criteria and data ranges that are important to assist in focusing on data best able to inform person trip rates and vehicle trip rates for proposed developments.

The latest version of the TRICS Good Practice Guide clearly states that users must avoid using the TRICS dataset in a biased, selective manner to achieve pre-determined trip rates. However, despite this advice, this practice has been observed which has, in turn, contributed to the P&P approach being sustained.

A common misunderstanding is that TRICS only provides as basis for vehicle trip generation calculations. In fact, it provides multi-modal data (walking, cycling and public transport trips). Use of vehicle trips only, insufficiently informs the assessment process, tending to reinforce unsustainable development.

Traditionally, TRICS data has been used to find 'developments like mine' and identify a representative (car) trip rate for such a development that then feeds through into the TA/TS. However, the real power of TRICS as a dataset becomes apparent when one realises that it offers insights into how trip rates for given development types (may) have been changing over time. Change may be because the wider nature of society has been changing; it may also be because of changes in development design.

Wivelsfield Parish Council alluded to trips being either generated or induced which have been subject to various studies.

Generated traffic: Additional peak-period vehicle trips on a particular roadway that occur when capacity is increased. This may consist of shifts in travel time, route, mode, destination and frequency.

Induced travel: An increase in total vehicle mileage due to roadway improvements that increase vehicle trip frequency and distance, but exclude travel shifted from other times and routes. Expanding London's M25 motorway increased traffic volumes up to 23% two to three years after opening, but contrary to projections, failed to increase traffic speeds, reducing expected economic benefits. A study on behalf of the Department for Transport by WSP together with Rand Europe in May 2018 reviews literature for other sources. The final conclusion reads: "There is very little evidence on the sources of induced traffic in the short or long run. These are important for transport appraisal, where induced road traffic may come from other modes or result from economic growth due to land-use development associated with the transport investment. There may also be additional traffic resulting from changes in land use such that residences or business locations have been transferred from other areas. Determining how best to measure these effects is itself an area for research. The geographical scale for measurement and appraisal becomes important in determining whether these are included as induced traffic." A major source of generated or induced traffic is accounted for by delivery companies such as Amazon, Evri, Ups, Royal Mail, Sainsburys, Ocado, Tesco, Waitrose, taxis and others, contrary to paragraph 3.19.

Milestone appear to have lifted the trip rates in Table 5-2 of WSP Transport Assessment (July 2021), being part of DM/22/2272 into Table 4.1 of the Transport Statement (February 2026) being part of DM/26/0682 which is only possible for a balanced equation. Whether the primary school is under threat of being axed or not, it is extremely presumptuous of Milestone to assume that "It should be noted that the scale of development is unchanged from the outline permission and accordingly so too is peak hour trip generation." That comment cannot be dismissed as a typo; it is not only a fundamental error, it's an outrageous howler. The scale of the units for each parcel has changed, resulting in parcels 2 and 3 accounting for 247 units instead of 240, generating even more traffic during the peak hours transiting a

single carriageway on Hurstwood Lane. Copying and pasting data fails to recognise that, during the intervening period between applications, driver behaviour may have changed relative to traffic congestion, according to various studies, which can be summed up as follows. *“Generated traffic is the additional vehicle travel that results from a road improvement. Congested roads cause people to defer trips that are not urgent, choose alternative destinations and modes, and forego avoidable trips. Generated traffic consists of diverted travel (shifts in time and route) and induced travel (increased total motor vehicle travel). In some situations, highway expansion stimulates sprawl (automobile-dependent, urban fringe land use patterns), further increasing per capita vehicle travel. If some residents would otherwise choose less sprawled housing locations, their additional per capita vehicle travel can be considered to be induced by the roadway capacity expansion.”*

Children living within development DM/25/0233 who would have attended a nearby primary school have had to go elsewhere, as will those resident in parcels 1 to 4, estimated by WSP to be 220, and from other nearby cumulative developments (LW/21/0729 and LW/25/0071) without the primary school being completed in a timely manner. The overall size of the residential development may be unchanged but the knock-on effects of having no primary school will have untold ramifications for trip rates across the wider highway network. Additional comments under Trip rates also apply.

WSCC Highways required additional traffic data in connection with LW/25/0071-DM/25/0827 in 2026, which should also be required for DM/26/0682 due to the six years' time frame between traffic counts. WSP stated: *“The previous application manually added trips for a number of committed developments identified at the time, however analysis of the 2016 and 2020 ATC surveys set out in Section 0 demonstrates that very little background growth has occurred during this period despite these developments coming forward. It was therefore agreed that the trips associated with those developments will be accounted for within the 2021 baseline. The exception is the now completed ‘Land off Greenhill Way’ development which is discussed below.”*

Their traffic predictions were subsequently proved to be an under estimate upon the release of data associated with LW/25/0071-DM/25/0827. WSP used the above statement to their advantage to mislead the Highway Authority. The fact is that traffic nationally has noticeably reduced in 2020 due to the effects of the pandemic and has since recovered to a new high, according to the Department for Transport. From the interactive graph for England, it is apparent that traffic in billion miles has increased by 2.67% ($7.6 \div 285.5$) since 2018, which is almost half the average for West Sussex, say between 4.5 and 5%. There needs to be a revised completion date reflecting a more accurate assessment of traffic volumes in 2030/2031.

Table 2: Estimates of vehicle billion miles travelled in Great Britain in 2025 compared to earlier years, appears after the redacted name.

It is worth remembering what WSP concluded as part of DM/22/2272.

ENVIRONMENTAL STATEMENT, VOLUME 1, CHAPTER 13 - TRAFFIC AND TRANSPORT, the following:

“13.6. ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION AND RESIDUAL EFFECTS

CONSTRUCTION PHASE

13.6.1. As set out in paragraph

13.5.6, the impacts of the Proposed Development during the Construction

Phase fall below the thresholds set out in the IEMA Guidelines, therefore no detailed assessment is required within this chapter.

OPERATIONAL PHASE

B2112 FOX HILL (BETWEEN A272 AND HURSTWOOD LANE)

Severance

13.6.2. This section of B2112 Fox Hill has a moderate level of severance in the Future Baseline with an AADT flow of 10,038. With the Proposed Development in place this increases to an AADT flow of 14,508 which is also categorised as moderate.

13.6.3. The above represents a 45% increase in AADT, which in terms of magnitude represents a low adverse change in levels of severance. The sensitivity of effect for this link is considered to be medium, therefore the significance of effect for severance is negligible.

Driver Stress/Delay

13.6.4. As set out in Section 6 of Appendix 13.1 the B2112 Fox Hill/Hurstwood Lane priority junction at the southern end of this link is operating with a maximum RFC of 0.40 in the Future Baseline, increasing to 0.84 with the Proposed Development in place when the effects of the FTP are considered. In line with the criteria set out in Section 3.2 of this chapter, this suggests a low level of driver stress/delay in both scenarios.

13.6.5. It is noted that the new toucan crossing proposed to the north of the Hurstwood Lane junction will introduce a small amount of additional driver delay, however that would be primarily only during the weekday school drop off/pick up times. This impact is anticipated to be minor and restricted to short periods during weekday term-time.

13.6.6. The magnitude of change at this junction is negligible as the future operation is below an RFC of 0.85, and the sensitivity of the effect is considered to be medium. The significance of the effect for

driver stress/delay is therefore negligible.

- 13.6.7. The B2112 Fox Hill / A272 Rocky Lane / Wivelsfield Road / Kennard Lane roundabout at the northern end of this link is shown to operate with a maximum RFC of 0.85 in the Future Baseline, increasing to 1.08 with the Proposed Development in place when the effects of the FTP are considered. This suggests a medium level of driver stress/delay in the Future Baseline increasing to high with the Proposed Development in place.
- 13.6.8. The magnitude of change at this junction is high adverse due to an increase in RFC of 27%, and the sensitivity of the effect is considered to be medium. The significance of the effect for driver stress/delay is therefore moderate adverse.
- 13.6.9. A mitigation scheme has been proposed to improve the future operation of this junction. This is "discussed later in this section."

WSP published the above in July 2021 without much regard to cumulative developments at Bolnor and the Northern Arc.

Table 3-7 indicates the changes in traffic volumes 2016 to 2020.

Table 3.7 . 2016 and 2020 ATC Survey Analysis

Link	Average Weekday 2016		Average Weekday 2020		Comparison	
	0745.0845	1645.1745	0745.0845	1645.1745	0745.0845	1645.1745
A2112 Fox Hill (north of Hurstwood Lane)	1,244	949	1,194	918	-4.0%	-3.2%
A272 Rocky Lane (west of B2112)	1,969	1,452	2,063	1,454	4.8%	0.1%
A2112 Wivelsfield Road	1,593	1,277	1,647	1,222	3.4%	-4.4%
A272 Rocky Lane (east of B2112)	1,276	910	1,224	962	-4.1%	5.6%
Network Average					0.01%	0.45%

Table 3-7 highlights the fact that despite the intervention of Covid traffic volume increased significantly on the A272 during the AM and PM periods between 2016 and 2020.

Highway safety issues.

“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.”

The Transport Statement states in paragraph 2.5 that *“A signalised crossing is present outside the Princess Royal Hospital, approximately 230m to the west of the Lewes Road / Rocky Lane roundabout to assist pedestrians crossing between the hospital and the bus stops.”* Traffic flow on that section of the Lewes Road is predicted to be less than that south of the Fox Hill roundabout to Hurstwood Lane as indicated in Table 13-6 for 2027 + Base operational phase (14508 as opposed to 13004). Logically, reserved matters cannot apply to a non-entity such as the primary school, rendering the access points void. There is a strong case to be made for the proposed Toucan crossing to be relocated nearer to the southbound bus stop on Fox Hill. Paragraph 4.2.5 of the Transport Assessment reads *“A widened footway and new Toucan crossing will be located approximately 60m north of the Hurstwood Lane Junction on B2112 Fox Hill to provide a safe crossing facility for pedestrians and cyclists into the Site and the school especially. The proposed crossing is shown in Figure 4-3 (WSP Drawing 70081355-WSP-XX-XX-DR-CV-0007 contained in Appendix H).”*

In the event that the school is out of the mix, the need for a crossing at that location which does not afford access to the southbound bus stop, which does not offer an hourly service for the 271 and 272 routes, is less of a priority and would be a safer option for crossing the road nearer to the bus stop, similar to that on the Lewes Road. Without a safe Puffin crossing to the southbound bus stop there will be an unacceptable impact on highway safety; this planning application should be refused on safety grounds until such time as a safe crossing is implemented, thus ensuring that the responsibility of local authorities to ensure citizens remain safe is not compromised.



Table 2: Estimates of vehicle miles travelled in Great Britain in 2025 compared to earlier years

Road type	Latest year 2025	Change from last year 2024	Change from pre-pandemic 2019
All roads	342.6 billion	+1.9%	+1.2%
Motorways	71.9 billion	+2.4%	+2.0%
'A' roads	151.6 billion	+1.9%	+0.9%
Minor roads	119.0 billion	+1.5%	+1.0%