

Mermaid Cottage
Fox Hill
Haywards Heath
West Sussex
RH16 4QY
17th October 2025

Planning application DM/25/1630

Dear Mr King

I wish to continue to object to planning application DM/22/2272 that has been renamed DM/25/1630 on the grounds that traffic flow data presented by WSP were flawed.

WSP failed to consider cumulative development sufficiently in order to inform meaningful input data generated by the Northern Arc for the modelling process as part of DM/22/2272 that has been subsequently taken into account in connection with planning applications DM/25/0827 and LW/25/0071. WSP would have been aware of the effects of the Northern Arc traffic flows on the surrounding areas well before their involvement in Hurst Farm as stated by AECOM in Paragraph 1.4.47 of the Transport Assessment regarding details of the modelling process:

“1.4.47 The assessment presented in this chapter has been based upon output from the BHTM. Data relating to the Proposed Development, including development quantum, proposed highway layout and trip generation by land use, was provided by AECOM. The modelling work was then undertaken by WSP, the custodian of the model on behalf of WSCC. The modelling presented is therefore from a strategic model. Whilst strategic models are useful for understanding potential re-distributional effects resulting from changes to the highway network they can provide coarse results at a junction turning count level.

To address this, turning movements have been forecast by applying the growth from the BHTM to observed 2018 data. A series of assumptions were required to adopt this approach which are outlined in more detail in the TA (Ref: 11-1) which accompanies the planning application.”

From the above it is clear that WSP were aware of the Northern Arc effects prior to August 2019 while WSSC Highways and Mid Sussex were made aware on or after the application was received on 19th July 2022. Similarly, the Decision for LW/21/0729 was made on 10th May 2022 two months prior to WSP issuing their documents.

Table 13-6, WSP

Link	Sensitive?	2027 Base				2027 Base + Development			
		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
B2112 Wivelsfield Road	No	1,399	1,446	13,446	13,593	1,500	1,491	14,138	14,291
Kennard Lane	No	56	57	538	544	56	57	538	544
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
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
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
B2112 Fox Hill (South of Hurstwood Lane)	Yes	1,278	1,344	12,393	12,528	1,349	1,373	12,864	13,004

Table 2.2, Stantec

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

From the tables, the same link is compared; Stantec in 2025 indicated a total number of 20,128 vehicles (link 6) whereas WSP (first line) indicated 17,745 for 2027 Base+Development, a difference of 13.4% (20128 ÷ 17745 +1.134) that is unaffected by the closure of Hurstwood Lane by being measured away from the roundabout. Likewise, Stantec link 2 is 14452 as opposed to WSP (line 6) B2112 Fox Hill south of Hurstwood Lane 13004, making an increase of (14452 ÷ 13004 = 1.111, 11.1%). Such increases in traffic flow are concluded to be mainly generated from the Northern Arc developments. In view of the above, WSCC Highways are requested to confirm via the Case Officer that mitigation measures as proposed by AECOM and WSP will be sufficient to meet future demands upon the ageing highways network that suffers from neglected infrastructure improvements. The only significant change to Fox Hill in the last 45 years is that the crossroads at the top were replaced by a roundabout in order to accommodate the relief road.

Based upon data in Table 13-6, WSP stated the following in 2022.

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 “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.”

There is a strong argument for WSP to carry out further modelling by including DM/18/5114 and LW/21/0729 as cumulative developments. Sadly, WSP’s optimism regarding driver stress/delay during the school run, as indicated in paragraph 13.6.4, is not shared by others due to the configuration of the junction which remains uncontrolled.

Returning to paragraph 1.4.47, Table 2 below is the result of rudimentary modelling based upon AECOM network diagrams for scenario, 2025 AM and PM Do Something Total Flows - 2018 plus BHTM growth, in order to estimate traffic flows at the Fox Hill roundabout in 2025, by which time 921 units will have completed as part of the Northern Arc. Waterman who did the modelling for DM/18/2739 and WSP who modelled traffic data for DM/22/2272 did not consider the Northern as cumulative development whereas Stantec DM/25/0827 did so. The table was sent to WSCC, who commented as follows.;

“In responding to the points you are raising, it’s important to understand that Mid Sussex District Council have a committee resolution to permit the Hurst Farm planning application (DM/22/2272). As such, the application has effectively been determined and is awaiting the resolution of the s106 legal agreement before planning permission is issued. I cannot provide any updates regarding the s106 agreement or when planning permission may be issued. There is though no opportunity through the Hurst Farm planning application to revisit already agreed transport mitigation.”

As a more general comment, the National Planning Policy Framework (paragraph 114D) acknowledges and allows development to have an impact on the highway network; any residual impacts (i.e. once mitigation is accounted for) must not however be severe. In practice, the theoretical capacity of a junction can be exceeded as a consequence of new development and this in itself is a reason to refuse planning permission. The NPPF is also quite clear that a development is required only to mitigate its impacts rather than any pre-existing issues or those arising from other developments; the issues you have raised regarding increased traffic from the Northern Arc development is not a matter for the Hurst Farm development to resolve.

WSCC remain of the view that the Hurst Farm development would not result in any severe impacts upon the local highway network. There is not in any case the ability to revisit this position. Likewise, any impacts from the Northern Arc development would have been considered and suitably mitigated if deemed necessary.” WSCC did not comment on the content of the validity of Table 2.

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
AECOM 2025	Traffic	Link	Ratio A/B, B/A	2025 total	HB - RL	Sandricks	Two way	RL/BW	RL/BW	AECOM	Waterman	WSP 2027	Stantec	average
Isaac's Lane <	volume		west/east 2024		2024 ratio	2025	vehicles	2024	2025	2025	2024			
IL→LV, AM	689	LV-HB, AM→	1.0372	664	0.5736	1158	2459	0.8942	1295	2506	2119	1858	1932	2104
LV←IL, AM	934	HB-LV, AM←	0.8805	1061	0.8155	1301		1.0738	1211					
IL→LV, PM	1138	LV-HB, PM→	1.1385	1000	0.7694	1299	2803	1.1002	1181	2401	1864	1551	1865	1939
LV←IL, PM	782	HB-LV, PM←	0.8263	946	0.6295	1503		1.2322	1220					
Table 2														
AECOM. 2025 AM and PM Do Something Total Flows -2018 plus BHTM growth, totals are indicated in column K.														
Waterman. 2024 Base + Hurstwood Lane Closure + Committed Developments totals are indicated in column L.														
WSP. 2027 Base + Development + Hurstwood Lane Closure AM and PM peaks, Network Diagrams 2 and 3, totals are indicated in column M														

- 3.7
- COMMITTED DEVELOPMENT
- 3.7.1
- “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.
- 3.7.2
- WSCC and ESCC confirmed during scoping discussions there are no new committed developments coming forward within the vicinity of the site which need to be considered.”
- LAND OFF GREENHILL WAY
- 3.7.3
- “WSCC have confirmed that approximately 50% of the land off Greenhill Way development was completed when the March 2020 ATC surveys were undertaken, meaning 50% of the trip generation associated with the development would not be captured by the ATC survey and therefore would not be accounted for within the baseline traffic flows. For this reason, it was agreed via email correspondence with WSCC to manually add 50% of the trips associated with the development to the 2021 baseline to ensure the Greenhill Way development is fully accounted for within the capacity assessments.”

From the above there is little prospect of any changes to the planning application despite the flawed presentation. The Northern Arc received planning approval on 3rd October 2019 and therefore was committed development prior to discussions between WSCC and WSP as stated in the Transport Assessment dated July 2022 and would not have had any bearing on the ATC carried out in 2020. Since that time 925 units will have been completed by the end of 2025, less than a third, which appear to have influenced traffic flow to and from Haywards Heath from the west and south as indicated in Tables 13-6 and 2.2. Relying upon outdated traffic data is not a sound basis for planning purposes and an up to date traffic survey, as proposed by WSCC Highways in connection with DM/25/0827, is long overdue.

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 illustrated 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)

In view of what the Highway Authorities said above regarding mitigation measures in connection with the Northern Arc, they need to explain in further detail than in the West Sussex Local Transport Plan 2022-2037 where the A272 is not mentioned in Chapter 7, by going into unambiguous print as to when the proposed mitigation measures needed to attain Scenario 5 status will be in place in order to ameliorate the situation as indicated on the map on page 16 (Figure 3) in the Transport Study, where four junction roundabouts from Fox Hill through Tylers Green, C12, C13, C14, C15 and C16 at another location are indicated as severe under Scenario 3. 2038 is too long to wait for mitigation measures to be implemented.



Figure 3 is a map showing the locations of the significant and severely impacted junctions appears below.

Figure 3. 'Significant' and 'severely' impacted junctions - Scenario 3 versus Reference Case



