



90 Lewes Road
Haywards Heath
West Sussex
RH17 7SX

16 April 2025

Re: Outline application for Land at Colwell Farm Lewes Road under reference DM/25/0445

Dear Ms Fisher,

I write in connection with the above planning application. I attach information on traffic speeds and volumes that contradict data supplied by Millers Homes (MH). This data was provided by West Sussex County Council (WSCC) following an FOI request.

Due to the provision of this additional data, which conflicts with Millers Homes’ data, I ask that you re-consult with WSCC Highways to ensure that all information about the site is taken into account.

Failure to assess all information provided may lead to a decision that is incomplete and this matter could be challenged by Judicial Review.

I have included the raw data supplied as a result of the FOI request as an attachment to this email, and analyse this data (to allow comparison with Millers Homes data) below.

WSCC data shows higher traffic speeds than claimed by Millers Homes

Every WSCC speed data point (apart from one) is higher than the Millers Homes’ equivalent data points. Some WSCC data points are 1.5mph higher than WSCC data.

Overall, this indicates that Millers Homes have consistently underestimated transport speeds by the site entrance. Higher speeds impact both driver and pedestrian safety.

The high speeds of drivers on the A272 mean that a large-scale development off the A272 with unrestricted pedestrian crossings will have an “unacceptable impact on highway safety,” therefore not meeting paragraph 116 of NPPF.

Table 1: Comparison of Millers Homes (MH) and WSCC data on Average Weekday Speeds (in mph)

Time	Average Weekday Eastbound Speeds (MH data)	Average Weekday Eastbound speeds (WSCC data)	Average Weekday Westbound Speeds (MH data)	Average Weekday Westbound Speeds (WSCC data)
08:00 – 09:00	36.5	36.2	38.4	39.4
17:00 – 18:00	35.9	36.3	37.3	38.0
00:00 – 24:00	37.1	37.4	38.5	39.6

Table 1 uses data from Table 4.2 in Millers Homes’ Transport Assessment, and WSCC data on traffic monitoring from spreadsheet: 00001604_A272 Lewes Road_east of Birch Close-2022_11_08-2022_11_15.xls. Data from Tue 8/11/2022, Wed 9/11/2022, Thu 10/11/2022, Fri 11/11/2022 and Mon 14/11/2022 was averaged to provide weekday

averages (see *A272 Lewes Road-Weekday-Speed-Calculations&Volume-Graph.xls* for calculations). Millers Homes and WSCC monitored speeds in a similar location East of Birch Close where there is a speed limit of 40mph.

Table 2: Comparison of Millers Homes' and WSCC data on 85th Percentile Speeds (in mph)

Time	85 th Percentile Eastbound Speeds (MH data)	85 th Percentile Eastbound Speeds (WSCC data)	85 th Percentile Westbound Speeds (MH data)	85 th Percentile Westbound Speeds (WSCC data)
08:00 – 09:00	41.3	41.8	42.5	44.0
17:00 – 18:00	40.1	40.7	41.2	42.7
10:00 – 12:00 & 14:00 – 16:00	41.1	41.3	42.5	43.3
00:00 – 24:00	N/A	42.5	N/A	44.4

Table 2 uses data from Table 4.2 in Millers Homes' Transport Assessment, and WSCC data on traffic monitoring from spreadsheet: *00001604_A272 Lewes Road_east of Birch Close-2022_11_08-2022_11_15.xls*. Data from Tue 8/11/2022, Wed 9/11/2022, Thu 10/11/2022, Fri 11/11/2022 and Mon 14/11/2022 was averaged to provide weekday averages (see *A272 Lewes Road-Weekday-Speed-Calculations&Volume-Graph.xls* for calculations). Millers Homes and WSCC monitored speeds in a similar location East of Birch Close where there is a speed limit of 40mph.

WSCC data shows high proportion of A272 drivers who exceed the speed limit

Millers Homes omitted data on the high proportion of road users who speed on the A272.

The data from WSCC shows that a high proportion of drivers exceed the speed limit along this section of the Lewes Road.

Where the speed limit is 30mph (East of Sussex Gardens), approximately 87% of vehicles drive over the speed limit, with 53% driving at least 5mph over the speed limit.

Where the speed limit is 40mph (East of Birch Close), approximately 40% of drivers speed, with 12% of all drivers speeding at least 5mph over the speed limit.

This impacts both driver and pedestrian safety, as two unrestricted pedestrian crossings are proposed – one in the 30mph zone, one in the 40mph zone.

As mentioned in my previous submission, there have already been pedestrian fatalities on the A272. The high speeds of drivers on the A272 mean that a large-scale development off the A272 with unrestricted pedestrian crossings will have an “unacceptable impact on highway safety,” therefore not meeting paragraph 116 of NPPF.

Table 3: Percentage of drivers speeding on A272 – East of Sussex Gardens (speed limit 30mph)

Speed (in mph)	≤30	30 - <35	35-<40	40-<45	45-<50	50-<55	55-<60	≥60
Number of Drivers at this speed	1324	3440	3421	1545	410	78	13	6
% Drivers at this speed	12.9%	33.6%	33.4%	15.1%	4.0%	0.8%	0.1%	0.06%

Table 3 uses WSCC data on traffic monitoring from spreadsheet *00001603_A272 Lewes Road_east of Sussex Gardens-2022_11_08-2022_11_15.xls*; Worksheet *Speed Summary (7 day average)*. Data is from Nov 2022.

Table 4: Percentage of drivers speeding on A272 – East of Birch Close (Speed limit 40mph)

Speed (in mph)	≤40	40-<45	45-<50	50-<55	55-<60	60-<65	≥65
Number of Drivers at this speed	6083	2658	858	246	72	23	19
% Drivers at this speed	61.1%	26.7%	8.6%	2.5%	0.7%	0.2%	0.2%

Table 4 uses WSCC data on traffic monitoring from spreadsheet: 00001604_A272 Lewes Road_east of Birch Close-2022_11_08-2022_11_15.xls; Worksheet: Speed Summary (7 day average). Data is from Nov 2022.

Millers Homes – Omission of additional A272 peak hours

WSCC traffic volume data indicates that peak usage hours of A272 is over a more prolonged period than considered by Millers Homes. Between 07:00 and 18:00, the road is heavily used – not just for the peak hours of 08:00 – 09:00 and 17:00 – 18:00, considered by Millers Homes. Trip Impact should be considered for this extended period.

Chart 1: Traffic volumes on Lewes Road (5 day average)

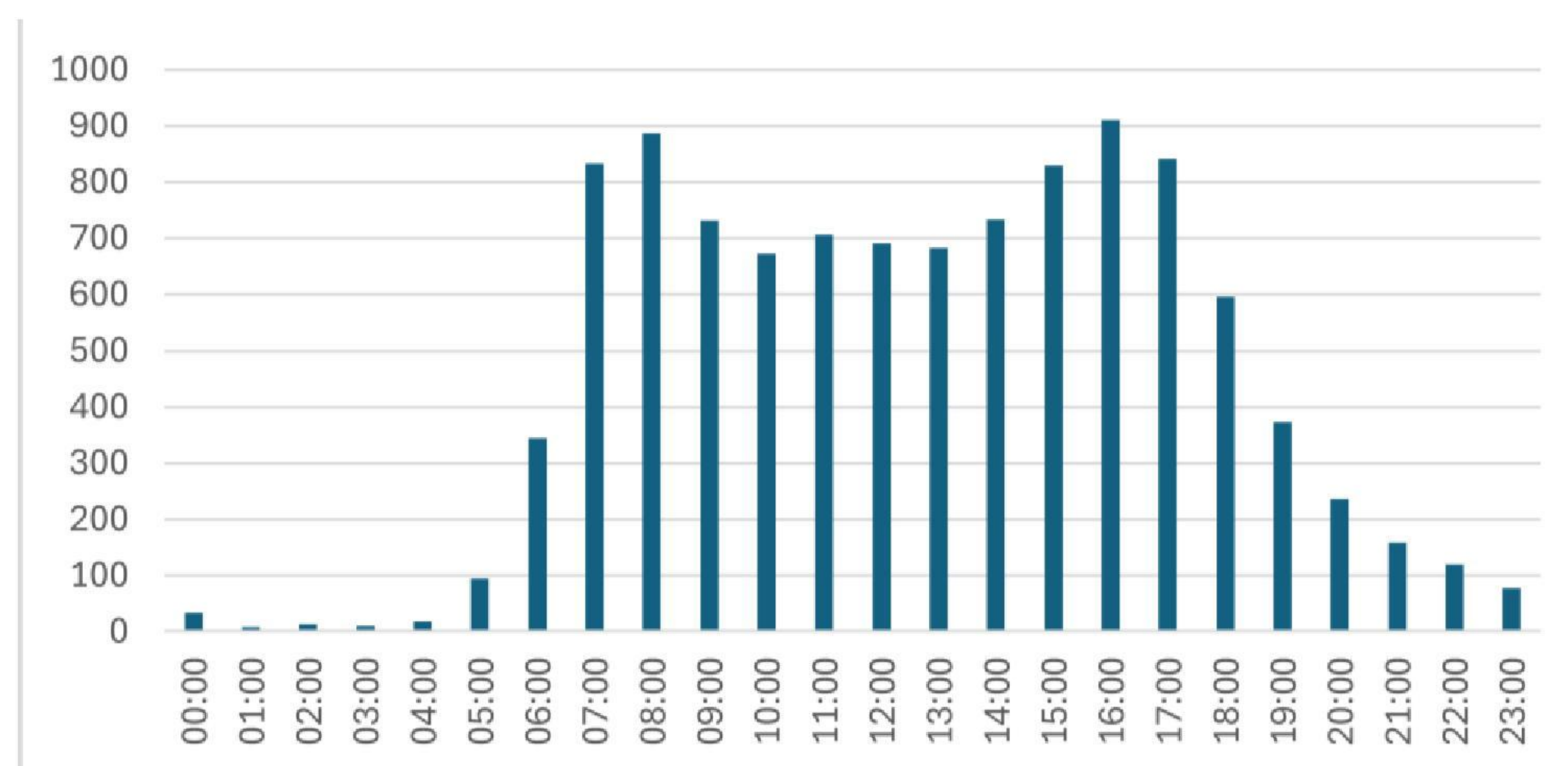


Chart 1 uses WSCC data on traffic volume data from spreadsheet: 00001604_A272 Lewes Road_east of Birch Close-2022_11_08-2022_11_15.xls; Worksheet: Volume Summary. Data is from Nov 2022. Original chart is available in A272 Lewes Road-Weekday-Speed-Calculations&Volume-Graph.xls.

The cumulative impact of 80 homes on the road network needs to be considered over the extended peak period of 07:00 – 18:00 (not just the 2 one-hour “peak periods” considered).

Missing/ incorrect information in WSCC Highways consultation response

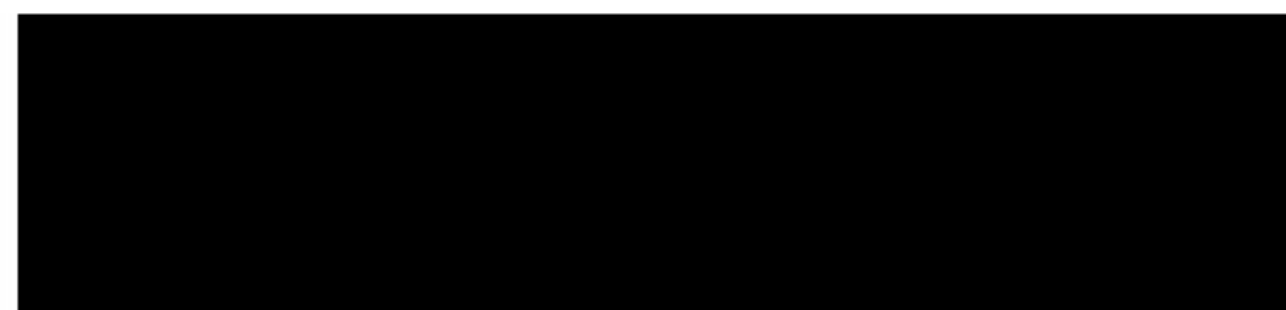
- Incorrect speeds used for splays and trip data - the consultation response is based on “85th percentile speeds of 41mph eastbound and 42.5 mph”. According to WSCC’s own data, 85th percentile speeds between 0:00 and 24:00 are actually 42.5mph eastbound and 44mph westbound.
- No comment provided by WSCC on potential danger to pedestrians using an unrestricted crossing where drivers regularly exceed speeds of 45mph.
- No comment provided on extended peak traffic volumes (07:00 – 18:00) on Lewes Road
- Omission of information on the primary pedestrian crossing proposed by developers. Millers Homes proposed two unrestricted pedestrian crossings across the A272 – one

opposite the site entrance, one by Birch Close. Highways Agency only mentions the Birch Close crossing in its submission.

- No comment provided on data omitted from TRICS calculation supplied by Millers Homes. The developer has not followed best practice by omitting all its calculation variables (eg. Location Type, Gross Floor Area) and therefore their estimated trip rates cannot be independently verified. Given the car-dependent nature of the site, 64/73 two-way trips from the site during peak hours seems low. In addition, due to the consistently high daytime traffic volumes on the A272 (07:00 – 18:00), Millers Homes should be required to provide Person Trip Rates for all hours over this period.

Thank you for your time in considering this submission.

Yours faithfully

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