

[REDACTED]
90 Lewes Road
Haywards Heath
West Sussex
RH17 7SX

15 May 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 and in response to the latest WSCC Highways submission (dated 2/5/2025)

Traffic Speeds

Thank you to WSCC Highways for responding to the data I obtained via FOI.

WSCC Highways states (in point 3): *“WSCC speed data used is not directly comparable as this data is taken from a different location, this being east of Birch Close, and not the site access.”*

It is noted that Birch Close is 200m west of the site access, therefore the WSCC data collection point is around 200m from where the developer measured its data (therefore is comparable).

WSCC states the data was obtained 2 years prior to the developer data. I invite WSCC to revisit the site as I believe traffic volumes and speeds have increased significantly since 2022 (and therefore Millers Homes data is even more of an underestimation).

Regarding the visibility splays (WSCC point 10), it is noted that at Birch Close, the maximum visibility for traffic flowing Eastbound is 75m due to the curve in the road (see photos and map on next page).

Photo showing view from Birch Close:



Map showing visibility distance along Lewes Road from proposed Birch Close junction:



Given the high speeds of cars recorded there, and the high proportion of cars recorded speeding along this section of road, it is an exceedingly hazardous place to site an unrestricted crossing.

A car travelling at 40mph, travels 18m per second, so a person crossing the road at Birch Close would have fewer than 4 seconds to cross the road before a car unobserved behind the curve of the road reaches them.

Pedestrian Crossings unsafe

WSCC states *“The Stage 1 RSA did not raise any safety concerns with the location of the crossing.”*

I believe a more detailed investigation should be carried out by WSCC considering:

- The high speeds of traffic (including a high proportion of drivers exceeding the speed limit, and a high proportion of heavy goods vehicles). If a pedestrian is hit by a car travelling at 40 mph, there is a 90 percent chance they will be killed. How is a crossing over a 40mph road (where people regularly speed at 50mph) safe?
- The high volumes of traffic (between 600 and 930 vehicles using the road hourly between 7am and 7pm). With 10 – 15 vehicles travelling along the road every minute, how are pedestrians able to find a safe gap in traffic?
- The location of a pedestrian crossing adjacent to the site access road junction (in contradiction to Highways Agency advice that crossings shouldn't be adjacent to a junction). This means that pedestrians will have to be mindful of cars turning in and out of the development, as well as the cars on the Lewes Road.
- The poor visibility at the Birch Close junction, where only 75m of the road can be seen due to the curve in the Lewes Road. A car travelling 40mph, travels 18m per second, so a person crossing the road at Birch Close would have fewer than 4 seconds to cross the road before a car unobserved behind the curve of the road reaches them.

I believe WSCC should carry out a more detailed investigation to assess whether there will be an unacceptable safety hazard, if an uncontrolled pedestrian crossing is created.

10% reduction in vehicle trips will not be met

The unsafe road crossings, along with poor pedestrian access to local services (which WSCC has highlighted in sections 22 – 28 of its response) means the developer will not be able to meet its target of 10% reduction in vehicle trips.

Millers Homes claims in its Framework Travel Plan: *“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)

WSCC has omitted to challenge Millers Homes on this point, which is a critical omission.

Speed limit changes

Regarding WSCC’s point 18, the Millers Homes proposal to reduce the speed limit to 30mph is unlikely to be effective given that WSCC’s own data shows that 87% of drivers exceed the 30mph speed limit at Sussex Gardens, and 40% of drivers exceed the speed limit East of Birch Close (200m away from the proposed site access road).

If this development goes ahead, Millers Homes should be asked to support measures to enforce the speed limit, for example, a significant contribution to police budget to enforce speed limits. Speed limit changes are pointless if they are not enforced and I’m aware from speaking to the Lewes Road Speedwatch group that the local police do not have the resources to follow up the high number of speeding offences recorded on the Lewes Road.

RTCC

Regarding WSCC’s point on Road Traffic Collisions (Section 19 -21), WSCC rely on historic accident records to conclude that there is minimal road safety hazard.

But past experience is not relevant because it takes no account of the different pedestrian and vehicle movements that would be generated by the new development.

There is no discussion by WSCC of the implications of having two uncontrolled pedestrian crossings, or of the fact that vehicles entering and exiting the development will have to cross the A272 traffic (which travels at high speeds, and often in excess of speed limit).

This would create a new hazard that past experience of accidents on this stretch of road does not factor in. In short, past traffic accident experience that WSCC relies on is irrelevant.

If this development goes ahead, Millers Homes should be asked to contribute to Police, Ambulance, Fire Service and NHS budgets to compensate for attending the additional RTCCs that this development will almost certainly cause.

Millers Homes should also be asked to contribute to Council budgets to enable ongoing maintenance of vegetation to allow better visibility for cars and pedestrians.

Footway widths

Thank you to WSCC Highways for highlighting the inaccessible routes and the narrow footway along the Lewes Road.

WSCC states in point 25: *“WSCC would ask the applicant if they are willing to push back vegetation which has encroached into the usable footway to maximise the existing footway widths, as part of the offsite highway mitigation.”*

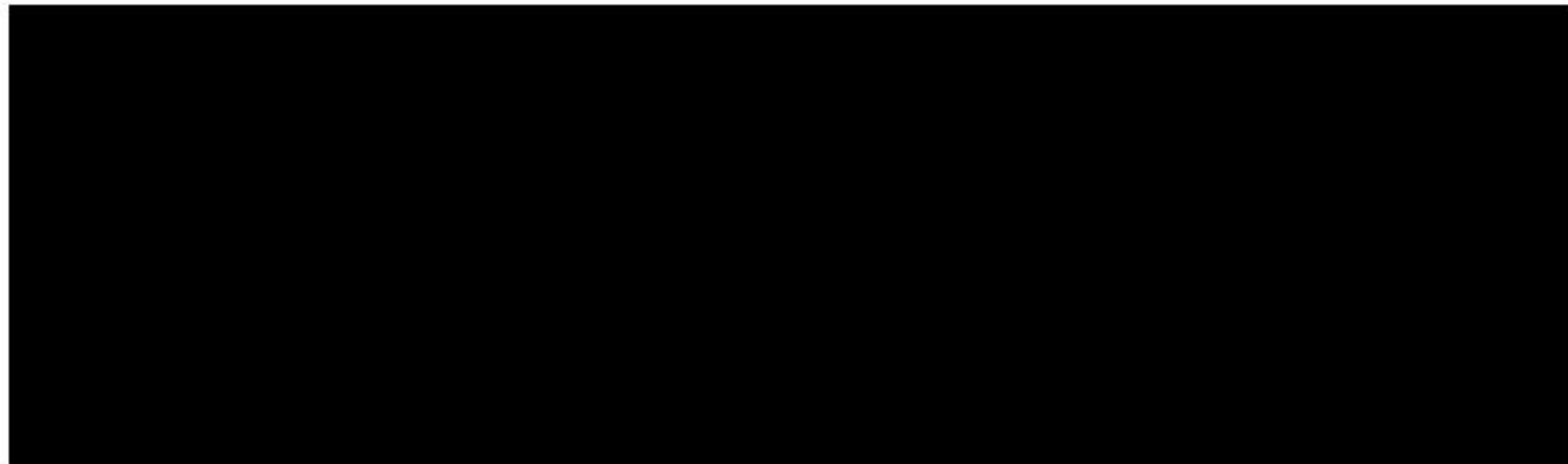
While this suggestion is welcomed, this will only add around 10cm to the narrow footway widths. It is noted (as outlined in my previous submissions) that the pavement near the site

access is only 75cm (far lower than the recommended 2m recommended by Active Travel England).

Also, ongoing maintenance is required. If this development goes ahead, Millers Homes should be asked to contribute to Council budgets to enable ongoing maintenance of vegetation.

Thank you for your time in considering this submission.

Yours faithfully

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