
Response to WSCC Traffic Consultation on DC/24/2006

Date: February 2025

1. Introduction

This document presents a critical response to the **West Sussex County Council (WSCC) Highways Authority Consultation** regarding planning application **DC/24/2006** (62 dwellings at Land North of South Wood, Melton Drive, Storrington).

The WSCC response suggests that the proposed development would not create a **severe impact** on the local road network. However, a more detailed analysis, incorporating **existing congestion data, air quality concerns, and cumulative impact assessments**, strongly challenges this position.

2. Key Concerns with WSCC's Assessment

2.1 Underestimation of Traffic Impact

The WSCC response acknowledges that the proposed development will generate **34 vehicle trips in the AM peak and 33 in the PM peak** but asserts that this **will not exceed road capacity limits**. However, this analysis fails to account for:

1. Cumulative Impact:

- WSCC's study considers only **committed developments** (Downsview Avenue, Thakeham Tiles, Ravenscroft Allotment) but does not include additional housing proposed in **Storrington, Sullington, Thakeham, and West Chiltington**.
- These settlements are interdependent, with significant **cross-boundary traffic flows** that were **not modelled** effectively.

2. Existing Congestion Issues at Key Junctions:

- **A283 Manley's Hill / High Street / B2139 School Hill Roundabout** was identified as the most impacted by development traffic, yet WSCC concludes it remains **below the "severe" threshold**.
- This contradicts previous **Horsham Highway Model Forecast Reports**, which show that the **A283 High Street/North Street Junction** is already **over capacity** during peak periods:

- **AM Peak Volume/Capacity (V/C) Ratio: 109.13%**
 - **PM Peak V/C Ratio: 102%**
- Any additional development **worsens** these conditions.

It is just not correct that the road system is suitable to have additional traffic without any consequence, and unimaginable that this is somehow not impacted as are all junctions onto/from the main High Street/West street arew.

2.2 Lack of Consideration for Air Quality Management Area (AQMA)

Storrington's village centre is **already designated as an AQMA**, yet WSCC's assessment **does not evaluate the air quality impact** of additional vehicle emissions from the development.

1. Failure to Assess Increased NO₂ Levels:

- The AQMA status means that traffic-related pollution is already a **serious issue**.
- Increased vehicle trips from new developments contribute to **higher nitrogen dioxide (NO₂) emissions**, exacerbating the problem.
- WSCC's response lacks **any air quality modelling** or **mitigation strategies**.

2. Contradiction with National Policy:

- The **National Planning Policy Framework (NPPF)** requires that planning decisions should ensure **development does not worsen air quality in AQMAs**.
- The omission of an air quality impact assessment contradicts **policy 40 of the Horsham District Planning Framework (2015)**, which mandates **safe and suitable access for all** while considering environmental impact.

3. Integration of WSCC Road Safety Strategy

The **West Sussex Road Safety Strategy 2025-2036** articulates a vision to achieve a highway network free from fatalities and serious injuries.

This vision is underpinned by the adoption of the **Safe System** approach, which emphasizes proactive identification and mitigation of risks within the transportation system. (WSCC Road Safety Strategy)

Safe System Approach: Key Elements

- **Safe Road Use / Behaviours:** Promoting responsible road user behaviour to minimize risks.
- **Safe Speeds:** Ensuring speed limits are appropriate for road conditions to prevent collisions.

- **Safe Roads and Roadsides:** Designing and maintaining roads to reduce the likelihood and severity of collisions.
- **Safe Vehicles:** Encouraging the use of vehicles equipped with advanced safety features.
- **Post-crash Response:** Enhancing emergency response and care to reduce the consequences of collisions.

Addressing Identified Risks in Storrington

- **Safe Road Use / Behaviours:** Increased traffic volume will lead to higher instances of risky driving behaviour's.
- **Safe Speeds:** Without appropriate traffic calming measures, the additional traffic could result in speed limit violations, increasing the risk of collisions.
- **Safe Roads and Roadsides:** The existing road infrastructure is not be equipped to handle the increased traffic load.
- **Post-crash Response:** Increased traffic congestion could impede emergency response times, adversely affecting post-crash care. Storrington ob

4. Evidence-Based Recommendations

4.1 Require a Full Traffic and Air Quality Impact Assessment

- ✓ **Include cumulative traffic growth projections for Storrington, Sullington, Thakeham, and West Chilington to reflect realistic congestion levels.**
- ✓ **Assess air quality impacts on Storrington AQMA using NO₂ dispersion modelling.**
- ✓ **Ensure traffic mitigation measures are enforceable, not just proposed for future consideration.**

4.2 Upgrade Road and Pedestrian Infrastructure

- ✓ **Mandate the completion of a continuous footway along Fryern Road to ensure safe pedestrian access.**
- ✓ **Install traffic calming measures (raised crossings, chicanes, speed tables) alongside the 30mph extension to ensure compliance.**
- ✓ **Redesign the A283 High Street/North Street junction to increase capacity before adding further development traffic.**

4.3 WSCC Must Address These Concerns Before Re-Consultation

- ✓ **WSCC must update its report to address these clear omissions.**
 - ✓ **A public consultation on the revised traffic data should be conducted before the application progresses.**
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5. Conclusion

WSSC's current assessment is **flawed** due to:

- ✗ **Failure to model cumulative traffic impact** from all nearby settlements.
- ✗ **Ignoring the air quality impact** on the designated AQMA in Storrington.
- ✗ **Weak mitigation measures** that do not fully address the road network challenges.