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Date: 6th July 2017
Your Ref: ID24
Our Ref: 038

Via Email: ldfprogrammeofficer@tiscali.co.uk

Mr Jonathan Bore MRTPI
Inspector
C/O Mrs Pauline Officer
Mid Sussex District Plan 2014-2031 Examination.
260 Collingwood Road
Sutton
Surrey SM1 2NX

Dear Mr Bore,

MID SUSSEX DISTRICT PLAN EXAMINATION - SUBMISSION MSDC PLAN HEARING 25TH AND 26TH JULY 2017

As per our previous Submissions, Jubb Consulting Engineers Ltd and PowerHaus Consultancy Ltd advisors to Mr Peacock, wish to make a further representation to the Mid Sussex District Plan Examination, to the Inspector, for consideration at the MSDC Plan Hearings on the 25th and 26th July 2017.

This Submission focuses on the transport considerations of Item 1c of the Hearing agenda i.e.

1. *Whether MSDC 16 contains an appropriate approach to the subject of unmet need in Northern West Sussex HMA having regard to:*

c The reasons for not meeting the totality of unmet need in Mid Sussex ie "transport and habitats considerations at the required level of supply".

The previous representations referred to above to the Inspector provided detailed background to traffic conditions on the A22/A264 Strategic Road Network.

If it would be helpful, we would be very happy at the appropriate time to answer any points the Inspector has regarding this Submission.

Yours sincerely

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Short Statement Commenting on Agenda Item 1c, Mid Sussex District Plan Hearing 25th 26th July 2017 - 'Whether MSDC 16 contains an appropriate approach to the subject of unmet need in Northern West Sussex HMA having regard to ----- 1c) 'The reasons for not meeting the totality of unmet need in Mid Sussex ie transport and habitats considerations at the required level of supply'. This Short Statement focuses on Transport Considerations.

MSDC 8c of 12th May 2017, with revised policies DP5 and DP 6, sets an increased 17% District Plan (DP) 2014-2031 minimum housing provision (MHP) figure of 15,942 homes, up from 13,600 (submitted DP) following a stepped trajectory of 876 dpa for years 2014/15 to 2023/24 and 1,026 dpa for years 2024/25 until 2030/31. This new higher MHP requires the Council to undertake the necessary traffic re-assessments and secure agreement from the relevant statutory bodies, as to the deliverability of this revised higher MHP.

This new stepped trajectory meets the MSDC OAN requirement and also provides a primarily contribution to the Crawley Unmet Need within the Northern West Sussex Housing Market Area (HMA) but results as shown in MSDC 16 12th May 2017 with a 917 dwelling shortfall in 2029/30 for the HMA.

A large part, (48% of the Districts increased MHP 'to find' of 2,491 dwellings in the revised DP), is 1,184 dwellings allocated to East Grinstead and Surrounds (EGS- East Grinstead - EG, Copthorne, Crawley Down and Turners Hill), which reaches a total for the plan period 2014 to 2031 of 3,246 EGS dwellings an increase of circa 50% to the submitted DP. The traffic from the increased dwellings 'to find', are concentrated in EG 1,065 with Copthorne 27; Crawley Down 27; and Turners Hill 65, requiring to extensively use the already severely congested A22 A264 Strategic Road Network (SRN), which is recognised by MSDC as a district significant infrastructure constraint.

East Grinstead (EG), and Surrounds (Copthorne, Crawley Down, Turners Hill) are located adjacent to Crawley Borough, M23, and Tandridge District, which relies heavily for commuting on the important severely congested West Sussex County Council's (WSCC) A22 and A264 SRN. This suffers major queuing delays at peak times, imposing a major constraint on development. The prime route starts on the A22 in Mid Sussex at Ashurst Wood through East Grinstead turning along the A264 at Felbridge to the M23. An alternative leg of the route is provided by joining/leaving the A264 at A264/B2028 roundabout at Dukes Head going from/to Turners Hill then to and from EG.

The Transport evidence supporting the submitted District Plan (DP) 2014-2031 800dpa, 13,600 dwellings which requires re-assessment, is the Mid Sussex Transport Study Stage 3 December 2016 (MSTS S3), which concludes that providing the proposed remedial schemes are introduced, the Development strategy would not worsen the performance of the highway transport network, relative to the reference development case and would not have an adverse impact upon traffic flows in Ashdown Forest. MSTS S3 was accompanied by a statement of common ground between MSDC, WSCC and Highways England (HE). The new traffic re-assessment which is required, as well as assessing the proposed much higher traffic volumes, needs also to take account of:

1. MSTS S3 is not specifically focussed on the A22/A264 SRN and is absent of adequate survey data and silent on commentary on a key part of the SRN the severely congested EG A22 traffic network and its Junctions. MSTS S3 alone, is inadequate and makes scant reference to A22/A264 SRN traffic conditions in the DP evidence base.
2. All MSTS Stage Reports, 1,2, and 3 rely on 8 - year old base year AM Peak Data which is out of date and is non-compliant with NPPF 158. To comply the MSTS Transport Model needs to be

reviewed using the most up-to-date traffic survey data to recheck and ascertain both current and predicted traffic flows and junction performance for the A22/A264 SRN.

Following on from the Atkins Stage 3 East Grinstead 2012 Traffic Report, the most up to date recognised Traffic Survey Reports of EG and Surrounds Traffic Network are the Jubb Survey Reports (December 2014 - September 2016). The 2014, 2015 Reports have been taken as technical evidence by WSCC in June 2015 for consideration of planning applications in EG. Subsequently the Examiner of the EG Neighbourhood Plan (EGNP) 'made' November 2016, accepted these reports in the EGNP evidence base and commented '*There is a significant highways infrastructure issue within the Neighbourhood Plan Area*' and recognised '*that inadequate highway infrastructure is an issue which needs to be addressed when new development proposals come forward.*'

Noting the above and 1 and 2 on page 1, it would be appropriate for the Atkins EG Stage 3 (May 2012) Report and the Jubb EG Survey Reports 2014-2016 to be added to the DP evidence base.

The Jubb Traffic 2014-2016 Reports, Representations and Correspondence have recognised and concluded along the length of the Counties A22 and A264 SRN to the M23 and Crawley, that:

3. The A22 has reached a new higher unacceptable level of congestion notably at A22 Felbridge and Imberhome Junctions with the Lingfield Junction continuing to experience significant queueing delays on the A22 London Rd (N) and A22 London Rd (S) arms. These Junctions face further pressure arising from the significant effect of the already approved committed and allocated development. No adequately funded approved highway infrastructure plans are in place to mitigate further major scale development.

This is followed by the proposed junction enhancements by St Modwen A264 junction enhancements at the Dukes Head Junction, which will not deliver sufficient spare capacity to accommodate the anticipated growth from already approved committed and allocated development in the area and thus does not offer a long-term solution. Congestion is predicted to be aggravated with severe delays and queue lengths at both Turners Hill Road and Cophorne Common Road; and

The alternative route from and to EG via the overstretched Turners Hill Junction, a major node of congestion suffers from significant queueing delays and that the junction mitigation proposal contained in the 'made' Turners Hill NP will not resolve the severe congestion issues but redistribute the queue around the approaches with increase queues and delays predicted along the B2028.

In addition, still to be recognised, is a Crawley Unmet Need of 917 dwellings in 2029/30 and also to be assessed, in light of the 20th March 2017 Wealden High Court decision, is the acceptability of the net potential adverse effect of the increased DP development on nitrogen disposition in the Ashdown Forest SAC near which the large majority of EG and Surrounds development resides. Without any suitable planned highway interventions, piecemeal, uncoordinated, standalone, unplanned development around and along the A22/A264 SRN, including Turners Hill B2028 link, will create even further delay and congestion to the recognised severe conditions that exist on the A22/A264 SRN.

Noting 1 and 2 on page 1 and in a background of the severe traffic congestion on the A22 A264 Strategic Road Network i.e. 3 above, with no adequately funded highway infrastructure plans in place to mitigate any further major scale development, locating, as the revised DP 2014-2031 of 15,942 dwellings proposes, another 1,184 dwellings 'to find' in this East Grinstead and Surrounds area - a circa 50% increase to the submitted DP, - requires a new in depth area wide traffic network re-assessment providing a comprehensive up-to-date survey and study of the A22 and A264 SRN and its feeder roads including the cross border impacts to and from neighbouring districts.

This study, noting the Crawley Unmet need, should include an Area Wide model including all key routes to the M23 and M25 and cross border impacts concluding with an Area Wide traffic network improvement plan that will offer a long-term highway solution or if not, clearly defining the limitations on housing development by location in that area.