

T: 02036087612  
 M: 07496611110  
 Suite 6036, 1 Fore Street,  
 Moorgate, London EC2Y 5EJ  
 mp@powerhausconsultancy.co.uk  
 www.powerhausconsultancy.co.uk



**PowerHaus**  
 Consultancy

## Mid Sussex District Plan Examination.

13th February 2017

**Response to the Inspectors 'Comments and Questions : site allocations and non-housing policies ' Reference ID8 27th January 2017, ID9 31st January 2017.**

### APPENDIX 2

#### Statement of Background Facts Leading to the Suggested Rewording of Policy DP 19 Transport.

- 2.1 Current Evidence shows today and historically in reports that the East Grinstead and Surrounds (EG) A22/A264 Traffic Network and key routes to the M23 and M25 motorways suffers from severe traffic congestion a wide area of Northern Mid Sussex.
- 2.2 The MSDC 2004 Local Plan identified that the existing EG highway network was no longer adequate to cope with the traffic demand placed on it. Since then, as reported traffic conditions has progressively deteriorated, which has been acknowledged by the Local Authorities, as housing development has significantly outstripped the provision of new highway infrastructure and upgrades leading to today's severe congestion.
- 2.3 This has been clearly portrayed by the Atkins EG Stage 3 (May 2012) and later from 2014, by the Jubb EG Transport Studies Reports. These Reports have been taken as technical evidence by West Sussex County Council (WSCC) for consideration of planning applications in EG. As well as being accepted by the Examiner of the EG Neighbourhood Plan as part of its evidence base, recently Jubb was referenced and taken into account by Surrey County Council in the Tandridge District Council Local Plan Strategic Highways Assessment of 2015.
- 2.4 No adequate highway Infrastructure Investment plan is planned or funded to mitigate the above EG traffic conditions in Local Authority plans. Also traffic from the large pipeline of already approved committed and allocated housing development in the EG and Surrounds Area will join the traffic network shortly deteriorating the situation even further. See paragraph 2.6 below.
- 2.5 The above was recognised by the EGNP Examiner' August 2016 report which stated

*'There is a significant highways infrastructure issue within the Neighbourhood Plan Area' (paragraph 4.5.2 (b) page 9) and recognised 'that inadequate highway infrastructure is an issue which needs to be addressed when new development proposals come forward' (comment on EG11 page 30).*

## 2.5 cont

As a result the EGNP Examiner approved *Policy 'EG11 -Mitigating Highway Impact'*.

*'Due to the identified highway constraints within the Neighbourhood Plan Area all new housing and business development proposals will be expected to':*

- 1. Be supported by an appropriate assessment of the impact of the proposal on the highway network. Proposals, which cause a severe cumulative impact in terms of road safety and increased congestion, which cannot be ameliorated through appropriate mitigation will be refused. Appropriate mitigation could be in the form of a zero car development (where justified in a transport assessment), a travel plan, the provision of footpath and cycle links, junction and highway improvements or contributions to the Highway Authority to carry out junction and highway improvements;*
- 2. Include access arrangements that are appropriately designed and include adequate visibility splays'.*

2.6 The cross boundary impact on the A22/A264 Traffic network is seriously underestimated by SCC and MSDC. The Already Approved Committed and Allocated Development (ACD) traffic of MSDC at 1st April 2016 from 1,394\* dwellings shortly to join the network, is not taken into account in the SCC modelling. As a Result the congested state of the A22/A264 Felbridge junction is far worse than the RFC of 1.74 (74% more traffic passing through that junction than the capacity of the junction) that SCC has predicted in its Strategic Highways Assessment for the TDC Local Plan in November 2015.

\* 1 April 2016 ACD EG 664 dwellings ( 472 approved, 192 allocated ) 545 Copthorne dwellings, 91 Turners Hill and 94 Crawley Down a total of 1,394 dwellings.

2.7 Mid Sussex District Council single out that one of the Districts significant infrastructure constraints is the highways network at East Grinstead with an existing infrastructure deficit, which would be exacerbated by increased development levels - MSDC 7 'Constraints and Capacity' - Summary Paper page 1 27th January 2017. Accompanied by Mid Sussex Local Plan 2014-2031 Submission Version page 5 stating 'Transport infrastructure is under particular strain ... East Grinstead in particular has acknowledged congestion problems along the A22/A264.'