

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



PowerHaus
 Consultancy

Date: 22nd February 2017

Your Ref:

Our Ref: 038

Via Email: ldfprogrammeofficer@tiscali.co.uk

Mr Jonathan Bore MRTPI
 Inspector
 c/o Mrs Pauline Butcher
 Programme Officer
 Mid Sussex District Plan 2014-2031 Examination
 260 Collingwood Road
 Sutton
 Surrey
 SM1 2NX

Dear Mr Bore

MID SUSSEX DISTRICT PLAN 2014-2031 EXAMINATION – Policy DP19

As you will be aware, Jubb Consulting Engineers Ltd and PowerHaus Consultancy Ltd advisors to Mr Peacock, submitted a letter dated 13th February 2017, suggesting rewording for the proposed modified Policy DP19 Transport, and made a request for Mr Grist of Jubb to participate in the discussion at the Hearing on the 28th February 2017.

Whilst we had hoped that Mr Grist could have taken part in the discussion of Policy DP 19, we have noted in your letter, '*Site allocations and non-housing policies' Hearing 28th February 2017 - Important note*', that you have decided to set out the necessary changes to make policies DP18, DP19, DP20 and DP 40 'sound' in a separate letter and that these modifications should be dealt with through an exchange of letters.

We therefore read with interest, your letter of 20th February 2017 to Mr Chris Tunnell with your proposed revised wording for draft Policy DP19, which we welcome. As you requested, we now make our comments regarding the revised wording by correspondence through the following paragraphs.

We note that the submitted **MSDC Local Plan 2014-2031** Para 2.9 (page 5) states '*Transport Infrastructure is under particular strain notably in East Grinstead*'. This is further reinforced in **MSDC 7 'Constraints and Capacity - Summary Paper'** (27th January 2017, page 1 Para 5), which recognises that the '*East Grinstead Highways Network is one of the District's most significant infrastructure constraints and deficits*'. Over recent years MSDC and WSCC have concluded that the A22/A264 traffic network in and around East Grinstead suffers from '*severe*' traffic congestion.

Nonetheless the Plan's Evidence Base is silent on the above, '*one of the district's most significant infrastructure constraints*'. The '*Mid Sussex Transport Study, MSTs Stage 3 Report*' (December 2016), which uses 2008 base year data and the '*West Sussex Transport Plan 2011-2026*' (February 2011), both fail to provide any evidence of the severely congested A22/A264 traffic network in East Grinstead.

This gap in the Evidence Base underpinning DP19 ie the East Grinstead traffic constraint - can be filled and made '*adequate, up - to - date and relevant*' by adding to its list of evidence as follows:

- '*Atkins East Grinstead Stage 3 (May 2012) Report*;
- '*Jubb East Grinstead 2014 to 2016 Reports*' and the

- **'Recently made' November 2016 'East Grinstead Neighbourhood Plan Policy EG11 'Mitigating Highway Impact''.**

The East Grinstead Neighbourhood Plan (EGNP) Examiner accepted the Atkins Stage 3 2012 Report and Jubb (2014 to 2016) Reports into the EGNP Evidence Base, which led directly to the formulation and drafting of EGNP Policy EG11. The inclusion of this East Grinstead specific evidence would make the DP19 Evidence Base sound and compliant with **NPPF paragraph 158 and the 'WSCC TA Methodology** (June 2007) Section 10.1.2, which states **'traffic flow data for Transport Assessments (TA's) should be up - to - date meaning two years'**.

Adding these Reports and reference to Policy EG11 ties together the MSDC Local Plan and the EGNP by both filling the current evidence gap and by providing clarity to the implementation of Policy DP19 alongside EGNP Policy EG11 for decision making.

If it would be helpful we would be very happy to answer any points you have regarding the above.

Yours sincerely



Mary Power
Director
PowerHaus Consultancy Ltd

Cc: Mr C. Tunnell Esq – MSDC - Email Chris.Tunnell@midsussex.gov.uk