

Your ref:

Our ref: 36408/TAA/GH/6622



27 February 2017

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Inspector
c/o Mrs Pauline Butcher
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Dear Mr Bore

MID SUSSEX DISTRICT PLAN EXAMINATION - POLICY DP19

We have reviewed your letter of 20th February 2017 to Mr Tunnell and titled “*Mid Sussex District Plan 2014-2031 – Wording of proposed paragraph 2.13 and Policies DP18, DP19, DP20 and DP40.*”, specifically in relation to Policy DP19.

Whilst we have no further comment with respect to the wording proposed by yourself, we do wish to submit comments regarding the letter dated 22nd February 2017 and submitted to examination by PowerHaus Consultancy in relation to the above.

Paragraph 4 of the Powerhaus Consultancy letter (the letter) refers to the submitted Local Plan 2014. The quote referenced in the letter is :

‘Transport Infrastructure is under particular strain notably in East Grinstead’.

However, this is not a correct reproduction of the wording as the Mid Sussex District Plan 2014 – 2031 Submission Version states :

“Transport infrastructure is under particular strain with high levels of car ownership and car usage combining with narrow, winding rural roads and congested towns and major junctions. East Grinstead in particular has acknowledged congestion problems along the A22/A264;”.

Hence the submitted Local Plan states that the A22 / A264 in East Grinstead has acknowledged congestion problems, rather than transport infrastructure generally across East Grinstead as implied by the letter.

The reference quoted by Powerhaus Consultancy in paragraph 4 of the letter in relation to MSDC 7 is :

‘East Grinstead Highways Network is one of the District’s most significant infrastructure constraints and deficits’.

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However, this is not a correct reproduction of the wording as MSDC 7 states :

“There are significant infrastructure constraints, in terms of water supply and waste water; and particularly at East Grinstead, with the highways network. There are existing infrastructure deficits, which would be exacerbated by increased development levels.”

Hence the word “deficit” quoted by Powerhaus Consultancy at paragraph 4 within the letter is not used explicitly by MSDC 7 in relation to the East Grinstead highway network as implied by the letter.

There is no explicit reference quoted by Powerhaus Consultancy for their use of the word “severe” at paragraph 4 of the letter. There is no instance of the word “severe” in MSDC 7 and no reference in the submitted Local Plan in relation to East Grinstead.

The letter (paragraph 6) suggests that further documents should be added to the list of Evidence Base underpinning DP19, including “Jubb East Grinstead 2014 to 2016 Reports”.

It is interesting to note that another of the documents suggested by the letter is the “Atkins East Grinstead Stage 3 (May 2012)” report, the contents and findings of which are consistently challenged and questioned within the Jubb reports.

Hence, the two documents suggested by the letter as suitable as evidence base could be seen as contradictory or conflicting on the basis of the Jubb reports.

Nevertheless, having reviewed the latest Jubb report from September 2016 we have a number of comments, including those summarised below :

- Table 3.0 compares the Jubb 2015 and Jubb 2016 surveyed maximum queues with the Atkins 2011 model queues. This is unreliable and inappropriate for the following reasons.
 - A surveyed maximum queue reading may occur due to an isolated event such as a broken down car rather than being a typical value during the survey period.
 - A queue observation can be subjective - does it include only static cars or those that are slow moving?
 - Modelling software will report queue lengths based upon a prediction of static vehicles which may be a different basis to a surveyor.
 - Making a comparison between the two sets of survey data and the model data is complicated and unreliable and is potentially why the Jubb survey data, as reported, indicates queue lengths that are significantly greater than the Atkins modelling output.
- With reference to the 2015 and 2016 survey data at Table 3.0, and ignoring the comparison with the Atkins models for the reasons given above, a comparison is worthy of comment as follows:
 - In general, the observed queue lengths reported do not all increase between 2015 and 2016, some go up and some go down.
 - On this basis, it is not possible to conclude that this shows a linear deterioration in network performance. Indeed, without knowing what volume of traffic flows cause these queues it is even less possible to conclude this.
 - A difference in observed queue length may be a result of daily variation in traffic, or it may be a result of a stalled vehicle or more crossing movements by pedestrians on a particular day.
 - A difference in observed queue lengths may be a result of a surveyor recording a queue length slightly differently from the previous year. For example, is a queue defined as stationary vehicles or slow moving vehicles, and if so, how slow moving?



- The detailed data (appendix A of the September 2016 Jubb report) underpinning Table 3.0 is perhaps equally worthy of comment. This shows that the Table 3.0 data is an average of the February and June queue length data for 2016. However, it is apparent that there are some large variations from day to day and month to month in this data so taking an average (as reported in Table 3.0) is unrepresentative.
- The junction models developed by Jubb have used an average of the February and June turning movement surveys as input data. This is not a typical way to produce a validated model, particularly where it is evident there are variations in queue lengths between the two sets of data as described above. A validated model should be based upon a turning count and the associated queue lengths for that particular turning count.

Therefore, and based upon the above comments, we would disagree to the inclusion of the Jubb reports as suitable evidence base documents.

Yours sincerely

Gary Heard
Senior Associate
For and on behalf of
PETER BRETT ASSOCIATES LLP