

**Review of the Impact of the Established East Grinstead Severe Traffic Constraint on the Mid Sussex District Council Strategic Land Availability Assessment's (SHLAA's) Not Allocated in the District Plan or Neighbourhood Plans as analysed in MSDC 5.**

Current evidence shows that today and historically the A22 traffic network in and around East Grinstead [EG] suffers from *severe* traffic congestion. This has been clearly identified and acknowledged in a series of reports by local authorities and Jubb Consulting, over the last decade.

Particularly noted are:

- **The 2004 Mid Sussex Local Plan (MSLP):** Chapter 12 '*Future Development of EG*' recognised in 12.5 page 203 that '*...the existing highway network is no longer adequate to cope with the traffic demands now placed on it...*'.
- **The West Sussex Structure Plan 2006-16 (WSSP) Policy LOC1** identified a mixed-use Strategic Location south/southwest of East Grinstead [EGSL]. This was contingent on delivering essential infrastructure before development, including a comprehensive transport package, to provide effective traffic relief. West Sussex County Council (WSSCC) and the East Grinstead Developer Consortium [EGDC] commissioned a comprehensive multi-modal transport model from Peter Brett Associates [PBA] to test the proposed transport package. This modelling confirmed the severe congestion problems on the EG road network and went on to demonstrate that the extensive interventions proposed to support the EGSL (including an EG Relief Road & Fastway-style bus connection to Crawley) failed to resolve the severe traffic conditions.
- **The West Sussex Transport Plan 2011-2026 [WSTP, February 2011]** page 62 concludes that '*...East Grinstead suffers from acute congestion and safety issues at peak and off peak times due to current traffic behaviour which is dominated by private car...*'
- **The Atkins EG Traffic Management Study Stage 3** report 3rd May 2012 for WSSCC: The 1-day November 2011 survey identified that two A22 junctions were already operating above practical capacity, with two more over theoretical capacity. At the 3 Tiers meeting reviewing the report (WSSCC, MSDC, EGTC 18th July 2012), WSSCC confirmed several A22 junctions were '*severe*'.
- **The Jubb November 2014, March 2015 and September 2016 traffic survey reports**, the most up-to-date and comprehensive of the EG Traffic Network, identified that traffic conditions had *materially deteriorated* in recent years, since the Atkins Stage 3 November 2011 survey, with **all** A22 Junctions operating on or over theoretical capacity

In addition, the Jubb November 2014 report identified that other related routes from and to East Grinstead which use

- The Turners Hill B2110/2028 Junction was a major node of congestion and
- The A264/B2028 Junction underperformed with a significant level of queuing.

The survey reveals that traffic conditions at both junctions were far worse in 2014 than had been predicted for 2021 performance by 2012 Amey Stage 1 Mid Sussex Transport Study [MSTS -1].

- **Taken into technical evidence by WSSCC in June 2015 for consideration of planning applications at EG, the Jubb March 2015 A22 survey findings identified that:**
- Felbridge Junction Maximum Queue Lengths (MQ\*'s) were between 4.1 (PM) and 4.8 (AM) times higher than November 2011, with queue lengths at A264 Copthorne Road arm reaching 1.1-1.4km and records a Degree of Saturation (DOS) of 133-139%, significantly over capacity. \*MQ Maximum Queue in pcus [passenger car units] during peak periods

- Imberhorne Junction, the most congested surveyed, total MQ's of AM 5.4 times higher and in PM 3.5 times higher than November 2011, with queues reaching an average of 900m reaching 1.3km on A22 London Rd South arm with DOS 131-144% significantly over theoretical capacity.
- **The Jubb 2014 and 2015 Traffic Reports demonstrate that a progressive, significant deterioration in traffic conditions in and around East Grinstead has occurred** since the Atkins Stage 3 November 2011 survey and shows that traffic conditions are severe and unacceptable. **The Jubb 2016 A22 Surveys carried out in late February and early June demonstrate further junction deterioration** at Imberhorne and Felbridge Junctions; e.g. Imberhorne total junction MQ increases 8% and 14% respectively in AM and PM Peak (2015 vs. 2016).

The Jubb EG and Surrounds Traffic Surveys and Reports provide an up-to-date, comprehensive, area wide assessment of the East Grinstead Town Transport Network and the key junctions on routes to the M23 and M25. Spanning 19 months across seasons of the year they provide 14 survey days of evidence showing the severely congested A22 junctions and 4 survey days showing overcapacity at Turners Hill B2010/B2028 Junction and the Dukes Head A264/B2028 roundabout.

The above clearly shows that during the last decade new highway provision and upgrading of the highway network at East Grinstead has not kept pace with the rate of development and its traffic growth, or general traffic growth. Progressively, key junction performance has significantly deteriorated leading to the existing highway no longer being able to cope with traffic demands.

In November 2016 the 'made' East Grinstead Neighbourhood Plan (EGNP) included all the Jubb reports and the Atkins EG Traffic Management Study Stage 3 2012 Final Report in its Evidence Base [page 60]. The Examiner's report states '*...I am now satisfied having heard the submissions that both the Atkins and Jubb report contribute as part of the evidence base to the understanding of the scope of these issues...*' continuing '*...I am satisfied that there is a significant highway infrastructure issue within the Neighbourhood Plan area...*'. This led to the rewording and adoption of Policy EG11

#### EGNP - Policy EG11 - Mitigating Highway Impact which states:

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

- *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 the 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 to the Highway Authority to carry out junction and highway improvements.*
- *Include access arrangements that are appropriately designed and adequate Visibility Displays '.*

**With the submitted draft MSDC District Plan 2014-2031 [MSDP] recognising in the Settlement Sustainability Review (May 2015 document EP 52) paragraph 4.4 page 11** that East Grinstead is subject to '*...severe highway constraints...*'. And in the submitted MSDC District Plan page 4 paragraph 2.9 '**The Challenge Facing the District**', highlights that '*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.*'

Regarding **Mid Sussex Transport Study** matters the submitted MSDP (page 106) references MSTs 3 Interim Summary Report by AMEY November 2015 which comments (page 42) on the A264/A22 Felbridge Junction and the A264/B2028 Dukes Head Roundabout. These two junctions are included on Page 42 in Table 8, a list

of Road Junctions with RFC [Ratio of Flow to Capacity] in excess of 100% in AM Peak 2031, *after* including the implementation of primary and secondary interventions agreed with MSDC and WSCC at MSTs Stage 1 and 2 and finalised the Stage 3 report.

**The 12th January 2017 Appeal Decision APP/D3830/W/16/3156544** (30 Dwellings at Land at Gibbshaven Farm, Felbridge East Grinstead) was dismissed for Harmful effects on the Strategic Gap between East Grinstead and Crawley and because the **Residual Cumulative Effect on the Highway Infrastructure (A22/A264)** of this proposal in conjunction with other Nearby Commitments would be **severe**. These reasons would demonstrably outweigh the limited benefits of the proposal.

Paragraphs 21 and 22 Page 5 of Inspector P W Clark Appeal Decision state:

- 21 *However, as several respondents have pointed out, advice in the NPPF is that development should only be prevented or refused on transport grounds where the residual cumulative effects of development would be severe. In this case although the residual effects of the development itself would not be severe there is considerable other development also proposed in the vicinity and so the cumulative also need to be considered.*
- 22 *These correspondents refer me to 'Surrey County Council's Tandridge District Council Local Plan Strategic Highway Assessment Report of November 2015 and the 'East Grinstead and Surrounds 2016 Survey and Review of Traffic Conditions by Jubb Consulting dated September 2016. These documents provide support for the argument that the residual cumulative effect of all development in the area, including the current appeal proposal would be severe.*

The Inspector refers above to the important evidence provided by the Jubb Consulting Report (September 2016) and the Surrey County Council [SCC] Tandridge District Council [TDC] Local Plan Strategic Highway Assessment Report November [SCC TDC SHA 2015] Report in reaching the decision.

**The Surrey County Council TDC Strategic Highway Assessment Report of 12th November 2015 was commissioned by TDC to undertake highway modelling to assist in the provision of an evidence base for the emerging TDC Local Plan. It identifies that the traffic conditions at the A22/A264 Felbridge Junction are 'severe' and also that there are issues at A264/B2028 Roundabout at the Dukes Head.** It provides additional evidence to the 4 Jubb Reports which span surveys from November 2014 to June 2016 on the East Grinstead (EG) and Surrounds Traffic Conditions.

As stated above the SCC TDC SHA 2015 Report '*does not*' take into account the existing already large MSDC '*Approved, Committed and Allocated*' East Grinstead Development in its modelling, and therefore its 1.74 RFC (i.e. 74% more traffic passing through the junction than the capacity of the junction) already well in excess of the junction capacity must significantly understate the severe congestion at A264/A22 Felbridge Junction and understate the severe delays at A264/B2028 Junction at the Dukes Head. This means that the severe traffic conditions on the A22 Traffic Network particularly the A264/A22 and nearby Junctions would suffer far worse, significant deterioration than the SCS TDC SHA Report predicts. The Inspector's decision on the recent Felbridge Appeal confirms the importance of the Jubb reports and their conclusions and also acknowledges that of the SCC traffic report for the emerging Tandridge Local Plan which independently sets out the severe situation at the Felbridge A264/A22 and Dukes Head A264/B2028 junctions.

With an average of 186 dwellings per year completed in EG over 2015 and 2016 the presently overloaded and severely congested EG A22 Traffic Network will deteriorate even further as shortly more traffic will be added from the existing large, 664 dwellings, EG already '*approved committed and allocated*' pipeline hous-

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ing development, as evidenced in the Jubb September 2016 EG and Surrounds Survey and Review of Traffic Conditions will join the network.

The only Local Authority infrastructure improvement plan proposed for the EG traffic network to mitigate the severe traffic congestion is the Atkins Stage 3 Do Minimum (DM) solution which is inadequate and not funded. DM was designed to accommodate an EG housing ceiling limit of 765 dwellings from the 1st April 2011 up to 2021. Already at the 1st April 2016 1,160 dwellings have been built or are approved/committed developments. This is 395 units or 52% above the Atkins Stage 3 ceiling. Since April 2016 more dwellings have been approved. In addition, the £900,000 (2012 costing) proposed for funding this project is an under-estimation and would leave a funding shortfall to implement the project.

### **Conclusion**

In conclusion, the Jubb reports produced over the last two years are up-to-date and meet the requirements of NPPF 158. These confirm that the well-established, current, severe traffic conditions in East Grinstead and the surrounding area continue to deteriorate significantly. No adequate or funded approved highway plans are in place to mitigate major scale development on the EG traffic network.

The severe traffic conditions impose a major constraint that must be fully recognised when making any further evaluation of major housing development or any development proposals which may have a material adverse cumulative impact on the East Grinstead Area Traffic Network. Any such allocations that may be proposed must be fully tested against the NPPF (notably Paras 7 & 32) and the NPPG.

27th January 2017