

FELBRIDGE PARISH COUNCIL | RESPONSE TO MSDC DPD SITE ALLOCATIONS 2020

Statement for MIQ 6.3

Part A – Your Details

1. Personal Details

Title	MRS.
First Name	PATRICIA
Last Name	SLATTER
Job Title (where relevant)	PARISH CLERK
Organisation (where relevant)	FELBRIDGE PARISH COUNCIL
Respondent Ref. No. (if known)	
On behalf of (where relevant)	
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MIQ 6.3 Representation

Name or Organisation:

Felbridge Parish Council

3a. Does your comment relate to:

Site Allocations
DPD

Sustainability
Appraisal

Habitats Regulations
Assessment

3b. To which part does this representation relate?

SA19 & SA20 MIQ 6.3

4. Do you consider the Site Allocations DPD is:

4b. Sound

Yes

No

5. With regard to each test, do you consider the Plan to be sound or unsound:

	Sound	Unsound
(1) Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
(2) Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(3) Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(4) Consistent with national policy	<input type="checkbox"/>	<input type="checkbox"/>

6b. Please give details of why you consider the Site Allocations DPD is not legally compliant or is unsound. Please be as precise as possible.

Matter 6.3 Are there any issues arising from the development allocations of the Plan on the strategic highways network or on any locations with potential highways/ pedestrian safety issues? Can these issues be satisfactorily ID-02 11 overcome? Several representations state that the Council's independently commissioned highways and transport studies, which generally support the site allocations in the Plan, are flawed; in what ways are these studies flawed?

Please see pages 8-11, 20-23 and 24-31 of our Regulation 19 response for detail relating to this matter.

Since the Regulation 19 consultation we have communicated with the Strategic Transport Team at Surrey County Council, this has raised **relevant new evidence** that was not available for the Regulation 19 submission.

In Paragraph 1, Page 29 of the MSDC response to ID1 they state;

“Neighbouring Highway Authorities Surrey and East Sussex County Council have also scrutinised the Strategic Transport Assessment Report [T7], they raise no objection and highlight no cross-boundary issues arising from the Sites DPD development.”

Appendix 1 contains the email communication with the SCC Strategic Transport Team (4 Jan 2021). We have highlighted the section where the SCC team confirm they saw the model validation report in 2018 but had not seen the Strategic Transport Assessment Report. Felbridge Parish Council are very concerned that the Strategic Transport Assessment Report has not been scrutinised by the Strategic Transport Team as they had never received it for review.

The second highlighted paragraph shows their opinion is;

“when it comes to considering specific locations, it would be the outputs from the more detailed LinSig [WSP] model that might be more informative.”

Thus, Felbridge Parish Council believe that the WSP model should be used for the assessment of available highway capacity at the Star and Imberhorne Lane junctions to accommodate the DPD allocations of SA19 and SA20.

The second highlighted paragraph ends;

“As we understand it, Mid Sussex acknowledge that more detailed analysis of the potential impacts on key junctions may be necessary.”

We contend that this demonstrates that the sites SA19 and SA20 are being brought forward when there is acknowledgement that the potential impacts are not fully understood and require more analysis. Without the impacts being fully understood there can be no certainty that there are deliverable mitigation schemes to address them. And further that as the DPD does not contain any proposed mitigation, referring instead to the future delivery of an A22 corridor scheme which may never come to fruition.

Despite MSDC's response to ID1 stating that SCC “highlight no cross-boundary issues”, Appendix 2 contains the email communication with the SCC Strategic Transport Team (10 Mar 2021) where they raise concerns about the Strategic Transport Assessment Report in relation to SA19 and SA20 but as they had not seen the Report until well after the Regulation 19 consultation had closed, their concerns have not been recorded or been considered.

The inclusion of Sites SA19 and SA20 is Unsound as proportionate data has not been used to justify them.

Felbridge Parish Council believe the Site Allocations DPD is **Unsound** as the cross-boundary strategic matters identified in the statement of common ground (SoCG) have been deferred rather than dealt with, it is therefore **not Effective**.

The TDC-MSDC SoCG confirms that both parties confirm the necessity to implement highway improvements at four junctions on the A264 and A22. This project is called the 'A22/A264 corridor

project'. Whilst financial contributions are sought from SA19 and SA20 towards the corridor project, the delivery of that project is not included within the Plan's infrastructure deliverables. The transport assessment does not include the benefits of the project and the source of the funding to complete the scheme has not been identified.

West Sussex Highways response to the consultation was '*The DPD should acknowledge the possibility that improvements may not be deliverable at the Felbridge junction.*' So even the Highway Authority is questioning the viability of delivering the junction improvements.

By excluding the 'corridor project' from the DPD and the transport assessments, the development of sites SA19 and SA20 could proceed, whilst Sussex and Surrey Highways may decide in the future that no viable scheme exists to really mitigate the already severe road network. This would lead to even more development burdening an already severe road network. Therefore, the identified cross-boundary strategic matters have been deferred rather than dealt with, rendering the DPD **not Effective**.

7. Please set out what change(s) you consider necessary to make the Site Allocations DPD legally compliant or sound, having regard to the reason you have identified at question 5 above where this relates to soundness.

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Felbridge Parish Council request that the following action is taken with respect to the draft Site Allocations DPD and associated documents:
Sites SA19 and SA20 should be withdrawn as proportionate data has not been used to justify them and there are sufficient reasons to believe they would be unable to deliver their allocations within the plan period.
The latest Transport Study by WSP commissioned by MSDC & TDC should be published in full and its content used to inform the DPD.

In the event that the Inspector decides that Site Allocations 19 or 20 should progress then this should be made contingent on delivering a viable and meaningful set of junction improvements to mitigate the cumulative impact of local development since 2017 prior to their commencement.

Signature:

Felbridge Parish Council

Date:

13th May 2021

Appendix 1

From: William Bryans
Sent: 04 January 2021 15:17
To: Jeremy Clarke FPC
Cc: Georgie Sharpe
Subject: RE: Felbridge Junction Modelling

Dear Cllr Clarke,

The two models are very different and so it is not surprising that the outputs for this junction are also different. The Systra model is a strategic model using SATURN modelling software and covering a large geographical area (extending from the edge of Brighton in the south to the edge of Reigate & Redhill in the north), whereas the WSP model is a LinSig model covering just the Felbridge and Imberhorne junctions on the A22.

We have not seen the recent Mid Sussex transport study report. The only report we have seen back in 2018 is the model validation report, which is an explanation and analysis of the model build. So while we would not have validated the model, we might have stated that we were content with the model build and the validation: the report does not contain details of every single element of the model but key outputs as indicated by Department for Transport guidance. However, we might be able to make further comment if you are able to either forward the study report or let me know where it is available.

The two models are built for different purposes, but when it comes to considering specific locations it would be the outputs from the more detailed LinSig model that might be more informative, although it would be important to take into account the results of the strategic modelling as well. As we understand it, Mid Sussex acknowledge that more detailed analysis of the potential impacts on key junctions may be necessary.

With my regards,
William.

William Bryans BA MSc CILT
Transport Studies
Strategic Transport,
Environment, Transport & Infrastructure,
Surrey County Council

From: Jeremy Clarke FPC
Sent: 02 January 2021 12:08
To: William Bryans
Cc: Georgie Sharpe
Subject: Felbridge Junction Modelling

Dear William,

Following on from our very useful meeting in November 2019 when we discussed various transport models for the A264/A22 signalised junction at The Star in Felbridge; I was hoping that you would be able spend a few minutes helping me understand what appears to be a major discrepancy between the baselines of two models.

The first model is by Systra and is the basis of the Mid Sussex transport study, the report states that it has been validated by Surrey Highways. The Felbridge junction baseline data from the summary report is as follows;

	2017							
	AM Dem (Veh)	AM RFC (%)	AM Delay (s)	AM AvgQ (pcu)	PM Dem (Veh)	PM RFC (%)	PM Delay (s)	PM AvgQ (pcu)
A264 Cophthorne Road (W)	676	61	15	2	609	65	21	3
A22 Eastbourne Road (N)	384	68	28	2	504	65	20	2
A22 London Road (S)	1326	73	70	14	1112	68	47	4

This is compared to the WSP study that is supporting the Tandridge Local Plan which has the following baseline analysis of the same junction.

Table 1-1 – Baseline Assessment 2018 Baseline Scenario

2018 Baseline Assessment	AM Peak Period			PM Peak Period		
	Degree of Saturation	Mean Max Queue	Delay per PCU (secs)	Degree of Saturation	Mean Max Queue	Delay per PCU (secs)
A22 South	82.7%	16	16	83.6%	16	17
A264	106.6%	48	182	101.4%	33	115
A22 North	56.0%	9	31	96.0%	22	76

The Systra model has produced Ratio of Flow Capacity figures for the junction which implies that it has modelled this as a priority junction rather than using LinSig for the signalised junction. Whilst the baseline years are not the same, the performance of this junction has not dramatically changed during that period.

On the basis of the Systra study, Mid Sussex are stating that there is no need for any improvements at the Felbridge junction as it is operating well below capacity, but this is clearly contrary to the view put forward in the Tandridge Local Plan.

Are you able to provide any insight as to why the two models would give such different baselines, particularly considering that this is the baseline state rather than any future state modelling?

Best regards

Jeremy Clarke
Felbridge Parish Council

Appendix 2

From: William Bryans
Sent: 10 March 2021 06:28
To: Jeremy Clarke FPC
Subject: RE: Felbridge

Dear Mr Clarke,

Thank you for your further response and clarification.

I have now considered the report in detail, and I have the following observations, some of which I know you have already identified.

- the transport impact assessment indicates the A22/A264 junction to be operating under capacity;
- the only sustainable travel mitigation options proposed for both the proposed development sites in the vicinity of the junction are bus priority measures on the A22 together with direct bus services to Gatwick: these measures are forecast to reduce car trips by 2% for the Crawley Down development (SLA ref. 196) and 3% for the Imberhorne Lane developments (SLA ref. 770);
- by 2031 the junction is forecast to be operating over-capacity with both the A264 and A22 from the south experiencing the worst congestion.

This contrasts with the WSP draft report which states that the junction is already operating over-capacity with significant delays and queues on the A264 arm in particular.

Even with the sustainable transport mitigation in place, the Crawley Down and Imberhorne Lane developments are forecast in the morning peak to generate 79 and 218 outbound trips respectively and 38 and 105 inbound trips. What I cannot tell from the report is the geographical distribution of those trips (i.e. where those trips are forecast to travel to and from and therefore the direction they take to and from the sites.) However, looking at the flows passing through the A22 / Imberhorne Lane junction, the increase in trips into the junction from Imberhorne Lane is only 88 trips in the morning peak hour. This is not to say that just 88 trips are forecast to travel north from the Imberhorne Lane development in that hour to the A22 because other trips could be re-routing as a result of the additional demand in the area. But the inference is that a significant majority of trips are forecast to travel in another direction, most likely towards East Grinstead and therefore do not need to pass through the Felbridge junction.

Another complication is that I am not sure what the bus priority would be, but any junction related measures would not have been able to be represented in the strategic model: this would have to be done by utilising other tools such as microsimulation modelling. I am also unclear on how buses will serve the Imberhorne Lane development: Table 5 states there will be bus shelters within the development, but it is possible bus operators will be unlikely to divert services either into the site itself or off the A22. Furthermore, if buses will be serving the site then it is difficult to introduce intelligent bus priority measures (i.e. measures that alter the operation of the signals as opposed to physical bus lanes) on all arms of a junction, such as the A22 / Imberhorne Lane junction as the measures can counteract each other.

As a result of concerns above, notably that Felbridge already suffers from traffic congestion, Mid-Sussex District Council has agreed in a joint [Statement of Common Ground](#) that it will “...work in partnership to undertake detailed feasibility work...” with the intention to “...assist in bringing forward schemes at these locations”, namely the A264 corridor at the Copthorne Hotel junction and the A22 corridor at Felbridge and at the Imberhorne Lane and Lingfield junctions. It should be noted that the WSP report is still draft and the document has never been published because the various parties who commissioned the work, including Mid-Sussex District Council, recognise that further work is required.

In the scale of the proposed development in the district, the impact on Felbridge may be relatively light. However, this ignores the fact that the area is already very busy, experiences congestion and there are limited facilities to accommodate pedestrians and cyclists: consequently both Mid-Sussex and Surrey County councils agree that “...schemes are required to address the existing capacity issues...”. Furthermore Surrey County Council officers wish to ensure that such measures enhance the local area as a “place”: this means improving facilities for pedestrians and cyclists and enhancing the local built environment and townscape rather than just amending the junction to push more vehicles through it at the expense of other aspects that make it a location where residents wish to live and businesses to locate.

With my regards,
William.

William Bryans BA MSc CILT
Transport Studies
Strategic Transport,
Environment, Transport & Infrastructure,
Surrey County Council

From: Jeremy Clarke FPC
Sent: 28 February 2021 10:19
To: William Bryans
Subject: RE: Felbridge

Dear William,

Many thanks for responding, I understand the rerouting argument, but this is all through residential estate rat runs including a resulting significant impact at Wallage Lane.

I cannot see how it is justified for A-road traffic resulting from a specific DPD allocation to be diverted onto residential streets rather than specify that mitigation of the A-road junctions is a requirement for the delivery of that allocation.

Whilst I accept that all parties are acknowledging that improvement schemes are required on the A22; the DPD allocations document does not require the improvement to be delivered at the time of residential growth instead it puts it into the future with no timeline, such that it may never be delivered.

Considering your reply of 4th January;

when it comes to considering specific locations it would be the outputs from the more detailed LinSig model that might be more informative, although it would be important to take into account the results of the strategic modelling as well.

Do you feel it is appropriate that MSDC have decided that the LinSig model is not relevant and have excluded it from their transport evidence base, and that they are stating that this 'transport modelling work has been validated by WSCC HA in consultation with Surrey CC HA' although you had not seen the transport study report?

Best regards

Jeremy Clarke
Felbridge Parish Council