

MID SUSSEX LOCAL PLAN 2014-2031
SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT EXAMINATION
INSPECTOR'S MATTERS, ISSUES AND QUESTIONS (MIQS)

HEARING STATEMENT FOR MATTER 6

**PREPARED ON BEHALF OF BURGESS HILL TOWN COUNCIL AND
SOFLAG (SOUTH OF FOLDERS LANE ACTION GROUP)**

**MATTER 6 – ARE THE TRANSPORT, INFRASTRUCTURE, IMPLEMENTATION AND
MONITORING PROVISIONS OF THE PLAN SOUND?**

This representation covers MIQS 6.1, 6.3, 6.4 and 6.5

6.1 *Are there any necessary infrastructure needs that are not addressed in the Plan?*

1. The Plan is not considered to have fully addressed its necessary highway infrastructure needs.
2. In the Burgess Hill area, and to its south, there are existing issues arising from lack of highway capacity for strategic north/south movements, resulting in congestion and delays on all north/south routes in the corridor, and contributing to air quality issues at Stonepound crossroads. The Sites DPD Scenario Modelling Report confirms the only feasible solution is the improvement at Site S1, the junction of A23/A2300, providing additional capacity on the southbound section of A23 between the A2300 and B2188. The Plan is critically dependent on delivery of improved capacity in the corridor and, therefore, on that improvement, which is included as part of DPD Policy SA35.
3. Highways England is the highway authority for the A23. No relevant improvement is included in its Roads Investment Strategy 2 (2020-2025) and no scheme or investigation in RIS3 covering the next 5 years. Such a scheme would inevitably require substantial funding from the development included in the adopted Local Plan and proposed in the DPD.
4. The DPD doesn't put forward any specific approach to its funding and therefore doesn't demonstrate its deliverability. In not doing so, and in light of the acknowledged compelling need to deliver the scheme as early as possible, the Plan cannot be considered to have fully addressed its necessary infrastructure needs.

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 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? Is it acceptable/good practice for the highways impact of a scheme to be considered less than severe if the existing traffic conditions in the area, which admittedly not the result of the proposed allocation, are acknowledged to be severe; in other words, should the **cumulative impact** be the determining factor in assessing traffic impact in relation to the impact of a specific housing allocation? Reference is made to a recent study by WSP in relation to traffic conditions in the East Grinstead area; what were the principal conclusions of this study?*

5. **The model used in the transport studies is not considered to be fundamentally flawed. However, the interpretation of their outputs is considered to be flawed both in its approach to the definition of a 'severe' impact and in its inconsistent comparative application. The cumulative impact should be the determining factor. There are potential highways and pedestrian safety issues arising from the development allocations of the Plan on locations not on the strategic network.**

6. The transport modelling undertaken by SYSTRA for the Council uses a highway model which is an updated version of the model that supported the adopted Local Plan. The approach is conventional and, other than some concerns about the way that the model represents the capacity offered by one of the competing north/south routes in the corridor south of Burgess Hill (B2112 approaching and through Ditchling village) the model itself cannot be considered to be fundamentally flawed. The issue is in the interpretation of the model outputs, specifically the definition adopted to identify 'severe' impacts which has been used as the guide to where mitigation is required. It is this process which is flawed in its definition of what constitutes a severe impact.

7. The criteria adopted are:
An increase in RFC of 10% or more to 95% or more, or
An increase in delay of 1 minute or more to 2 minutes or more.

8. Concerns are:
a. All severity assessments using these criteria are relative. A junction with clear capacity problems in any Scenario, including base year (e.g. excessive RFCs, queues and delays) would not be identified as being an issue in the network if it had those problems in another comparison Scenario but the incremental change did not comply with the criteria;
b. In reality, if the prior situation is a severe impact, ANY additional traffic from additional development would increase that severity;
c. The criteria do not, and should, include identification as 'severe' where the RFC exceeds 1.00, i.e. where the junction is operating over-capacity.

- d. The RC and ALL additional development scenarios should be judged against the base year, rather than the incremental approach used where the RC is judged against the base year, but other scenarios are judged solely against the RC.
9. It is the cumulative impact of a scenario against a common base which is important, and any junction operating over-capacity should be assessed as being severely impacted.
10. The transport modelling demonstrates that the district's highway network is forecast to experience widespread severe highways operational impacts on at least major routes by 2031 with the substantial amount of committed development in the RC alone, with the prospect of significant additional severe impacts arising from the Sites DPD. To address that, mitigations are proposed in the Plan with the objective (para 1.5.4 of the Sites DPD Scenario Modelling Report) *"Where junctions are assessed to be adversely impacted by the developments, a set of appropriate sustainable measures and highway mitigation schemes are proposed and tested. These mitigations aim to remove the 'severe' impacts"*.
11. The modelling report shows that the inclusion of the identified mitigations would reduce or offset the bulk of the additional impacts of the Sites DPD sites and help to partially offset the scale/severity of impacts of the RC itself compared to the 2017 base year. The modelling report demonstrates the modest anticipated effects of the conventional sustainable measures accompanying the DPD (generally a 1.5% reduction in car trips) and that by far the most important mitigation is the improvement at Site S1, the junction of A23/A2300, providing additional capacity on the southbound section of A23 between the A2300 and B2188. Nonetheless, even with that improvement, traffic flows would remain high on the alternative routes – for example, total flows through Stonepound crossroads, which is an existing AQMA, would increase by 16% from 2017 (combined AM and PM peak hours) in the Reference Case increasing to +23% with the DPD (+mitigation).
12. Elsewhere in the town, despite the overall relief afforded by the mitigation package, issues would remain at some junctions, including Site S6 (the junction of Keymer Road with Station Road, Junction Road and Silverdale Road which is assessed as having a severe impact comparing RC and base year, despite a traffic signals improvement in the RC) and a severe incremental impact between the RC and the 2031 Sites DPD Scenario. Whilst the impact was not assessed as severe in the Sites DPD + Mitigation Scenario, the relevant assessment values are barely different from the DPD scenario but with the two falling marginally either side of the criteria set. In practice, this junction operationally interacts with junction Site S27 (Keymer Road / Folders Lane) in a way that is not replicated by the model, and which would have safety as well as capacity consequences. A principal cause of the continuing issues in this part of the town network, even with the DPD mitigation package, arise from the allocations in the Plan of Sites SA12 and SA13.
13. There are, therefore, potential highways and pedestrian safety issues arising from the development allocations of the Plan on locations not on the strategic network, for which

there are no proposals put forward by which those issues could be satisfactorily overcome.

6.4 *Is policy SA35, which addresses **the safeguarding of land for and delivery of strategic highway improvements**, sufficiently justified, detailed and effective to enable the delivery of the following schemes: (i) A22 Corridor upgrades at Felbridge, Imberhorne Lane and Lingfield Junctions; (ii) A264 Corridor upgrades at Copthorne Hotel Junction; (iii) A23 junction upgrades at Hickstead? Does the policy need to be extended to address potential highways issues in and around the proposed science and technology park to the north-west of Burgess Hill; the traffic impact of allocations SA12 and SA 13 to the south-east of Burgess Hill; and/or any other locations?*

14. **Policy SA35 is not considered to be sufficiently detailed or effective, and amendments to the Policy are proposed.**
15. The DPD recognises in para 3.8 (Safeguarding of Land for Strategic Highway Improvements) that whilst Mid Sussex is well placed in transport terms, there are a number of existing transport related constraints. The DPD continues that, in particular, these include road congestion during peak periods affecting many parts of the highway network throughout the district; most notably including the M23/A23 corridor which is stated to be congested at key junctions including the A23/A2300 Hickstead.
16. Policy 35 includes "A23 junction upgrades at Hickstead". In respect of that scheme, Policy 35 is considered sufficiently justified and is therefore welcomed, but subject to the following reservations about detail and effectiveness:
 - a. The scheme description is not consistent with the mitigation identified as necessary in the Sites DPD Scenario Modelling Report.
 - b. The policy states that "this approach will ensure the **long-term** delivery of these schemes is not prejudiced whilst more detailed feasibility work is undertaken". The implication is that the schemes themselves are only needed in the long term. The policy should clarify that it is not the **need for the improvement** that is long term.
 - c. The policy identifies West Sussex County Council, relevant neighbouring authorities and other key stakeholders. The policy should also specifically name Highways England, as highway authority for the A23/M23.
17. Highway improvements necessary to accompany the science and technology park are identified in the Sites DPD Scenario Modelling Report (Site S2). Those are distinct from the strategic improvements necessary and included in Policy 35. However, there may be unforeseen interaction effects that could impact on the efficacy of the strategic scheme. Policy 35 should be amended to reflect the supremacy of the strategic scheme.
18. Any scheme required to mitigate the impacts of allocations SA12 and SA13 or any other locations in the Burgess Hill area would not be strategic schemes. Their need should therefore be covered elsewhere in the DPD, in the specific policy relevant to each site.

6.5 *Does the identification of **detailed schemes for highways improvements** provide the necessary certainty to enable key housing and employment allocations to be delivered, or is the opposite true, i.e. that securing detailed schemes at a relatively early stage in scheme delivery would be inflexible, and therefore counterproductive to effective scheme delivery? Is part of the solution in addressing the effectiveness of the Plan to set out a series of phased triggers or thresholds which would link the implementation of housing numbers to the delivery of key highways and sustainable transport improvements?*

19. **The critical contribution of the A23/A2300 scheme to the DPD mitigation package, strongly suggests the early identification of a related development threshold. Other phased triggers or thresholds linked to the delivery of other transport improvements are not considered necessary.**
20. The key delivery timing relates to the A23/A2300 junction which is needed as early as possible. As stated in the response to MIQS 6.1 above, the DPD, however, doesn't put forward any specific approach to its funding and therefore doesn't demonstrate its deliverability. Assuming that can be resolved, a preliminary scheme design should suffice as the basis of necessary contributions from developments. Inevitably, there would be a period before the earliest scheme delivery during which the traffic issues in the town would intensify. It is not possible from the information available to suggest what level of development may result in an unacceptable, unmitigated transport impact and how that would relate to the funding available at any time. Given the critical contribution of the scheme to the DPD mitigation package, it strongly suggests the early identification of a related development threshold.
21. For other highway improvements, provided that allocations contribute, as they come forward, in the usual way to the delivery of relevant necessary highway and sustainable transport mitigations and other requirements, there should be no need for any further phasing of allocations in Burgess Hill linked to the delivery of other transport improvements.



Civil Engineering - Transport Planning - Flood Risk

GTA Civils & Transport, Gloucester House, 66a Church Walk, Burgess Hill, West Sussex, RH15 9AS

T: 01444 871444 E: enquiries@gtacivils.co.uk www: gtacivils.co.uk

GTA Civils & Transport Limited, Registered in England No. 11917461. VAT Registration No. 319 2609 02