

DM/23/2699 Land South And West Of Imberhorne Upper School, Imberhorne Lane

Felbridge Parish Council objects to this application. Whilst it is accepted that development of this site has been agreed in principle by the adoption of DPD Policy SA20 following the examination in public, Felbridge Parish Council does not believe that the development proposal as submitted meets the criteria necessary for the application to be considered viable.

The inspector's amendment to Policy SA20 requires that the traffic impact from this site is mitigated 'by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered'. This requires the Sustainable Transport Plan to have been completed and the mitigation that will be delivered calculated such that the necessary highway mitigation measures can be quantified. The current proposal is based upon a detailed draft travel plan with a suggested target of a 10% reduction in baseline vehicle movements, subject to this target being revised and agreed with WSCC following the baseline surveys. How can the necessary highway mitigation methods be understood if that target is not agreed prior to Planning Approval? We also note that the report on 'A22 and A264 Corridor Feasibility Study' presented to the TDC Planning Policy Committee on 16 November 2023 specifically states that (para 14);

"Prior to the conclusion of this work, any planning applications in and around the corridor will need to demonstrate they can mitigate their own transport impacts"

Therefore, this site must mitigate its transport impacts and cannot rely upon any element of the corridor project. There is still the potential that the Corridor feasibility study will not be able to identify a deliverable solution to the Star junction. West Sussex Highways response to the DPD 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. Thus, S106 funding is not necessarily going to be able to mitigate the traffic generated as 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.

Felbridge Parish Council fully supports the East Grinstead Town Council amendment to the East Grinstead Neighbourhood plan that requires Mid Sussex District Council to issue a Grampian precedent condition for SA19 & 20. Should any future planning consent be granted for either or both of these allocated sites, then Mid Sussex District Council guarantee that Section 106/278 legal agreements will be executed prior to consent. This includes an upgrading of the A22/A264 'Star' road junction to provide full mitigation for the existing over capacity of this junction; mitigation to negate the increased capacity caused by the proposed extra 750 dwellings; plus the additional accommodation for 150+ residents of the Retirement Community on the SA20 site. The relocation of Imberhorne Lower School from Windmill Lane in East Grinstead to the site, along with the addition of a two-form entry primary school will also increase vehicle movements for the site. This work is to be completed prior to the first housing occupations of either site mentioned above.

We believe that the transport modelling needs to be revised to allow for the single entrance now proposed to the south of Bluebell Close, this is likely to affect the proportions of the vehicle movements that are taking Imberhorne Lane north of Heathcote Drive, turning into Heathcote Drive and taking Imberhorne Lane south of the new roundabout. This is material as it will alter the impact on the Star Junction, but also upon residents of Heathcote Drive which should be protected from 'rat-running'; there is also the impact upon Turners Hill Road which has reached saturation at Turners Hill crossroads, and is yet to see the impact of completion of the Hill Place Farm site.

We are also concerned that the transport modelling has only considered the journey times starting from the junction of Crawley Down Road with Copthorne Road, despite it being currently routine that the traffic queues from about Mill Lane, thus significant journey delays as a result of that queue length growing has

been ignored in the analysis. A similar scenario exists on the A22 southbound where the modelling limit is from the Star traffic lights thus ignoring any southbound queue on the A22 north of the junction.

The transport modelling also needs to take account of the SA19 site and all other committed non-completed dwellings at the time of its baseline traffic survey in the East Grinstead area to ensure that the future state modelling includes the cumulative impact of all of these sites.

There should also be sensitivity analysis regarding the potential that Imberhorne Lower School does not relocate to the site and/or that WSCC do not build the 2-form entry Primary School upon the site. The transport assessment has assumed that these two school moves will internalise all the School associated vehicle movements and thus significantly reduce peak time traffic in the surrounding area. The developer has no control over the future decisions made by WSCC in relation to education facilities and thus all realistic future scenarios need to be considered in an area where congestion is already considered to be severe by the Highway Authorities.

The Transport Assessment states;

7.7 Sensitivity test

7.7.1 In addition to the microsimulation assessment detailed above, a further sensitivity test of the potential impact of the site has been undertaken which considers a situation where the Atkins Do Minimum schemes at the A22 / A264 Felbridge junction and A22 / Lingfield Road junctions are not within the baseline position.

7.7.2 It is currently understood that the position of WSCC remains that the schemes are both committed and funded, and this additional modelling is provided purely as a sensitivity test should that position be changed.

Surrey Highways Authority, who are responsible for the A264/A22 junction have confirmed that the Atkins Do Minimum scheme at the A22/A264 Felbridge junction (2 lanes turning south) **‘will not and cannot be implemented’** [see SCC response to DM/23/0810 19/7/2023]. This scheme was previously implemented and had a significant detrimental impact upon junction performance and was subsequently removed. It is therefore misleading to rely upon the Atkins Do Minimum scheme at the A22/A264 Felbridge junction when it cannot be implemented.

Considering all of the above issues relating to the traffic modelling, we currently do not believe that the application demonstrates that it will fully mitigate its impacts upon the highway network in combination with the already approved local schemes and the associated DPD SA19 site. As such it does not meet the requirement of Policy SA20.

We also have concerns that the Inspector for the DPD examination specifically considered this scheme when it had two entrances, one for the residential site opposite Heathcote Drive and another for the Care Community. The proposal now being put forward with only a single entrance for such a large combined usage is highly likely to be a material divergence from the Inspected Scheme. Particularly as the Inspector states in his report how much transport related evidence was put forward and debated, and that this change to a single entrance is highly likely to have impacted upon that evidence.

We are concerned that there are no proposals to improve the Imberhorne Lane bridge immediately south of the proposed entrance to the site, there are blind spots in both directions making it difficult to see oncoming traffic before committing to cross the narrow bridge. Moving the entrance closer to this bridge is likely to increase the proportion of traffic that turns south and thus bridge improvements must be considered.

The school and community (healthcare) building that is included in the plan, must be protected to ensure that the land must be used for community infrastructure and not be able to transfer to additional residential, if the community plans do not come forward.