

Felbridge Parish Council strongly objects to this application. Whilst it is accepted that development of this site has been agreed in principle by the adoption of MSDC DPD Policy SA19 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.

HIGHWAYS AND TRANSPORT

Felbridge Parish Council does not recognise the modelling of the Star junction presented in that it is more than 3 years old and shows a junction operating within capacity, when more recent studies show that it is exceeding capacity and is declared as a severe junction by Surrey Highways. We believe a current traffic study is necessary to support this development. The Tandridge traffic study, used as the basis for their emerging District Plan, which showed this junction already operating at 106% in 2018 with a MMQ (mean max queue length) of 48 cars, draws a very different conclusion. The junction severity was also evidenced by the Inspector for APP/M3645/W/18/3198090 who included in his decision (Para 34) data that demonstrates that the queue length of eastbound traffic on the A264 increases by 168 vehicles in the 2 hour period 4:15pm to 6:15pm. The throughput of the junction in the PM peak averages 719 vehicles per hour, thus the inspector is recording that the junction was already operating at 112% of its capacity based upon 2018 traffic data. Since then 120 additional dwellings have been approved within 500m of this junction.

This latest Transport Assessment also fails to model the Crawley Down Road/A264 junction against a current traffic survey, instead it states that it has replicated the '15 Crawley Down Road' [TA/2017/1290] modelling which was based upon 2018 surveys and is therefore 5 years out of date. We do not recognise the modelling presented as the baseline for the Crawley Down Road (CDR)/A264 junction which states that there is effectively no queue with it 'unloading every cycle'. During the peak hours (and well outside them) the queue on the eastbound A264 reaches back to Crawley Down Road, as such the opportunity to turn east out of CDR is about having a gap in the westbound lane at exactly the same time as the queue is not moving in the eastbound lane as the hatched box at this junction only clears when the eastbound traffic stops moving and the next queuing vehicle has complied with the hatching. Contrary to the TA, there is always a queue at the end of CDR, the current delays at this junction are the only thing that prevents Rowplatt Lane & CDR being a rat run to avoid the queue on the A264. The model is therefore inappropriate.

The provision of a separate entrance for the western part of the site, such that vehicles do not cross the bridleway is welcomed, The original plan for vehicles to cross this widely used Public Right of Way was likely to raise many safety issues. However, the proposed additional entrance appears to be an afterthought in the submitted documents as there is no safety assessment for this location, nor is there any modelling for this new junction. Felbridge Parish Council are very concerned that this junction for ~140 houses immediately west of the junction of Crawley Down Road and Rowplatt Lane will have a negative impact upon the safety of that junction. The visibility splay for the exiting vehicles at 123 CDR is very poor. Even the applicants own speed data [out of date as it is 2016] shows 85%tile speeds of 37/40mph so using the known speeds the relevant visibility table should be ~100m to the nearside kerb, approximately three times that provided.

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' junction to provide full mitigation for the existing over capacity of this junction; mitigation to negate the increased capacity caused by the proposed extra 775 dwellings; plus the additional accommodation for 120+ 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.

The Transport Assessment for this proposal has incorporated the Atkins proposal of 2-lanes turning south at the Felbridge junction within their baseline model 'as this is a committed improvement project'. This future improvement scheme has now been cited as the mitigation for the Hill Place Farm (200 units), 17 Copthorne Rd (26 units), 11a Crawley Down Rd (32 units), 15-39 Crawley Down Rd (63 units), 61 Crawley Down Rd (20 units) as well as SA19 (200 units) - a total of 539 units. All of these schemes have quantified the additional impact they will have individually upon the junction. The 2-lanes turning south was previously implemented and withdrawn when it had a significant detrimental impact upon junction performance and we believe there are significant doubts as to whether this proposal would actually deliver any junction capacity. There is also the Surrey County Council agreed need to improve pedestrian crossing facilities at this junction.

In response to the initial phase1 application for this site, SCC Highways requested a number of items to be revised in the Transport Assessment (TA), none of those items have been included in this latest TA. The greatest flaw is that SCC stated;

It should not be assumed that a solution will be in place for the A22/A264 junction that can mitigate the adverse impact of the development. The TA should therefore consider the current junction without mitigation.

The TA provided with the new application continues to include the junction mitigation. It is therefore fundamentally flawed as it is solely based upon that scheme being in place and delivering a quantified benefit by 2026 when the viability of that scheme is being questioned by SCC.

The baseline used for the transport assessment does not use the same approach that SCC required for the initial 63 unit scheme at 15 Crawley Down Road (TA/2017/1290). For that scheme, the Transport Assessment was based on a June 2019 traffic survey. The 2019 baseline measured traffic level was then revised to include all subsequent local approved developments and completed developments to properly reflect baseline traffic levels. The revised baseline must then be adjusted using TEMPRO to uplift the revised baseline at the development completion date and the current development traffic added to properly assess the cumulative impact of all relevant developments. This data should then be used to model the +10 year scenarios with and without development.

The Surrey Highways determination of the Star junction as Severe and the requirement to mitigate it will be challenged by the Examination Inspector for the Tandridge District Plan. The emerging Tandridge District Plan included mitigation of this junction by the proposal to create two lanes turning south from the A264 into the A22. This proposal has already been identified for implementation as mitigation for the 200 houses approved at Hill Place Farm

[APP/D3830/W/16/3142487] and the 121 dwellings approved along Crawley Down Road and Copthorne Road [APP/M3645/W/18/3205537, APP/M3645/W/18/3198090 & TA2019/1453]. Thus the proposed mitigation approach has already been put forward as the mitigation for numerous other sites that have been approved, and in some cases completed, despite the agreed mitigation not being implemented.

Whilst Felbridge Parish Council fully support Sustainable Active Travel as a means of reducing the impact of development; we have significant concerns regarding the failure of MSDC/WSCC to implement and/or monitor the effectiveness of Travel Plans for the larger developments around East Grinstead (see our detailed response on this specific matter) and therefore do not believe that any potential ameliorative effect should be included within the transport assessments for this site, as the evidence indicates that may not be achieved.

Inspector's Minor Amendment to SA19 & SA20 Felbridge Parish Council draws attention to Surrey County Council's agreement to undertake a study with West Sussex County Council to determine what junction mitigation can be implemented to alleviate the A22/A264 corridor issues both now (in light of cumulative development locally), and in the future state with the additional DPD sites and normal traffic growth. The agreement quotes "Working collaboratively with and to the satisfaction of both Surrey and West Sussex County Council Highway Authorities, mitigate development impacts by maximising sustainable transport enhancements; where additional impacts remain, highway mitigation measures will be considered". The Atkins study (which SCC and WSCC commissioned) has not been concluded and as such SCC will not be able to say whether (or how) the Star junction could be mitigated to below its current 'severe' state. Felbridge Parish Council contends that until the joint WSCC and SCC transport study has been concluded and suitable and deliverable mitigation of the current severe junctions has been agreed, it is inappropriate to approve this application as the Highways elements of the adopted DPD policy SA19 cannot be delivered.

We wish to remind Tandridge District Council that you are the LPA for the eastern entrance into this development. If you are concerned that you cannot object as the site has been allocated in the DPD, Felbridge Parish Council draw your attention to the Examination Inspector's report paragraph 309 below, where he is clearly stating that it is the planning process that will address specific problems of congestion and therefore allocating these sites is not a determination that these sites have suitable mitigation plans.

"Highways matters were debated fully in several sessions during the hearing sittings. On the basis of all that I have read and heard, I consider that there is a reasonable likelihood that all the allocations can be delivered in line with the expectations in the Plan. If, however, any of the allocations stall and are considered to be uneconomic for highway reasons, it will be incumbent on the Council to review its housing land supply and assess the deliverability of alternative sites. I also consider it will be at **the planning application stage for more detailed TAs to be submitted to address specific problems of congestion and/or safety.**"

DESIGN

We find a number of failings in relation to compliance with the MSDC Design Guide regarding the following principles. These will all have a negative impact upon the local Tandridge Residents.

Principle DG9 (Page 51): Reduce Reliance on the Private Car: There is an inadequate bus service in Felbridge with few services at evenings and weekends. There is a lack of local facilities, for example no doctor or dentist; supermarket; leisure centre; restaurants; rail service or safe footpath option. The village is served by one single intake primary school that is already oversubscribed before all the 121 dwellings already approved on MSDC land off or near Crawley Down Road have been constructed or occupied. There is reference in the application to a safe cycle route using the Gullege Bridleway and Worth Way to reach East Grinstead. However, the bridleway surface is unsuitable for cycles (or wheelchairs/pushchairs), it regularly floods and the Worth Way has no lighting.

Principle DG11 (Page 52): Respond to the Existing Townscape. “New development should generally reflect the scale of adjacent areas and the settlement context within which it is located to deliver a coherent and consistent urban fabric”.

Felbridge Parish Council strongly object to the Planning Statement

4.2 The proposed development seeks to deliver a sympathetic extension to Felbridge.

This proposal does not provide a sympathetic extension to Felbridge as the housing density of the west parcel at 40dph is in stark contrast to the existing density immediately north of the site which is 16dph. It is also greater than the 30dph of the eastern parcel despite being nearer the development edge and the rural edge. This does not conform to the MSDC design guide principles DG11, DG16 & DG34.

Principle DG11 requires this site to have a comparable density and style of housing to the neighbouring areas whereas this application is for a considerably higher density with properties that are totally different in scale or design. The proposed western parcel comprises 2-storey, 2.5-storey and 3-storey dwellings, the abutting dwellings in Felbridge on the north boundary of the site are a mixture of single storey and 2-storey houses with nearly one third being single storey and therefore the solely 2-storey and higher development immediately south of them is inappropriate. We are also concerned about the visual impact as there is very little drop in height between the existing single storey dwellings on Crawley Down Road and the site of the proposed 3-storey dwellings, thus there are likely to be visible above the existing street scene.

Principle DG16 (Page 63): Create a Positive Development Edge. “Development should nevertheless be sensitively designed so that it avoids imposing upon the rural edge and existing roads that are characterised by their hedgerows and tree belt. This may require additional boundary planting. At the rural edge lower density development will also normally be necessary”.

This requirement has not been met in the site plan as presented which has a higher density at the rural edge, than the surrounding area.

Principle DG34 (Page 87): Managing Increased Density in Urban Extensions. “A range of densities, building types and forms will normally be required with higher density development in the more accessible locations and lower density development in the peripheral areas.”

This proposal has its highest density in the parcel furthest from the urban centre of East Grinstead and on the periphery of the built up area boundary bounding onto the rural area beyond.

PRIMARY SCHOOLING

Felbridge Parish Council are very concerned about the potential impact of this development upon Felbridge Primary School and its ability to provide spaces for the residents of Felbridge Village and the neighbouring Surrey catchment area. Whilst the Proposed Development cites the close proximity of Felbridge Primary School as a positive and likely to reduce vehicle use for school runs, this does not take any account of the bigger impacts. The school is required to take pupils based mainly upon their distance from the school. Building such a large development within a few hundred metres of the School would mean that pupils living in this new development (without siblings at the school) would be more likely to obtain a space compared to pupils in similar circumstances living in Copthorne Road, within the built up area boundary of Felbridge but more distant than this development. This will result in Surrey County Council having to find alternative spaces for Surrey Primary pupils that will create longer car journeys for school runs, as there are no other Surrey Primary Schools with public transport access in this area.