

FELBRIDGE PARISH COUNCIL COMMENTS ON 2023/429 and 2023/482

Travel

Whilst Felbridge Parish Council support Sustainable Active Travel as a means of reducing the impact of development, we have serious concerns about the effective delivery of these schemes in East Grinstead. The local resident's group, Infrastructure First, submitted FOI's relating to three large developments in East Grinstead;

Land West of Imberhorne Lane for 100 dwellings [12/03843/REM]

Land South of the Old Convent for 74 dwellings [14/00294/FUL]

Land Adjacent to Ashplats House for 117 dwellings [12/00716/REM]

The details of the FOI responses are in the attached travel plans information which was submitted by Infrastructure First as part of their consultation response to the previous SA19 application.

It is clear that even with planning conditions requiring a travel plan to be in place, MSDC developments have completed and been occupied without any travel plan. Even when there is a plan, there is no monitoring to show whether any significant modal change has taken place. Thus, we take the view that having a sustainable travel planning condition on the SA19 site does not guarantee local residents that a plan will be in place, or that it will be effective.

The MSDC latest Infrastructure Delivery Plan (IDP), dated 21 December 2020, lists only a single costed measure for SA19: 'Real Time Passenger Information' at local bus stops. There is no evidence to show that this would be effective in reducing car journeys, and no guarantee that it would be implemented. A similar upgrade to local bus stops was used as mitigation for development traffic from the 100 dwelling scheme West of Imberhorne Lane [Ref 10/02071/OUT] committing to;

Bus stop improvements on Imberhorne Lane and Heathcote Drive (four existing stops to be upgraded with shelters, real time information, hardstanding areas etc)

Funding was secured by s106, dated 24 May 2011, but the bus stop improvements have never been implemented. Other SA19 highways mitigation measures listed in the IDP include 'Bus priority improvements'. The same 100 dwelling scheme above also committed to local bus priority measures;

The introduction of bus priority measures at the A22 London Road/Imberhorne Lane signalised junction

Again, these have also not been implemented despite the site being fully occupied for over a decade.

The following MSDC sites have all made S106 contributions for highways mitigation, none of which have been implemented.

Land West of Imberhorne Lane for 100 dwellings – 10 years after completion, traffic light coordination is not in place

Land South of the Old Convent for 74 dwellings – 6 years after completion, Moat Road/A22 junction improvements not implemented despite assessment of ‘severe impact’ of this development by WSCC

Land Adjacent to Ashplats House for 117 dwellings - 9 years after completion, highways improvements not implemented despite assessment of ‘significant impact’ of this development by WSCC

Land at Hill Place Farm for 200 dwellings – 4 years after approval (occupation now started), Lingfield Rd and Star junction highways improvements not implemented

17 Copthorne Road & 15 Crawley Down Road totalling 89 dwellings - now occupied, Star junction highways improvements not implemented

Thus, it is clear that even when S106 agreements are in place, WSCC has not implemented the highway mitigations that were specified in the planning process. Therefore, S106 conditions on MSDC sites are no guarantee that the agreed highway mitigation plans will be implemented.

For the land at Hill Place Farm, the appeal inspector drafted a Grampian condition for the Secretary of State to prevent occupation before the highway improvements were implemented, but decided it was not necessary as there was sufficient certainty that the improvement works would be completed before occupation took place. Clearly that ‘sufficient certainty’ was ill-placed.

We therefore contend that there is sufficient evidence to demonstrate that for MSDC developments around East Grinstead;

Sustainable travel planning conditions do **not** provide a guarantee that significant mitigation will be delivered

S106 agreements do **not** guarantee mitigating highway improvements will be implemented

Even if the agreed highways mitigations are implemented and effective, these mitigations only deal with the incremental impact of these individual developments and not the cumulative impact of over 2,000 other approvals for East Grinstead in the last decade.

Even without this development, residents are already suffering the cumulative impact from the several hundred dwellings already occupied and for which the required highways mitigation at the Felbridge junction has NOT been delivered. Therefore, as residents are all experiencing unacceptable delays along the A22 corridor into East Grinstead, Felbridge Parish Council ask that you consider the failure to deliver committed improvements to the Felbridge junction as weighing negatively in the planning balance.

Felbridge Parish Council wishes to know what TDC, as the Local Planning Authority for the eastern entrance into this development, will do to guarantee (if this development goes ahead) that effective mitigation measures will be in place and how they will be monitored BEFORE the dwellings are occupied. You must deliver long term mitigation for the severe traffic impacts that these developments have upon our residents.

