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.

Whilst it is stated in the TA that WSCC requested the use of a LinSig model for the Star junction in addition to the existing VISSIM model, FPC believe this is a retrograde step as the VISSIM model has been fully tested and demonstrated to model the interaction between the Imberhorne Lane and Star junctions as best as possible. The LinSig model is not capable of modelling the interaction between these two junctions and therefore cannot provide as reliable a future prediction, this is supported by the TA at para 4.3.10 "*it is more appropriate to use the VISSIM model to enable a more realistic reflection of the operation of the A22 / A264 corridor*". LinSig is also known to have reduced accuracy when applied to junctions operating very close to, or at, capacity, such as the Star junction. We also note that there is no validation of the LinSig model provided within the TA, the queue length cameras are shown on the diagram (TA page 45), but there are no queue length observations reported in the TA and thus no queue length validation for the model. Even with these limitations, the LinSig model still shows the Star junction exceeding capacity (104% 2032 with development v 97% 2032 base case) as a result of this development, with no proposal of how to mitigate this impact.

We welcome the updated traffic study (16th & 17th April 2024), but are disappointed that it has only provided manual vehicle counts at the Star junction without providing any queue length analysis for the same period. As this junction is already declared by SCC to be operating at capacity, counting the vehicles passing through the junction during a peak hour is not a measure of the demand upon the junction, only the number of vehicles able to pass through the junction in that time period. Any excess demand would be seen as increases in queue lengths and thus without the queue data it is impossible to determine if the traffic demand has actually dropped since the 2019 survey (as the TA suggests), or whether the slightly reduced number of vehicles able to pass through the Star junction during the survey period was due to other impacts such as the performance of the Imberhorne Lane junction at that time, which would have led to longer queues. There were also emergency gas works which started on 3rd April with lane closures at the A264/Crawley Down Road junction and this also closed the southbound A22 turn into the A264, the lane closure notice was extended until 16th April and this was widely published on social media. Although the works ended early (late on 13th April), it is possible that the very significant disruption (eastbound queues in excess of 1.8km) which had been experienced during the lane closure and the published extension may have caused drivers to seek alternative routes.

The removal of the proposed signalised junction from the Heathcote Drive/Imberhorne Lane junction has not been explained or justified in the revised TA. It is currently difficult to exit Heathcote Drive for hours of the day with queues regularly backing up to Garden Wood Road. This situation will be exacerbated by the additional +41% to +50% vehicles (development movements/2019 observed) approaching the Heathcote drive junction along Imberhorne Lane at peak periods. We are also concerned that Heathcote Drive should be protected from 'rat-running' and the proposed development flows indicate additional traffic will be using Heathcote Drive without any proposed mitigation.

We are still very concerned that the VISSIM 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. This issue was highlighted in the consultation response from Surrey Highways, but no revisions or assessment relating to this omission have taken place.

The transport modelling also needs to take account of the SA 19 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. This has still not been accounted for within the base scenario.

Whilst there is now a detailed analysis of the Primary education trip generation, there is still no 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 75% of 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.

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.