

**Contact:**

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**Your Ref:**

**Our Ref:** RS/RS

**Date:**

7 September 2022

Dear Sir/Madam,

**Re: TfSE Strategic Investment Plan Consultation – London to Sussex Coast**

Mid Sussex District Council ('the Council') (MSDC) welcomes the opportunity to comment on the Strategic Investment Plan (SIP) which sets out the thirty-year vision for the region which is aligned with the government priorities to decarbonise the transport system, level-up communities in the region and facilitate sustainable growth. The Council supports the London to Sussex Coast Strategic Programme Outline Case (SPOC) (Version 2.4) which includes the business case for a programme of interventions in Mid Sussex which sits within the London to Sussex Coast area. We would also make the following comments.

The Council fully supports TfSE's aspiration to be a Sub-national Transport Body for the South East Region and we welcome our involvement to date as a stakeholder in the evolution of the Transport Strategy for the region and the draft SIP which provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions over the coming thirty year period.

The SPOC identifies a number of the key issues, challenges and opportunities affecting Mid Sussex which have helped inform the draft SIP which will influence and help shape investment decisions by government and national bodies, such as Network Rail and National Highways.

The Council fully support TfSE Transport Strategy for the South East and the ambitious vision for sustainable, high performing, net-zero carbon transport system. The vision for the London to Sussex Coast Area to: develop a sustainable, prosperous, balanced economy to provide opportunities for its residents, businesses and visitors to thrive; have a more resilient economy; a transport network which is reliable, well connected, and accessible which is decarbonised to deliver net-zero economy by 2050 and provide affordable housing for all, designed to promote sustainable travel outcomes, fully aligns with the Council's Development Plan, the Sustainable Economic Strategy and the aspirations of the emerging District Plan Review.

The Council supports the principle of the five packages of interventions set out in the SPOC; the aim of these comments is to provide some additional context to the work the Council have been involved with and signpost existing evidence which may be of use in the continued development of the SIP, as well as provide additional local context regarding some key interventions identified in the SPOC.

The Council has recently adopted its Sites Allocations Development Plan Document (June 2022) and is currently working on a review of its District Plan which was adopted in 2018 and continue to engage in strong effective partnership working with National Highways, Local Highway Authorities and neighbouring authorities to plan for growth in the district.

Package N – N14 - A23 Hickstead and Bolney Junction Enhancements

The Council welcomes the inclusion of the A23 Hickstead junction in the potential package of interventions. You will see from the [District Plan](#) and the [Sites DPD](#) (covered in more detail below)

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that improvements at this junction will ensure successful delivery of one of the Sub Regions most important growth programmes, at Burgess Hill. However, the Council would welcome further engagement with TfSE through the development of detailed schemes and in particular to understand how the proposed timetable aligns to the delivery of the Science and Technology Park.

#### *Site Allocations DPD*

The recently adopted (June 2022) Site Allocations Development Plan Document (Sites DPD) allocates land for 1,280 dwellings in the district, 8 employment site allocations, along with a Science and Technology Park (SA9) to the west of Burgess Hill in the vicinity of the A23 Hickstead junction. A [copy of the plan](#) is available on the council's website.

The Council has worked closely with West Sussex County Council (WSSCC) as the Local Highway Authority and National Highways (NH) during the preparation of the Sites DPD. The Sites DPD is underpinned by extensive transport evidence, particularly in respect of the strategic allocation for the Science and Technology Park which identified an in-principle solution to relieve the anticipated severe impact on the Southbound on-slip at the Hickstead junction as a result of this development.

#### *Science and Technology Park*

The science and Technology Park is an employment allocation of regional importance located only 250m from the edge of the largest strategic allocation in the Mid Sussex District Plan for 3,500 homes, the Northern Arc now known as Brookleigh. This is a flagship scheme for Homes England and is currently under construction providing significant infrastructure in the form of schools, community, leisure, health facilities in addition to housing.

The Coast to Capital Local Enterprise Partnership recognised Burgess Hill as a strategic growth location in the Strategic Economic Plan (SEP, 2014), which supported the proposal for a high-quality Science and Technology Park alongside additional employment provision within the Burgess Hill area (notably the 25ha of employment land at The Hub (A2300) and Brookleigh). The Strategic Economic Plan stated that provision of these "will create more sustainable communities within Mid Sussex by improving job prospects within the district and reducing the need for commuting".

In relation to the Science and Technology Park, the SEP recognised the positive impact it would have on the wider region and beyond, supporting high-end economic and business growth across the Coast to Capital and South East Local Economic Partnership areas. The SEP was updated in 2018 ("Gatwick 360"), recognising the plans in place for growth at Burgess Hill following adoption of the District Plan.

The implementation of a Science and Technology Park will support the types of sectors which are identified in the Government's "Build Back Better" plan for growth, has the potential to create 2,500 new jobs, providing economic growth opportunities during the nations post-covid economic recovery and is likely to deliver additional employment land post-recovery.

The Science and Technology Park, as a strategic development will also provide significant opportunities to facilitate additional sustainable travel infrastructure in Burgess Hill, building on the success of the existing Place and Connectivity Programme (P&CP) in Burgess Hill.

The P&CP is a £22.8m package of sustainable transport improvements for Burgess Hill, secured by Mid Sussex District Council and West Sussex County Council working with the Coast to Capital

Local Enterprise Partnership. It incorporates a package of projects aimed at creating safe, direct, and attractive walking and cycling routes and high-quality public spaces to encourage people to choose to walk, cycle and use public transport. The project is fully funded, and several elements of the programme are already complete or are under construction. The schemes will also improve pedestrian and cycle links from Burgess Hill and Wivelsfield stations to the Brookleigh, The Hub and Science and Technology Park; more information on the P&CP is available [here](#).

#### *Available evidence*

A key element of the Science and Technology Park relates to the site promoter's incorporation of a comprehensive sustainability strategy which will ensure sustainable travel is at the centre of the development's ethos. Sustainable travel measures have been prioritised ahead of physical mitigation schemes and a detailed [Mobility Strategy](#) has been prepared by the site promoter in collaboration with, and agreed by MSDC, WSCC HA and NH in the Statement of Common Ground [DP17] and in a May update [DP26] in support of the Sites DPD. The Strategy sets out sustainable measures and interventions to reduce reliance on the private car and therefore reduce the impacts of the site on the A23/A2300 junction and the surrounding network, building on the P&CP at Burgess Hill.

A Transport and Mobility Working Group was established to develop the extensive evidence base which details and justifies mitigation at the A23/A2300 Hickstead junction. The Working Group consists of NH, MSDC, WSCC and the site promoters. The Strategic Transport Assessment [T7] prepared for the Regulation 19 Sites DPD identifies, and models, proposed mitigations related to the Science and Technology Park (S&TP) which primarily consists of a widening to the A23 southbound to three lanes from A2300 Southbound Off-slip to B2118/Mill Lane Off-Slip. The model concludes that this mitigation would be successful in removing 'severe' impacts at the two locations above. Therefore, it can be demonstrated that there is, in principle, mitigation to resolve the issue.

The Transport and Mobility Working Group met on a regular basis throughout the evolution of the Sites DPD and on the lead up to the Examination hearings to discuss detailed mitigation requirements, including design, extent and phasing. The working group signed a Statement of Common Ground (SoCG) in December 2020 [DC17] which agreed that solutions exist and sets out the approach to agreeing a final mitigation package.

#### *Highway mitigation options explored for southbound on-slip*

An updated SoCG [DC26 – May 2021] was signed by all parties prior to the Sites DPD Examination hearing sessions and as described on page 9 of the SoCG, there are three potential options being explored in relation to the A23/A2300 Hickstead southbound merge in the lead up to submission of a planning application. Two of these options are within the existing highway boundary and are therefore the preferred approach. The SoCG also agrees potential phasing triggers for physical mitigation, along with relevant Stage 1 safety audit as required by GG119.

The Parties also agree that upgrade is required at the A23 / A2300 Hickstead southbound merge in 2023 baseline Reference Case in the PM peak, prior to the addition of the Sites DPD traffic.

The mitigation on the A23 is part of a wider package of mitigation associated with the impacts of the S&TP, focusing on the Hickstead junction interchange (east and west), the A2300 and at the mini roundabout at Ansty and represent a collaborative solution on the Strategic and Local Road Network. The detailed evidence submitted by the site promoter can be found in the Site Allocations Library under [SA9](#) and more specifically their [Regulation 19 Transport Statement](#).

This evidence therefore highlights how crucial swift intervention at this location is, not only for delivery of the strategic employment allocation of the Science and Technology Park but also to the safe operation of the network.

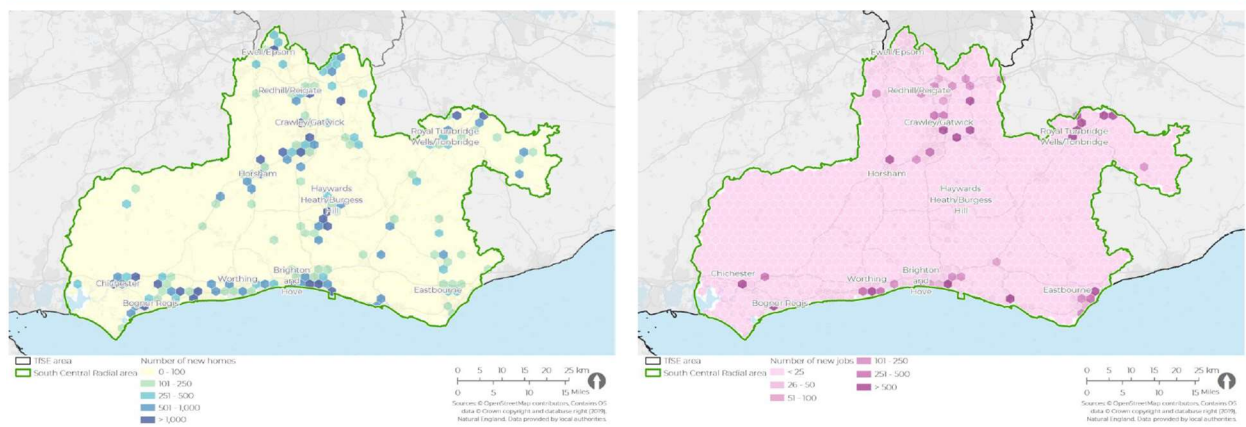
*Cross boundary implications*

Extensive evidence exists to demonstrate the existing and future capacity issues at the Hickstead junction which is under pressure from growth in the wider region of London and the South East and presents a significant barrier to growth. The council is aware that this junction may also have implications for future development within the neighbouring district of Horsham who are seeking to progress their Local Plan Review and whilst currently the levels and locations of development are not agreed, the benefits of mitigation at this junction could help support growth in the wider region as well within Mid Sussex.

*Key challenges and opportunities*

The SIP acknowledges the significant housing growth planned in the wider area and highlights various locations of growth within Mid Sussex. Problem Statement 18 which relates to a lack of highway capacity to accommodate planned growth highlights the potential for imbalance between housing and employment growth, in the region. Figure 2.4 is a particularly compelling demonstration of the disparity between housing and employment within the central part of the London to Sussex Coast area. However, the plan and the SPOC evidence needs updating to include the Site DPD allocation for the Science and Technology Park which will make a significant contribution to the region, geographically located close to Gatwick Airport whilst providing vital new employment opportunities within the centre of the London to Sussex Coast Area.

**Figure 2.4: Housing allocations and employment growth forecasts in the London to Sussex Coast Area**



Additionally, as highlighted in the presentation of the SIP and supported by the evidence base for the MSDC Sites DPD for the Hickstead junction, highway interventions are needed to provide a multi modal solution, not simply private vehicles but to support improved bus services and active travel modes as well. Additionally, it highlights the need for sustainable integrated planning in the London to Sussex Coast area, in a way that promotes sustainable travel outcomes, promoting development that reduces the need for residents to travel long distances to access employment and other key services.

In acknowledgement of the existing capacity issues at this location and to support delivery of the Science and Technology Park, swift delivery of intervention at the Hickstead junction is vital and will form part of a package of interventions in the wider location which facilitate implementation of an employment allocation of regional importance, with the potential to provide 2,500 new jobs in a location which is already providing the largest housing allocation in the County.

Growth in Burgess Hill is supported by a sustainable transport programme (P&CP) which the Science and Technology Park will be building upon, helping to deliver a thriving and sustainable community. Inclusion of interventions at the Hickstead junction is therefore vital to ensuring delivery of a balanced community offering not only a choice of housing but also extensive employment opportunities to its residents, and the wider region. A similar submission to the above has also been made by the Council to the recent National Highways Route Strategies consultation which took place in the latter part of 2021.

#### *District Plan Review*

A draft version of the District Plan Review was published in January 2022. Although its preparation was paused in order to undertake additional evidence-based work, it is important to note that the draft plan includes the potential for significant growth (approximately 1,400 dwellings) in the vicinity of Burgess Hill, in particular, on the western side close to the A23/A2300. The economic case therefore for supporting swift intervention to help support delivery of the already committed development including the Science and Technology Park, will be made even more compelling as further growth is planned for in the emerging District Plan.

#### *Continued engagement – next steps and delivery:*

Detail of potential interventions is still evolving at this stage and the Council would welcome further engagement with TfSE, building on existing close partnership working with WSCC, National Highways and the site promoters.

The Council identify this intervention as a high priority and would welcome further discussions to share the detail in the available evidence base and assist the next stages of development of the SIP and timely delivery of highway improvements.

In summary, the Council fully supports Package N as:

- It will support delivery of economic growth by supporting delivery of the regionally important Science and Technology Park which is capable of supporting 2,500 jobs in an existing growth location of Sussex.
- The Science and Technology Park strategy prioritises sustainable travel, helping to reduce the need to travel for work and building on the successful Place and Connectivity Programme will help reduce reliance on private car use.
- Potential interventions have already been developed and tested through close partnership with National Highways, WSCC Highway Authority and site promoter.
- Delivery of the Science and Technology Park will help address the imbalance between housing and employment growth in the region, identified as a key challenge in the SIP.
- Intervention here will also help support future housing growth close to an expanding economic hub, both within Mid Sussex and neighbouring authorities.

### Package L: Mass Transit

A number of locations close to East Grinstead are highlighted in the SIP as 'congestion hot spots', an issue which is well understood by the Council, neighbouring authorities and the local community. Establishing an effective strategy is a council priority.

The Council have been working with neighbouring authorities Tandridge District Council and Surrey County Council (SCC) and West Sussex County Council as Highway Authorities through the evolution of the Sites DPD, emerging District Plan Review and neighbouring authority Local Plan preparation in order to better understand what the most appropriate solution.

The development of the Site Allocations DPD and its subsequent Examination highlighted some key constraints to development in this area of the district, and a strategy for how to approach transport impacts has been developed in consultation with West Sussex County Council. One of the key challenges is that parts of the A22 and A264 fall outside West Sussex and is within Surrey; the Felbridge junction falls within both. A joined-up strategy with support from each of the affected authorities is essential to the successful delivery of improvements to the network. The constrained nature of the highway is a significant challenge to providing safety and capacity improvements and will be a barrier to delivery of segregated bus infrastructure and associated journey times.

Ongoing work with WSCC, SCC and Tandridge DC has identified the need to assess the impacts of any interventions on the A22 / A264 corridor as a whole, as opposed to assessing individual junctions, in order to establish more robust conclusions. The council fully supports a holistic approach which sets out a clear strategy for the location with a focus on the network as a whole and avoids the risk of cherry-picking single aspects, such as only focusing on junction capacity improvements. The Council supports the need for major sustainable travel interventions in this location, particularly given the constrained nature of the highway and potential impacts on Ashdown Forest. An overarching strategy which sets out a clear vision for this location will assist each of the councils and the local communities to understand how issues associated with traffic congestion, can and will be resolved by a full package of measures and supporting sustainable growth in the wider area.

In respect of the north of the district, the impacts of the proposed expansion of Gatwick Airport (being progressed through a Development Consent Order) are likely to lead to increased housing demand in Mid Sussex which cannot be met by Crawley. The airport expansion will also provide increased employment opportunities. Potential employees in Cophorne, Crawley Down and East Grinstead will not be able to easily access by sustainable transport modes unless there are direct interventions and improved east west connections to support staff and passenger movements where no direct rail and very limited bus services currently exist. Potential Fastway extensions to connect East Grinstead to Crawley/Gatwick are therefore supported in principle but should also cater for the communities which exist between these main destinations. The Council are eager to understand the detail of proposed Fastway and other mass transit packages and how they connect to our rural settlements outside of the main towns, including connections to any future development planned in the area. The Council is therefore fully supportive of interventions which will facilitate sustainable, joined up travel options in the north of the district, particularly as these communities, although among the closest geographically to the airport, have very few realistic alternatives to travelling by car, either as passengers or staff.

In summary, the Council fully supports Package L as:

- It identifies the need to address significant issues associated with this heavily constrained and congested network through sustainable travel.

- The potential extension to the Crawley Fastway and segregated bus infrastructure will provide an attractive alternative to private car where no rail connections exist.
- It should:
  - Aspire to connect existing rural settlements to the economic hub of Gatwick.
  - Avoid the risk of piecemeal interventions focusing on singular junctions.
  - Provide a holistic approach to the corridor identifying a clear strategy and secure 'buy in' from each of the affected authorities.

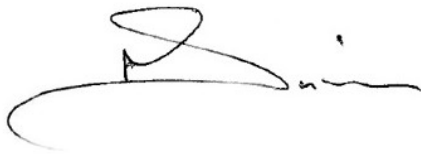
Package M: London – Sussex Coast Active Travel

The Council notes support plans to improve cycling and walking and would welcome further understanding of how the Active Travel Package will align with this work and the delivery of the Local Cycling Walking and Infrastructure Plan (LCWIP).

The wider benefits of the proposed long-distance route between Chichester and Crawley are difficult to identify as there are very few settlements between the two. Further exploration of how these longer routes could be integrated with and/or enhanced by the more local and higher frequency routes would be welcome to help facilitate a more joined up approach to cycling throughout the region to support leisure and commuting.

The Council is very grateful for the opportunity to contribute to the evolution of the SIP and SPOC to date and looks forward to continued engagement with TfSE.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Robert Salisbury', with a large, stylized initial 'R'.

Councillor Robert Salisbury  
Cabinet Member for Planning