

# A259 Action Group

Campaigning to improve the A259 from

Brighton Marina to Newhaven

Peacehaven Focus Group



## 1.0 Introduction

At its full council meeting on 10<sup>th</sup> May 2017, Lewes District Council was presented with 'The Big Petition - A259 South Coast Road Congestion' signed by 4462 local residents.

It was presented by Peacehaven Focus Group who had combined their efforts with the Telscombe Residents Association, Saltdean Residents Association, Safe (Rottingdean) plus receiving support from residents in Newhaven. In total over 17,000 residents signed the three separate petitions that were presented to Lewes, East Sussex and Brighton & Hove Councils.

We have continued our joint efforts in now forming the A259 Action Group.

### 1.1 The Big Petition

The petition stated the following:

*'We call upon Lewes District Council together with East Sussex County Council and Brighton & Hove City Council to carry out new and joint traffic evaluation studies on the A259 South Coast Road between Newhaven and Brighton Marina.*

*We also call upon Lewes District Council together with East Sussex County Council and Brighton & Hove City Council to carry out an economic impact study on the detrimental effects caused by traffic congestion on the A259 between Newhaven to the Brighton Marina (particularly at peak times) on the local economy for this area as well as looking at air quality and the quality of life for residents in this whole area.*

*Once the results of these studies have been reviewed we call upon Lewes District Council together with East Sussex County Council and Brighton & Hove City Council to clearly identify what new physical road infrastructure improvements will be required to meet any identified capacity shortfall, along with a schedule of works for when those improvements will be need to be implemented, before any further development takes place.'*

### 1.2 Our objective

We are now submitting this contribution to the LDC Scrutiny Committee to inform the continuing debate which we know is being taken very seriously by all the relevant Councils. This follows on from the LDC Planning Committee's resolution on the 11 December 2017 to defer a decision pending receipt of more information before making a decision on the Lower Hoddern Farm Planning Application. Importantly we would point out that residents all along this coastal strip feel strongly that more focus needs to be placed upon looking at infrastructure improvements in the area. The building of houses alone is insufficient to create a community nor will the towns function well without adequate transport links. *See our conclusions at Page 11.*

## 2.0 Our contribution to the debate

This briefing introduces the Scrutiny Committee to

- What we know about the A259 Coast Road congestion between Newhaven and The Marina
- How we know what we know.
- Some major conflicts versus the current assumptions made by planners and developers.

2.1 **The context**, as per the A259 Big Petition, is to examine whether the existing knowledge and skills are adequate to inform planning decisions. Given **the A259's future is so linked to the Bus Lanes**, Bus Services and promotion of sustainable transport, this area is also commented on.

In order to illustrate cases where the existing knowledge base or skills have proved wanting, some examples from the recent high profile planning application have been used.

*They are not comments on that proposal (for Lower Hoddern Farm LHF-2017), but illustrations of the problems being encountered due to lack of current baseline data on local traffic conditions.*

To support these illustrations, use is made of traffic data from Wednesday 7<sup>th</sup> December 2016, as that is when the consultants to the developers for the Lower Hoddern Farm application collected their base data.

Professional traffic and queue counts taken in late January 2016 and October 2017 are also used.

It is not the purpose of this paper to suggest solutions to any problems, so references to possible alleviations and improvements should be read as just illustrating the types of improvements that might be achieved were our officials better informed.

*We do not profess to understand fully how the responsibilities for scoping what is required in planning applications or evaluating Transport Assessments are split between the various unitary and non-unitary authorities covering this section of the A259, or their accountabilities under various Road Traffic Acts, so this paper does not discuss organisational issues.*

It is assumed that any scrutiny or audit committee will be interested in the questions it should be asking the planning / highways authorities to confirm they are performing their duties properly.

Hopefully this paper will help the committee to formulate some of the right questions to ask.

Traffic queue 7 December 2016 at 08:00  
Looking towards Brighton from the junction  
of the A259 with Telscombe Cliffs Way –  
Source: Icen Projects Limited on behalf of BDW  
Southern Counties



### 3.0 Our Knowledge Base – Measuring the level of congestion

There are 4 hourly automated traffic counts (ATCs) on this section of the A259.

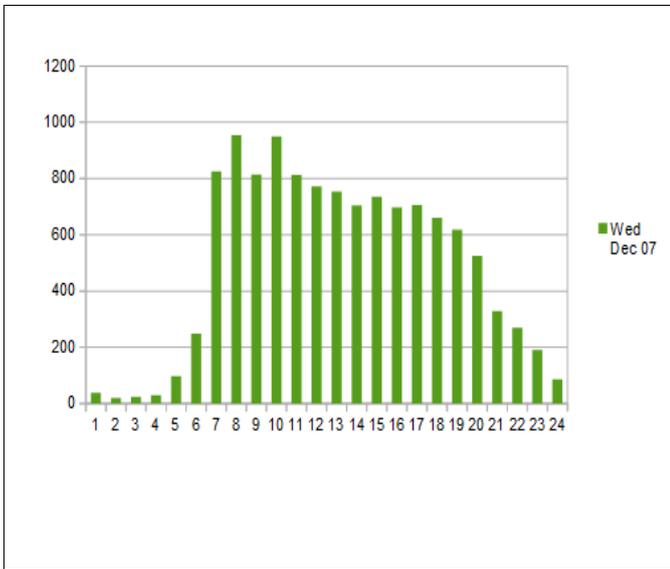
- ATC24 In East Peacehaven, by the Sussex Coaster
- ATC97 A few hundred metres West of Telscombe Cliffs Way
- ATC614 A few metres East of Rottingdean High Street
- ATC23 West of Roedean School, where Roedean Road meets the A259

At the simplest level, ATC23 tells us recent growth in traffic volumes is 5% per annum, not 1% as is generally assumed in estimating the congestion level of the A259 in future years. (Why?)

The traffic data for the 4 counters collected for Wednesday 7<sup>th</sup> December 2016, is set out below.

Vehicle Count Report									
Wednesday 7 <sup>th</sup> December 2016									
East Bound					Westbound				
	ATC 23 @ Roedean	ATC 614 East of High St.	ATC 97 West of Telscombe C	ATC 24 E Peacehaven @ Sussex Coaster		ATC 23 @ Roedean	ATC 614 East of High St.	ATC 97 West of Telscombe C	ATC 24 E Peacehaven @ Sussex Coaster
00:00	161	239	80	50	00:00	107	115	38	36
01:00	73	97	50	31	01:00	49	49	20	20
02:00	29	59	25	19	02:00	29	25	24	16
03:00	38	31	27	25	03:00	20	27	29	12
04:00	33	32	33	38	04:00	35	42	98	41
05:00	41	36	63	93	05:00	80	121	248	119
06:00	56	72	189	385	06:00	206	303	826	383
07:00	214	206	585	933	07:00	682	966	954	553
08:00	552	550	619	726	08:00	1223	1234	814	673
09:00	646	686	592	706	09:00	1305	1193	950	654
10:00	539	687	683	724	10:00	1099	1184	813	693
11:00	613	747	684	763	11:00	934	977	772	747
12:00	696	779	829	734	12:00	852	922	754	767
13:00	867	890	817	746	13:00	773	844	705	729
14:00	830	946	876	798	14:00	749	824	735	805
15:00	976	994	952	764	15:00	669	806	697	792
16:00	1098	1043	997	780	16:00	673	780	706	801
17:00	1280	1060	1067	721	17:00	675	773	660	859
18:00	1224	1091	1003	696	18:00	630	682	619	818
19:00	884	1156	697	499	19:00	589	640	525	484
20:00	694	855	516	314	20:00	487	579	329	328
21:00	527	671	427	290	21:00	300	356	270	254
22:00	488	557	307	226	22:00	267	309	191	172
23:00	472	384	192	121	23:00	196	212	86	83
<b>Total</b>					<b>Total</b>				
12H(7-19)	9535	9679	9704	9091	12H(7-19)	10264	11185	9179	8891
16H(6-22)	11696	12433	11533	10579	16H(6-22)	11846	13063	11129	10340
18H(6-24)	12656	13374	12032	10926	18H(6-24)	12309	13584	11406	10595
24H(0-24)	13031	13868	12310	11182	24H(0-24)	12629	13963	11863	10839
<b>AM Peak</b>	09:00	11:00	11:00	07:00	<b>AM Peak</b>	09:00	08:00	07:00	11:00
	646	747	684	933		1305	1234	954	747
<b>PM Peak</b>	17:00	19:00	17:00	14:00	<b>PM Peak</b>	12:00	12:00	12:00	17:00
	1280	1156	1067	798		852	922	754	859

This data is useful when we want to drill into the detail of the traffic flows, but often simple graphical displays of the data can bring a key insight.



This bar chart shows the penultimate column above, the number of vehicles going West past the Telscombe counting point, in each hour.

The traffic volumes are greatest around the morning peak period but **throughput** “dips” in the peak hour, when there is most traffic!

Severe over congestion has reduced the throughput. This is not a sign that peak traffic levels have fallen, as some might assume!

3.2 We can deduce a certain amount about congestion levels and traffic queues from this chart/table.

e.g. 140 fewer vehicles pass the counter in the peak hour than in adjacent hours, so 140+ vehicles have to queue, so LHF-2017 should have noticed the queue (probably from Longridge Avenue or the road narrowing at this point) block Telscombe Cliffs junction. Congestion is severe.

In fact LHF-2017 recorded minimal queues and congestion though the Google Congestion map below shows the true position, and concluded the development's traffic would have little impact,

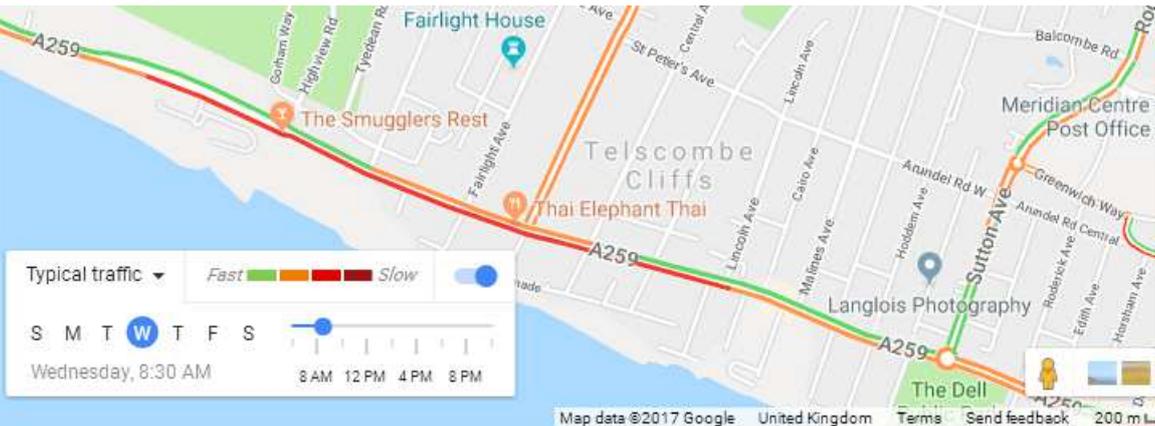
3.3 What is **very worrying** is that the Transport Assessment by the developers for the Lower Hoddern Farm application had to be referred to external consultants before ESCC accepted that it had not measured congestion correctly (the Rottingdean errors were particularly extreme) or calculated correctly how the A259 would handle extra traffic.

With a proper knowledge base, this would have been immediately obvious, saving time, effort and money and greatly reducing the risk of letting through a proposal that severely adds to A259 congestion and to NO2 pollution in the AQMAs. How many bad proposals have slipped through?

**3.4 So can we find out what caused the congestion at Telscombe?**

**Yes, we just ask Google!**

“Google, display a map of the congestion around Telscombe at 8.30am on a typical Wednesday”



The red line on the A259 east of Thai Elephant shows slow moving traffic approaching Telscombe

junction and gives a feeling for the length of the traffic queue. However the red line continues West after the junction (to ATC97 above), showing congestion on the Exit Lane is reducing throughput.

Traffic trying to leave the junction cannot flow freely, a condition called “Exit Blocking”, where the traffic queue from one bottleneck overflows a junction causing another bottleneck.

As is shown later, this exit blocking problem that results in long queues and delays is even more severe at Rottingdean and Greenways.

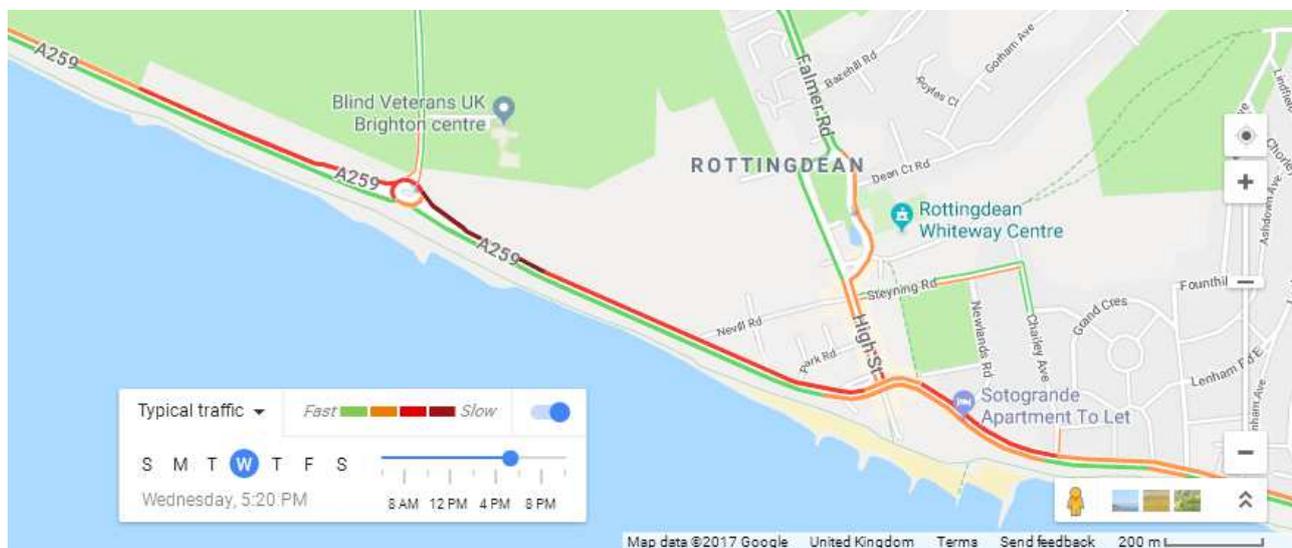
But planners and developers **say the Junctions are the main problem and some say that reduced peak hour throughputs prove the junctions are not overloaded!**

*No recent Traffic Model (Transport Assessment) identified Exit Blocking as a concern.*

*No recent Traffic Model correctly performed the standard DfT's validation checks that detect this type of error.*

3.5 So developers asked to assess their development's impact on the wrong bottlenecks can hardly be blamed for proposing mitigations that address the wrong problems!

Below Google shows the “typical” queue of 350 vehicles stretching past Greenways Roundabout to Roedean, also showing that the East bound traffic after the junction is very congested up to Chailey Avenue and quite congested after that. Traffic cannot flow freely away from this junction



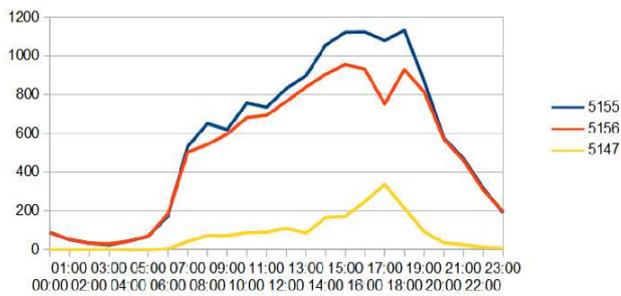
This is probably the worst stretch of the A259, yet planning staff in B&HCC and LDC/ESCC have not spotted the error when various assessments claim this queue holds less than 100 vehicles (as few as 25!), claiming this proves that congestion is not severe! (see 4.2 below)

#### **4.0 Our Knowledge Base - Improving the measuring of congestion levels**

The evidence from the standard ATC counts, even when assisted by the independent traffic congestion maps from Google, has failed to win acceptance from planning officers, so further professional counts were commissioned to increase the evidence/knowledge base.

4.1 A week of Traffic Counts in January 2016 provided additional information about the roads adjacent to the A259 around Rottingdean, confirming the severity of Exit Blocking and highlighting the role of the Steyning Road “rat run” in amplifying the A259 evening queue.

A259 East, EB Traffic Counts, 17th Jan 2016



In Red (ATC5156) we see the Eastbound Traffic flow immediately East of Rottingdean Junction

Just further East, in Blue (ATC5155), we see the higher volume of traffic when vehicles from Steyning Road join the A259. The rat runners.

The dip in throughput in Red, is matched by the Yellow peak (ATC5147 at Steyning Road). Most peak hour traffic from the north uses Steyning Road, bypassing the congested High Street.

4.2 As the evidence that the A259 queue held around 350 vehicles seemed not to be persuasive, professional queue counts were taken in October 2017 on behalf of Rottingdean Parish Council , confirming 342 vehicles in the queue.

4.3 In fact **Google maps can also be used to estimate the length of queues in meters**, which is quite easy to convert to a number of vehicles (which we have checked using DashCam recordings).

4.4 We would ask what data is available to measure “rat run” traffic in Peacehaven, Telscombe ,Saltdean and Rottingdean ? For example the use of Arundel Road and Arundel Road West to avoid the Coast Road. The use of roads like Malines Avenue to avoid the Telscombe Cliffs Way junction and then come back onto the Coast Road at Highview Road, Telscombe. Other “rat runs” through Saltdean to Steyning Avenue Rottingdean all exist but their likely impact is to further slow traffic when they reach the main arterial routes. Data on the effect these have is simply not available.

4.5 Another useful source of traffic data is peak period “Turning Counts” in Transport Assessments (and if shared, videos taken for traffic counting). For example Turning Counts being lower in the peak period than in adjacent periods, highlights over-congestion in much the way that traffic counts can, and often we have Turning Counts on minor junctions where we do not have traffic counts.

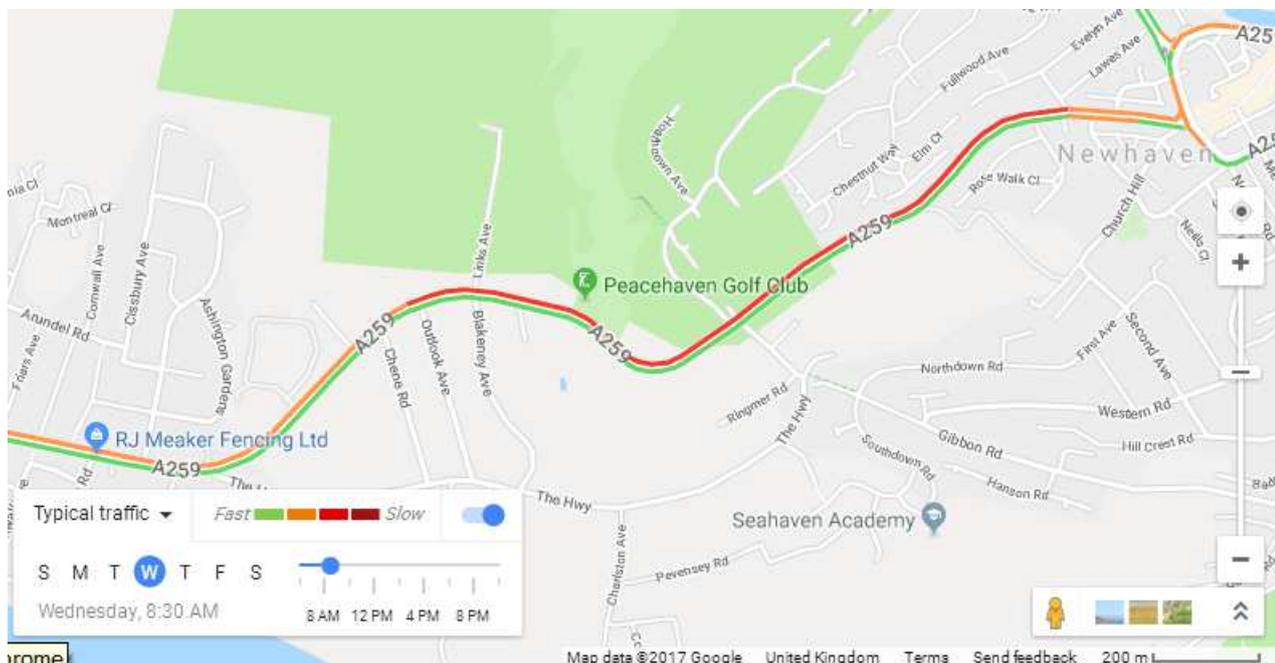


The return home for residents involves queues all the way back to Roedean School

## 5.0 Our Knowledge Base – Using Google to measure congestion Peacehaven to Newhaven

Once we have a wealth of professional traffic data confirming the validity of Google Congestion Maps, those maps themselves become a useful source of information to add to our knowledge base.

We can for example step through the congestion maps in 5 minute intervals to watch how congestion builds up and clears, which often gives an insight into what triggers extreme congestion.



We can see the long queue to Newhaven at 8.30 above, but can also watch in 5 minute intervals how it builds up i.e. from 8.00, 8.05, 8.10, 8.15 etc.

This is particularly useful for spotting congestion on a junction exit growing and blocking the traffic flow.

At a more advanced level Google, TomTom, INRIX and others have massive databases of traffic movement that can tell us much more about delays and journey times.

For example Google can look at a Journey and assess how long it is likely to take by car, bus or bicycle on any given day, at any given time and how much of that journey time is due to delays and how much error margin to allow (i.e. how reliable the journey time is).

## 6.0 Our Knowledge Base – Bus Services

The bus services and the bus lanes are a vital part of the A259 and its future, but while we see broad statements like

- the bus lane saves 25% of journey time without impacting other traffic
  - buses carry almost as many A259 commuters as the cars.
  - The 100% increase in bus capacity was matched by 67% increase in passengers.
- ... there is, often for good commercial reasons, very little detail available, such as

Do the above statements apply to the A259 at peak time around Peacehaven?  
Is it still claimed that the bus lanes do not affect other traffic?  
Have peak time passenger levels around Peacehaven fallen or risen in recent years?  
What is the evidence for any of these statements?  
What is the trend in bus journey times and journey time reliability?

6.1 As noted above, we have used Google to compare bus and car journey times along the A259.

We have also used data from the LHF-2017 Bus Patronage Survey (Appendix) to estimate trends in bus patronage and plotted trends in bus journey times using old bus time tables.

However, when it was claimed that an extra Peak Time bus service will convert 50 car drivers to using buses, freeing substantial road space on the A259, we do not believe the authorities have the information needed to assess that claim. Our albeit limited information base suggests converting even 10 car drivers to bus passengers is most unlikely.

## **7.0 Our Knowledge base - Comments by LDC Director of Regeneration and Planning**

We would like to mention a specific comment made in response to the Big Petition A259 by the LDC Director of Regeneration and Planning in their report to Council 17 July 2017 agenda item 8 Report No 107/17 when the petition was debated at LDC Full Council.

7.1 In the report she said that the petitioners claimed that ESCC's advice relied upon data which failed to take in to account of the cumulative impact of development in Brighton & Hove, as well as in Lewes District. This is incorrect she asserted.

It was said that the Newhaven Transport Study and subsequent modelling both incorporated forecast traffic growth external to Newhaven and Peacehaven using TEMPRO, a software programme that is nationally accepted for transport planning purposes.' However in the same report it was said that multi-modal transport measures needed to be considered and as detailed within Spatial Policy 8 –

'The applicant's transport consultants are working with ESCC to review and update baseline studies, impact assessments and possible mitigation measures along the A259 coast road between Newhaven and Rottingdean'. Furthermore any future decision on Lower Hoddern Farm (LW/17/0226) will be based on the most up to date information available and will take in to account the transport impact of development from other sites.'

7.2 We would say that in order to comply with the Joint Core Strategy Spatial Policy 8 it is absolutely essential that a review and update of baseline studies be undertaken, and that process is likely to show traffic has grown by more than expected. If compliance with Spatial Policy 8 has actually occurred we would ask to see the results of that baseline study.

However as seems more likely a "review and update baseline studies, impact assessments" has not taken place and we would refer to the GTA Civils Review saying that the Transport Assessment's congestion and traffic volumes and the impact of extra traffic were all seriously underestimated.

7.3 As a further comment what has therefore been done to provide a valid baseline and correct impact assessments ?

Of course TEMPRO like any forecasting system is no better than the data you give it and still can be caught out. TEMPRO based studies put A259 peak hour traffic growth for 2015 at 1%, however growth as measured was 5% The same happened in 2016.

Our conclusion is that the original base data has been overtaken by actual traffic growth.

See Appendix for the historical measurements and assessments on the A259 versus reality since Mar 2004.

## 8.0 Knowledge gaps – tactical and strategic.

The above introduced the gap between current planning assumptions and the real world at the **road link and junction level** on the A259. The strategic plans based on the Saturn/Cordon-Level models and the A259 Capacity for New Homes analysis also have severe limitations. When the A259 bottlenecks are overloaded, the assumptions about A259 throughput capacity cease to be true.

This is explained in more detail at Appendix

### 8.1 A259 capacity, congestion and the Bus Lane.

The DfT's road capacity guidelines say when the Bus Lane took 3m of A259 carriageway width, it reduced traffic throughput capacity by about 35%, but the 2006 traffic model said Bus Journey Time would improve by 25% and **there would be no delay to other traffic. Was this possible?**

**Yes**, when the bus lane took capacity from the roads, it took negligible capacity from the junctions, so **if in 2006** the junctions were the main capacity bottlenecks, the model was credible. However in 2017 the role of road bottlenecks, such as the sharp A259 bend at Rottingdean, cannot be ignored.

Unfortunately no traffic study was performed to check the bus lane's impact, but bus time tables from 2005 to 2010 confirmed a reduction in bus journey times, though in 2017 measurements show **journey times are now longer than in 2005**, implying buses now suffer seriously from congestion.

*The increases in peak hour traffic volumes in 2015/16 are not easily explained and we should be concerned that congestion may be driving passengers away from buses, as happened in London.*

8.2 *What the Papers say* : The Argus reported on 13th December 2017 that;

*Businesses are bearing the brunt of traffic congestion in Brighton & Hove. A study by telematics company TomTom has found heavy traffic in the city is costing businesses more than £10.5 million across one year. That is an increase of £1.26 million in the past year, according to the figures of the Tom Tom Traffic Index, which measures congestion on the road networks of 390 cities around the world. The cost is based on the amount of hours lost from time sitting in traffic.*

In response to another article on the 21st December 2017 ' Martin Harris, Managing Director , Brighton & Hove Buses said that it was a tough year on the buses which had forced fare rise. The letter apologised to customers for the fares increase. He said that;

*'I have had to make some very difficult decisions this year. Congestion in the city is getting considerably worse which means we need to run more buses and hire more drivers just to deliver the same level of service'.*

Congestion is causing increased journey times and increasing costs to users. This is very true of the routes along the A259 from Newhaven to Brighton.

8.3 Other big bus lane questions include, could we utilise bus lanes better to reduce congestion or could short breaks in bus lanes (marked as “Keep Clear”) reduce the impact on other traffic?

Opening bus lanes to multi-occupant cars (“Pool Lanes”) could help, but we lack the traffic data needed to confirm how much (or to assess the benefit of limiting bus lanes to peak periods).

8.4 The transport assessment for the LHF application proposed that **an extra peak time bus would result in 50 car drivers deserting their cars in favour of buses**. The limited local data available on how bus patronage changes with increased bus capacity, says fewer than 20 car drivers would switch, probably **fewer than 10 car drivers**. 50 cars would be wonderful if true, but is unrealistic wishful thinking.

One common sense argument is that as 70% free capacity didn't attract the 50 car drivers, why would increasing the free capacity to 75% encourage even one single car driver to switch?

*The commercial structure of our bus companies mitigates against sharing passenger data but if we could find out **why 70% of existing peak time bus capacity is unused** (at Peacehaven) and tackle whatever it is that discourages car drivers from switching to make use of this huge pool of free capacity, we might reduce congestion without adding extra buses (**which themselves increase congestion** on key link roads at the bus stops and at the pedestrian operated traffic signals).*

## 9.0 The Way Ahead

9.1 The strategic planning assumptions and link/junction level planning assumptions about the A259 that inform planning determinations are not themselves informed by recent congestion studies and are often seriously contradicted by readily available traffic data.

9.2 There is also a dearth of planning information about the Bus Lanes and the Bus Services which needs to be addressed, if they are to provide a sustainable alternative to peak time car travel.

9.3 The absence of a “database” of current information about the road links and junctions makes it harder for planners to recognise absurd assertions in Transport Assessments or to recognise when impact analyses are incorrect and proposed mitigations are not relevant to the A259's congestion.

9.4 This information vacuum is not hard to fix, much of the data already exists and just needs to be pulled together. Without proper analysis of current data, improperly regulated growth will continue to increase delays and NO2 levels in our AQMAs, while simple alleviations may be overlooked.

Once this information is readily available this group hopes recommendations can then be brought forward which will assist with improving traffic flows along the South Coast Road from Newhaven to Brighton.

Cllr Vic lent said on the 11<sup>th</sup> December proposed to the Lewes District Council Planning Committee that the decision on the Lower Hoddern Farm development be deferred until East Sussex County Council provided more information in consultation with Brighton & Hove buses and B&H City Council to look at improving their transport plan for the A259. This proposal was agreed by the committee. The Committee has listened and understood that more information is needed to resolve these issues. Then and only than can Officers put forward potential solutions to congestion on the A259.

## Conclusion

If you consider that LDC officers are being ill informed about current traffic congestion problems and that this is acceptable, then continue with existing work practices and old traffic data. However, if you have any doubts whatsoever and consider the people you represent deserve better informed Officers to deliver better planning decisions and traffic flows, please take the actions requested in the original petitions which were presented to each of the three Councils and signed by over 17,000 residents. Please ask for up to date data and innovative solutions to the traffic problems on the A259 from Newhaven to Brighton Marina.



# APPENDIX

## Congestion – A259 Measurements & Assessments - History versus Today's Reality

<b>Mar 2004 measured</b>	Queue Counts and Turning Counts <b>measurements</b> were taken at several points on the A259 and on significant “rat runs” such as at Arundel Road. <i>This was to inform the 2006 Bus Lane study and was generally of excellent quality.</i>
<b>Sep 2012 estimated</b>	The A259 capacity and congestion (utilisation) was <b>assessed</b> by a “ <b>paper exercise</b> ”. <i>The peak hour capacity (1285 vehicles) was <b>estimated</b> using the A259's road widths. The vehicle arrival rate (1015 vehicles) for the peak hour was <b>estimated</b> as 1/20<sup>th</sup> the Annual Average Daily Traffic AADT (20,310), a common “rule of thumb”.</i>

... actual existing flows were compared to estimated capacity based on Design Manual for Roads and Bridges (DMRB) TA79/99 (capacity of urban roads).

The September 2012 advice identifies that, when given, the current Annual Average Daily Traffic at Telscombe Cliffs was **20,310** vehicles per day (two way). The two way peak hour weekday flow is **1/12 of AADT** which equates to 1693 vehicles. 60% of traffic travels in the major flow direction, which equates to **1015** vehicles per hour and gave the actual flow.

This was then compared to the DMRB highway link capacity for the A259 west of Peacehaven, which equated to around **1285** vehicles per hour (1 way) in the highest flow direction based on the **average** for Urban All Purpose (UAP)2/3 road types and 6.75 – 7.3m road width. Therefore, the advice note identifies that: ...  
 $1/20^{\text{th}}$  of 20,310 = 1015

The “**1/20<sup>th</sup>** rule of thumb” (**60% of 1/12<sup>th</sup>**) seems not to have been verified using measurements, but in 2016 Automated Traffic Counter ATC23 confirms the 1/20<sup>th</sup> rule is **reasonably accurate** for the A259. (The local A259 ATCs are below ATC23, ATC614, ATC97, ATC24, going left to right)



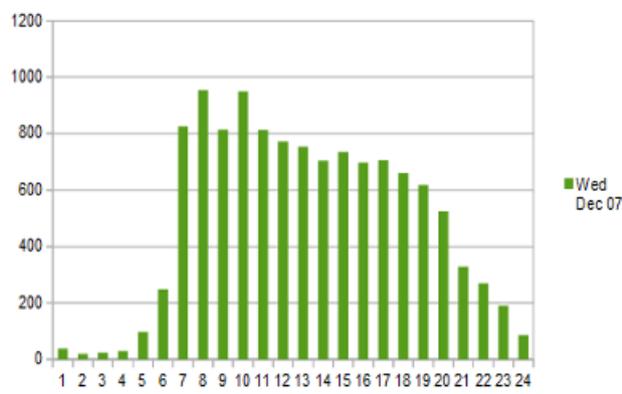
!!! However the 1285 vehicles per hour Capacity figure is a **very serious overestimate** !!!  
so the calculated “headroom” for extra peak hour traffic is a myth.



The calculation takes an **average** (for Urban All Purpose (UAP)2/3 road types and 6.75 – 7.3m road width). On that basis, the capacity of the A259 road section above would be the **average** of the calculated capacities for the 40 mph and 30 mph segments, but in fact the lower capacity segment (in this case the 30 mph segment) **always** limits the capacity of the whole of the road section.

Thinking you can just average the capacities along a road section, is an astonishing error.

What is clear from various traffic counts is that the estimated **1285 vehicles per hour (1 way)** is not achievable in practice on sections of the A259 – and **even 950 vehicles per hour is very optimistic.**

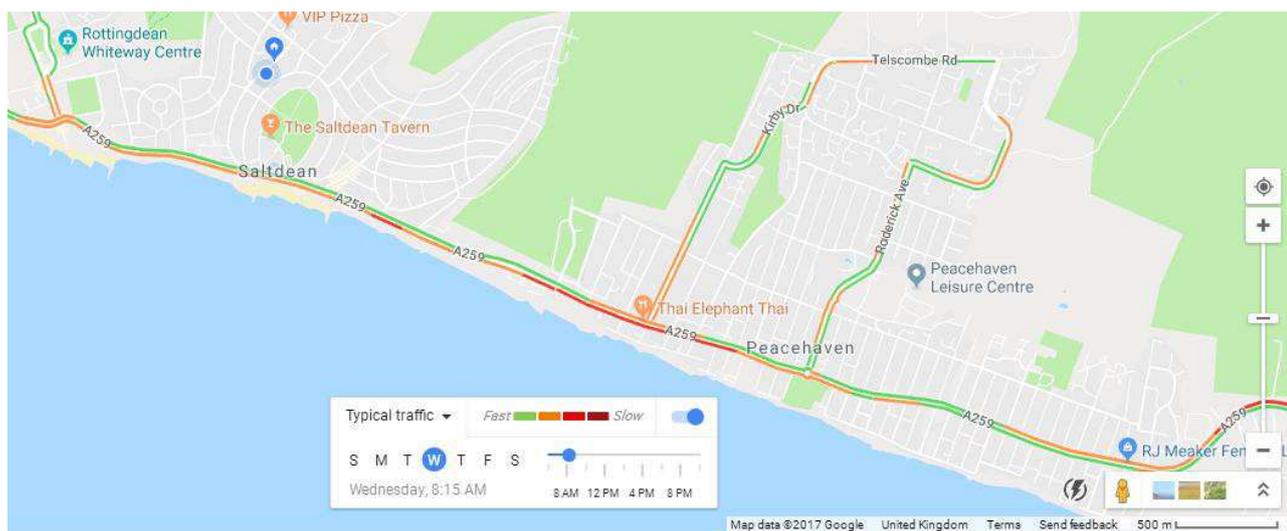


This bar chart shows the number of vehicles going West past the Telscombe counting point ATC97, in each hour.

The traffic volumes are greatest around the morning peak period but **throughput “dips”** in the peak hour, when there is most traffic!

Severe over congestion has reduced the throughput. This is not a sign that peak traffic levels have fallen, as some assume!

On the above day, 1209 vehicles arrived in the peak hour (according to the AADT 1/20<sup>th</sup> rule,  $24173/20 = 1209$ ). Only 814 vehicles passed the counting point, so a total of 395 vehicles queued on Telscombe Cliffs Way, in side roads and in the Grassmere Avenue “rat run” and on the A259 going back towards Peacehaven, **blocking Telscombe Junction**. (Even before it was blocked, at most 950 vehicles passed ATC97, not 1285!).



The typical congestion map above is reasonably consistent with about 250 vehicles queuing on the A259.

**Note** that Telscombe Junction is **not the underlying problem**, so money spent improving that junction or estimating the impact of extra traffic on it, is mostly wasted. The same applies to Rottingdean Junction.

The lack of **current congestion** and **valid capacity MEASUREMENTS** means plans are based on unrealistic assumptions that **do not reflect the 2017 real world**, leading to poor determinations.