

Proof of Evidence on Behalf of East Sussex County Council

Bird in Eye south, Framfield Road, Uckfield

Planning Application Ref: WD/2021/2198/MAO
PINS Ref No: APP/C1435/W/22/3307820



Index

1	Introduction	2
2	The Site Main Access Junction	5
	Description	5
	Suitability of the Site Main Access Junction for Vehicles	6
	Suitability of the Site Main Access Junction for Non-Motorised Users	13
	Overall Assessment of Site Main Access Junction	14
3	Impact on Town Centre Highway Network	15
4	Sustainable Accessibility	16
	Distance	16
	Quality and Attractiveness	18
	Conclusion	23
5	Summary and Conclusions	24
ANNEX	Post Reconsultation Proposals	25
	Site Main Access Junction	25
	Framfield Road Zebra Crossing	25
APPENDIX 1	ESCC Formal Consultation Responses	26
APPENDIX 2	Post Reconsultation Correspondence List	27
APPENDIX 3	ESCC Policy Summary PS05/02 – Speed Limits	28

Issue	Issue date	Compiled	Checked	Authorised
FINAL	23 rd August 2023	RN		LNS

Compiled by: Roger New BSc, MSc, CEng, MICE

Checked by:

Authorised by: Lawrence Stringer BEng (Hons), MSc, CEng, MCIHT, MRTPI

1 Introduction

- 1.1 My name is Roger New. I am Project Manager at GTA Civils and Transport where I carry out and manage a range of transport projects within the company.
- 1.2 I hold a Batchelor of Science degree in Civil Engineering from Leeds University, gained in 1970 and a Master of Science in Transportation Engineering from Leeds University, gained in 1971. I am a Chartered Engineer, being a Member of the Institution of Civil Engineers since 1979. I have over 40 years' experience in local government (mainly with East Sussex County Council – hereafter referred to as ESCC) and in the private sector (with my current employer – hereafter referred to as GTA) covering transport policy, transport planning, transport modelling, transport development control and the highways and transport aspects of major and minor development proposals. During my time at ESCC I was the lead officer managing and delivering the transport policy, transport planning, transport modelling and transport development control functions across the whole county. At GTA I have carried out and managed a variety of transport projects including transport assessments for a wide range of housing, commercial and education related development proposals. Over both roles I have provided transport-related expert witness and representation services to local authorities and others.
- 1.3 GTA has been appointed by ESCC to present its case at the Public Inquiry into the appeal (ref APP/C1435/W/22/3307820) by Croudace Homes Ltd ('the Appellants') against Wealden District Council's non-determination of planning application WD/2021/2198/MAO relating to the site known as Bird in Eye south. The application sought outline permission (all matters reserved except for access) for up to 290 residential dwellings and a SANGS, with access from the B2102 Framfield Road, on land to the south of Bird in Eye Farm, Framfield Road, Uckfield.
- 1.4 ESCC's formal consultation responses to the local planning authority of 08.12.21, 12.05.22 and 04.11.22 are included at **Appendix 1**. Those record the detailed reasoning supporting the council's position as the proposals developed from those originally part of the application submission documents to those relevant at the time of the lodging of the appeal. In its final formal consultation response to WDC at the time of lodging of the Appeal, ESCC as the County Highway Authority objected to the planning application on the following bases:
 1. *"The proposal would result in a material change in the volume of traffic using B2102 Bird in Eye Hill where speeds are derestricted, and hazards would be introduced by the slowing, stopping, and turning traffic at the proposed access, contrary to para 111 of the National Planning Policy Framework.*
 2. *The proposal would lead to increased traffic hazards on the B2102 Bird in Eye Hill by reason*

of the inadequate visibility at the proposed access and would therefore be contrary to para 111 of the National Planning Policy Framework.

3. *Insufficient measures have been submitted on the highway to support an urban extension, for purposes of reducing traffic speeds which are required to support sustainable transport modes.*
4. *Non-car travel choices for residents/users are limited between the site and Uckfield town centre as a result of substandard highway infrastructure which would not encourage sustainable travel modes and would therefore be contrary to para 104 and 106 of the National Planning Policy Framework."*

- 1.5 Subsequently, the Appellant further iteratively developed their highway and transport proposals, which were also commented on by ESCC at various stages in that process. **Appendix 2** records those exchanges. Following the Inquiry Inspector's Case Management Conference on 26th June 2023 the Inspector determined that the changes on these and other matters to the application proposals required an additional public consultation on the revised overall site proposals. That reconsultation was carried out in July 2023. In relation to highways and transport, the reconsultation included the ,then, current proposals for the design of the site access and other transport measures along Framfield Road.
- 1.6 The Highways Statement of Common Ground (**CDD.2**) records that the parties agree:
 - Trip Rates, Trip Generations and Trip Distribution
 - Base Traffic Flows and Forecasting Methodology
 - Form of Site Access Junction
 - Location of proposed site access
 - Improvements to Existing Bus Stops in vicinity of Uckfield Hospital
 - Degree of impact on the Town Centre Highway Network
- 1.7 My Proof of Evidence builds on the ESCC Statement of Case (**CDC.5**) and will focus on the drawings and other submissions related to the Appellant's highways and transport proposals that were subject to the July 2023 reconsultation. Where relevant, I will also refer to those drawings and other submissions which formed part of the original planning application and, therefore, the original consultation, and those which were the latest at the time of submission of the Appeal by the Appellants in September 2022.
- 1.8 Since the July 2023 reconsultation there have been ongoing discussions between the Appellant and ESCC during which the Appellant has submitted to ESCC further iterations of designs both for the main site access junction on Framfield Road (Bird in Eye Hill) and for their proposals for a zebra

pedestrian crossing on Framfield Road in the vicinity of The Alma Arms. These are not the proposals upon which the Appeal is to be determined, but ESCC has endeavoured to consider and respond to each as they have arisen. Given the limited time available, the volume of supplementary submissions, and the need to consult widely within the council on each submission, at the time of preparation of this Proof of Evidence only initial comments are possible on the Appellant's further post-reconsultation revisions. These initial comments are included in an **Annex** to this Proof of Evidence .

1.9 The District Council's Statement of Case (**CDC.4**) sets out the reasons as to why planning permission should be refused, which are summarised below:

1. Conflict with the development plan;
2. The adverse impact of the development on Ancient Woodland;
3. Whether the appeal scheme is in an accessible location so as to offer a genuine choice of transport modes;
4. Whether the appeal scheme can provide safe access;
5. The impact on the safety and operation of traffic on the local highway network and town centre; and
6. No mechanism to secure affordable housing, custom built housing and other key infrastructure mitigation measures.

1.10 My Proof of Evidence will consider reasons 4 and 5 in that order, referencing item 1 as appropriate. I will then consider reason 3.

1.11 This evidence is provided in accordance with the guidance of my professional institution. It is true to the best of my knowledge and belief.

2 The Site Main Access Junction

Description

- 2.1 The Transport Assessment (TA) (**CDA.15**) submitted in support of the planning application showed the proposed form of the site main access junction in Appendix 10, Drawing Number 5330/006/F (hereafter referred to as 006 Rev F). This was a simple priority arrangement located close to the existing farm access, with no right turn lane on the main road. 006 Rev F included a proposed extension of the existing 30mph speed limit from its current termination at the foot of Bird in Eye Hill eastwards to a point east of the proposed site main access junction. The form and location of that proposed junction was the subject of subsequent discussions with ESCC who raised concerns relating to inadequate driver sightlines, inadequate access design including the need for a right turn lane, and the proposed extension of the 30mph speed limit.
- 2.2 Drawing 5330-021 Rev H (hereafter 021 Rev H) was the latest site main access junction design submitted to ESCC prior to the applicant's decision to appeal against non-determination of the planning application. This also included a proposed extension of the existing 30mph speed limit eastwards from the foot of Bird in Eye Hill to a point east of the proposed site main access junction, which itself had been moved eastwards, compared to 006 Rev F, to the eastern site boundary on Framfield Road (Bird in Eye Hill). The proposed junction shown in 021 Rev H now incorporated a ghost island right turn lane. An associated RSA1 safety audit was also submitted which raised Problems relating to side road gradient, taper geometry, narrow through lanes, a proposed splitter island on Bird in Eye Hill, risk of side-swipe collisions between larger vehicles entering and exiting the site access road, and positioning and type of 30mph signing. ESCC's formal consultation response (Appendix 1 of this Proof) raised the same general issues with 021 Rev H and queried the applicability of a 30mph speed limit in this location.
- 2.3 The Appellant's Designer's Response as recorded in the RSA, sought to address some of those Problems in subsequent drawing revisions. Importantly for scheme development however the Appellant did not accept or incorporate the road safety auditor's recommendation to incorporate entry and exit tapers into the access road geometry, and did not agree that the proposed 2.75m through lanes were inadequate.
- 2.4 Subsequently, the Appellant undertook further iteration of the scheme design. Drawing 5330-021 Rev K (hereafter 021 Rev K) (**CDA.55**) was the latest design for the site main access junction submitted to ESCC by the Appellant by the date for submission of Statements of Case relating to the Public Inquiry and was the design that was included in the reconsultation carried out in July 2023.

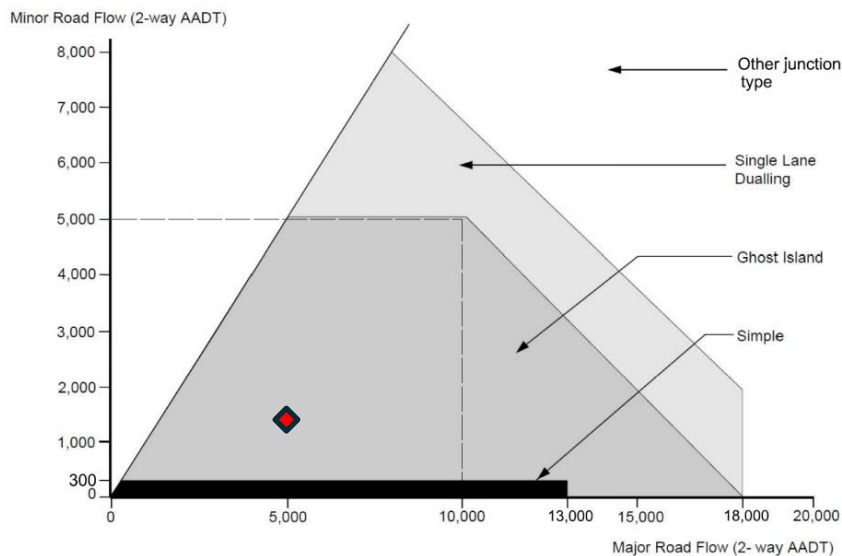
- 2.5 021 Rev K retains the site main access junction location in the position shown in 021 Rev H but does not propose any extension to the existing 30mph speed limit, retaining the current posted speed limit (60mph) past the site and on its approaches from west and east. 021 Rev K includes other amendments to the 021 Rev H layout, including the removal of the splitter island on Bird in Eye Hill, which sought to address some of the Problems raised in the RSA1 for 021 Rev H. An updated RSA1 safety audit for 021 Rev K was also submitted. Problems related to taper geometry, narrow through lanes, and the risk of side-swipe collisions between larger vehicles entering and exiting the site access road. As with 021 Rev H, the Appellant did not accept the road safety auditor's recommendations regarding the access road geometry and the proposed 2.75m through lanes, both of which remained concerns for ESCC.

Suitability of the Site Main Access Junction for Vehicles

- 2.6 The proposed main site access junction would serve not only the proposed new major housing development but also the proposed SANG as well as the continuing commercial B class operations permitted in buildings at Bird in Eye Farm. The access arrangements would therefore need to support many types of vehicles and users and ensure that all are accommodated safely, as well as providing sufficient capacity.
- 2.7 006 Rev F was a simple priority layout. The Appellant contended in the application TA that capacity assessments of that simple priority junction layout, which did not include the right turn lane, do not indicate the need for one on capacity grounds. Subsequently, 021 Rev H and K show a ghost island priority junction with a right turn lane incorporated into the junction design at ESCC's request and a matter agreed in the Transport Statement of Common Ground.
- 2.8 The principle of a ghost island junction with a right turn lane has been the highway authority advice from the start of its consideration of the application. ESCC does not consider a right turn lane as optional for a new junction serving a major new development in this location. Recorded 2-way flows on the B2102 past the site are between 4500-5500 vehicles per day. The TA states that the site would generate about 1250 vehicles per day, about 80% of which (i.e. 1000 vehicles per day) would be to and from the west, with a significant number (about 250 vehicles per day) being to and from the east. There would therefore be a substantial proportion of total traffic at the junction making conflicting turning movements, with the majority of site generated traffic making the right turn from the west when accessing the site.
- 2.9 The Design Manual for Roads and Bridges (DMRB) is a suite of documents setting out current design standards relating to the design, assessment and operation of motorway and all-purpose trunk roads in the United Kingdom. It is also used by local highway authorities in the design and assessment of relevant local roads.

- 2.10 For the mix of major and minor road flows set out in para 2.7 above, Figure 2.3.1 of DMRB technical standard CD123 'Geometric design of at-grade priority and signal-controlled junctions' (**CDI.7**) places this combination of major and minor road flows firmly in the area where a ghost island arrangement is the most likely appropriate junction provision.

Figure 2.3.1 Approximate priority junction provision on single carriageway roads based on flows only



- 2.11 ESCC also consider it important that the form and layout of the site main access junction, and any potential resultant queueing, would not impact on the free flow of eastbound emergency vehicles associated with the hospital / medical centre. A simple priority junction would not satisfy that requirement.
- 2.12 The current posted speed limit past the proposed site vehicle access is derestricted (i.e. 60 mph). 021 Rev K does not show any change in the posted speed limit past the site. During the course of development of the scheme proposals from 006 Rev F to 021 Rev K, detailed discussions were held with ESCC relating to the possible reduction on this section of B2102 from the current 60mph to 30mph or 40mph.
- 2.13 Speed measurements carried out for the Appellant show actual 85%ile speeds of approx. 42-45 mph and average speeds of about 35mph in the vicinity of the site access that are consistent with speed data recorded over many years at an ESCC permanent ATC site nearby on the B2102 to the west of the existing access serving Bird in Eye Farm.

- 2.14 ESCC policy in respect of local speed limits is set out in Policy Summary PS05/02 which is attached to my Proof as **Appendix 3**.
- 2.15 Average recorded speeds of 35 mph are significantly higher than 30mph and are therefore incompatible with a 30 mph speed limit (PS05/02 Specific Policy 5) and ESCC would not support a proposal to reduce the speed limit to 30mph past the site on that basis irrespective of other considerations.
- 2.16 In terms of speed alone, the average recorded speeds may be compatible with a 40mph speed limit. However, ESCC could not support a reduction to 40 mph in this instance for the following reasons:
- a. Roadside character – the extent to which the adjoining environment would contribute to self-enforcement, through e.g. visible frontage development, footways, street lighting, and infrastructure that supports the movement of non-motorised users. PS05/02 Specific Policy 3 states that the principal determinant of a proposed speed limit should be the appearance and character of the road. Satisfying that is potentially more achievable where the site abuts Framfield Road, i.e. to the west of the site main access junction, though that is very dependent on the site layout and urbanisation appearance of the development from the highway and that land is proposed as an extensive open space area in the Illustrative Site Layout Plan submitted as part of the planning application. To the east of the site main access junction there would be little, if any, character self-enforcement of the speed limit on the approach from the east. ESCC could therefore not support a 40mph speed limit which would not be policy compliant in respect of PS05/02 Specific Policy 3;
 - b. Compatibility – potential conflicting ‘messaging’ for eastbound traffic between the derestricted signing at the eastern end of the 40mph length and the recently introduced safety treatment of the bend nearby to the east incorporating the junction of B2102 with Sandy Lane.
- 2.17 The site main access junction ghost island dimensions shown in 021 Rev K have been reviewed for compliance with DMRB CD123. Based on the observed 85%ile speeds of approx. 42-45 mph on the approaches to and through the junction, that review shows the majority of design dimensions to be compliant with CD123 but with some important elements of non-compliance relating to the through lane width on the major road, and to the access road corner radii.
- 2.18 Regarding main road through lane width, CD123 para 6.8 specifies a minimum through lane width of 3.0m, maximum 3.65m. The proposed 2.75m lanes provided in submitted designs up to and

including 021 Rev K are therefore significantly substandard. Although ESCC reluctantly agreed that such narrow through lanes may be acceptable should a 30mph speed limit be realistic, that speed limit is not an acceptable option as recorded speeds are incompatible. In a higher speed limit environment, such a design with narrow through lanes could increase the risk of sideswipe collisions involving larger vehicles travelling through the junction and other vehicles turning into or out of the access road, noting that an HGV can be max 2.55m wide (2.6m if refrigerated) plus wing mirrors, which doesn't leave much room for driver positioning variability, particularly if they are travelling on the main road at speeds similar to the observed 9pprox.. 42-45mph 85%ile.

- 2.19 Regarding corner radii, the 8m corner radii proposed at the site main access junction are not compliant with DMRB CD123 paras 5.6.1 to 5.6.3 which deals with the corner radii and corner radii tapers required at junctions of this type so that all turning movements by all vehicles expected to use the junction can be made safely. An extract from CD123 showing those designs is reproduced below.

Figure 5.6 Corner radii

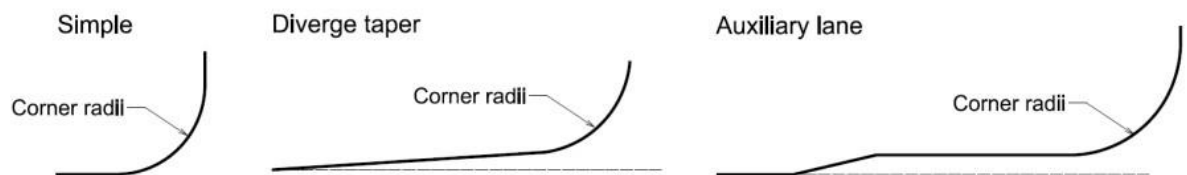
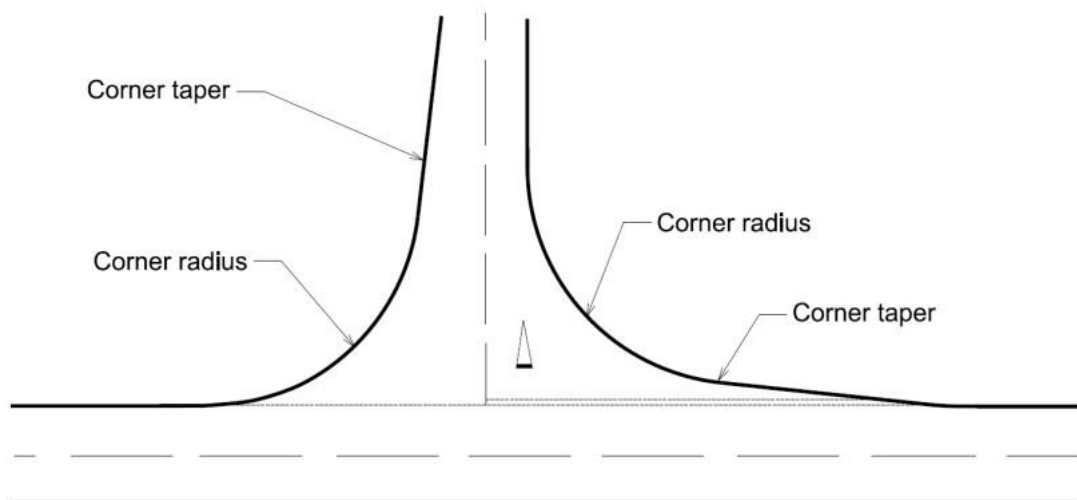


Figure 5.6.2N2 Corner radius tapers at priority junctions without diverge tapers or auxiliary lanes

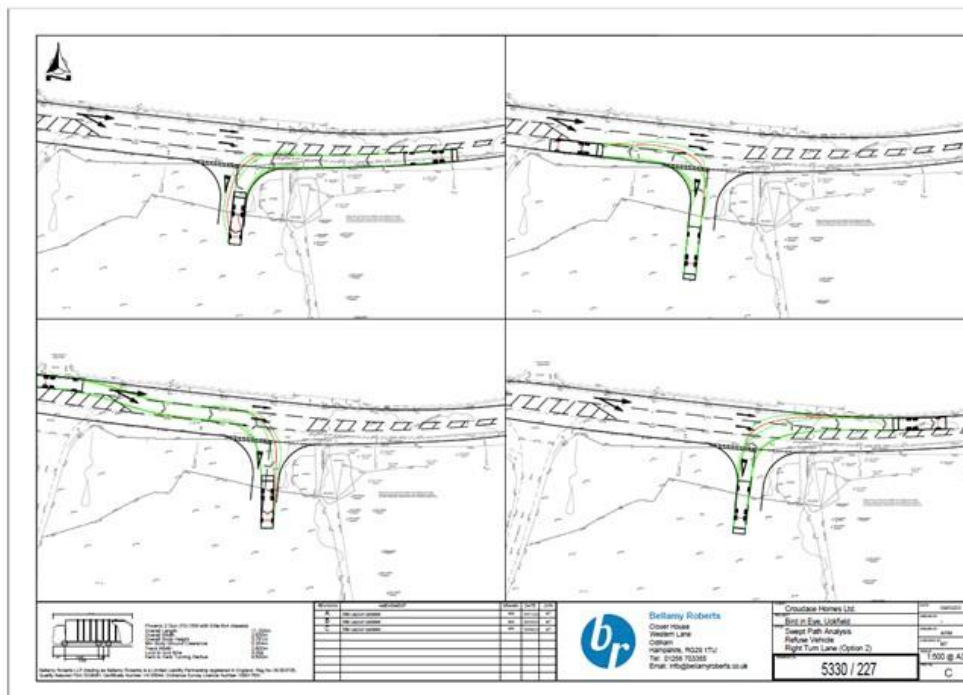


- 2.20 Whether the simpler 5.6.1 design or the more complex 5.6.2/3 design is the more relevant depends on whether there is a need to provide for the 'design vehicle', which is defined as the largest vehicle expected to use the junction in sufficient numbers. Para 5.2 of CD123 provides guidance on the appropriate design choice thus:

"5.2 Allowance shall be made for the swept turning paths of the worst case design vehicle which is expected to use the priority junction, unless:

- 1) the design vehicle is expected to form only a very small percentage of the total number of vehicles that will use the junction; and*
- 2) any swept path conflicts as a result of the design vehicle encroaching into other lanes will not occur on bends."*

- 2.21 If, on that basis, it was determined that there is no need to provide for the design vehicle then CD123 para 5.6.1 would apply. As the site main access junction location is, and would remain, much more rural than urban in character that would require the simple 10m corner radius applicable to rural areas, not the 8m corner radius shown in all submitted designs including 021 Rev K. It is worth noting that if the location was considered to be urban, which ESCC do not consider to be the case, CD123 para 5.6.1 would require a simple 6m corner radius. It is not clear why all submitted designs include the 8m radii proposed.
- 2.22 If, instead, it was determined that the volume of worst-case design vehicles exceeded a "*very small percentage of the total number of vehicles that will use the junction*" paras 5.6.2/3 would apply requiring 15m corner radii together with corner tapers in a rural location such as this, or 10m plus tapers in an urban location.
- 2.23 Swept path analyses (tracking drawings) have been prepared by the Appellant for 021 Rev K (i.e. incorporating the substandard through lane widths and corner radii) showing the paths taken by a range of vehicle types turning at the site main access junction (Drawing Numbers 5330/229 Rev B & 5330/227 Rev C). Those show substantial over-runs by larger vehicles involving significant incursions into the main road right turn lane and across both entry and exit lanes of the site access road. Extracts from the submitted drawings are shown below.



- 2.24 Although the numbers of larger vehicles generated by the retained existing site uses may not be large at present, that is a consequence of the operations of the current occupiers of the commercial units at Bird in Eye Hill. Other occupiers within the site's legal use class could be more intensively reliant on larger vehicles. Even at current levels, the Appellant's traffic data shows that 3 inbound and 4 outbound movements by heavier vehicles associated with the commercial units can be

expected on a daily basis in addition to deliveries by larger vehicles to the housing and refuse collection vehicles serving all the on-site activities. ESCC therefore do not accept that the submitted tracking drawings demonstrate that the number of heavier vehicles likely to use the junction can be safely accommodated in the proposed site main access design. ESCC would expect that for a new junction in a location such as this, the design would comply with the requirements of CD123.

2.25 Other safety related concerns with the overall design of 021 Rev K are:

- a. Although not specifically required by any relevant technical standard, as a matter of best practice an isolated ghost island design in such a location would normally be expected to include a traffic island, with a beacon and bollards with keep left signs in the centre circle, at the front (eastern) end of the right turn lane. This would be to highlight to drivers approaching from the east the existence and form of the junction and to prevent overtaking or lane indiscipline and thus provide some shielding to drivers occupying the right turn lane.

Depending on its siting relative to the side road, the island may also present an opportunity to provide for an informal crossing of the main road by non-motorised users (e.g. pedestrians and cyclists).

ESCC are aware that such an island / bollard arrangement was considered by the Appellant post-Rev K and that a design including such an island in the 021 Rev K design (021 Rev L) was prepared and subject to a safety audit in March 2023. ESCC has seen the safety audit but not the scheme drawing. That audit was an informal update by email which dealt only with the island / bollard proposal, the remainder of the junction being considered to be covered by a preceding RSA1 of 021 Rev K dated November 2022. Problems identified related to visibility, junction conspicuity, and lane widths, with which ESCC would concur. We understand that the Appellant subsequently decided not to incorporate the island / bollard in future design iterations.

The problem of lane compliance in the 021 Rev K design therefore remains – vehicles approaching the site main access junction from the east may overtake (&/or cut the corner) without effective lane management. A solid white centre line extension of the hatched area to the east of the junction may help but is unlikely to be a reliable deterrent on its own.

- b. Observed 85thile speeds at the proposed access junction are 12pprox.. 42-45 mph. Assuming a 40mph (70kmph) design speed the access road visibility splay requirements from CD123 paras 3.4 – 3.11 would be 2.4m x 120m in both directions.

To the east, 2.4m x 127m visibility can be achieved but full visibility would require extensive vegetation management on the southern side of the carriageway that may rely on consent from a third party landowner.

The visibility shown in 021 Rev K to the west (2.4m x 113m) is technically sub-standard but has been accepted by ESCC. However, the full extent of that visibility is dependent on an effective means of eliminating eastbound overtaking on the uphill approach to the access junction. A proposed physical central splitter island on that section of road was considered by the Appellant but discounted following a safety audit which identified problems associated with such an isolated island with no obvious purpose. 021 Rev K instead proposes a solid centre white line on the uphill approach in an attempt to effectively eliminate eastbound overtaking. The white line proposal was not an identified Problem in the associated Road Safety Audit for 021 Rev K and has been agreed with ESCC as an engineering solution. However, contravention of the solid white line is an enforceable offence subject to penalty points, legally restricting vehicles from crossing into the opposing lane unless either a stationary vehicle, a pedal cycle, horse or road maintenance vehicle, is present and are travelling at 10 mph or less and it is safe to do so. Consultation with the Police would therefore also be required.

- 2.26 Non-highway land within the visibility splays on the southern side of the road within the Appellants control would need to be adopted or have a legal agreement put in place to ensure the visibility splays are not obstructed by future planting or erection of a fence or other structure.
- 2.27 Taking all the above into account, ESCC consider that 021 Rev K does not provide a safe means of access to and from the site for motorised users of the junction.

Suitability of the Site Main Access Junction for Non-Motorised Users

- 2.28 None of the proposed site main access junction designs (006 Rev F, 021 Rev H or 021 Rev K) provide any specific facilities at the junction itself for non-motorised users (NMUs) which here would potentially comprise pedestrians, cyclists and horse-riders. Although a rural location, there is no evidence of material numbers of horse riders on this part of the B2102 and ESCC has agreed with the Appellant that no specific provision needs to be made for them in the design of the site main access junction.
- 2.29 In respect of provision for pedestrians and cyclists, the proposed main site access junction would serve not only the proposed new major housing development but also the proposed SANG as well as the continuing commercial B class operations permitted in buildings at Bird in Eye Farm. Because of those mixed demands, the access arrangements would need to support many types of users and ensure that all users, not only vehicles, are accommodated safely.

- 2.30 NMUs at the site main access junction could include pedestrians, potentially with children and/or dogs, and cyclists. Any pedestrians and cyclists generated by the site and travelling to / from the east would have to be accommodated, though the numbers involved are likely to be small as it is agreed with the Appellant that the vast majority of pedestrian and cyclist trips generated by the site will travel to and from the Uckfield direction.
- 2.31 The Appeal proposals provide for those trips to and from the west by means of the proposed shared pedestrian / cycle way within the site linking to an improved shared pedestrian / cycle way from the foot of Bird in Eye Hill to the junction of Framfield Road with the Hospital access road. This would be the route of choice for pedestrians particularly in light of the lack of any provision up and down Bird in Eye Hill on the B2102 and it is reasonable that the design of the site main access road does not make specific provision to accommodate any of those pedestrians. However, it cannot be reasonably expected that all cyclists would seek to use the proposed new and improved route, and they cannot be prevented from using the site main access junction instead. 021 Rev K makes no provision for any cyclists staying on the B2102 and needing to cross the road at the junction on a return trip from Uckfield to the site.
- 2.32 Cyclists presently travelling along the B2012 past the site can continue to do so but some may choose to instead use the proposed new route though the site. For those travelling from west to east the 021 Rev K design does not make any provision for the right turn from the site access road onto the B2102. The narrow through lanes at the junction in the 021 Rev K design are also concerning for existing, passing cyclists remaining on the B2102. Vehicles travelling behind a cyclist through the junction would be tempted to overtake within the junction using the right turn lane and would likely pass very close to the cyclist in doing so.

Overall Assessment of Site Main Access Junction

- 2.33 Taking all the above into account, ESCC consider that 021 Rev K (**CDI.56**) does not provide a safe means of access to and from the site for motorised users and cyclists and would therefore be contrary to paras 104 and 111 of the National Planning Policy Framework; Policy TR3 of the Wealden Local Plan 1998; and Policy SPO12 of the Wealden Local Plan Core Strategy 2013.

3 Impact on Town Centre Highway Network

- 3.1 The Appellant has carried out assessments of the impacts on the town centre highway network using two approaches to the derivation of demand flows at affected junctions. An exercise undertaken using a strategic SATURN model demonstrated that increased congestion in the town centre and on the bypass as a result of this site and in combination with others could lead to a significant risk of strategic traffic reassignment away from those routes and onto much less suitable alternative routes using minor roads to the east and west of the town.
- 3.2 A separate exercise undertaken by the Appellant using a more conventional approach taking account of general background growth, agreed commitments, and traffic generated by the site itself, concluded that there would be an impact on key town centre signalised junctions that would need mitigation.
- 3.3 I understand that ESCC has neither accepted nor rejected the strategic SATURN modelling, being of the view that it should comprise one input into the assessment process that must be taken into account on its merits. In my opinion, this is the correct approach and that the potential for traffic reassignment onto other unsuitable minor roads should be addressed by ensuring that the performance of the major road network is fit for purpose. I consider that the more conventional approach undertaken by the Appellant would provide a more locally relevant assessment of the impacts of the proposed development. ESCC was of the same view and was content to proceed on the basis of that more conventional approach.
- 3.4 Currently the town centre signals are operating as best they can with the existing operating system and linking, and there are significant issues of lack of capacity with associated queuing and delays. ESCC considers that the Appellant's modelling shows that the impact of the proposed development would be severe and require mitigation. It is agreed with the Appellant that the impacts of the proposed development could be sufficiently mitigated through the implementation of an enhanced control system, but that system would have to cover a more extensive area within the town centre than the junctions assessed by the Appellant. The costs of implementation of such an areawide scheme and appropriate financial contributions towards the introduction and on-going maintenance of that system, have been agreed with the Appellant, and are included in the draft S106 Agreement put to the Inspector in the event that the proposed development was to be granted planning permission. Contributions would have to be paid prior to commencement for the scheme to be in place prior to any occupation.

4 Sustainable Accessibility

- 4.1 NPPF **(CDL.1)** para 105 (Section 9 – ‘Promoting Sustainable Transport’), whilst recognising the differences between urban and rural areas, states that *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*
- 4.2 For any site, a “genuine choice of transport modes” and the likelihood that sustainable modes would be used instead of the private car will be a function of where the main trip attractors / generators would be in relation to the site and the distances between the site and those key attractors / generators; and the quality and attractiveness of the sustainable networks connecting the two.

Distance

- 4.3 Advice and guidance on appropriate walk and cycle distances is scant. PPG13 Transport **(CDI.14)**, although now long withdrawn and superseded by NPPF, stated in relation to the potential for trips to be made by walk *“para 74. Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under two kilometres”* and for cycling *“para 77. Cycling also has potential to substitute for short car trips, particularly those under five kilometres, and to form part of a longer journey by public transport.”* NPPF 2021 **(CDL.1)** does not include such specific advice.
- 4.4 Some further advice is given in other documents but crucially these are mainly design guidances which advise what may be achievable by, and should be sought through, good design. Manual for Streets 1 (2007) **(CDI.1)** at para 4.4.1 states: *“Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit.....”*. The more recent 15-minute neighbourhood concept is essentially a planning tool intended to help people lead easier, independent and more fulfilling lives and create stronger communities; bringing basic amenities to people, rather than expecting people to travel long distances to those amenities by car or bus. A 15 minute trip on foot would cover up to 1.2 km, by cycle about 3-4 km.
- 4.5 Other relevant advice and guidance includes the CIHT publications ‘Planning for Walking’ **(CDI.3)** and ‘Designing for Walking’ (both 2015) **(CDI.11)** and ‘Planning for Cycling’ (2014) **(CDI.5)**. None give advice or recommendations related to specific trip distances and their acceptability by either mode. A predecessor CIHT ‘Planning for Walking’ document of 2000 did include a table showing desirable and maximum walk distances for various journey purposes (reproduced below) but that

document was superseded by the later 2015 version which did not include any such recommendations.

Table 3.2: Suggested Acceptable Walking Distance.

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

- 4.6 The 2km and 5km figures originally quoted in PG13 were based on the results of the National Travel Survey (NTS) which records annually trip data from a sample of households across England. The proportion of trips made on foot or by cycle has remained relatively constant since 2002. The 2km and 5km values are commonly quoted as representing a 'reasonable' distance but that is an over-simplification; NTS simply records what people do, regardless of reasonableness, in response to their need to make trips, the modal choices available to them, and the relative attractiveness of competing modes available to them.
- 4.7 As stated in the Appellant's Transport Assessment (TA), NTS 2018 (**CDI.13**) identifies that nationally about 80% of all trips by all modes up to 1 mile (1.6km) are walk trips. This has changed little for many years. 80% is an average figure over the range 0-1 mile. As nearly all very short trips would be by walk, the proportion of all trips by all modes of exactly 1 mile (1.6km) by walk would be substantially less than the 80% average across the range 0-1 mile. The proportion by walk at distances greater than 1 mile would be even less, as borne out by the TA which also refers to NTS 2018 data as showing that only 15% of all trips by all modes between 1 and 5 miles (1.6km to 8km) are walk trips.
- 4.8 Using data from NTS Table NTS0303d, the average distance of all walk trips in 2018 was 1.06km. Other than the proposed SANG, the Appeal site is not close to any key facilities providing for the day to day requirements of residents in the proposed housing. Most are in the town centre which is approx. 1.5km distant from the site, with the nearest (the railway station) being approx. 1.2km distant). At such distances, for those for whom the full range of choices is relevant, walking or cycling are likely to be the more likely chosen sustainable mode than using the bus, which would involve not only transit time on the bus but also walking and waiting times and the fares payable. The Secondary College is 2km distant from the site access and walking is less likely than cycling to be the chosen sustainable mode. Access to Primary schools in Uckfield would entail distances of between 1.5km and 2km from the site access.

- 4.9 For pedestrians, at the generally accepted average walk speed of 3mph across all users in favourable terrain, the railway station would be a 15 minute walk from the site, the town centre a 19 minute walk (38 minutes round trip), the secondary college a 25 minute walk, and Primary schools between 19 and 25 minutes (i.e. a 38 to 50 minute round trip for accompanying escorts). For competent cyclists, the relevant times could be about 1/3rd of walk times but this mode is not always a viable alternative for some destinations or trip purposes. In the context of this site would such distances and times contribute by themselves, irrespective of network quality, to providing a 'genuine choice of transport modes' sufficient to consider that this site is sustainable in transport terms? In my professional opinion they would not. At such distances network quality is crucial.

Quality and Attractiveness

- 4.10 The importance of network quality in an individual's mode choice decision is a recurring theme in guidances dealing with provision for sustainable modes:
- CIHT Planning for Walking **(CDI.3)** which states in Section 2 *"If destinations are within walking distance, people are more likely to walk if walking is safe and comfortable and the environment is attractive."*
 - LTN 1/20 Cycle Infrastructure Design (2020) **(CDI.12)** which states: *"1.5.1 There are five core design principles which represent the essential requirements to achieve more people travelling by cycle or on foot, based on best practice both internationally and across the UK. 1.5.2 Networks and routes should be Coherent; Direct; Safe; Comfortable and Attractive."*
 - Manual for Streets 1 (2007) **(CDI.1)** which states: *"6.3.1 The propensity to walk is influenced not only by distance, but also by the quality of the walking experience. A 20-minute walk alongside a busy highway can seem endless, yet in a rich and stimulating street, such as in a town centre, it can pass without noticing."*
- 4.11 Sustainable connectivity between the site and the key town centre and other facilities is dependent on Framfield Road. Framfield Road east of the Hospital access road is narrow with extensive on-street parking in places, inadequate footways and no specific provision for cyclists. There is also a significant gradient at its western end (about 7% over about 75m).
- 4.12 Its deficiencies as a major sustainable transport corridor for non-motorised users (pedestrians and cyclists) has long been recognised and was a feature of the Inspector's consideration of previous proposals for the application site and two other sites at a previous planning Appeal held in 2008 **(CDK.1)**. Regarding the Bird in Eye South site, the Inspector concluded that whilst the site was, for a reasonably fit person, within practicable walking distance from the railway station and bus station

(para 742 of Inspector's Report), the only connecting route was Framfield Road which was described as narrow and frequently congested (para 755).

- 4.13 For the current application, the Appellant has prepared a Walking, Cycling and Horse riding Assessment and Review (WCHAR) (**CDA.59**) which covers the Framfield Road route, which was subsequently amended to better accord with ESCC's preferred format. This has been accepted as a record by ESCC who consider that it highlights the issues of poor quality and lack of attractiveness for both pedestrians and cyclists using the route, and confirms the unsuitability of Framfield Road west of the Hospital access road, and the suggested alternative route to its north between Keld Avenue and the High Street, to provide for pedestrians and cyclists in its current state, and the difficulties involved in attempting to retro-fit any enhancement measures.

Pedestrians

- 4.14 The WCHAR summarises the existing footway widths along Framfield Road from the Hospital access road to the High Street as being (WCHAR para 2.28);
- "The existing footway network varies in width but is generally in excess of 1.5-1.8m wide, and 1m at its narrowest in the vicinity of 2-8 Framfield Road."* 2-8 Framfield Road are at the High Street (town centre) end of the route which is also where the gradient is steepest (see para 4.10 above).

- 4.15 To put those widths into context, guidance on appropriate footway widths is given in a number of documents.

- 4.16 The CIHT document 'Designing for Walking (2015)' states at section 4.2:

"The following effective design widths, which are clear and generally unobstructed, are recommended:

- *Absolute minimum width: 1.8m*
- *Desirable minimum width: 2.0m*
- *Preferred width 2.6m (especially adjacent to high-speed roads)"*

- 4.17 Manual for Streets 1 (2007) states at para 6.3.22:

6.3.22 There is no maximum width for footways. In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2 m. Additional width should be considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops. Further guidance on minimum footway widths is given in Inclusive Mobility.

- 4.18 Inclusive Mobility – A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (2021) (**CDI.16**) published by DfT states at Section 4.2:

"Footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of 2000mm is the minimum that should be provided, as this allows

enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of 1500mm could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other."

- 4.19 All agree that the minimum design width should be considered to be 2m. The CIHT guidance advises that 1.8m should be considered the absolute minimum. It also recommends a preferred width of 2.6m which takes account of and allows for edge effects, e.g. unwillingness to walk immediately adjacent to walls or other physical barriers without a small comfort separation, and similarly to kerb edges where parking or moving traffic is also a disincentive. Both edge effects are relevant to Framfield Road.
- 4.20 Judged against those design guidances, the existing available footway widths on Framfield Road are clearly inadequate. The footways are also unattractive, and potentially unsafe in places, with a patchwork of surfaces and repairs, ironwork, street lighting and other obstacles. Some of those issues were identified as Problems in safety audits of the Appellant's proposals for improvements to pedestrian facilities along Framfield Road relevant to the dates of lodging of the Appeal and of the reconsultation. The Designer's Response was that it is *"expected that the Highway Authority should maintain their carriageway network to a suitable standard"* despite the sustainable accessibility of the Appeal site being dependent on the quality of the route.
- 4.21 The Appellant's initial proposals at the date of lodging the appeal for Framfield Road into the centre of Uckfield (Drawing numbers 5330/017 Rev F & 5330/018 Rev E) included drop kerbs and tactile paving at some existing side roads connecting onto Framfield Road, a new zebra crossing in the vicinity of numbers 45/52 Framfield Road, and substantial revisions to / rationalisation of the existing on-street parking regime on Framfield Road. ESCC could not support the parking proposals which did not appear to address pedestrian or cycle needs and would be dependent on public acceptability and consultation and the making of Traffic Regulation Orders. The location of the proposed new zebra crossing was also not accepted due to the narrow footways, particularly on the south side, and need to incorporate belisha beacons in this constrained location.
- 4.22 The Appellant's reconsultation proposals for Framfield Road, Drawing numbers 5330/017 Rev **H (CDA.57)** & 5330/018 Rev J **(CDA.58)**, exclude the parking control measures, retaining and extending the drop kerb / tactile paving approach to side road crossings and relocating at ESCC's request the zebra crossing point across Framfield Road to a position in the vicinity of numbers 78/80 which presented the only potential location for such a facility. That crossing point was subject to a road safety audit carried out for the Appellant which highlighted issues related to the difficulties of inserting such a facility into this location on the existing highway layout, which included its proposed layout, its proximity to a pub car park and other accesses, and inter-visibility

between drivers and those using the crossing. ESCC concurred and did not accept the proposals as they stood at that time.

- 4.23 No other location has been identified although the desirability for such a crossing is agreed between the parties.

Cyclists

- 4.24 Other than the connection between the site and the Hospital access road, the Appellant has not proposed any improvements to cycling facilities along Framfield Road. Cyclists are therefore expected to continue to travel using the traffic carriageway. As set out in para 2.8 of my Proof, volumes of traffic on Framfield Road would be between 5500-6500 vehicles per day, including those generated by the site proposals. The impacts of traffic on ease of cycling is compounded by Framfield Road's narrow carriageway width (generally only about 5.5m) and the effects of on-street parking.
- 4.25 Local Transport Note 1/20 (LTN 1/20) (**CDI.12**) sets out the appropriate measures for provision for cyclists to provide protection from motor traffic on highways. Figure 4.1 of LTN 1/20 shows the provision appropriate for a range of speed limits and vehicle flows. At traffic levels of 5500-6500 vehicles per day on a road subject to a 30mph speed limit, Figure 4.1 shows that on-road cycling would represent a *"provision suitable for few people and will exclude most potential users and/or have safety concerns"*.

Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane (mandatory/ advisory)	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation		
20 mph ³	0					
	2000					
	4000					
	6000+					
30 mph	0					
	2000					
	4000					
	6000+					
40 mph	Any					
50+ mph	Any					

Provision suitable for most people

Provision not suitable for all people and will exclude some potential users and/or have safety concerns

Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:

1. If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied

2. The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow

3. In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

LCWIP

4.26 The unsuitability of Framfield Road is echoed in the Local Cycling and Walking Infrastructure Plan (LCWIP) **(CDI.15)** prepared by Sustrans for ESCC. Sustrans was commissioned by ESCC in March 2017 to support the development of a countywide Cycling and Walking Strategy. Sustrans' role was to lead on identifying new and improved walking and cycling routes and infrastructure that align with key County Council policies and programmes that support local economic growth, improvements to health and well-being and the environment, together with the engagement of key local stakeholders, who have a vested interest in the development of the strategy.

4.27 In respect of Framfield Road the LCWIP described the existing conditions as:

"Busy connector road with residential and commercial frontages along length. Road holds between 5,000 and 10,000 vehicles a day. Parking on some of road. Footways are narrow and are crossed by driveways. No facilities to support cyclists. 20mph (its actually 30 mph) speed limit with no traffic calming."

4.28 Barriers to walking and cycling were described as:

"Cyclists are required to mix high levels of traffic (between 5,000 - 10,000 per day), with no traffic calming or separated facility. Vehicles able to speed due to good visibility and no traffic calming. Footways are narrow in places, leading to low levels of pedestrians comfort. Lack of pedestrian crossings requires people travelling by foot to crossing informally, leading to high risk of collision with vehicles, and uncomfortable pedestrian environment. Framfield Road holds high level of traffic, and gaps in traffic are limited. This has significant impact on those using mobility aids, as well as delays pedestrians making journeys across the road. Side junctions cross footway, forming risk of collision with pedestrians, and high risk of left/ right hook for cyclists."

4.29 The LCWIP recommendations for Framfield Road included widening footways where it is less than 2 m wide (which is most of the route) and removal of on-street parking (which ESCC consider undeliverable in practice). No action is being taken by ESCC to further investigate what may be feasible and deliverable.

Keld Avenue / Alexandra Road Route

4.30 The WCHAR identified Keld Avenue and Alexandra Road as possible alternative routes for pedestrians and cyclists between Framfield Road and High Street. Both routes carry significantly less traffic than the B2102 Framfield Road but are indirect, that via Keld Avenue particularly so. Carriageways and footways are even narrower than on B2102 Framfield Road e.g. the WCHAR records footways of only 1m width over the length of Alexandra Road. Footway and carriageway surfacing is generally poor. Both routes would entail use of Mill Drove which has a gradient of

about 10% over about 100m as it climbs from High Street, which is steeper over a longer length than the unattractive climb at the western end of Framfield Road.

- 4.31 Neither route was identified in the WCHAR as presenting User Opportunities and the Appellant has not progressed any proposals to improve or enhance the routes.

Buses

- 4.32 For those site residents using the bus, the Appellant proposes enhancements to existing bus stop provision on Framfield Road close to the Hospital access and. These are agreed in principle but ESCC consider that those bus stops are too remote from the site (approx. 500-1000m depending on the site layout, compared to the generally accepted target of 400m) to effectively encourage bus use by site residents or those accessing other site uses. Given the distance of the site from the main town centre destinations, and taking account of waiting time and travel cost, unless access to routes is very convenient the use of buses is unlikely to be able to constitute an attractive alternative to the use of the car for such journeys or a significant component of overall sustainable transport usage by site residents.
- 4.33 The Appellant has explored with ESCC the possibility of incorporating a diversion into the site of some or all buses currently passing the proposed site main access junction. However, on consideration, ESCC has concluded that any such diversion would have unacceptable impacts on route timetabling and the proposal is not supported. ESCC's preferred approach remains the provision of new bus stops at or close to the proposed site main access junction. Whilst this should be achievable for westbound buses (potentially utilising the redundant existing site access) there is no apparent acceptable means of providing such a bus stop for eastbound buses, and no safe means of crossing the road is provided at the site vehicle access junction.

Conclusion

- 4.34 Taking all the above into account, ESCC consider that the existing facilities for pedestrians and cyclists along Framfield Road into the town are sub-standard, inadequate and unattractive and would not, even with the measures put forward in the Appellant's reconsultation proposals (Drawing numbers 5330/017 Rev H & 5330/018 Rev J) encourage the use of sustainable travel modes by site residents and those accessing other site uses and would therefore be contrary to paras 104, 105, 106, 110, 111 and 112 of the National Planning Policy Framework; Policies TR3 and EN2 of the Wealden Local Plan 1998; and Policies SP07 and WCS14 of the Wealden Local Plan Core Strategy 2013.

5 Summary and Conclusions

- 5.1 In relation to the proposed vehicle site access I have several concerns about the proposed design of the junction with the B2102 as shown in 021 Rev K. Those concerns relate to some fundamental issues that would have potentially significant safety consequences for all users of the junction, including vulnerable users. I consider that resolution of those issues is not achievable simply through minor amendments of the submitted Rev K design.
- 5.2 With regard to sustainable accessibility, the site is dependent on Framfield Road for sustainable connectivity between the site and important town centre and other facilities. I consider that Framfield Road currently provides very poorly for its necessary use as a major sustainable transport corridor serving the site and that the Appellant's proposals are not sufficient to overcome those deficiencies.
- 5.3 I consider that on the basis of the work undertaken by the Appellant, there would be an impact on the safe and efficient operation of junctions within the town centre that would need mitigating and such a scheme would need to cover a more extensive area within the town centre than the junctions assessed by the Appellant. There is no current areawide scheme. The costs of implementation of such an areawide scheme and appropriate financial contributions towards the introduction and on-going maintenance of that system, have been agreed with the Appellant, and are included in the draft S106 Agreement put to the Inspector in the event that the proposed development was to be granted planning permission. Contributions would have to be paid prior to commencement for the scheme to be in place prior to any occupation.
- 5.4 The proposed access arrangements are unacceptable and inappropriate for the scale of development proposed, and the site is poorly located for travel by sustainable modes.
- 5.5 The Appeal proposals are contrary to paragraphs 104, 105, 106, 110, 111 and 112 of the NPPF; Policies TR3 and EN2 of the Wealden Local Plan 1998; and Policies SPO7, SPO12 and WCS14 of the Wealden Local Plan Core Strategy, and I respectfully request that this Appeal is dismissed.

ANNEX Post Reconsultation Proposals

- A1.1 Since the July 2023 reconsultation there have been ongoing discussions between the Appellant and ESCC during which the Appellant has submitted to ESCC further iterations of designs both for the main site access junction on Framfield Road (Bird in Eye Hill) and for their proposals for a zebra pedestrian crossing on Framfield Road in the vicinity of The Alma Arms. These are not the proposals upon which the Appeal is to be determined, but ESCC has endeavoured to consider and respond to each as they have arisen. Given the limited time available, the volume of supplementary submissions, and the need to consult widely within the council on each submission, at the time of preparation of this Proof of Evidence only initial comments are possible on the Appellant's further post-reconsultation revisions. These initial comments are included in this Annex to my Proof of Evidence.

Site Main Access Junction

- A1.2 Further iterations of designs for the site main access junction have been submitted to ESCC. The latest includes wider through lanes (at 3m which has long been requested) and inclusion of 10m corner radii at the junction (which similarly has been long requested) plus additional white lining on the approach to the junction from the east. However, ESCC continues to have reservations about the potential for unacceptable conflicts between turning vehicles at the junction, and the deliverability of the widening within the highway boundary without unacceptable impacts on the integrity of the adjoining hedgerow and trees.

Framfield Road Zebra Crossing

- A1.3 Updated proposals have been submitted which include belisha beacons, amended zigzag markings and a small amount of pavement widening on the southern side. ESCC continues to have reservations about the design, including effective pavement width (allowing for the impacts of the belisha beacons themselves), the number of accesses close to the crossing, inter-visibility between drivers and pedestrians in view of the location of on-street and other parking, and would not accept those amended proposals as they currently stand.

APPENDIX 1 ESCC Formal Consultation Responses

Communities Economy and Transport**Rupert Clubb**

BEng(Hons) CEng MICE
Director

County Hall
St Anne's Crescent
Lewes
East Sussex
BN7 1UE

Tel: 0345 60 80 190
www.eastsussex.gov.uk



To: Head of Planning
Planning and Environmental Services
Wealden District Council
Council Offices
Vicarage Lane, Hailsham
BN27 2AX

FAO: Claire Turner

Copy to: Passenger Transport Team; Highway Implementation Team; PRoW Team

Date: 08.12.21 & 12.05.22 & 04.11.22

Our Ref: WD/2021/2198/MAO

District/Borough Ref: WD/2021/2198/MAO

Applicant: Croudace/Berry

Location: LAND AT BIRD IN EYE FARM, SOUTH OF BIRD IN EYE HILL, FRAMFIELD, TN22 5HA

Development: OUTLINE PLANNING APPLICATION FOR THE ERECTION OF UP TO 290 DWELLINGS, ASSOCIATED LANDSCAPING, INFORMAL OPEN SPACE AND STRATEGIC SANG, WITH ACCESS FROM THE B2102.

Road Name or Number	B2102 Bird In Eye Hill	Consultation Date	1 October 2021
National Reference	Grid 548366120913	Contact Officer Details:	Kal Kamboh 01273 482287 kal.kamboh@eastsussex.gov.uk

Recommendation:

No objection		Objection	x
No objection subject to the imposition of conditions		Objection due to insufficient information	

Comments on Transport Assessment Addendum dated September 2022 following Highway response dated 12.05.22.

Access provision for servicing this proposal was outstanding from the previous comments and matters relating to this aspect of the proposal are still not complete for purposes of giving full consideration of this application.

Being outline, the application form states that approval is sought for access. This means access and accessibility.

Site Access – this has been revised in terms of its position and is shown on drawing 5330/021 Rev. H. In fact, 2 access proposals have been produced, 1 having a ghost right turn lane as recommended, and one as a simple priority working junction. Paragraph 2.25 in the Addendum 2 is incomplete. The applicant at the time of compiling the addendum2 had instructed a RSA audit for the access provision, but to date this has not been provided. A recent email from the transport consultant dated 14/10/22 indicated that this is still awaited. The County Council indicate in their highway guidance for major new development that a RSA should be provide with a designer's response. The proposed access would be serving a major housing development alongside the existing operations on Bird in Eye Farm and a proposed SANG. The access would need to support many types of users and ensuring that the level of road traffic alongside pedestrians with children and/or dogs, cyclists, business/farm vehicles which is from a rural road. A road safety audit is essential to ensure that what is being proposed is fundamentally deliverable and can support its demand. The highway authority wishes to raise comments on the current proposed arrangement with the right turn facility:

- 30mph speed limit extension. This is desirable in principle for an urban extension, and the scale of proposed development gives rise to an increase in activity on the highway by a variety of user types. Sussex Police are required to comment on the speed limit reduction but there is insufficient detail provided to support this. It has been raised on numerous occasions that with actual speeds at 42.4mph EB and 45.9mph WB, that traffic calming and visual influence indicating a change in the environment is required, which a gateway sign cannot provide adequately. Examples are visible frontage development, footways, street lighting, and infrastructure that supports the movement of non-motorised users which are absent.
- The straight through lanes at the new access are only 2.75m wide. Ideally all lanes should be 3m in width though it is noted that the available highway and achieving the required driver sightlines has dictated this arrangement. If a 30mph speed limit can be realistically considered, then the arrangement with narrower lanes either side of the stack lane may be acceptable.
- The Right Turn facility appears to be sufficient in terms of its capacity based on the junction modelling.
- A traffic island at the eastern end of the right turn lane would help to highlight it to drivers travelling towards Uckfield. It may be an issue that drivers could potentially cutting the corner which would conflict with vehicles waiting in the right turn lane, including cyclists as there is no provision for eastbound cyclists returning to the site having a safe means to join the shared path. The principle of a traffic island east of the junction would highlight the road alignment and offer some protection to right-turning vehicles, but may conflict with vehicles turning right from the site and a swept path plan would need to demonstrate the manoeuvres by the largest vehicle regularly requiring access.
- Dragon's teeth markings are not prescribed by the TSRGD 2016. In addition, research carried out on their effectiveness concluded that these markings are only really visible to a driver at the last minute, and it is doubtful, therefore, that they would contribute much to any slowing down effect on the approach. Due to this, the markings are considered an unnecessary maintenance burden and will not be authorised.
- The proposal for access as a simple priority junction is not supported on the basis that the 30mph limit cannot be supported for reasons highlighted above. Existing speeds are in excess of 40mph and a right turning vehicle waiting in the carriageway has a risk of being impacted by an eastbound vehicle.
- The revised position of the access further east is much closer to the adjoining boundary, where is dense vegetation. There is a highway verge allowing some to be cut back, though it is generally required that the hedge is not destroyed. Any growth left unmaintained is likely to hinder a driver's visibility at the access, from a set back point of 2.4m and shallower gradient.



This is the third iteration of the proposed site access submitted which is not supported by a RSA and has problems highlighted that would need to be addressed. Given that this application has now been appealed on non-determination grounds, the proposed access has not been demonstrated to be acceptable for the proposed development. Taking into account the quantum of housing, the generation of traffic and a promotion of a travel plan (encouraging active travel) and its location which would in effect should reflect the design of an urban extension, a 30mph speed limit would be a measure that is sought to support the safety of active users. The existing conditions are not appropriate for the proposed light touch measures such as signs, road markings (which are not acceptable) and a traffic island to effectively bring speeds to 30mph and support a large development in a predominantly rural position. Attention is drawn to the first planning appeal at Mornings Mill Farm which was dismissed on highway grounds based on insufficient details relating to access and accessibility (WD/2017/1942).

Framfield Road:

- Plan 5330/017 rev F shows a raised table zebra crossing outside no. 45. A formal crossing point is supported as was referred to in the previous highway response, but the constraints of a zebra type crossing had been pointed out. Nevertheless, a raised zebra crossing has been indicated by the applicant and road safety colleagues have highlighted that a single traffic calming feature like this is not desirable as it will be unexpected by drivers. There would need to be speed reducing features in advance of any vertical traffic calming such as this.
- The bus stop in advance of the crossing seems less than ideal. A car overtaking a bus would have limited time/space to see someone crossing, especially if they are crossing from north to south.
- It is not clear what the benefits of installing parking bays are, as there are already parking restrictions to control where parking takes place. Enforcement of the any parking restrictions is unlikely.
- Inclusion of bus cages and tactile paving/dropped crossing points is a benefit, though the overall conditions of the walking and cycling environment along Framfield Road are unchanged.

Cycle Track/area to west of the site:

- The bus stops east of no. 185 aren't positioned correctly. The markings don't line up with the flag/high level kerbing. However, it was raised in an earlier response that closer bus stops would be expected to ensure that all dwellings could be within the ideal distance of 400m. A provision

close to the access, within the site (with suitable turning) would be considered provided it did not impact on the timetabling of the services.

- Having the westbound bus stop within the shared cycle/footway would present a conflict unless enough space for people to wait for a bus outside of it is provided. Passenger transport would wish to see shelters at these stops which would potentially obstruct the shared cycle/footway. This aspect of the active travel/sustainable travel provision would need to complement one another.
- Access for pedestrians/cyclists has been raised previously and the provision for eastbound cyclists to join the path indicated has not be accommodated for.

Summary

Access provision is not acceptable for this site as indicated on drawings provided in the Addendum2 for the reasons indicated in this response.

Traffic modelling, in particular impact when considering wider sites is yet to be validated, and to this site there is some concern in terms if expected town bound impact on Framfield Rd Junction with New Town. Further exacerbation on town centre roads is also expected, with knowledge that these roads are already straining to cope with current traffic volumes.

As such highway objection is presented to this development proposal. Again, previous comments highlight that a joint working relation with site proponents for Bird In Eye North would enable a more comprehensive approach to reaching urban extension characteristics that this site cannot achieve with the access arrangement as shown and with the illustrative layout being concealed from the street scene. Framfield Road characteristics are urban and have constraints as set out in earlier responses which cannot be overcome through a parking scheme. An alternative crossing provision that is more appropriate to the function of Framfield Road needs to be considered.

Accessibility proposals (footway/cycleway) have scope to be provided but are expected to join Framfield Road where there are constraints with narrow footways and lack of crossing points.

Highway objection is sustained, for the following reasons:

- 1) The proposal would result in a material change in the volume of traffic using B2102 Bird in Eye Hill where speeds are derestricted, and hazards would be introduced by the slowing, stopping, and turning traffic at the proposed access, contrary to para 111 of the National Planning Policy Framework
- 2) The proposal would lead to increased traffic hazards on the B2102 Bird in Eye Hill by reason of the inadequate visibility at the proposed access and would therefore be contrary to para 111 of the National Planning Policy Framework
- 3) Insufficient measures have been submitted on the highway to support an urban extension, for purposes of reducing traffic speeds which are required to support sustainable transport modes.
- 4) Non-car travel choices for residents/users are limited between the site and Uckfield town centre as a result of substandard highway infrastructure which would not encourage sustainable travel modes and would therefore be contrary to para 104 and 106 of the National Planning Policy Framework.

Comments on Transport Assessment Addendum dated March 2022 following Highway response dated 08.12.21.

2.1 Site Access – Right turn lane requirement

Reference is made to the appeal decision dated 2006 and AADT flows at that time on Bird-In -Eye Hill (4400 vehicles). Data provided by the County Monitoring Team indicated 2019 AADT flows are 5560 and 2020 flows are 4830. As stated previously, the 2020 flows are evidently lower as a result of Covid travel restrictions. The 2019 flows are applicable and should be used for this application. The figures presented by the applicant are less at 3900 and cannot be accepted. PICADY modelling at the proposed site access has been provided but there is no breakdown of the farm/industrial unit related trips in peak periods which would need to be added to the proposal related peak trips. The PICADY analysis should be presented on flow diagrams for each peak for scenarios baseline 2019, baseline 2019 + development and existing uses, 2027 baseline, and 2027 baseline + development and existing uses.

For access to the site, the junction arrangement is required to have a right-turn lane for several reasons:

- i) Site related traffic would be weighted towards the west with more right turns into the site than left turns.
- ii) Emergency vehicles (associated with the nearby hospital) would be obstructed by right turners waiting within the carriageway to make a right turn.
- iii) This arrangement would afford right-turning vehicles (including cyclists) some protection and assist free flow of major road through traffic.
- iv) The daily traffic cumulation from the site exceeds 1400 trips. For developments generating an AADT of over 500 vehicles, right turning traffic should not impinge on general flows which are 5560. Furthermore, the event that other potential development such as Bird In Eye North comes forward, it is likely that the flows on Bird In Eye Hill will increase further.

The modelling provided is incomplete and although it is stated by the applicant that a priority junction would not result in significant queues for right turning vehicles, it is unclear from the submission what data has been used for the PICADY analysis.

Quotes from the 2006 former planning application and dismissed appeal are outdated and not valid for the current proposal now 16 years on. Furthermore, the former application was for 197 dwellings, not 290 and highway response dated June 2007 had requested that the priority junction be upgraded to be a right turn lane. The current standards are in DMRB CD123 CD 123 Geometric design of at-grade priority and signal-controlled junctions.

Access Visibility

A speed survey demonstrates 85th percentile speeds of 42.4mph EB and 45.9mph WB.

The required driver sightlines based on actual speeds are 113m looking west and 127m looking east, from a setback point of 2.4m (desirable minimum distances). The distances stated in the transport assessment addendum are not accepted. Manual for Streets standards are applicable where 85th percentile speeds are up to 37mph, and higher speeds should take account of Stopping Sight Distances. In this case desirable minimum distances should be applied. The sightline looking west is indicated on drawing 5330/020D as only 91m, some 22m short of the requirement based on actual speeds.

The proposal to extend the 30-mph speed restriction was not supported previously unless speeds can be reduced to an appropriate and conducive speed. This was proposed historically by the Parish Council, and it was indicated to them that traffic calming measures would be required to effectively provide suitable traffic calming. It was due to the cost of installing engineered measures that the speed limit reduction was not proceeded with. Any proposal to extend the 30mph limit will require a highway related scheme that would effectively reduce speeds and be self-enforcing and an extent of the limit extension would need to

be agreed. A matter to flag up is the bend in the road to the east of the site which should not conflict with the terminal point of a 30mph limit as traffic may be encouraged to accelerate towards this section. Such traffic calming schemes should ideally benefit from frontage development to guide drivers that they are entering a change in environment. It is expected that a continuation of built form should be visible from drivers' position to support a change to 30 mph. The 30-mph limit extension will require engineered speed reducing solution to bring mean speeds to a maximum of 33mph. Speed limit reduction schemes should accord with the guidance found in ESCC document Local Speed Limits PS05/02 which can be forwarded to the applicant's transport consultant. As shown in appendices 4 and 5, I note that a 30mph extension is shown which terminates just east of the proposed access position. The area of highway contained within the proposed 30mph extension has no significant change in character or appearance other than additional signage and three islands over a section of 500m which may not have a speed influencing effect that would be necessary for accommodating residential development associated travel needs such as walking and cycling.

A change to the speed limit would need to be authorised by a Traffic Regulation Order and have support from Sussex Police, the enforcing body. It is advised that further discussion with the highway authority is necessary to develop a suitable traffic calming scheme. As mentioned previously, collaborative working with site proponent for Bird In Eye North would assist to influence a suitable design for a traffic calming scheme from the junction for Uckfield Hospital up to a suitable point east of the proposed site access.

Following the previous RSA1, a further audit has been commissioned and the designer's response refers to scheme amendment drawings that have not been provided as part of the Transport Addendum. The only highway related application plans are provided in appendices 4, 5 and 6 [5330/020D; 5330/008E; 5330/1001]. The RSA response refers to drawings 5330/16E; 5330/18D and 5330/17E which are part of appendix 9 which in accordance with their revisions, would supersede the plans in the original TA.

Framfield Road

The parking scheme on Framfield Road has received comments from the Traffic and Safety Team in relation to the build-outs: The series of build outs proposed on Framfield Road do not appear to form part of the audit (first) and do not appear to serve any useful purpose? At the same width as the parking bays, they offer no contribution in terms of traffic calming and as there is a bollard central to each one, they do not aid crossing movements. As such, an alternative proposal in Framfield Road may offer more value to assist pedestrians crossing. It is noted that plan 5330/017 rev E shows an uncontrolled crossing with dropped kerbs and tactile paving outside 52 and 45 Framfield Road. There has been a request to the Traffic and Safety team from a local Councillor for a formal crossing with suggestion for a zebra crossing in the vicinity of Harcourt Road/Alexandra Road. There may be constraints in terms of the physical requirements for a zebra, in terms of driveways, junctions and bus stop but a more formal crossing would be preferable to one that is informal.

Proposed build outs have been questioned and the locations of them are questioned.

- i) the build out opposite the former church potentially prevents a bus from stopping close to the kerbs to allow passengers to board and alight safely. Installation of bus cages here is likely to be more useful than a build out.
- ii) parking bays marked either side of 69 Framfield road leave a very narrow space for access into an undercroft access leading to a yard in which a vehicle is parked. Access is likely to be restricted to the yard area if vehicles are parked at capacity either side of the access and opposite within the shown marked bays. See extracts below. Furthermore, the build-outs are provided but it is not known the reason. DYs are present to restrict parking around the junction Keld Avenue.



iii) the proposal indicates demarked bays for parking, though no restrictions for parking where the caged areas are not shown. It is presumed that the parking would still be permitted in the areas outside the marked bays unless DYLS are provided. As parking restrictions are secured through a TRO requiring public consultation, there would need to be a convincing scheme not only to the Highway Authority, but to the local residents that a parking scheme would be beneficial. I have noted the 2nd parking survey provided, undertaken on 9th February 2022. I do not understand what information the first table provides. Does the survey have a plan and photographs indicating the areas that are restricted that have been used for parking?

The parking scheme and survey required further discussion to understand how the survey was carried out and what the overall benefits are of the parking scheme.

Road Safety Audit

Again, a number of safety matters were raised by the auditor.

Regarding the proposed access, as I have indicated that a right turn facility should be the design standard for the proposed scale of development, this element would need to be revisited and so further comments on the access proposal are not provided to this aspect of the audit. Access provision is reliant on achieving driver sightlines and potentially reducing the speed limit with engineered traffic calming features. Turning provision of larger vehicles should also be considered at this stage and not left to detailed design as this application seeks approval for the access and accessibility.

Splitter islands on Bird in Eye Hill: the proposed tapers are not in accordance with CD123, and revisions have been made in dwgs 5330/008E, 020C and 016E. I do not have access to these drawings as they are not provided as part of the TA addendum or application submission.

Problems highlighted on Framfield Rd, that relate to the parking reconfiguration would need to be further discussed and so further comments in this regard are not provided.

Problems A.4.2, A.4.3, and A.4.4 relate to access and accessibility and are likely to require further intervention in design terms and should not be left to detailed design stage. Problem A.4.4 may be affected by off-site highway works relating to Mallard Drive (Harlands Farm) approved development which is under construction. As part of their s278 agreement, bus stops on Framfield Road close to the medical centre are enhanced and tactile paving at the existing dropped kerbs are technically accepted. A drawing can be provided on request.

Relocation of street furniture and telegraph poles can be reviewed as part of the detailed design as these can be moved. The footway sign is adjacent to land being opened up for the footway/cycleway route into the site and there would be scope to relocate this sign and potentially alter the content to indicate direction into the site. For cyclists wishing to continue eastbound, there would need to be a measure for safely re-joining the carriageway.

My concerns remain intact with regard to achieving suitable access and accessibility based on the points raised and having had discussions with the transport consultant with regard to the access, and the need to have verified the impact of the development on the adjacent and wider network, the application attracts objection. Discussions with the applicant have been arranged and the above will be raised to seek solutions.

K Kamboh – 12.05.22

Original response Dec 2021

Executive Summary

This application can only be considered on the access arrangements proposed. The impact of the development cannot yet be considered as the applicant has agreed to jointly work together with other development proponents to consider wider highway impact on the network in Uckfield and surrounding areas. As this work is being carried out currently with purpose to study the existing network and identify the opportunities, constraints and potential mitigation required for future growth that has not been possible through the local plan process, the impact on the network and principle of the development is not yet accepted or understood. Until this joint working group has completed the transport modelling the formal highway response cannot be provided in full. As such a highway objection is presented based on insufficient information that the applicant is fully aware of.

Response:

This application seeks outline planning consent for up to 290 dwellings on a greenfield site (agricultural) and retains an area of existing development comprising Bird-In-Eye farm business units (12 in total). The site is shown to be served from Bird-in-Eye Hill (B2102). The site has history of a planning appeal dismissal for housing dating back to 2009 (WD/2006/3564 for 197 dwellings), when 2 other sites were subject to the appeal inquiry (Downlands and BIE North). At the time of that appeal, the development at Ridgewood Farm had not been submitted or approved.

A Transport Assessment, Road Safety Audit and Travel Plan have been submitted which will be referred to within this response. Pre-application advice for approximately 175 dwellings was provided for site but was not extensive as the scope for the proposed development kept changing and a response was provided which highlighted the constraints of the site location and connectivity by non-motorised users. The applicant refers to meetings with the County Highway Authority which relate to wider impact modelling for several major sites in the Uckfield area.

Existing conditions – B2102

Actual speeds for the B2102 have been measured in two separate positions either side of the proposed access for a 7-day period 9-15th July 2019 and the results of the speed survey indicate that the 85th percentile speeds are 42.4mph EB and 45.9mph WB. Peak period flows 08-0900hrs and 17-1800hrs are approximately 400 vehicles in each hour segment.

The B2102 has Average Annual Daily Traffic count of 5560 (1% HGV) vehicles as of 2019; and 4830 (1% HGV) in 2020. The count for last year demonstrates a Covid19 related reduction in overall trips on the network, hence the 2019 data should be used as baseline and the 2020 is not accepted.

Police reported crash data within the highway has been interrogated for a period of 5 years for area between Sandy Lane junction and Framfield Road junction with Newtown/High Street. A total of 8 injury crashes (categorised as 5 slight, 2 serious and 1 fatal) occurred. Although this is unfortunate, the contributing factors were driver error in all cases, and not contributory to the road design or character.

The site is located within 2km walking distance of Uckfield High Street shops and amenities and approximately 1-1.5km from the railway station and bus station.

The pedestrian infrastructure towards the town centre, when using Framfield Road, is poor as a result of narrow footways, parked vehicles straddling footways, no defined crossing points until the signalised junction with New Town/Bridge Farm Road. Here the inter-visibility for pedestrians is poor, there is little footway width and when pedestrians are waiting to cross the road, there is little space for other pedestrians to pass by. The junction here is very much vehicle dominant and the current pedestrian experience between the site and the Framfield Road signalised junction is not convivial nor would it encourage travel on foot.

Cycling is a mode of travel available to confident cyclists who are not discouraged by the existing local infrastructure/characteristics. However, encouraging new users or less confident cyclists would require the use of quiet residential streets, as an alternative to the main roads that are bus routes and carry high volumes of traffic. The availability of permeable residential streets to serve a suitable cycle route is a convoluted route through Keld Avenue which avoids a potential wait at the signals but this location has uncontrolled connection between the B2102 (New Town) and Mill Drove.

Public bus transport is available on Framfield Road, but which is very limited and cannot support commuter journeys. Although there are bus stops within 300m of the site, the most regular service (231 Uckfield to Etchingham) operates 6 buses per day between 0740 and 1740 so allows a passenger to reach destinations up to Etchingham before 0900 but the last bus to return arrives at 1726 with no option after that. Bus services are also available in the town centre/bus station, but entails a 1.3km walk which exceeds the recommended distance (400m), the walking environment is below a suitable standard and would take 20 minutes plus bus waiting time, which is not convenient and encourage car use instead.

Rail services are available within 1.1km which is an acceptable distance to walk for commuting long distances and trains generally run to schedule with waiting times minimal for regular users. Again, the walking route is using Framfield Road, where constraints have been highlighted.

Employment areas in Uckfield are the Bell Lane and Ridgewood industrial estates; High Street (tertiary sector).

The Application

For the proposed development of 290 units comprising 189 market and 101 social/affordable (unit type unspecified), the main issues to consider and requirements that would need to be met are:

- **Access** - Suitable vehicle, pedestrian and cycle access, to include sufficient width, gradient and visibility splays are a standard requirement.

The proposed vehicular access into the site is in a position a short distance east of the existing farm access which would be closed as part of the proposal. The retained uses at BIE Farm, and existing dwellings Lycroft, 18 and 19 Bird In Eye Hill would have vehicular access from the proposed arrangement. The proposed access is within a section of Bird In Eye Hill (B2102) that is currently subject to a derestricted speed limit (60mph).

The geometry and configuration of the access should take account of the traffic expected to use it and 290 dwellings, 12 business units and 2 existing dwellings would generate in excess of 1400 trips per day. The types of business or related vehicles are not provided. The type of junction shown is a simple priority

arrangement, and at pre-application stage, when 175 dwellings were proposed, the site proponent was requested to consider a right-turn stack lane and given the uplift to the quantum of housing proposed within this application with daily trips on the minor access road exceeding 1400 movements, a right turn lane is recommended, bearing in mind the anticipated distribution of traffic being predominantly weighted to and from Framfield Road junction. Furthermore, the assessment at the site access has been based on 2020 observed trips which are not acceptable and does not account for trips that are derived from the existing dwellings and businesses served by the site access. The TA indicates in 5330/405D the proposal will generate 80 trips turning right into the site in the PM peak hour which is likely to be greater as a result of the businesses and visitors to the proposed SANG (the existing Horsted Green Park SANG should be considered as an example in terms of trip generation).

Driver sightlines at the access should reflect either posted speed limit, or where speeds are lower, the 85th percentile recorded speeds over a period of 7 days. The emerging 85th percentile speeds of 42.4mph EB and 45.9mph WB would require sightlines to be imposed in accordance with Manual for Streets 2. The actual speeds would need to be much lower for consideration for 30 mph speed limit reduction as the speed limit should be self-enforcing. As 30mph limit is suited to urban areas, the extension of an urban zone would need to display the visual character [frontage development, street lighting, built form, footways - as examples] to provide visual guidance for road users that they are within a restricted area. Speed limit signage alone is not acceptable for self-enforcement in this case. The required driver sightlines based on actual speeds are 113m looking west and 127m looking east, from a set back point of 2.4m (desirable minimum distances). The distances stated in the transport assessment are not accepted, nor is there a plan to demonstrate what is achievable.

It is repeatedly mentioned that a 30mph limit extension is supported by the highway authority. This is not the case, and this is not explicitly stated in the pre-application response as this notion is reliant on the view of ESCC Road Safety Team and Sussex Police and as mentioned earlier is reliant on visual characteristics for an urban area to enable self-enforced lower speeds. These parties have been consulted and their views can be provided in due course.

Road safety audit

The vehicular access to the site should be supported with a RSA 1 and scheme promoter's response. It is noted that this has been provided and a total of 10 problems have been highlighted.

1) LOCAL ALIGNMENT - proposed access

Auditor Comment: Vehicles may approach Bird in Eye Hill at inappropriate speeds. The application site is currently set at a level above the adjacent Bird in Eye Hill with the existing access rising gradually away from the main carriageway. The proposals relocate the existing access to Bird in Eye Farm in order to serve a proposed development of 300 residential dwellings as well as two existing dwellings outside of the application site. The scheme drawings do not identify the gradient of the proposed carriageway at this stage, however, the land in proximity appears to be approximately 2 to 2.5 metres higher than the level of the existing carriageway. A gradient in excess of 1 in 20 on approach to a simple priority access could lead to junction overshoot type incidents. It is recommended that the access road is set at a gradient shallower than 1 in 20 on approach to the B2102.

Designer Response: The proposed access will be designed with 1 in 20 or slacker gradient than in accordance with standards with the land either side, graded up away from the carriageway at an appropriate gradient.

LHA view – it is considered that the access details are required as part of the detail for this outline application and the appropriate gradient proposed should be presented as part of the matters for considering suitability and deliverability of the vehicular access. As such as there are no access details such as cross sections, or junction geometry, the access detail is incomplete.

2) GENERAL – Bird in Eye Hill

Auditor Comment: Drivers approaching the proposed traffic island may not become aware of the feature at a safe distance. In proximity of the proposed access, Bird in Eye Hill is derestricted, subject to the 60 mph national speed limit and accommodates a number of bends in proximity of the proposed access. The proposals that are subject to this Stage 1 Road Safety Audit includes two options; one to extend the existing 30mph zone to a point just east of the proposed access and another where the derestricted nature of the road remains unchanged but a splitter island is to be installed just to the west of the proposed access to ensure that eastbound vehicles approaching the proposed access, do not encroach the opposing lane and thus ensure the achievable visibility accords observed speeds. The scheme drawing illustrates that illuminated keep left bollards are to be provided which should highlight the features to approaching drivers, however, due to the existing alignment of Bird in Eye Hill to the west as well as vegetation abutting the carriageway, forward visibility for eastbound drivers is limited. As such, there may be insufficient warning of the traffic island which could lead to vehicles striking the feature and a loss of control type incidents. It is recommended that sufficient forward visibility is achievable to an object within the carriageway.

Designer Response: The Highway Authority are supportive of the extension to the 30mph speed limit and as set out in MfS2, the starting point for visibility on non-trunk roads is MfS. It is clear that Bird in Eye Hill is not a trunk road and sufficient forward visibility is achievable.

LHA view – the 30mph speed limit extension cannot be supported without clear acceptance from Sussex Police and the Road Safety Team at ESCC. Frontage development and an environment conducive to supporting lower speeds is a prerequisite. Although forward visibility is available there is evidence that traffic does breach the speed limit. The presence of the isolated island within a derestricted speed limit that is not supplemented by street lighting or frontage development may encourage middle of road driving during quieter times such as night when road traffic volumes are low.

3) GENERAL – Proposed access

Auditor Comment: Existing Telegraph / Electric pole will become an obstruction to vehicles. Signage and telegraph poles are situated within the existing verge along Bird in Eye Hill. The proposals relocate an existing access approximately 30 metres to the east which is to serve the existing dwellings as well as the proposed development of 300 dwellings. However, a telegraph/electric pole is situated in the proposed bell mouth access in the path of vehicles and will be an obstruction. It is recommended that the telegraph/electric pole is relocated, and the access is free of obstructions.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.

LHA view: The pole would need to be relocated to accommodate the access, and it is agreed that this should be reviewed at detailed design stage (S278) and the pole placed in a position that does not obstruct access safety requirements of the highway and its users.

4) GENERAL - Proposed Access and Bird in Eye Hill

Auditor Comment: Existing road gully will be within the path of vehicles. Bird in Eye Hill is cambered with surface water falling to the channels either side of the carriageway where road gullies are present. During the site visit associated with this Audit, a number of gullies in proximity to the proposed works were observed to be blocked and therefore ineffective. The proposals that introduce a traffic island to the west of the proposed access, widen the Bird in Eye Hill carriageway where a gully is present either side of the road. No details of the proposed surface water drainage have been provided at this stage; however, an insufficient network is likely to result in ponding during inclement conditions which increases the likelihood of loss of control type incidents. Furthermore, a road gully within the path of a vehicle could give rise to loss of control type incidents particularly for two wheeled vehicles and vehicles undertaking a braking manoeuvre. It is recommended that an adequate surface water drainage network is provided.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.

LHA view: it is agreed that features in the highway that are affected by a highway related scheme can be reviewed at detailed design stage (S278).

5) JUNCTIONS – Bird in Eye Hill

Auditor Comment: Drivers approaching and waiting to turn right into the proposed access may not become aware of each other at a safe distance. In proximity of the proposed access, Bird in Eye Hill is derestricted, subject to the 60 mph national speed limit and accommodates a bend on each approach. The proposals that are subject to this Stage 1 Road Safety Audit includes two options; one to extend the existing 30mph zone to a point just east of the proposed access and another where the derestricted nature of the road remains unchanged but a splitter island is to be installed just to the west of the proposed access to ensure that eastbound vehicles approaching the proposed access, do not encroach the opposing lane and thus ensure the achievable visibility accords with the splays illustrated. The Audit Team took measurements whilst on-site and visibility splays of 2.4x117.2 metres and 2.4x102 metres are achievable from the proposed access to an approaching vehicle, however, due to vegetation within the verge to the north of the carriageway, forward visibility to and from a vehicle attempting to turn right into the access, is restricted to below 117.2 metres for westbound drivers. As such, a westbound driver will have insufficient warning of the traffic attempting to turn right and vice versa. It is recommended that the sufficient forward visibility is achievable.

Designer Response: As stated by the Auditor's, the proposed access is clearly visible for westbound drivers and as such, one would approach cautiously in the knowledge that a vehicle may attempt to turn right. It must be noted that a right turning vehicle will be moving across the carriageway and not be a stationary object. The Highway Authority are supportive of the extension to the 30mph speed limit and in any event, MfS2 advises that the starting point for calculating visibility for non-trunk roads should be MfS. It is evident that sufficient visibility is therefore achievable to/from the proposed access.

LHA view: designer response is assuming that a 30 mph speed limit is supported, and vehicles would approach cautiously, and a right turning vehicle is not stationary (a vehicle waiting to turn has to ensure that it is safe to do so and eastbound vehicles may prevent this). Furthermore, there would be an increase in traffic volume approaching from the west as a result of the proposal. It was raised that a ghost right turn lane at the proposed access should be considered. The auditor comments remain valid.

6) JUNCTION - Proposed access

Auditor Comment: No road markings are provided to highlight the need for exiting vehicles to give-way. The existing access arrangement serving a mixed-use development on land at Bird in Eye Farm does not accommodate any road markings. The proposals subject to this Stage 1 Road Safety Audit are to provide a priority access that serves a development of 300 dwellings. The scheme drawings provided with the Audit Brief provided do not identify that any carriageway markings are to be provided at its junction with Bird in Eye Hill. Vehicles exiting may not therefore align themselves sufficiently to allow space for a vehicle to enter simultaneously which could give rise to sideswipes type incidents as well as rear end shunts along Bird in Eye Hill and junction overshoot type incidents. It is recommended that road markings are provided to guide vehicles sufficiently.

Designer Response: Give-way and road centreline markings are to be provided.

LHA view: it is considered that the access specification is required as part of the detail for this outline application and the appropriate junction configuration should be presented as part of the matters for considering suitability and deliverability of the vehicular access. As such as there are no access details such as cross sections, gradient, or junction geometry, and the access detail is incomplete.

7) JUNCTION – Proposed access

Auditor Comment: Insufficient space may be provided to allow service vehicles to enter. The existing access to Bird in Eye Farm is approximately 5 metres wide with large corner radii that allow for Heavy Goods and Agricultural Vehicles to manoeuvre safely. The proposals include the relocation of the priority access with 8 metre corner radii which provides access to a 5.5m wide carriageway. No swept path analysis has been provided with the Audit Brief and as such, the corner radii may not be sufficient to allow for the infrequent HGV movements that could be expected from a development of 300 dwellings. Should turning movements be restrictive, vehicles could be required to encroach the opposing lane or vehicles may be required to reverse out of the proposed access or in order to enter and exit the access raising the risk of rear-end, sideswipe collisions.

Designer Response: A swept path analysis has been undertaken and the proposals are adequate for the expected vehicles.

LHA view: A refuse truck has been tracked through the access as shown. The access details are insufficient as stated previously. A further note is that the access will serve existing industrial related uses and although the weekly occurrence of a refuse truck would ordinarily be accepted with some overhang onto adjacent lanes, more frequent use of such vehicles for the 12 business units (details been excluded in this application) would require an access that accommodates larger vehicles that require regular use. The access should accommodate regular use by all vehicles without the risk of conflict on the highway or at the access.

8) WALKING, CYCLING & HORSE RIDING – proposed footpath connection BIE Hill

Auditor Comment: Existing signage will become an obstruction to pedestrians. In proximity of the proposed footway cycleway access the verges of Bird in Eye Hill accommodates a number of telegraph / electric poles and road signs. The proposals introduce a connection between Bird in Eye Hill and the local pedestrian network, to the west of the proposed access via footpath through a wooded area. An existing telegraph / electric pole is situated just to the west of the proposed connection will be situated central to the footway and become an obstruction to pedestrians that could force one to enter the carriageway suddenly raising the risk of vehicle collisions with pedestrians. It is recommended that the telegraph pole is relocated.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.

LHA view: Agreed, though the proposal should be able to demonstrate deliverability and any relocation of telegraph poles and road signage would require alternative locations that are suitable for their revised positions and should not compromise accessibility or highway safety.

9) WALKING, CYCLING & HORSE RIDING – proposed footpath connection BIE Hill

Auditor Comment: Cyclists are likely to utilise the proposed footpath. Bird in Eye Hill benefits from a footway along the southern side that terminates just to west of the gated access to the application site. The scheme drawing provided with the Audit Brief illustrates that a footpath connection is proposed at this location which is approximately the same width as the existing footway, however, as identified within the Transport Assessment associated with the scheme, a 3.0-metre-wide shared use footway / cycleway link is to be provided. The proposed link is considerably shorter than following Bird in Eye Hill and as such, it is highly likely that cyclists will utilise the link. Should the link be insufficient to accommodate a high number of pedestrians and cyclists, there could give rise to cyclist-pedestrian collisions. It is recommended that the width of the facility is increased appropriately to accommodate cyclists.

Designer Response: The section of footway between the pedestrian/cycle access and the bus stops to the west will be widened to 3m to facilitate its use as a shared footway/cycleway.

LHA view: Agreed, though the proposal should be included as part of access detail submission included in the audit brief, and considering the provision being up to the carriageway, it is advised that a section of verge of say 0.5m is included to separate the non-motorised provision with the carriageway to prevent users from sidestepping into oncoming traffic that may be driving close to this facility (HGV and bus route).

10) WALKING, CYCLING & HORSE RIDING – proposed footpath connection BIE Hill

Auditor Comment: Existing road sign could become an obstruction to users of the footway. Bird in Eye Hill benefits from a footway along the southern side that terminates just to west of the gated access to the application site at a location where a 'pedestrians in carriageway' road sign with a 'no footway for 1 mile' plate is present. The sign face appears to provide insufficient headroom for a pedestrian to walk beneath. Should a pedestrian step slightly off the existing footway, the sign would be an obstruction resulting in a personal head injury. It is recommended that the sign face is relocated further back from the edge of footway or raised to a suitable level.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.

LHA view: Auditor recommendation is accepted, and detailed design of the scheme can include the minor adjustment of the sign in position or height provided it does not conflict with the proposed provision of the footway/cycleway

To summarise the Road Safety Audit, it is apparent that insufficient details were included in the audit brief and submitted as part of the application documents. A 30mph speed limit can only be accepted if the environment is conducive to supporting a self-enforcing reduction in speeds. This would be assisted by frontage development, street lighting, and a visual change in character supported by urbanising the street infrastructure. It is contested that the highway authority supports a 30mph as this would be reliant on a suitable scheme to support this notion. Consideration of the Bird In Eye North site which is being offered as a potential housing site has the potential to contribute to the urban extension of Uckfield and the sites are advised to be considered collaboratively as they can coordinate highway enhancements for mutual and wider benefit. As such the vehicular access details submitted are not accepted.

Pedestrian and Cycle Access

This is indicated on the submitted plan as a route from the northern corner on the westernmost point where the site meets the highway. The submitted plans do not show this in detail though a plan is provided within the Transport Assessment documents (5330/008C) which also includes the proposal for a 30mph limit with gateway features.

The ESCC Passenger Transport team have been consulted on this proposal and have provided the following comments and contribution request:

In terms of this application, I have the following observations/concerns.

The size of the site means that dwellings in the south east part of the development will be in excess of 500 metres walking distance to the B2102. The consultant's Transport Assessment, in Appendix 21, appears to be it acceptable to walk a further 450 metres to the existing 'Uckfield Community Hospital' bus stops on the B2102 to the west. Clearly this is totally inappropriate.

Two new bus stops (one in each direction) would need to be provided adjacent to the main site entrance, and even then, they would be in excess of the accepted 400 metre walking distance. Each would need to have a raised kerb, bus stop clearway, bus shelter with seating, new bus stop pole (sourced from Externiture), lighting and real time information provision. A safe and accessible road crossing point would be required.

In Appendix 22 it is noted that the consultant has approached the bus operator for costed proposals to improve the frequency of the weekdays daytime only 2 hourly bus service 231. A couple of return journeys are also provided on Saturdays by a community transport operator.

It is not appropriate for the developer to secure service improvements directly through a bus operator. The current contract with the bus operator of service 231 is due to end in 2022. The indicative prices provided that operator in April 2021 will now have significantly increase due to the cost of securing driving staff due

to the national shortage of bus drivers. The particular is suggesting future contract price increases of up to 20% so as to account for additional driver costs and other cost pressures.

The level of service specified is also not sufficient. Already the existing service is reaching capacity at school times, so additional provision will be needed for pupils from the development attending secondary schools in Heathfield and Uckfield. There is additionally the requirement for an early morning, evening and Sunday service. In particular, the last journey from Uckfield currently is 1735, which is too early for commuters from a wider (eg. from Brighton making connections at Uckfield Bus Station, and train commuters from London). We estimate the additional cost of these bus requirements to be:

- £69,256 per annum for the level of Monday to Saturday provision as shown in Appendix 22 (ie a 20% increase).*
- £10,120 per annum for the additional early morning provision (Mondays to Fridays).*
- £43,560 per annum for the additional evening provision (daily).*
- £18,061 for the Sunday daytime service provision.*

Therefore, a total of £140,997 per annum, which will be required for a minimum of 3 years.

The proposals on Framfield Road include a crossing point in vicinity of 2-8 Framfield Road. This is close to a signalised junction where traffic queues back to and beyond, and where footways are narrow (less than 1.5m in width). This is not included in the RSA and cannot be considered as a deliverable solution as part of accessibility strategy. Bus stop improvements are proposed but these are not to the requirements of the Passenger Transport Team nor have these been part of the RSA.

The installation of parking controls on Framfield Road has been presented by the applicant and supported by a parking survey on one day. The Lambeth methodology requires :

Residential Developments The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site. For further detail see 'Extent of survey' below. The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (ie. Monday, Tuesday, Wednesday or Thursday).

The methodology is directed at proposed development and not necessarily for securing parking restrictions for existing development that benefits from unrestricted parking provision. If the applicant wishes to understand where residents park, it may not be solely on Framfield Road as other minor roads are also utilised. The outcome of the parking survey is therefore not considered to be an appropriate parking assumption for this road and further surveys are recommended, jointly with the BIEN site proponents in accordance with a methodology that is agreed with the Highway Authority.

A non-motorised user audit is required carried out to understand any constraints experienced by pedestrians and cyclists using the highway network to connect to local service providers and amenities, to then seek appropriate and commensurate solutions to assist accessibility for this group of highway users. Ideally, as BIEN has a direct relationship to this site and potential link to the north of the railway line, and mentioned earlier, a collaborate approach drawing together sustainable solutions from each site (they are very much reliant on each other) would benefit both sites. Joint solutions to overcome the accessibility constraints for both these sites are likely to be more meaningful and effective if both sites work together to prevent conflicting mitigation measures that come forward independent of each site.

It is recommended that these sites coming forward independently is likely to result in collaborative working to address appropriate and safe mitigation measures later down the line, and as such it would make sense not to have conflicting solutions and have solutions and measures that are conducive to both sites worked out from the outset, given that both these sites have been considered at appeal with the Inspector's comments highlighting the constraints and opportunities in this location.

Since pre-application discussions, which I highlight were not conclusive and did not indicate support for a 30mph extension explicitly (no reference was made within the pre-application response that the applicant has provided in appendix 1).

At this stage, the access and accessibility aspects of the application have not been fully addressed or justified.

Highway Impact

Modelling for this site is being prepared in conjunction with several other major sites in Uckfield as part of an agreed strategy between the County Highway Authority and Wealden District Council. The applicant has signed and committed to a Statement of Common Ground to understand the wider impact of traffic on the highway network. The trip assessment of the proposal, as mentioned earlier is based on 2020 baseline surveys which were taken during a Covid restricted period and are unrepresentative.

Proposals to install SCOOT has been explored as part of the highway assessment for land at Eastbourne Road for 90 dwellings (WD/2020/0410). At that time both MOVA and SCOOT solutions were considered by the East Sussex Highways signals team and deemed as ineffective and it is unlikely that this can be considered as a solution or be modelled to demonstrate mitigation at the critical junctions Framfield Rd or High Street/Bell Lane. Further comments on this aspect of the application cannot be provided until the outcome of the wider modelling exercise is complete.

Internal Layout

An indicative layout of the proposed development is provided. The details do not give any indication of housing types or amount of parking. The TA suggests that the parking will be provided in accordance with the ESCC parking standards. This is essentially a reserved matter, though it should be clear at this stage that the indicative layout can meet the proposal description and highway related requirements. The SANGS car parking area shown as 30 spaces appears to be served from a minor road which is potentially to unadopted standard. If the SANG is available to the general public it would have amenity value and road that connects to it should ideally be adopted or responsible to the SANG managing authority for its maintenance if it remains privately owned.

There is a public right of way that runs along the south boundary of the SANG, and suitable connections should be provided to allow SANG users to link to it, though gated sections.

Swept path plans have been provided throughout the site, though the application seeks consent for access only. As the layout is not for determination, the swept path plans are not considered as part of this response. The swept path plan for the access is shown though the details of the access are not complete and it has been requested that other vehicle movements from the business units are considered as they would require use of this access.

It has not been specified if the proposed site road network is to be offered for adoption. This should be indicated at outline stage.

Travel Plan

This is required to be secured through a s106 agreement.

It is essential that this site and its proposed uses are supplemented with a suitable travel plan which covers a 5 year period (and phased, if phases identified). The applicant has provided with the application a framework travel plan which is welcomed. The Passenger Transport team has suggested that bus service and infrastructure improvements are required as part of this development. In addition, hard measures

which have yet to be agreed and would be identified through a NMU audit, would need to form part of the Travel Plan so that it can be promoted effectively and define non-motorised routes.

Measures that have been included in the submitted travel plan framework are:

- 1) Travel Plan Coordinator
- 2) Residents' information pack – to include local walking and cycle routes, cycle journey planning resources, promotion of cycle training, public transport information on routes and timetables, locations of nearby destinations and mapping with cycle/walking times and distances. A £150 travel voucher offered for sustainable travel.
This pack should also include car club membership details/promotion, home deliveries for shopping, setting up a local group on a social network site by the travel plan coordinator which should also promote car sharing, walking and cycle groups.
- 3) Car club - only 1 vehicle has been included and is likely to be appropriate initially.
For a development of this scale 2 EVs are recommended with fast-charge facilities within an adopted road to enable wider use. For each household, Car club membership for a minimum of 2 year period with 50 miles drivetime should also be provided for each household.
- 4) *For inclusion: A twice annual Dr Bike visit to the development ensure that resident's cycle equipment is maintained to a good standard during the travel plan period.*

Monitoring of the travel plan – baseline surveys should be provided by 25th occupation and future surveys are required in years 1, 3 and 5 at this site, on the basis that sustainable travel modes should be reinforced on a much more regular basis to minimise where possible, the potential impact on the highway network by single occupancy vehicles. This attracts an audit fee of £6k.

Summary:

The application is currently incomplete in terms of access, accessibility and modelling details. Assumptions for a 30mph extension and SCOOT infrastructure are not accepted. Mitigation measures to improve non-motorised environment along Framfield Road should derive from the outcome of a NMU audit, ideally in conjunction with proponents of BIEN site to achieve meaningful and effective transport schemes to create a more sustainable environment.

To note:

S106 requirements (not conclusive)

- 1) Travel Plan for a 5-year period and travel plan audit fee of £6k. TP to include and flexible voucher for £150 for use on sustainable travel measures; car club membership for first occupant of each dwelling for 2 years and 50 miles drive time.
- 2) Car club provision – 2 E-vehicles and 2 dedicated fast-charging bays within the site
- 3) Road layout and access provision - subject to a combined s278/s38 agreement where internal roads are offered for adoption.
- 4) Provision of bus infrastructure (Two new bus stops adjacent to the main site entrance with a pedestrian crossing, raised kerb, bus stop clearway, bus shelter with seating, new bus stop pole, lighting, and real time information provision - subject to a s278 agreement and service improvement contribution of £140,997 per annum, which will be required for a minimum of 3 years.
- 5) Accessibility related highway works – to be agreed

On behalf of the Highway Authority
For Director of Communities, Economy and Transport

APPENDIX 2 Post Reconsultation Correspondence List

Correspondence list post formal re-consultation of highway related drawings following PINS agreement at Case Management Conference.

emails relating to changes to highway drawings since:				COMMENTS			
21-Jul			WDC	Re-consultation of appeal dwgs			
25-Jul			MT to KK	Confirms 229 rev B is the most recent revision rev C error in SoCG; appellant not issuing 021 rev L (showing bollard at access)	26/7 KK recommends that PINS is informed of error re 229 rev C		
26-Jul			MT to KK re TP	appellant does not wish to spend time at Inquiry discussing TP, request for outstanding matters	response provided on 1/8 highlighting errors and seeking clarification of measures proposed to support	KK chased up a response 21/8	23/8 no update from appellant re TP
27-Jul			NM to KK	revised bus service contributions (responding to MT email 18/7)	forwarded to MT on 27/07	Further query 14/8 from MT	KK responded 16/8
28-Jul			MT to KK	3 sets of RSAs (request by KK)	forwarded to Richard White for reference		
01-Aug			ESCC LEGAL	draft UU			
01-Aug			Meeting 10am MT/KK/RN	Discuss access, zebra, highway matters pending			
01-Aug			MT to KK	Croudace accept contributions suggested for town centre, PT			
01-Aug			MT to KK/RN	email with 6 attachments - Polegate appeal; TP (for comment)227 revD,228 rev D, 29 rev B, 244 artic SwPth	KK request for longitudinal plan for verifying vertical alignment and visibility.	MT provided plan 10/08	
07-Aug			MT to KK/RN	email with 8 attachments - 021 revM,228 revF,029 rev A, 244 revB,027 rev B, 227,revF,BIES access vehicle survey, traffic flows	3m through lanes, retaining 8m radii	forwarded revised dwgs to road safety and technical team 11/08	14/8 comments from technical team fwded to MT

07-Aug			MT to KK/RN	034 rev B zebra crossing amendments (2m wide footways)	Beacon poles will narrow available passage to 1.38m		
07-Aug			MT to KK	why the need for a longitudinal plan?	KK 07/08 - for vis horizontal and vertical	10/08 MT plan provided	
08-Aug			KK to RN	question re small print on dwg	RN checking with design team GTA		
09-Aug			MT to KK, RN, CT, SR	RSA auditor response to 021 rev K and zebra 034	A number of problems raised	Questions posed re standards used for zebra	
09 - Aug			MT to KK,RN	References to LTN 2/95 and Ch 6 TMS	KK/RN highlight conflict		
09- Aug			MT to KK,RN	Email from auditor re 021 re M relating to 3m lane widths and swept paths addressing problem A.2.1 and A.3.1 and A.1.1	KK forwarded to Richard White		
11-Aug			PINS	extn of time for proofs planning/highways			
11-Aug			RN to KK	zebra plan annotated for internal discussion	KK shared with road safety and technical teams for comment		
14-Aug			MT to KK/RN	chasing comments on 021 rev M	KK advised that we are in holidays and under resourced and more time needed		
14-Aug			MT to KK/RN	email from S auditor, 034 rev D (zebra) 033 rev B zebra vis			
14-Aug			MT to KK/RN	seeking clarity to bus contributions	Passenger Transport responded 15/08; without funding there would be very basic level of service	Passed onto MT	
14-Aug			KK to MT	early high level comments on 021 Rev M et al; request for CAD dwg	MT responded 16/08 with comments and CAD dwgs		

16-Aug		Road Safety to KK	comments re zebra 034 rev C	Problems highlighted: forward visibility, parked vehicle positions	Further comments from technical team concerning further loss of parking spaces on Framfield Rd (zig zags)	
17-Aug		ESCC Technical Team to KK	no CAD facility to view dwg provided			
17-Aug		KK to MT	KK asking if there is a levels drawing available	MT - not until Detailed design stage		
17-Aug		KK to landscape team; landscape team to KK	Request for comments on 021 rev M on grounds of impact on highway verge (east side) to secure vis.	Response: if trees/roots on third party land we can only advise - an arborist would need to comment on method to stabilise (3rd party owners' consent)	MT disagrees and considers that the works can be completed within the highway.	KK - No detailed design available and extent of encroachment or damage to roots not known.
17-Aug		KK to MT	technical comments on access and road safety comments on zebra	followed up with meeting 18/8 at 0830		
18-Aug		MT to KK/RN	revisions to access 021 rev N, 036 rev B, 227 rev G, 228 rev G, 244 rev C	Submitted prior to meeting		
18-Aug		Meeting 0830 MT, KK, RN	To discuss access and zebra, presented with new drawings with insufficient time to review	KK advised details would need to be internally consulted, time is limited	Internal consultation to Road safety and technical teams on 20/08	Road safety team comments received on 21/08
18-Aug		ESCC Legal	update to draft UU s106	no revisions to s106 from appellant received		
21-Aug		Town Legal	Richard White's proofs			
21-Aug		road safety team to KK	Re most recent drawings concern for the DWL on the east approach to access, not	Road Traffic Regulation Act 1984 (legislation.gov.uk)		

				complaint with standards, no crash records (departure); also provided legislation for standard procedure for formal crossing	Police and public notice; County Councillor, town/parish council are consultees		
--	--	--	--	--	---	--	--

Last updated 23/08/23

Abbreviations

KK – Kal Kamboh (Highway Officer ESCC)

RN – Roger New (ESCC appointed Transport Consultant)

MT – Matthew Twinberrow (Transport Consultant for Appellant)

CT – Claire Turner (Planning Officer for Major schemes, WDC)

SR – Stacey Robins (Head of Planning, WDC)

TP – Travel Plan

APPENDIX 3 ESCC Policy Summary PS05/02 – Speed Limits

EAST SUSSEX COUNTY COUNCIL

LEAD MEMBER – COMMUNITIES AND SAFETY
POLICY SUMMARY

LOCAL SPEED LIMITS	PS05/02
PURPOSE OF POLICY To achieve a safe distribution of speeds consistent with the speed limit that reflects the function of the road and the road environment	
SPECIFIC POLICIES <ol style="list-style-type: none">1. On trunk roads, speed limits (in common with other orders regulating traffic) are the responsibility of the Department for Transport (DfT), through its executive agency, Highways England. The County Council has no jurisdiction over this class of road.2. On all other roads Orders are made by the County Council subject to the statutory requirements for the advertisement of the proposals and considerations of any objections.3. The principle determinant of a proposed speed limit should be the appearance and character of the road as described in Appendix A.	
SUPPORTING STATEMENT Adherence to the criteria ensures consistency in the introduction of Local Speed Limits on a countywide basis and supports the work that has been undertaken with neighbouring authorities. It is recognised that, where appropriate, a lower speed limit can assist in the reduction of the number and severity of casualties and help to improve environmental aspects and quality of life for local residents. Reference should always be made to the latest national guidance available.	
<u>References – Further Information</u> Road Traffic Regulation Act 1984 Department for Transport – Circular Roads 01/2006 Department for Transport – Circular Roads 02/2006 Department for Transport – Traffic Advisor Leaflet 1/04 Department for Transport – Traffic Advisory Leaflet 2/06 Department for Transport- Circular Roads 01/2013 H & T Committee – Agenda Item 10 H & T Committee – Agenda Item 18 Cabinet Committee – Agenda Item 5 Lead Member for Transport and Environment – Agenda Item 11 Lead Member for Communities & Safety– Agenda Item 31	<u>Date of Approval</u> 17.03.1993 19.10.1994 15.11.2000 25.06.2007 16/03/2018

SPECIFIC POLICIES (CONTINUED)

4. Subject to paragraphs 5 and 6 below, villages may be considered for the introduction of a 30 mph speed limit in accordance with recommendations of DfT guidance for setting local speed limits providing that there are 20 or more properties served by private accesses which adjoin the main road (on one or both sides of the road), located over a length of not less than 600 metres, and clearly visible to drivers.
5. Speed limits should be set in accordance with the table below :-

Speed Limit	Average Speed Below
20	24
30	33
40	42
50	52
60	62

6. Where the average speed is above the figures quoted in paragraph 5 for a particular speed limit being investigated then, subject to available resources, either :-
 - a) Where the history of injury crashes at the site justifies the necessary expenditure, engineering measures appropriate to the function of the road should be investigated to reduce vehicle speeds below the figures quoted in paragraph 5 for a particular speed limit. If this can be achieved a Traffic Regulation Order (TRO) for the proposed speed limit may then be made in conjunction with the introduction of engineered measures.
 - b) Where engineering measures are not appropriate due to the function of the road or cannot be justified by the history of crashes a TRO may be considered for a higher limit than that originally proposed which reflects the speed quoted in paragraph 5.

7. 20mph Speed Limits and Zones

20mph speed limits or zones can positively contribute to quality of life and encourage healthier modes of transport such as walking or cycling. They can also help in creating a sense a place, better serving the local communities' needs. However, to ensure that they are effective, they will only be pursued if the following general criteria are met: -

- a) It can be demonstrated that there are clear benefits to be gained in terms of casualty reduction, particularly involving vulnerable road users;
- b) The lower limit is an integral part of either an area wide traffic calming scheme, a School/ Community Safety Zone or a Town Centre Management Scheme; and
- c) The lower limit is effectively self-enforcing

Proposed Speed Limit Criteria – Route Assessment

Below gives an indication of appropriate speed limits, reference should be made to the latest Department for Transport guidance for more detailed information.

SPEED LIMIT/ CHARACTER OF ENVIRONMENT	CHARACTER OF ROAD	TRAFFIC COMPOSITION
--	--------------------------	----------------------------

20 mph Speed Limit

Town centres, residential areas, in the vicinity of schools	Constrained in terms of vehicle movement with existing conditions or engineered features influencing vehicle speed with available alternative routes for through traffic	Mean vehicle speed below 24 mph High proportion of vulnerable road users in direct conflict with traffic
---	--	---

30 mph Speed Limits

Built up areas, visible properties with frontage access, the road giving a clear indication to drivers of the need to reduce speed	Urban streets Roads through villages and identified rural settlements with 20+ visible properties within a 600m length	Mean vehicle speed below 33mph Significant number of vulnerable road users in conflict with vehicular traffic
--	---	--

40 mph Speed Limits

Less built up areas, set back properties with frontage access indicating to drivers the need to reduce speed	Urban Suburban distributor roads buildings set back from the road Rural Roads through villages and identified rural settlements over a minimum length of 600m	Mean vehicle speed below 42mph Urban Vulnerable road users segregated from road space Rural A noticeable presence of vulnerable road users
--	--	--

50 mph Speed Limits

Limited frontage development	Higher quality urban distributors with few points of access Low standard classified roads	Mean vehicle speed below 52mph
------------------------------	--	--------------------------------

60 mph Speed Limits (Dual Carriageways)

Limited frontage development	High standard rural classified roads	Mean vehicle speed below 62mph
------------------------------	--------------------------------------	--------------------------------

Note: Vulnerable road users include pedestrians (particularly children, the elderly and disabled) and cyclists.



Civil Engineering - Transport Planning - Flood Risk

GTA Civils& Transport, Gloucester House, 66a Church Walk, Burgess Hill, West Sussex, RH15 9AS

T: 01444 871444 E: enquiries@gtacivils.co.uk www: gtacivils.co.uk

GTA Civils& Transport Limited, Registered in England No. 11917461. VAT Registration No. 319 2609 02

