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Land at Bird in Eye Farm
South of Bird in Eye Hill
Uckfield

PROOF OF EVIDENCE

Re: TRANSPORT MATTERS

by

Matt Twinberrow BEng, MCIHT

On behalf of
Croudace Homes Limited

croudacehomes

Appeal Ref: APP/C1435/W/22/3307820
LPA Ref: WD/2021/2198/MAO

MT/5330/PoE.7
August 2023

Experience and expertise working together



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QUALIFICATIONS AND EXPERIENCE

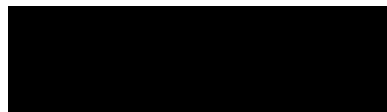
MATTHEW JAMES TWINBERROW will say:

I am an Associate Director at Bellamy Roberts Highway and Transportation Consultants. I hold a Bachelors degree in Civil Engineering from the University of Portsmouth and am a member of the Chartered Institution of Highways and Transportation. I have over 10 years' experience of traffic and highway engineering and have been responsible for dealing with development proposals on behalf of a wide range of private and public sector clients.

Bellamy Roberts specialises in the traffic and transportation area, with particular emphasis on development related matters, and the practice operates throughout Great Britain and Northern Ireland, with clients from major public and private sector organisations.

The evidence which I have prepared and provided for this Appeal is true and is given in accordance with the guidance. I can confirm that the opinions expressed are my true and professional views.

Signed:

A solid black rectangular box used to redact the signature of Matthew James Twinberrow.

Date: 23rd August 2023

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1. INTRODUCTION

1.1 My Proof of Evidence has been prepared to accompany an Appeal against the non-determination of an outline planning application for up to 290 residential dwellings, with all matters reserved except for access from the B2102, on land to the south of Bird in Eye Farm, Uckfield.

1.2 The Local Planning Authority's Statement of Case (CDC.4) sets out six putative Reasons for Refusal (RfR). Two of these reasons relate to highway matters (reasons 4 and 5), as follows:

Reason for Refusal 4

When measured against the full objectively assessed housing need, the Council does not have a 5 year supply of housing land. It is accepted that the NPPF requires applications for housing to be approved without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

This greenfield site is located at edge but beyond Uckfield, within Framfield Parish. Framfield is an unsustainable settlement, not identified within the Settlement Hierarchy. The site's position at this point outside Uckfield and between Uckfield and Framfield makes it detached from any recognised service centres within which to make a make contribution to existing rural communities, with services relied upon being those within the urban centre of Uckfield. This, combined with the limited bus service and lack of convenient pedestrian or cycle links means that housing would create a need to travel to access services in urban areas, and make occupiers of these units heavily reliant on the private car. This harm significantly and demonstrably outweighs the benefits of the proposal.

The scheme would therefore be contrary to Saved Policies GD2, EN1, EN2, TR3 and TR13 of the Wealden Local Plan 1998, Spatial Planning Objectives SPO7 and SPO15 and Policies WCS7 and WSC14 of the Wealden Core Strategy Local Plan 2013 and the guidance within Chapter 9 of the Framework.

Reason for Refusal 5

The proposal does not satisfactorily demonstrate that there would be an acceptable impact on the surrounding highway network, particularly (though not limited to) Uckfield town centre which is already heavily congested at peak times, nor that safe access can be secured for all parts of the site and scheme, contrary to, to SPO2, SPO12, SPO13 and Policy WCS14 to the Wealden Core Strategy Local Plan 2013, Saved Policies TR3 and TR16 of the adopted Wealden Local Plan 1998, coupled with the requirements of paragraph 110 of the National Planning Policy Framework 2021.

1.3 Reason for Refusal four refers to 5-year housing land supply and the accessibility of the Appeal Scheme. My evidence deals with the accessibility of the Appeal Scheme only. Housing land supply is considered within the evidence prepared by Mr Brown.

1.4 A Statement of Case has been prepared by GTA Civils (CDC.5) on behalf of the Highway Authority (East Sussex County Council). The Highway Authority has objected to the planning application citing the following reasons:

- *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.*
- *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.*
- *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.*
- *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** Within this Proof of Evidence, I will demonstrate that the Appeal Scheme is in sustainable location and future residents will not be heavily reliant on the private car.
- 1.6** I will also demonstrate that the Appeal Scheme does not have an unacceptable impact on the surrounding highway network and that safe access can be secured for all parts of the site, thereby addressing both putative reasons for refusal
- 1.7** I will also consider and address the concerns raised by the Rule 6 party within their Statement of Case and the concerns raised by local residents.

2. RELEVANT PLANNING POLICY AND GUIDANCE

National Planning Policy Framework (2021)

2.1 Chapter 9 of the National Planning Policy Framework (NPPF) relates to promoting sustainable transport.

2.2 Paragraph 104 states:

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

2.3 Paragraph 105 states:

The planning system should actively manage patterns of growth in support of these objectives. 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. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.4 Paragraph 110 states:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*
- d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

2.5 Paragraph 111 states:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Local Planning Policy

Wealden Local Plan 1998 Saved Policies

2.6 Policy EN1 states:

The Council will pursue sustainable development, having regard to the principles contained in Government guidance and its own Strategy for the Environment, in considering the location, layout and design of development, renewable energy and waste management proposals and in assessing the effects of proposals on the environment, including on water and air quality.

2.7 Policy EN2 states:

The Council will seek to maintain the existing settlement pattern and ensure that major new developments generating significant travel movements are located efficiently in relation to existing development and to public transport.

2.8 Policy TR3 states:

Planning applications for new development will be permitted where the following criteria are met:

- 1) *the proposed development does not create or perpetuate unacceptable traffic conditions;*
- 2) *a satisfactory means of access (vehicular, cycle and pedestrian) is provided to meet Local Planning and Highway Authority standards;*
- 3) *where appropriate, the provision of suitable public transport facilities.*

2.9 Policy TR13 states:

The Council will seek to secure the provision of safe and convenient pedestrian routes in new developments, which should link to the existing footpath network where appropriate.

2.10 Policy TR16 states:

In considering all development proposals, the Council will require the on-site provision of vehicle parking and servicing in accordance with the standards set out in Appendix 6.

Spatial Planning Objectives

2.11 Objective SPO7 states:

We will encourage reduction of the need to travel by car by concentrating development where it can most closely relate to public transport opportunities, improving the offer of our towns in terms of retail, leisure and recreation and by making it easier to travel by more sustainable modes of transport. We want to see noticeable improvements in journey quality for those people making trips on foot, bicycle or by public transport.

2.12 Objective SPO12 states:

We will continue to work with partners to help ensure that Wealden remains a safe place, with levels of crime and disorder well below the national average, and to achieve significant improvements in the safety records on Wealden's roads.

2.13 Objective SPO13 states:

We will encourage the development of high quality, safe and attractive living environments for communities in both towns and villages, while promoting local distinctiveness through good design in all new development. We want future built development to create spaces and places which are sustainable, distinctive and durable- places where people will want to live. These will be expected to make a real contribution to addressing climate change issues and addressing the needs of our ageing population.

2.14 Objective SPO15 states:

We will ensure, with our partners, that the spatial strategy's infrastructure requirements are clearly identified and will work with partners to ensure that this is provided at the right time to support development. New development will be expected to contribute to strategic and local infrastructure requirements, through both on site facilities and financial contributions for off-site works. In some cases development will require to be phased to ensure delivery of necessary infrastructure to support proposed growth.

Wealden Core Strategy Local Plan 2013

2.15 Policy WCS7 states:

The release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development. Where development would create the need to provide additional or improved community facilities, services and infrastructure to mitigate its impact, a programme of delivery must be agreed with the relevant infrastructure providers which will ensure that these improvements are provided at the time they are needed. These may involve coordinating contributions from the development with other investment streams. This approach will ensure that the necessary improvements can be completed in a timely manner to support growth.

Arrangements for the provision or improvement of infrastructure to the required standard will be secured by planning agreement/ obligation, or by condition attached to the planning consent or by any other appropriate mechanism.

The adequacy of infrastructure provision in Wealden will be the subject of regular review with infrastructure providers as part of the ongoing work on the Infrastructure Delivery Plan. This will include health, transport, utility services, and education providers and will be reported as part of the Local Plan monitoring arrangements in the Annual Monitoring Report.

2.16 Policy WCS14 states:

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and

environmental conditions in the area. Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted.*

3. EXISTING HIGHWAY CONDITIONS

3.1 Within this section of my Evidence, I consider the existing highway conditions along Bird in Eye Hill with regard to vehicle flow and speeds; the existing site access; and the operation of the Uckfield town centre signalised junctions.

Bird in Eye Hill

3.2 Bird in Eye Hill (B2102) is a two-way single carriageway road linking Uckfield to Framfield.

3.3 The carriageway width across the site frontage varies, however is approximately 5.2m wide. A plan showing the existing lane widths (5330/028) is provided at [Appendix 1](#).

3.4 In the vicinity of the Appeal Scheme, Bird in Eye Hill is 'de-restricted' and therefore subject to the national speed limit for single carriageway roads of 60mph.

3.5 Two Automatic Traffic Counters (ATCs) were installed on Bird in Eye Hill either side of the Appeal Scheme access for a 7-day period between the 9th and 15th July 2019. A summary of the recorded 85th percentile dry-weather speeds are provided below. The full ATC results are presented at [Appendix 2](#):

- Eastbound – 42.4mph
- Westbound – 45.9mph

3.6 The Local Highway Authority has provided the results of a speed survey undertaken just east of the Appeal Scheme access for a 7-day period, week beginning 10th July 2023 (see [Appendix 3](#)). The recorded 85th percentile speed for vehicles approaching the Appeal Scheme access (i.e., westbound) was 44mph.

3.7 For reference, the commensurate y-dimension and forward visibility (based on 44mph) is 118.3m and 120.7m respectively. When I consider the commensurate stopping sight distances at the Appeal Scheme access in Section 5 of my Evidence, I have used the higher approach speeds as recorded in 2019. Thus, a robust assessment of the Appeal Scheme access has been undertaken.

- 3.8** The volume of traffic movements in both directions as recorded in 2019 are summarised in Table 1.

Table 1: Summary of ATC Traffic Flow Data (5-day Average)

Time Period	Eastbound	Westbound	Two-Way
Morning Peak 0800-0900	152	258	410
Evening Peak 1700-1800	239	158	397
Daily Flows (24 Hour)	2,365	2,410	4,775

- 3.9** In contrast, the 2023 survey data recorded a reduction in the peak hour and 5-day average two-way flows on Bird in Eye Hill:

- Morning Peak Hour - 352 vehicles two-way
- Evening Peak Hour - 320 vehicles two-way
- Daily (24-hour) - 3,989 vehicles two-way

Existing Site Uses

- 3.10** Bird in Eye Farm comprises a livery stud, workshops, storage units and offices.

- 3.11** The livery stud will be replaced by the proposed dwellings. However, the workshops, storage units and offices will remain. The total floor area for the remaining units is c. 890m² which can be broken down to c. 340m² of office use and c. 550m² of light industrial use. Given the size of these units, the vehicle movements associated with them will be predominantly from smaller vehicles.

- 3.12** This is demonstrated by the results of a video survey recording all vehicle movements generated by the existing uses at the Bird in Eye Farm which was undertaken on Tuesday 1st August 2023. The full survey data, with summary diagram (5330/435 Rev. B), is provided at [Appendix 4](#).

- 3.13** The survey provides a fully classified count of all light and heavy vehicles using the existing site access. The total number of vehicles is shown in Table 2 and the number in brackets represents the number of heavy vehicle within the total number of vehicles. The landowner confirmed the movements recorded are representative of any given day, as there tends to be little fluctuation.

Table 2: Summary of Existing Vehicle Movements (Bird in Eye Farm)

Time Period	Arrivals	Departures	Two-way
Morning Peak 0800-0900	4 (1)	6 (0)	10 (1)
Evening Peak 1700-1800	11 (0)	7 (0)	18 (0)
12 Hour 0700-1900	97 (4)	101 (4)	198 (8)

3.14 The survey data shows Bird in Eye Farm generates very few vehicle movements during the peak hour periods or across the 12-hour day.

3.15 Only one heavy vehicle entered or exited the site during the peak hour periods. Across the 12-hour day (0700-1900), only 4 heavy vehicles entered and 4 exited the site.

3.16 Further analysis of the video survey reveals that on the day of the survey, the heavy vehicle movements comprised a refuse vehicle and three rigid vehicles. No articulated vehicle movements were observed although such vehicles have been observed accessing the site infrequently on previous site visits I have made. It is clear that Bird in Eye Farm generates very few vehicle movements in general and a very limited number of HGV movements.

Site Access

3.17 Access to Bird in Eye Farm is achieved via a simple priority T-junction from Bird in Eye Hill.

3.18 The formula for calculating Stopping Sight Distances (SSD) is set out at paragraph 7.5.3 of Manual for Streets (CDI.1) and is as follows:

$$SSD = vt + v^2/2d$$

where:

v = speed (m/s)

t = driver perception-reaction time (seconds)

d = deceleration (m/s²)

3.19 Manual for Streets 2 (CDI.2) recommends at Table 10.1 that for speeds above 60kph (37mph) a perception-reaction of 2 seconds should be used along with a

deceleration rate of 2.45m/s^2 . These are the parameters used to calculate the SSDs within the Table 2.10 of the DMRB document CD109 (CDI.17).

3.20

Using the above parameters, the commensurate visibility splays based on the recorded approach speeds are $2.4\text{m} \times 127\text{m}$ to the east, and $2.4\text{m} \times 113\text{m}$ to the west. These have been plotted on a plan of the existing access. Whilst the commensurate visibility splay to the east is achievable within the adopted highway boundary, achieving the full splay to the west would require third party land (see 5330/032 at [Appendix 5](#)). This is not just a theoretical issue but a practical one too as a substantial hedge obstructs visibility in this direction. The hedge is indicated by the red arrow in Figure 1.



Figure 1: Visibility to the West (source – Google Maps)

3.21

The splay achievable to the west, within the adopted highway and avoiding the hedge, is 73.4m (commensurate to an approach speed of c. 32mph). The achievable visibility in this direction is therefore substandard and does not accord with the required distance of 113m which is based on the recorded approach speed.

3.22

Heavy goods vehicles (HGVs), including articulated vehicles, have been observed entering and exiting the Bird in Eye Farm using the existing site access. Whilst these movements are infrequent (as I have demonstrated previously), swept path analysis of these vehicles entering and exiting the site demonstrates that when turning left in

and left out, the vehicle crosses into the oncoming lane (see 5330/243 & 5330/245 at [Appendix 6](#)).

3.23 Clearly such an arrangement is suboptimal when judged against technical guidance, particularly when accompanied by the substandard visibility to the west.

3.24 The Appeal Scheme will close the existing access and provide a new access approximately 45m to the east which will allow commensurate visibility splays to be achieved in both directions. I consider the Appeal Scheme access later in my Evidence.

Uckfield Town Centre

3.25 Classified turning count and queue length surveys were undertaken at the Framfield Road/High Street/Bridge Farm Road signalised crossroads and at the Bell Lane/High Street signalised T-Junction, in Uckfield town centre. A plan showing the location of these junctions relative to the location of the Appeal Scheme is provided at [Appendix 7](#) (5330/306 Rev. A).

3.26 Initial surveys were undertaken on 9th July 2019, during the recognised highway peak hours of 0800-0900 and 1700-1800. Follow up surveys were then undertaken over a 7-day period, between 14th-19th October and 3rd November 2020 at the request of the Highway Authority (the survey equipment was damaged on 20th October and an additional day's worth of data was collected on 3rd November to account for this loss).

3.27 Flow diagrams summarising the results of these surveys are at presented on plans 5330/404 & 5330/424 Rev. A at [Appendix 8](#).

3.28 It was agreed with the Highway Authority that the traffic generation/distribution associated with the committed developments of Mallard Drive, Ridgewood Farm and Eastbourne Road would be incorporated into the capacity modelling. A summary of the committed developments is provided below:

- Mallard Drive - 150 dwellings.
- Ridgewood Farm - up to 1,000 dwellings; employment use; primary school; retail, community, health and leisure uses.
- Eastbourne Road - 90 dwellings.

3.29 A plan showing the application site in relation to the committed development sites referenced at paragraph 3.28 is provided at Figure 2.

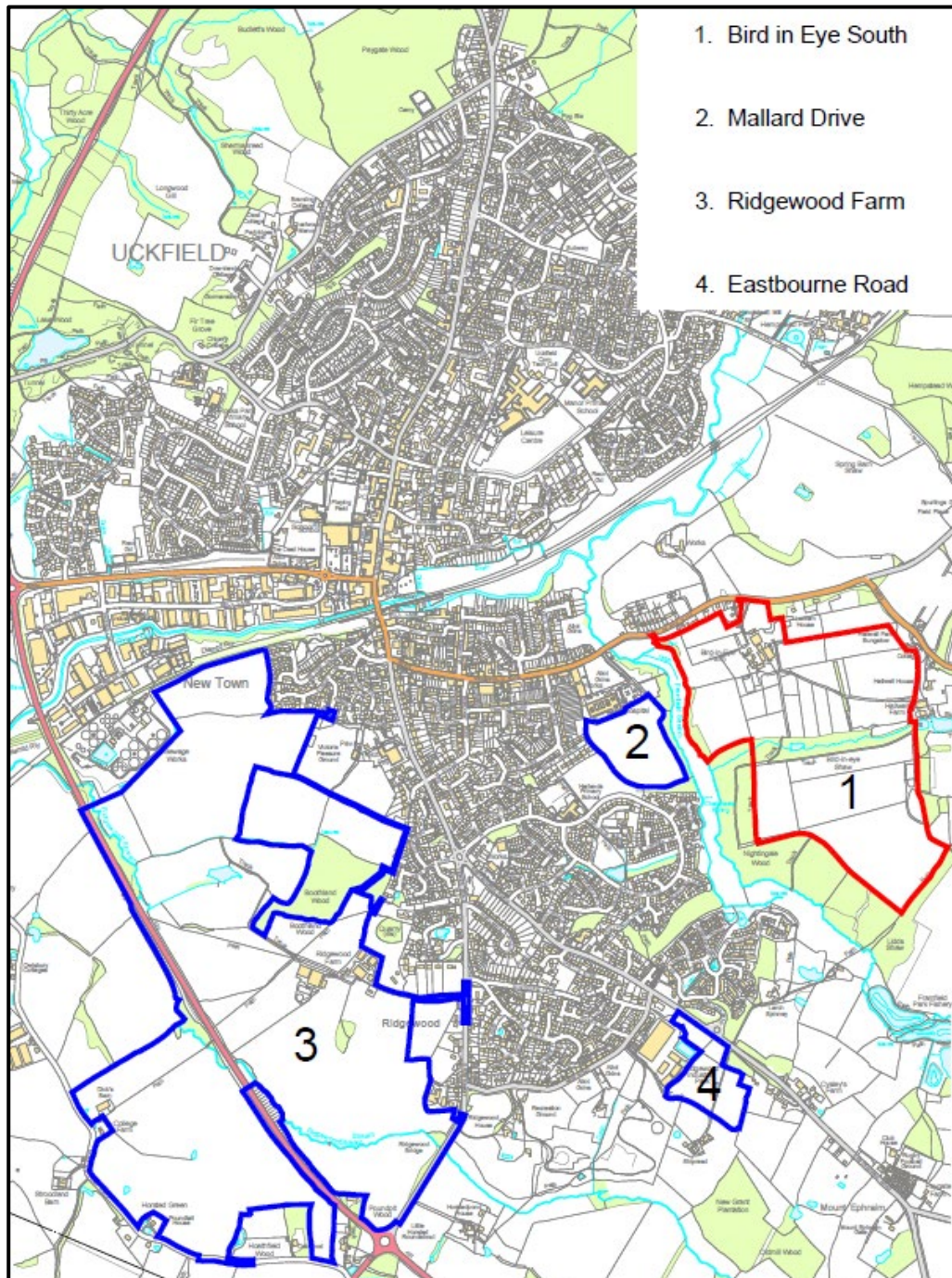


Figure 2: Location of Identified Committed Development Sites

3.30 The capacity of the two town centre junctions has been assessed using the industry standard software, LinSig. The results for Degree of Saturation and Mean Max Queue have been provided, which are defined as follows:

- **Degree of Saturation:** This describes the maximum traffic flow that can be accommodated by a junction. Values over 85% - 90% typically indicate traffic congestion, with the junction approaching its operating capacity. A degree of saturation of 90% is generally taken as the maximum acceptable albeit a junction would still be operating within its capacity at under 100% i.e., does not indicate a severe impact.
- **Mean Max Queue:** The Mean-Max Queue is the sum of the Maximum Back of Queue in the modelled typical cycle and the calculated Random & Oversaturated Queue. The 'Mean' refers to the fact that it is the mean over a number of cycles of the maximum queue occurring each cycle. It gives a representation of the maximum recorded queue during the modelled period and is used to validate the model against the recorded queues.

3.31

The Highway Authority has confirmed that the traffic signals at the two town centre junctions currently operate independently of each other, i.e., they do not operate a MOVA type system linking the junctions. Operational data has been obtained from the Traffic Signals Department of East Sussex County Council (ESCC) and this has been incorporated within the LinSig modelling. The model has been validated using the five-day average turning movements and queue length surveys undertaken in October/November 2020. This demonstrates that the model provides a suitable base from which an accurate assessment of the proposed traffic impact can be undertaken. A summary of the modelling results for the 2020 Base Year and 2027 Base Year + Committed Developments (i.e., without traffic from the Appeal Scheme) are provided in Tables 3 and 4. The full modelling reports are at [Appendix 9](#).

Table 3: Summary of Junction Modelling – 2020 Base Year

Road Name	AM		PM	
	Deg. Sat.	Mean Max Queue (PCU)	Deg. Sat.	Mean Max Queue (PCU)
Signalised Cross-Roads				
High Street (Northbound)	79.3%	11.5	56.6%	8.4
Framfield Road	76.7%	8.9	85.0%	7.5
Bridge Farm Road	43.2%	2.1	21.3%	1.0
High Street (Southbound)	80.7%	10.6	85.6%	14.6
Signalised T-Junction				
Bell Lane	80.3%	63.6	83.3%	17.9
High Street (Southbound)	50.0%	13.0	64.7%	8.2
High Street (Northbound)	78.5%	35.7	79.6%	14.9

Table 4: Summary of Junction Modelling – 2027 Base Year + Committed Development

Road Name	AM		PM	
	Deg. Sat.	Mean Max Queue (PCU)	Deg. Sat.	Mean Max Queue (PCU)
Signalised Cross-Roads				
High Street (Northbound)	87.4%	13.3	60.4%	9.5
Framfield Road	87.7%	12.6	86.5%	7.5
Bridge Farm Road	50.8%	2.5	34.8%	1.6
High Street (Southbound)	78.2%	10.4	91.3%	18.8
Signalised T-Junction				
Bell Lane	89.5%	17.4	90.7%	22.4
High Street (Southbound)	58.2%	5.8	78.8%	11.6
High Street (Northbound)	89.7%	23.1	89.8%	19.6

3.32 The assessment of the 2020 Base Year demonstrates that both town centre junctions operate at close to their theoretical capacities during both the morning and evening peak hours.

3.33 When committed development traffic and TEMPro growth rates are added to represent the 2027 base year, the degree of saturation exceeds 90% on some arms.

3.34 As I will consider later in my Evidence, the introduction of traffic from the Appeal Scheme will reduce the available capacity further. It has been agreed with the Highway Authority that improvements will be necessary at these junctions to accommodate traffic from the Appeal Scheme. I consider these further in Section 5 of my Evidence.

Collision Record

3.35 Collision data for the local highway network in the vicinity of the Appeal Scheme has been obtained from Sussex Safer Roads Partnership for a 7-year period (between 01/07/16 and 30/06/23).

3.36 Planning Practice Guidance states at paragraph 015 (reference ID: 42-015-20140306) that the analysis of injury accident records should be undertaken on the public highway in the vicinity of the site access “*for the most recent 3-year period, or 5-year period if the proposed site has been identified as within a high accident area*”.

- 3.37** The assessment of collision data has therefore gone above and beyond what would normally be undertaken.
- 3.38** The collision data is provided at [Appendix 10](#) and reveals that no personal injury collisions have been recorded at or near the site access. Furthermore, across the area surveyed, two collisions were recorded, both at the B2102 junction with Sandy Lane. The reports for both collisions give 'failed to look properly' as the causation factor indicating driver error was the cause behind both collisions.
- 3.39** The causation factors are not listed in the material at [Appendix 10](#) because this data is marked as 'sensitive'. As is standard, it is expressly stated that the data must not be transmitted. I will nevertheless ensure a hard copy is available at the Inquiry for the Inspector and Rule 6 Party to view.
- 3.40** In conclusion, the local highway network is demonstrably safe and would not be rendered unsafe with the introduction of traffic from the Appeal Scheme.

4. SUSTAINABILITY

- 4.1 Within this section of my Evidence, I consider the sustainability of the Appeal Scheme and its accessibility by modes of travel other than the private car, such as walking, cycling, by bus and by rail.
- 4.2 This has included an assessment of the distances to key facilities which future residents would likely require on a day to day basis such as for employment, education, leisure and retail.
- 4.3 Sustainable transport is defined in the NPPF as being *“any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.”*
- 4.4 There is no set distance that people are prepared to walk or cycle to facilities. The CIHT documents ‘Planning for Walking’ (CDI.3) and Planning for Cycling (CDI.5) suggest most people will walk to a destination that is less than 1 mile (c.1.6km) and cycling is a potential mode of travel for all journeys under 5 miles (c.8km).
- 4.5 The Department for Transport’s ‘Manual for Streets’ (CDI.1) identifies ‘walkable neighbourhoods’ as being *“characterised by having a range of facilities within 10 minutes (up to about 800 metres) walking distance of residential area which residents may access comfortably on foot”*. However, MfS does not consider 800 metres to be a maximum walking distance and the publication contends that walking can be used to access a variety of destinations within a range of up to 2 kilometres.
- 4.6 Further, data from the National Travel Survey (2021) suggests that 82% of all trips that cover a maximum distance of 1 mile are completed on foot. See Figure 3.

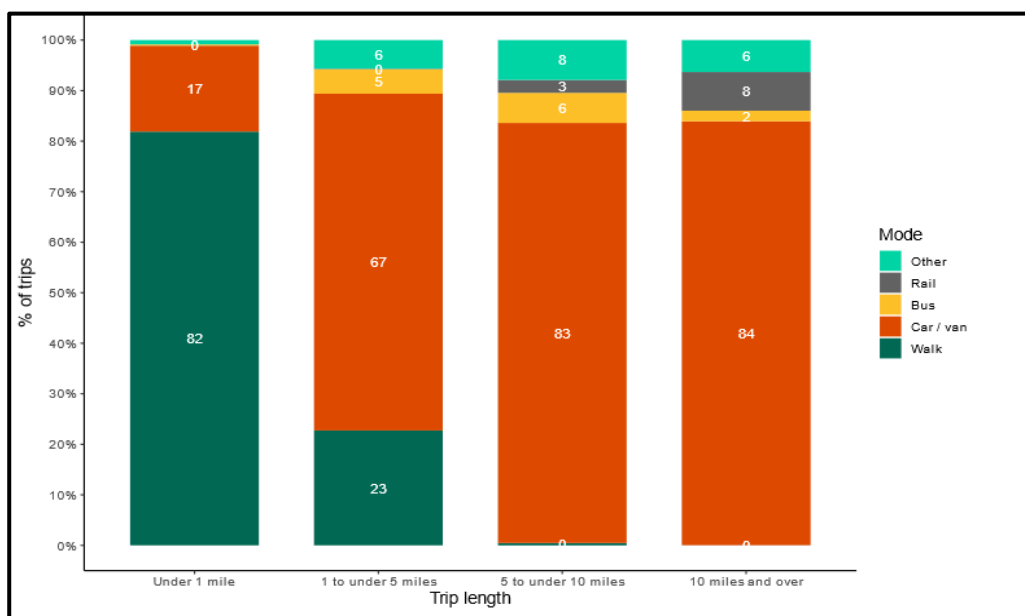


Figure 3: National Travel Survey 2021

4.7 The Wealden District Core Strategy Local Plan (February 2013) classifies Uckfield as a 'District Centre' with its function being defined as *"an accessible settlement by road and public transport containing a range of shops, employment opportunities and facilities including secondary school. Not reliant upon other centres within the District to meet day to day needs, but requires support from other secondary or primary centres to meet needs of the residents."*

4.8 The Secretary of State considered the accessibility of the Appeal Scheme within the 2009 appeal decision (CDK.1). Whilst I do not have access to the full evidence that was before the Secretary of State over 14 years ago, either as to the location of all relevant facilities, or as to what precise proposals were advanced by the appellants at that time, it is clear that locational sustainability issues were not regarded by the Secretary of State as a reason to dismiss the appeal.

4.9 The National Planning Policy Framework states at paragraph 105 that *"opportunities to maximise sustainable transport solutions will vary between rural and urban areas, and this should be taken into account in both plan-making and decision-making"*, furthermore paragraph 110 states it should be ensured that *"appropriate opportunities to promote sustainable transport modes can be, or have been, taken up given the type of development and its location"*.

4.10 This is reflected in the Appeal Decision (APP/R3650/W/21/3278196 at CDK.25) for a residential development of 99 units (Land West of Loxwood Road, Alfold), where the inspector stated at paragraph 32 that *“there is no local or national policy requiring the sustainable transport modes available to future residents to be as attractive as the private car. Instead, what is required is a “genuine choice of transport modes. There is no local or national policy which requires the majority of residents to use sustainable alternatives to the private car”.*

4.11 The Inspector goes on to state at paragraph 33 that *“there is no free-standing requirement...to consider the sustainability of the location in the first place. Instead, that location is taken into account in assessing compliance with sustainable transport policy.”*

4.12 In conclusion, the Inspector states at paragraph 109 that *“there would be no harm arising from undue reliance on the private car because opportunities for sustainable transport modes have been maximised by the appeal scheme, given the rural location. There are adequate services and facilities which can be accessed without needing a car”.*

Walking & Cycling

4.13 The walking/cycling distances from the Appeal Scheme to the plethora of facilities within Uckfield have been set out in Table 5. This is accompanied by an isochrone plan (5330/302 Rev. F) which clearly demonstrates the Appeal Scheme’s close proximity to these facilities, all of which are within recognised walking and/or cycling distance of the Appeal Scheme. See [Appendix 11](#).

Table 5: Walking/Cycling Distances to Key Facilities (From Centre of Appeal Scheme)

Destination		Walking/Cycling Distance
Education*	Manor Primary School and Nursery	2.7km
	Uckfield College	2.5km
	Holy Cross CE Primary School	2.2km
	St. Philips Catholic Primary School	1.6km
	Harlands Community Primary School	1.3km
	School House Nursery Uckfield	2.4km
	Future Ridgewood Farm Primary School and early years facilities (not yet constructed)	c. 2.4km
Retail	Waitrose (Uckfield High Street)	1.5km
	Tesco Superstore	1.8km
	Lansdown Health Store	1.6km
	Screwfix (Bellbrook Industrial Estate)	1.5km
	Proper Cycling	1.9km
	Toolstation (Bellbrook Industrial Estate)	1.8km
	Pets Corner	1.6km
	Sussex Larder	950m
	J.F. Bishop Butcher	1.9km
	Truffles Bakery	1.6km
	Millets	1.7km
	Halfords (Bellbrook Industrial Estate)	1.3km
	Alma Arms	900m
	The Highlands Inn	1.8km
	Golden Dragon	1.0km
	Kam's Fish Bar	1.1km
	Uckfield Tandoori	1.3km
	Relish Turkish Restaurant	1.6km
Food	Riverside Fish Bar	1.4km
	KFC	1.5km
	McDonald's	1.8km
	Subway	1.6km
	Canton Chinese	1.7km
	Star of Bengal	1.6km
	Bengal Spice	1.7km
	Amira's Kitchen	1.7km
	Uckfield Fish & Grill	1.7km
	Pizza Express	1.7km

Table 5: continued

	Destination	Walking/Cycling Distance
Leisure & Fitness	Fun Abounds Trampoline Centre	1.9km
	Uckfield Leisure Centre	1.8km
	The Luxford Centre	1.8km
	Civic Centre	1.7km
	Anytime Fitness	1.6km
	Isenhurst Health Club (Bellbrook Industrial Estate)	1.9km
	Uckfield Yoga	1.8km
	Picture House Cinema & Restaurant	1.8km
Faith	St. Saviours	850m
	Our Lady & St. Philip	1.5km
	Uckfield URC	1.3km
	Cornerstone Church	1.3km
	King's Church	1.6km
	Grange Evangelical Church	1.9km
	Holy Cross	2.0km
	Uckfield Baptist Church	2.7km
Healthcare	Meads Medical Centre	2.2km
	Uckfield Chiropractic Clinic	1.6km
	The Hearing Care Partnership	1.6km
	Specsavers	1.5km
	Uckfield Hospital	700m
	Dr M Bell Surgery	700m
	Kamsons Pharmacy	2.3km
	Uckfield Physiotherapy	1.7km
	Fairfield House Vets	1.5km
Transport	Bus Stops (Uckfield Hospital Access)	550m
	Uckfield Railway Station	1.5km
	R & R Taxis	1.5km
	Uckfield Bus Station	1.6km
Emergency Services	Uckfield Police Station	1.3km
	Uckfield Fire Station	1.7km
Banks & Post Office	Santander	1.5km
	Halifax	1.6km
	Nationwide	1.7km
	Lloyds	1.8km
	Uckfield Post Office	1.6km

* - The Old Grammar School was listed in a previous version of this Table however this has now closed and as such has been removed from the Table.

- 4.14** Uckfield is also home to two large industrial estates, namely the Bellbrook Industrial Estate (located on the western side of Uckfield) and the Ridgewood Industrial Estate (located on the southern side of Uckfield). Both are within walking and/or cycling distance of the Appeal Scheme and are identified on the isochrone plan (see [Appendix 11](#)).
- 4.15** The Wealden District Council website entries for the Bellbrook and Ridgewood Industrial Estates (see [Appendix 12](#)) states “*Uckfield is a large commercial centre and offers good facilities for the local workforce. The town has an existing office stock generally located within the town centre and at the western end of the Bellbrook Industrial Estate. The main industrial areas are Bellbrook and Ridgewood*” and “*in recent years, Uckfield has successfully attracted a significant amount of industrial and commercial investment and now provides a wide range of jobs in manufacturing and services. The majority of activity is contained in the two main business areas at Bellbrook and Ridgewood, together with a variety of businesses in the town centre.*”
- 4.16** In addition to providing up to 1,000 dwellings, the Ridgewood Farm development (currently under constructions) will provide the following:
- 2,000m² mixed use retail/community/leisure use;
 - 13,500m² commercial/industrial use; and
 - Up to 2 form entry primary school and early years facilities.
- 4.17** The land use plan shows the employment areas will be located towards the north-western corner of the Ridgewood development which will be approximately 1.9km walking/cycling distance from the Appeal Scheme and therefore readily accessible to future residents using these modes of travel.
- 4.18** The Appeal Scheme is within walking and cycling distances of all facilities that future residents may wish to use on a day to day basis. This includes a significant amount of employment opportunities for future residents, all of which are within walking/cycling distance of the Appeal Scheme.
- 4.19** The Appeal Scheme will provide a dedicated non-motorised user (NMFU) access for pedestrians and cyclists at the north-western corner of the site. This will connect directly to an existing footway along the southern side of Bird in Eye Hill which will

be widened to 3m and upgraded to a shared footway/cycleway between the NMU access and the existing bus stops adjacent to the hospital access.

4.20 Bird in Eye Hill becomes Framfield Road west of the hospital access and footways are provided on both sides of the carriageway along with street lighting. The footways vary in width but are generally between 1.5m and 2.0m wide.

4.21 The Department for Transport document entitled 'Inclusive Mobility' (CDI.8) advises in section 4.2 that a footway width of 2m is the minimum that should be provided. However, if this is not feasible due to physical constraints (as is the case along Framfield Road) then a minimum width of 1.5m could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other.

4.22 The narrowest section of footway is in the vicinity of 2-8 Framfield Road where footways are approximately 1m wide, albeit this is over a short distance (c. 45m) and wider footways c. 2m wide are available on the northern side of Framfield Road.

4.23 The footways along Framfield Road therefore accord with Inclusive Mobility guidance on footway widths and are appropriate to cater for the additional demand generated by the Appeal Scheme.

Bus Services

4.24 Bus stops are located on Bird in Eye Hill adjacent to the Uckfield Hospital access. These bus stops will be served by the route 29A service, operated by Brighton and Hove Buses which provides a service between Brighton, Tunbridge Wells and Eastbourne. A summary of this service is provided in Table 6.

Table 6: Summary of Route 29A Bus Service (Uckfield Hospital Bus Stop)

Eastbound Services (Towards Heathfield, Crowborough & Tunbridge Wells)			Westbound Services (Towards Uckfield & Brighton)		
Monday – Friday	Saturday	Sunday	Monday – Friday	Saturday	Sunday
0747	0850	1115	0648	0758	0959
0851	Then every hour until	1220	0737	0851	1059
Then every hour until	1551	1323	0856	Then every hour until	1203
1450	1701	1427	0951	1552	1308
1604	1809	1533	Then every hour until	1657	1411
1708	1909	1634	1658	1802	1515
1810	2007	1736	1805	1912	1621
1911	2104	1840	1914	2012	1722
2004			2012		1826
2104					

4.25 These bus stops are between 240m and 900m walking distance of the dwellings within the Appeal Scheme and this is presented diagrammatically on the plan (5330/035) at [Appendix 13](#). For bus stops in residential areas, 400m has traditionally been regarded as an upper limit for the distance people will be prepared to walk to a bus stop. However, this distance is *guidance* and not a rigid standard that all developments must adhere to.

4.26 Indeed, walking distances of between 500m and 1km were recently considered appropriate for a residential scheme for 180 units in Polegate (Wealden District Council), which was allowed at Appeal (ref. APP/C1435/W/22/3310445) (CDK.7). The Inspector stated at paragraph 10 that *“the site is located a minimum of around 500m from the nearest bus stop, with some properties requiring close to a 1km walk. Therefore, although there are public transport options in the area, given the distances involved, they are not readily accessible. However, the UU would secure a contribution towards more frequent, and evening and Sunday services from these bus stops. It would also secure a Travel Plan which would further promote sustainable transport modes. These actions are likely to reduce car dependence by improving the opportunity for future occupiers to utilise public transport options”*.

- 4.27** The Appellant has agreed to provide a financial contribution of £162,158 per annum for a 3 year period triggered from first occupation. This contribution will fund the following improvements (see [Appendix 14](#)):
- *Provision of hourly Monday to Saturday service (base service level without addition funding being 2 hourly) - £79,644 per annum.*
 - *Provision of additional Monday to Friday early morning journeys - £11,638 per annum.*
 - *Provision of additional evening provision - £50,094 per annum (note this amount is for a Monday to Saturday evening service).*
 - *Provision of Sunday daytime service - £20,782 per annum.*
- 4.28** The Highway Authority has advised that the service outlined in Table 6 will be funded by UK Government until April 2026. After this period, the services in Table 6 may not be sustained unless alternative funding is secured i.e., from developer contributions.
- 4.29** Without the Appellant's financial contribution, the Highway Authority has stated that there would be no 0648 service to Uckfield and only one service every 2 hours with no services after 1815. There would also be no services on Saturdays or on Sundays.
- 4.30** The service improvements funded by the Appellant including the provision of additional Monday to Friday early morning and evening services, will provide the opportunity for those future residents whose work hours are outside of the typical 0900-1700 period to travel by bus. For those future residents who travel by rail to destinations further afield, the provision of earlier and later bus services will allow the journey to/from the railway station to be made by bus.
- 4.31** These improvements will not only benefit future residents of the Appeal Scheme, but also all existing residents in Uckfield and the surrounding area.
- 4.32** The specified funding period of 3 years will allow the additional services to become established and develop into being self-funding.

4.33 In addition to this, the Appellant will provide bus shelters and a real-time passenger information (RPTI) system at the existing bus stops adjacent to the hospital access and bus cages at the existing stops further west on Framfield Road. I consider these improvements later in my Evidence.

4.34 A Travel Plan has also prepared for the Appeal Scheme to promote sustainable transport modes and this can be secured through the Section 106 Agreement, or by condition.

4.35 The existing highway network makes provision for cyclists within the town centre at the two signalised junctions. Advanced waiting areas, ahead of stopped vehicles, are provided by the Highway Authority at each junction. An Automatic Traffic Counter (ATC) survey undertaken in March 2023 along Bird in Eye Hill recorded an average of 9-10 two-way cycle trips across an average weekday. This demonstrates that cyclists consider the route along Bird in Eye Hill to/from the town centre to be safe to use.

4.36 Access for cyclists to/from the Appeal Scheme will be achieved either via the NMU access or the main site access, albeit for eastbound cyclists this will involve cycling up a hill. For any cyclists put off by this, eastbound cyclists could simply cross the carriageway at the hospital access, dismount and push their bike along the short route (140m) into the Appeal Site (where a two-way cycle route can be provided at reserved matters stage). Safe crossing facilities are provided at the Hospital access (dropped kerb and tactiles) and so further provision at this location is therefore not necessary.

Rail Services

4.37 Uckfield railway station is located approximately 1.5km walking/cycling distance from the Appeal Scheme. The station is the southern terminus of the Oxted branch line and provides direct services to London Bridge, Crowborough, Edenbridge Town, Hurst Green, Oxted and East Croydon, all of which would provide employment opportunities for future residents. The travel time from Uckfield to these destinations is set out below:

- Crowborough - 11 minutes (direct).
- Edenbridge Town - 35 minutes (direct).
- Hurst Green - 43 minutes (direct).

- Oxted - 46 minutes (direct).
- East Croydon - 1 hour 4 minutes (direct).
- London Bridge - 1 hour 20 minutes (direct).

4.38 The station typically provides one train per hour to London Bridge on weekdays and weekends. The first weekday service to London Bridge is at 0531 and last train from London Bridge to Uckfield departs at 2040.

4.39 The station provides significant cycle parking provision with 20 secure and covered cycle parking spaces within its car park, and a further 24 covered spaces located opposite the railway station, on the western side of the High Street.

Conclusion

4.40 In conclusion, the Appeal Scheme is within walking and cycling distance of a range of facilities and service along Framfield Road, and in Uckfield town centre.

4.41 Regular bus services are available close to the site and the Appellant will provide a contribution to improve these services further.

4.42 Uckfield railway station is within walking/cycling distance of the site providing regular services to London Bridge.

4.43 The opportunity exists for a significant number of trips to/from the Appeal Scheme to be made by sustainable modes of travel whether that is to the many facilities within Uckfield or by linking trips to destinations further afield.

4.44 Opportunities for future residents to travel by sustainable modes have been maximised, with due regard to the location of the Appeal Scheme, and there are adequate services and facilities which can be accessed without needing to rely on the private car.

5. DEVELOPMENT PROPOSAL

5.1 In this section of my Evidence, I will set out the development proposal, including means of access, traffic generation and distribution, and the impact of this traffic on the wider highway network.

5.2 The proposed development will provide up to 290 residential units on land to the south of Bird in Eye Hill.

Appeal Scheme Access

5.3 Access to the Appeal Scheme will be achieved from Bird in Eye Hill via a new access located approximately 45m east of the existing site access, which is to be closed. It will incorporate a ghost island right turn lane and has been designed with regard to the DMRB document CD123 'Geometric design of at-grade priority and signal-controlled junctions' (CDI.7). It is agreed with the Highway Authority that the majority of the design dimensions are compliant with this guidance. The Appeal Scheme access is shown on drawing 5330/021 Rev. K (see [Appendix 15](#)).

5.4 The Appeal Scheme access is shown on drawing 5330/021 Rev. K and demonstrates that commensurate visibility splays, based on recorded vehicle speeds, are achievable within the adopted highway boundary and do not require third party land

5.5 Visibility to the east has also been shown tangentially and drawing 5330/029 shows the visibility envelope in this direction (see [Appendix 16](#)). The shaded area represents the area that can be seen by a driver exiting the Appeal Scheme, from an x-distance of 2.4m. Whilst a small area is obstructed, this is approximately 800mm from the kerb line at its most significant, and tapers to zero in both directions. Such an area would not obstruct any approaching motor vehicle, which would be visible over the full length of the visibility splay.

5.6 In any event, the visibility splays as shown on the Appeal Scheme access plan are agreed with the Highway Authority. In addition, and based on my experience, I would expect approach speeds from both directions to reduce as a result of the proposed access configuration.

- 5.7** A further check has been made to ensure any vehicle waiting within the right turn lane is aware of a vehicle approaching from the east and vice versa over an appropriate distance. This distance is 129.4m (including 2.4m bonnet length) and is achievable within the adopted highway boundary (see 5330/027 Rev. A presented at [Appendix 17](#)).
- 5.8** At the request of the Highway Authority, a long profile showing the vertical alignment from the Appeal Scheme access along Bird in Eye Hill in both directions has been prepared (see 5330/037 Rev. B [Appendix 18](#)). The plan demonstrates that the visibility splays are achievable in the vertical plane i.e., they are not obscured by any vertical obstructions.
- 5.9** The Highway Authority's speed survey which I referred to earlier in my Evidence, recorded slightly lower westbound approach speeds. The access design has been based on the higher speeds recorded in 2019. I have therefore treated the Highway Authority's 2023 speed survey results as a sensitivity test which demonstrates the robustness of the approach I have taken when designing the Appeal Scheme access.
- 5.10** There are two areas where the Appeal Scheme access diverges from the guidance contained within CD123 (CDI.7) which require further commentary. This is in respect to corner radii and through lane widths and I consider both aspects in the following paragraphs.
- 5.11** Paragraph 5.6.3 of CD123 states that at ghost island junctions where no diverge or merge tapers are provided, the corner radii should be 15m followed by a corner taper of 1:6 over a distance of 30m. Paragraph 6.8 states that at ghost island junctions, the through lane widths in each direction shall be a minimum of 3.0m.
- 5.12** However, DMRB provides the design standard for *trunk roads* which are defined by National Highways as motorways and major A-roads, and carry a third of all traffic and two-thirds of all freight traffic. Vehicle speeds on trunk roads are typically higher too, as the speed limit on motorways and major A roads is generally 70mph.

5.13 Schemes affecting trunk roads are therefore designed to accommodate a significant level of traffic movements, including a large proportion of heavy good vehicles.

5.14 To put this into perspective, the Department for Transport has published Road traffic statistics (TRA) which set out the average number of vehicles passing a point in the given road network each day. The figures for the trunk road network are as follows (HGV percentage is given in brackets):

- 80,400 (47.2%) vehicles on Motorways; and
- 13,200 (20.7%) vehicles on major A-roads.

5.15 The above data is taken from the Government's road traffic statistics TRA0301 and TRA3105 datasets for the year 2022 (see [Appendix 19](#)).

5.16 The comparable figure for Bird in Eye Hill, based on the 2019 ATC survey, is 4,775 vehicles, 2.95% of which are HGVs.

5.17 The flows along Bird in Eye Hill are materially different to those typically found on the trunk road network, to which the DMRB guidance applies.

5.18 It is my considered view that there should be no requirement for the Appeal Scheme access to be designed to accommodate the flows typically found on the trunk road network.. In reality the flows along Bird in Eye Hill are significantly and materially lower.

5.19 This is reflected at paragraph 3.2.1 of Local Transport Note (LTN) 1/08 which states that *"regulations and technical standards have a key role in the delivery of good design, but, if used as a starting point, they may serve to compromise the achievement of wider objectives. A standards-based template view of road junction design, for example, is inappropriate."*

Corner Radii

5.20 The corner radii at the Appeal Scheme access are 8m.

5.21 Swept path analysis of the access has been undertaken for the following vehicles (see [Appendix 20](#)):

- Refuse vehicle (5330/227 Rev. D);
- Large rigid lorry (5330/228 Rev. D);
- Two cars passing (5330/229 Rev. F); and
- Articulated lorry (5330/244).

5.22 The analysis demonstrates that each vehicle is able to enter and exit the Appeal Scheme in a suitable manner and will not cross into the oncoming through lane. Such vehicles will access the site infrequently and predominantly outside of the network peak hour periods, as I have previously demonstrated.

5.23 The swept paths of articulated and large rigid lorries have been considered as these will continue to serve the retained uses at Bird in Eye Farm. The video survey of the existing site access (see [Appendix 4](#)) has demonstrated that during the network peak hour periods, only one heavy vehicle entered or exited the site. Across the 12-hour day (0700-1900), there were a total of 4 heavy vehicles entering the site and 4 exiting. Use of the access by these larger vehicles therefore occurs on a very infrequent basis and would not conflict with traffic from the proposed development.

5.24 Whilst these vehicles are shown to cross the centreline of the Appeal Scheme access when entering/exiting the site, Manual for Streets advises at paragraph 6.8.1 that “*on streets with low traffic flows and speeds, it may be assumed that they [service vehicles] will be able to use the full width of the carriageway to manoeuvre. Larger vehicles which are only expected to use a street infrequently, such as pantechnicons, need not be fully accommodated*”. Similarly, CD123 (CDI.7) advises at paragraph 5.2 that the swept path of the largest vehicles can be discounted where they comprise a very small percentage of vehicles that will use the highway in question and there are no relevant dangerous bends. This guidance is applicable here as HGV traffic will comprise around 0.6% of daily (12-hour) movements through the site access and there are no relevant dangerous bends.

5.25 The Appeal Scheme will generate in the region of 143-147 two-way movements during the network peak hour periods and 1,284 daily movements (12 hour). The survey of the existing site access referenced above identified 8 heavy vehicle

movements during the recorded 12-hour period, equating to around 0.6% of anticipated daily (12-hour) movements.

5.26 It is generally considered that an AADT flow of less than 2,000 vehicles constitutes a lightly trafficked street. Across the 24 hour day, the Appeal Scheme would generate less than 2,000 movements (AADT) and is therefore 'lightly trafficked'.

5.27 Furthermore, the PICADY analysis of the Appeal Scheme access (and agreed with the Highway Authority) shows there will be minimal queuing and delay for vehicles entering/exiting the site. A summary of the modelling result is provided in Table 7 and the full PICADY results are at [Appendix 21](#).

5.28 It should be noted that the values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle. A junction is considered to be approaching its capacity when the RFC is 0.85.

Table 7: Summary of Site Access Junction Assessment – 2027 Design Year

Arm	AM Peak			PM Peak		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
Site Access – Left Turn Out	0.2	8.12	0.18	0.1	6.90	0.09
Site Access – Right Turn Out	0.1	8.50	0.05	0.0	8.37	0.03
Bird in Eye Hill – Right Turn In	0.1	7.18	0.08	0.2	7.48	0.16

5.29 The modelling demonstrates minimal queuing and delay indicating there will be ample gaps within the traffic to allow larger vehicles to access the site in a safe and suitable manner. The potential for conflict between the vehicles using the Appeal Scheme access is therefore low.

5.30 Before HGV drivers are able to drive professionally, they must pass the initial Driver Certificate of Professional Competence (CPC) which is divided into four parts, those being theory test; case studies; practical driving test; and Driver CPC practical test. Once qualified, drivers must undertake additional training to tow heavier trailers which includes articulated lorries. To stay qualified, drivers must undertake 35 hours of Driver CPC training and renew their licence every 5 years.

5.31 Drivers of large vehicles are therefore highly trained and are fully aware of the characteristics of the vehicles they are driving, particularly how much space they need when entering and exiting a junction and the knowledge of when to wait for a car to clear.

5.32 This is supported by the absence of any car/HGV collisions associated with the existing access arrangement where the swept path analysis is worse than at the proposed access. This reflects 100 or so vehicle movements into and out of the existing Bird in Eye Farm access per weekday and around 4,800 two-way movements along Bird in Eye Hill (per day) over the 7 year period from which collision data was obtained and analysed.

5.33 The proposed corner radii are therefore appropriate and will allow all vehicles to access the Appeal Scheme safely.

Through Lane Widths

5.34 The through lanes in both directions will be 2.75m wide. This is generally wider than the existing through lanes (see [Appendix 1](#)). The proposed right turn lane is 3m in width.

5.35 The swept path analysis undertaken (see [Appendix 20](#)) demonstrates that the proposed 2.75m wide through lanes do not restrict the ability of larger vehicles to enter/exit the site, nor will there be an increased risk of side swipe type collisions.

5.36 When entering and exiting the Appeal Scheme, the analysis shows that neither vehicle overhangs into the oncoming through lanes. Whilst these vehicles are shown to encroach into the right turn pocket when exiting the Appeal Scheme, it has been demonstrated that such vehicles will enter/exit the site on a very infrequent basis (outside of the network peak hour periods) and will simply wait for the right turn pocket to become clear before exiting the Appeal Scheme.

5.37 Furthermore, when these larger vehicles are waiting in the right turn pocket, through vehicles travelling east and westbound are able to pass the waiting vehicle.

5.38 As I have demonstrated, the proposed through lanes are wider than the existing. Currently, vehicles turning right into the existing site will position themselves towards

the centre of the carriageway as no dedicated right turning provision is provided. There have been no recorded instances of side swipe collisions at the existing access which clearly demonstrates the existing (substandard) lane widths do not contribute to side swipe collisions. Nevertheless, the Highway Authority has suggested that the proposed widths of 2.75m could increase the risk of swipe collisions, particularly involving larger vehicles associated with the retained uses at Bird in Eye Farm.

5.39 The proposed through lanes, being 2.75m wide, are wider than existing and the introduction of a ghost island right turn lane will further increase the separation between eastbound and westbound through vehicles.

5.40 The existing access accommodates large vehicles turning right into the site being passed by vehicles continuing westbound. This existing arrangement has not resulted in any collisions in the last 7 years. The proposed arrangement will increase the separation between vehicles and therefore *reduce* the likelihood of side swipe collisions.

Other Design Matters

5.41 The Highway Authority has raised other design concerns at paragraph 2.14 of their Statement of Case. I deal with each matter in Table 8.

Table 8: Summary of ESCC Concerns and BR Response

ESCC Concern	Bellamy Roberts' Response
An isolated ghost island design in such largely rural surroundings would normally be expected to provide a traffic island with a beacon and bollards with keep left signs in the centre circle at the front end of the right turn lane to highlight to drivers approaching from the east the existence and form of the junction and to provide some shielding to drivers occupying the right turn lane.	<p>There is no requirement within the design guidance (CD123) that a solid traffic island with a beacon and bollards be provided.</p> <p>I have demonstrated in my Evidence that commensurate visibility is achievable between a vehicle waiting in the right turn lane and a vehicle approaching from the east.</p> <p>The Road Safety Auditor has recommended that side road ahead warning signs are provided on both approaches to allow drivers/riders to become aware of the proposed junction at a safe distance. This will be incorporated at the detailed design stage.</p>
There is also a concern that vehicles approaching the site access junction from the east may overtake (&/or cut the corner) without effective lane management.	<p>I have demonstrated in my Evidence that commensurate visibility is achievable between a vehicle waiting in the right turn lane and a vehicle approaching from the east.</p> <p>Drivers will therefore be aware of one another and eastbound vehicles would clearly not overtake or cut the corner if it would collide with a waiting vehicle.</p>

Stage 1 Road Safety Audit

5.42

The Appeal Scheme access proposal (5330/021 Rev. K) has been subject to a Stage 1 Road Safety Audit (see [Appendix 22](#)). I have provided my Designer's response to the matters raised within the Audit, which I have summarised in Table 9.

Table 9: Summary of Stage 1 RSA (Appeal Scheme Access)

Stage 1 RSA Recommendation	Bellamy Roberts' Designer's Response
Item A.1.1: It is recommended that the taper is amended to allow a smooth alignment.	Agree – This matter will be addressed at the detailed design stage and will not impact on the 2.75m through lane widths proposed at this location.
Item A.2.1: It is recommended that the proposed through lanes are adequate for the expected vehicles.	Agree – The proposed through lanes will be wider than existing. There has been no history of side swipe collisions at the existing access and the introduction of a right turn lane will provide further separation for east and westbound vehicles.
Item A.2.2: It is recommended that the existing gullies are removed, and an adequate surface water drainage network is provided.	Agreed – All existing gullies will be assessed during the detailed design stage and relocated accordingly.
Item A.2.3: It is recommended that the utility covers and poles are relocated accordingly.	Agreed – All existing utility covers and poles will be assessed during the detailed design stage and relocated accordingly.
Item A.3.1: It is recommended that the proposals allow for the expected vehicles to approach the proposed give-way without the need to encroach the opposing lane.	Disagree – The swept path analysis undertaken at the site access includes a refuse vehicle and larger 'heavy' vehicles such as an articulated vehicle and large rigid serving the retained Bird in Eye Farm uses. However, such vehicles would access the site on a very infrequent basis which is demonstrated in the results of the video survey at the Bird in Eye Farm access which shows that during the network peak hour periods, only one heavy vehicle entered or exited the site. Across the 12-hour day (0700-1900), there were a total of 4 heavy vehicles entering the site and 4 exiting. Use of the access by these larger vehicles therefore occurs on a very infrequent basis and would not conflict with traffic movements from the proposed development. Manual for Streets guidance (ref. paragraph 6.8.1) is appropriate in this instance i.e., it may be assumed that larger vehicles are able to use the full width of the carriageway to manoeuvre.
Item A.3.2: It is recommended that side road ahead warning signs are provided on both approaches to allow drivers/riders to become aware of the proposed junction at a safe distance.	Agreed – this will be included at the detailed design stage.

Proposed Access Amendments

5.43

I am continuing to work collaboratively with the Highway Authority with a view to addressing their concerns with the scheme. In this regard, I have made a further very minor amendment to the access plan to incorporate 3m wide through lanes over the length of the right turn pocket. At a meeting with the Highway Authority on 1st August, Mr New stated that should 3m wide through lanes be provided over the

length of the right turn pocket, the Highway Authority would accept this and would consider this matter to be addressed.

- 5.44** Whilst such minor amendments could be considered and implemented at the detailed design stage, to assist the Highway Authority and Inspector, I have nevertheless prepared revision M of the site access (5330/021 Rev. M – see [Appendix 23](#)) which has incorporated some very minor widening along the northern side of Bird in Eye Hill to facilitate 3m lane widths, as requested by the Highway Authority.
- 5.45** No other alterations have been made between revisions K and M.
- 5.46** The minor widening to achieve 3m wide through lanes has had no impact on the location of the Appeal Scheme access, or on the visibility achievable (y-dimensions and forward visibility). For completeness however, I have amended these plans and present them at [Appendix 23](#).
- 5.47** The accompanying swept path analysis for a refuse vehicle, two cars passing and larger heavy vehicles (associated with the retained uses at Bird in Eye Farm) have been updated to reflect revision M (see [Appendix 23](#)).
- 5.48** The Road Safety Auditor has confirmed that revision M of the Appeal Scheme access and accompanying plans have addressed items A.1.1, A.2.1 and A.3.1 as were raised in the Stage 1 Road Safety Audit. (see [Appendix 24](#)).
- 5.49** The Rule 6 Party and Highway Authority has been furnished with all relevant material relating to revision M of the Appeal Scheme access. This was sent by email to the Highway Authority on Monday 7th August (nearly two weeks before exchange of Highway Proofs) and to the Rule 6 Party on 10th August.

5.50 The Highway Authority provided comments on revision M of the Appeal Scheme access proposal via email dated 17th August (see [Appendix 25](#)). The Highway Authority has commented on the impact of the proposed road widening on the northern and southern sides of Bird in Eye Hill with regard to the root systems to the east and hedgerow to the north, and further requested that:

- 10m radii be provided at the site access;
- 'side road ahead' warning signs be provided on the eastbound approach to the access; and
- a solid white centreline be provided for vehicles approaching from the east.

5.51 Regarding the impact of the proposed road widening on the southern side of the carriageway, neither I nor Richard Hyett (Barton Hyett Associates Ltd) agree with the concerns expressed by the Highway Authority. Barton Hyett Associates Ltd has previously considered the impact of the Appeal Scheme access on land to the east and has advised that this causes no concern (see [Appendix 26](#)). Furthermore, the Council itself made clear at the Case Management Conference that it promotes no landscape objection.

5.52 The position of the access has not altered in the period since revision H (5330/021 rev. H) was submitted to the Highway Authority in September 2022 and matters relating to the location of the site access and visibility splays have been agreed with the Highway Authority as per the agreed Highways Statement of Common Ground (CDD.2). Nevertheless, there is no reason why this cannot be considered further at the detailed design stage and the need or otherwise of any special engineering measures can be reviewed.

5.53 Regarding the impact along the northern side of the carriageway, I do not agree that a retaining wall will be needed. I have spoken to ABG Engineering who design and manufacture a range of slope stabilisation/reinforcement products who has suggested that a reinforcement mat (Erosamat Type 3) would be suitable and would provide sufficient slope stabilisation at a location such as this. The accompanying data sheet (see [Appendix 27](#)) identifies that this product is suitable for use on slopes up to 65 degrees. Whilst the detailed design of the access has not yet been undertaken, I anticipate that the verge gradient at this location will be significantly shallower than 65 degrees therefore no retaining wall will be required. Again, this can be considered further at the detailed design stage.

- 5.54** In response to these further comments from the Highway, I have made further, very minor amendments to the access proposal. This includes increasing the radii at the Appeal Scheme access from 8m to 10m and a very minor realignment of the northern kerb line to achieve a minimum clearance of 450mm between the kerb line and highway boundary, as requested by the Highway Authority.
- 5.55** The increase in radii to 10m was requested by the Highway Authority to improve the swept paths of larger vehicles. This, coupled with heavy vehicle movements only accounting for 0.6% of daily traffic movements at the site access, should be taken to have addressed such matters.
- 5.56** I have also shown a suggested location for providing a 'side road ahead' sign for westbound vehicles approaching from the east. This was raised in the Stage 1 Road Safety Audit and whilst it was agreed with the Highway Authority that this could be dealt with at the detailed design stage, I have nevertheless shown a suggested location for this signage to assist the Authority and Inspector.
- 5.57** As requested by the Highway Authority, I have also included a solid white centre line to the east of the access. Whilst this could be dealt with at the detailed design stage, I have added this to the drawing to assist the Highway Authority and Inspector.
- 5.58** The minor amendments to the Appeal Scheme access are shown on 5330/021 revision P which is presented at [Appendix 28](#). The amendments made between revisions M and P have had no impact on the location of the Appeal Scheme access, the swept path analysis or on the visibility achievable (y-dimensions and forward visibility). For completeness however, I have amended these plans and present them also at [Appendix 28](#).
- 5.59** The Road Safety Auditor has confirmed that their comments on the safety of the access as shown on revision P are unchanged from those provided for revision M i.e., revision P has also addressed items A.1.1, A.2.1 and A.3.1 of the Stage 1 Road Safety Audit (see [Appendix 29](#)).
- 5.60** The changes made to the access plans are very minor and do not cause prejudice to any interested parties with regard to the Wheatcroft Principle.

5.61 The Rule 6 Party and Highway Authority has been furnished with all relevant material relating to revision P of the Appeal Scheme access. This was sent by email to the Highway Authority and Rule 6 Party on 18th August 2023.

5.62 It is worth noting that the highway layout agreed at the time when planning permission is granted is typically regarded as a 'general arrangement'. When Technical Approval is sought from the Highway Authority at the Section 278 detailed design stage, the design agreed at the planning stage may be subject to incremental changes as a consequence of the subsequent technical and statutory consultations and the detailed design process.

5.63 The incremental changes made between revisions K and P of the Appeal Scheme access could be dealt with at the detailed design stage. However, in the interests of collaborative working, minor alterations have been made to the Appeal Scheme access design to demonstrate to the Highway Authority and Inspector they are achievable.

Traffic Generation & Distribution

5.64 Traffic generation from the proposed development has been calculated using the TRICS database and distributed on the local highway network using Census 2011 data and existing turning count information.

5.65 The calculated trip rates and subsequent traffic generation for a development of up to 290 units is summarised in Table 10 and the full TRICS output is provided at [Appendix 30](#). The mixed private/affordable housing category has been used at the scheme proposes approximately 35% affordable housing. The figures in Table 10 are agreed with the Highway Authority.

Table 10: Summary of Proposed Trip Rates and Traffic Generation (290 units)

Time Period	Trip Rate (per dwelling)			Traffic Generation (290 dwellings)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Morning Peak 0800-0900	0.123	0.369	0.492	36	107	143
Evening Peak 1700-1800	0.345	0.161	0.506	100	47	147
Daily (12hour) 0700-1900	2.187	2.240	4.427	634	650	1,284

5.66 To distribute the development traffic onto the local highway network at the site access, the 2011 Census has been interrogated, specifically the 'Location of Usual Residence/Location of Work' dataset (see [Appendix 31](#)). The distribution of development traffic at the two town centre junctions has been based on the recorded turning movements at these junctions, surveyed in 2019. The development traffic distribution and assignment diagrams (5330/406 Rev. A & 5330/405 Rev. D) are provided at [Appendix 32](#) and show broadly 80% of development traffic travelling to/from the west (i.e., to/from Uckfield) and 20% to/from the east. The distribution of development traffic has been agreed with the Highway Authority.

Traffic Impact

5.67 To establish the impact of the proposal on the local highway network, capacity analyses have been undertaken using the JCT software LinSig V3. The following junctions have been assessed (see [Appendix 33](#)):

- Framfield Road/High Street/Bridge Farm Road signalised crossroads;
- High Street/Bell Lane signalised T-junction.

5.68 The following scenarios have been assessed:

- **Table 11** – 2027 Base Year (applying TEMPro growth rates to the observed data and including committed development); and
- **Table 12** – 2027 Design Year + Improvements (adding the traffic generated by the proposal to the 2027 Base Year).

5.69 Both assessments incorporate the committed developments agreed with the Highway Authority, namely:

- Mallard Drive - 150 dwellings
- Ridgewood Farm - up to 1,000 dwellings; employment use; primary school; retail, community, health and leisure uses.
- Eastbourne Road - 90 dwellings.

Table 11: Summary of Junction Modelling – 2027 Base Year + Committed Development

Road Name	AM		PM	
	Deg. Sat.	Mean Max Queue (PCU)	Deg. Sat.	Mean Max Queue (PCU)
Signalised Cross-Roads				
High Street (Northbound)	87.4%	13.3	60.4%	9.5
Framfield Road	87.7%	12.6	86.5%	7.5
Bridge Farm Road	50.8%	2.5	34.8%	1.6
High Street (Southbound)	78.2%	10.4	91.3%	18.8
Signalised T-Junction				
Bell Lane	89.5%	17.4	90.7%	22.4
High Street (Southbound)	58.2%	5.8	78.8%	11.6
High Street (Northbound)	89.7%	23.1	89.8%	19.6

Table 12: Summary of Junction Modelling – 2027 Design Year + Committed Development + Proposed Development and Improvements (290 units)

Road Name	AM		PM	
	Deg. Sat.	Mean Max Queue (PCU)	Deg. Sat.	Mean Max Queue (PCU)
Signalised Cross-Roads				
High Street (Northbound)	67.3%	12.4	45.5%	9.6
Framfield Road	78.3%	15.6	78.8%	8.7
Bridge Farm Road	63.0%	3.4	44.0%	2.2
High Street (Southbound)	62.6%	10.6	78.8%	17.5
Signalised T-Junction				
Bell Lane	88.8%	16.6	61.7%	7.2
High Street (Southbound)	55.6%	5.5	64.8%	11.5
High Street (Northbound)	90.8%	24.5	25.7%	0.2

*Commentary on 2027 Base Year (Table 11)***5.70**

During the 2027 base year + committed development scenario, both High Street junctions will operate with increased congestion, particularly during the PM peak hour period. A Degree of Saturation in excess of 90% occurs on two arms which is generally taken to be the maximum acceptable.

5.71

As such, it has been agreed with the Highway Authority that improvements will be necessary at these junctions to accommodate traffic from the Appeal Scheme. It is proposed to improve the existing situation by linking the two signalised junctions via a MOVA (Multiprocessor Optimised Vehicle Actuation) system. In summary, such a

system will link the signalised junctions/crossings along the High Street. The Appellant has agreed to fund these improvements through the S106 Agreement.

Commentary on 2027 Design Year (Table 12)

5.72 This analysis shows that by linking the signalised junctions, the development traffic from 290 units can be accommodated on the network to achieve significant improvements at the High Street/Framfield Road junction during both peak hour periods, and at the High Street/Bell Lane junction during the evening peak hour when compared to the 2027 Base Year + Committed Development scenario. During the morning peak hour at the High Street/Bell Lane junction there is a negligible impact on delay and queuing which certainly cannot be considered 'severe' as per the terms of the NPPF.

5.73 It is agreed with the Highway Authority that the impacts of the Appeal Scheme traffic can be sufficiently mitigated through the implementation of an advanced control system. The Appellant has agreed to pay a contribution of £100,000 + maintenance costs to fund the improvements within Uckfield town centre. This figure reflects a carefully worked out assessment by the Highway Authority of the likely scheme costs (see [Appendix 34](#)).

6. OFF-SITE HIGHWAY IMPROVEMENTS

6.1 In this section of my Evidence, I set out the package of illustrative off-site improvements that are proposed to improve the route along Framfield Road for existing and proposed users.

6.2 These illustrative improvements will include the following:

- Shared footway/cycleway between NMU access and Uckfield Hospital access;
- Installation of bus shelters and a real-time passenger information at the Uckfield Hospital bus stops;
- Installation of tactile paving at all existing crossing points along Framfield Road;
- Installation of bus cages at the existing stops in the vicinity of Alexandra Road; and
- Installation of a formal zebra crossing point across Framfield Road in the vicinity of numbers 78/80.

6.3 The proposed improvements are shown illustratively on the following drawings (all of which are provided at [Appendix 35](#)):

- 5330/016 Rev. K
- 5330/017 Rev. H
- 5330/018 Rev. J

6.4 The existing footway along Bird in Eye Hill between the NMU access and hospital access will be widened to 3m to provide a shared footway/cycleway. The Highway Authority has advised that a section of verge c. 0.5m wide should be included to separate the non-motorised provision with the carriageway. There is sufficient land available within the highway boundary to facilitate this and will be incorporated at the detailed design stage.

6.5 The existing 30mph speed limit will be extended to the approximate location of the NMU access. This is approximately 85m east of its current position. This is agreed with the Highway Authority.

- 6.6** Bus shelters are proposed at both existing stops in the vicinity of the Uckfield Hospital access along with real-time passenger information screens. These improvements are agreed with the Highway Authority.
- 6.7** An uncontrolled pedestrian crossing facility is located on Bird in Eye Hill, a short distance west of the eastbound bus stop. This crossing was recently implemented as part of a package of highway improvements associated with the Mallard Drive scheme. It is therefore considered a suitable and safe location for pedestrians to cross Bird in Eye Hill and can be utilised by future residents of the Appeal Scheme.
- 6.8** The Highway Authority has indicated their desire for a formal crossing point on Framfield Road and requested that I explore the introduction of such a crossing as part of the off-site works associated with the Appeal Scheme. The location and form of the crossing point is the result of a collaborative process with the Highway Authority and the proposed zebra crossing is shown illustratively on drawing 5330/034 at [Appendix 36](#). It has been designed with due regard to the design guidance for pedestrian crossings set out in Chapter 6 of the Traffic Signs Manual (CDI.9).
- 6.9** The zebra crossing is 2.4m wide and will incorporate Belisha beacons at each end of the crossing on the near side closest to approaching traffic. The beacons will be set 450mm from the edge of the carriageway. At the location of the beacons, footway widths of 2m and 1.38m are achieved on the northern and southern sides of Framfield Road respectively. Such widths are appropriate and conform to design standards.
- 6.10** Regarding proximity to side road junctions, paragraph 15.12.1 from Chapter 6 of the Traffic Signs Manual states *“where a crossing is to be placed near a side-road junction on a major road, the desire line may conflict with visibility requirements for drivers exiting the side road. Crossings may need to be moved off the desire line in order to give drivers enough time to see a crossing and brake safely, but deviations from the desire line should be minimised as far as possible. The exact distance will depend on the geometry of the junction and type of side road”*.
- 6.11** The proposed zebra crossing is not located close to an uncontrolled side road junction in the typical sense; however, it is located close to the car park entrance

associated with the Alma Arms. In any event, suitable intervisibility is achievable between the Alma Arms access and the crossing. The crossing is therefore in an appropriate position.

Stage 1 Road Safety Audit

6.12 The off-site highway improvements have been subject to a Stage 1 Road Safety Audit (see [Appendix 22](#)). I have provided my Designer's response to the matters raised within the Audit, which I have summarised in Table 13.

Table 13: Summary of Stage 1 RSA (Off-Site Highway Improvements)

Stage 1 RSA Recommendation	Bellamy Roberts' Designer's Response
Item A.2.4: It is recommended that adequate visibility to the proposed zebra crossing is achievable.	<p>Agree - Belisha Beacons will be provided at each end of the crossing, on the nearside closest to approaching traffic, as per Traffic Signs Manual Chapter 6 guidance. These coupled with the associated road markings will ensure that the crossing will be clear to approaching traffic which should approach cautiously as legally required. See drawing 5330/034 Rev. C.</p> <p>A speed survey was undertaken along Framfield Road, east of the proposed crossing. This recorded a westbound 85th percentile approach speed of 29.5mph. This equates to a stopping sight distance of 39.5mph which can be achieved. See 5330/033 Rev. A.</p>
Item A.4.1: It is recommended that the existing covers are adjusted	Agree – the existing covers will be adjusted if necessary and will be considered further at the detailed design stage.
Item A.4.2: It is recommended that the carriageway surface is repaired to provide an even surface	Disagree – This is an existing problem and it is the Local Highway Authority's responsibility to maintain their network.

Proposed Zebra Crossing Amendments

6.13 I am continuing to work collaboratively with the Highway Authority to address their remaining concerns regarding the proposed zebra crossing.

6.14 In this regard, the crossing plan has been amended (5330/034 Rev. D) to incorporate some minor footway widening on the southern side of Framfield Road which will allow the 2m footway width requested by the Highway Authority to be achieved either side of the crossing point (see [Appendix 37](#)).

6.15 This part of Framfield Road is subject to a speed limit of 30mph and Manual for Streets guidance (ref. Table 7.1) advises that the commensurate y-dimension is 40m, from an x-distance of 1.5m. A speed survey at a location east of the proposed

crossing which has recorded a westbound 85th percentile approach speed of 29.5mph ([Appendix 38](#)). This equates to a stopping sight distance of 39.5m.

- 6.16** Visibility splays of 1.5m x 40m and 1.5 x 39.5m have been plotted at the crossing, to the west and east respectively (see 5330/033 Rev. B at [Appendix 39](#)). The Auditor commented that visibility to the west could be obstructed by HGVs parking in the layby associated with the adjacent public house. In this regard, such a vehicle has been included and it is evident that visibility will not be obstructed in this direction.
- 6.17** The Road Safety Auditor has reviewed the amended plans for the zebra crossing and has confirmed via email (dated 14th August – see [Appendix 40](#)) that the very minor revisions described above have addressed item A.2.4 as raised in the Stage 1 Road Safety Audit.
- 6.18** The Highway Authority has provided further comments on the proposed zebra crossing from their Road Safety Team via email dated 17th August (see [Appendix 25](#)). I have provided my Designer's response to the matters raised within the Audit, which I have summarised in Table 14.

Table 14: ESCC Road Safety Team Comments

ESCC Road Safety Team Comments	Bellamy Roberts' Designer's Response
Right turn manoeuvre into PH car park would straddle crossing; This would raise concern, as would vehicles exiting the pub (turning left) being immediately on the crossing (as highlighted in our previous correspondence- attached). Drivers exiting (turning left) will be focussed on traffic approaching from their right. In seeing a gap, they may then move off before observing the crossing/pedestrians about to step out or already on the crossing.	<p>The Highway Code states that drivers and riders should give way to pedestrians waiting to cross and must give way to pedestrians on a zebra crossing. It would therefore be inappropriate and in contravention of the Highway Code for a vehicle to straddle the crossing. Any vehicle waiting to turn right into the public house would wait clear of the crossing i.e., not obstruct it.</p> <p>There are parked cars on both sides of Framfield Road along much of its length and approaching traffic (from both directions) would be positioned towards the centre of the carriageway. On exiting the public house car park, drivers would naturally look in both directions before setting off. This is the correct way to exit any side road or access. Any driver exiting the public house will therefore be aware of the crossing point and any pedestrians using it.</p>
Footway on south side; since the crossing provision is intended to be attracting peds wishing to cross Framfield Rd, there is a likelihood that there would be two way movements across during peak periods such as school arrival/departure times and when buses drop off passengers. The 1.38m wide footway may become congested, especially when accompanying children or persons in wheelchairs, and generally persons less mobile with walking aids.	The 1.38m footway width is over a distance of 170mm i.e., the width of the beacon pole. Either side of this the footway will be widened to 2m as previously requested by ESCC. A width of 1.38m over such a short distance will have no impact on the function of this crossing or its attractiveness to future users.

Table 14: continued

ESCC Road Safety Team Comments	Bellamy Roberts' Designer's Response
Crossovers/accesses on south side within scope of zigzag markings; Not ideal, sometimes unavoidable in urban environments for single vehicle accesses. Given there is a shared vehicle access here would present similar concerns to those highlighted at the pub access opposite, as it only appears to be wide enough for single vehicles. As such, if more than one vehicle was trying to turn left in (when a vehicle was exiting) the crossing may be straddled/vehicles turning right out are almost immediately on the crossing (albeit they should at least, already be looking to the right for approaching traffic before exiting).	As stated, this is unavoidable in urban situations. Regarding concerns raised on the vehicle access to the south, see my response to item 1.
Driver visibility for peds and vice versa when considering the speeds; While the visibility splay quoted on the drawing meet the minimum requirements for the recorded 85%ile speed (just), the parking east of the crossing, on the north side of the road, has been conveniently displaced to facilitate this splay. This would not be the case in reality? To the west, the rigid truck (shown) would have to be parked tight to the kerb to not obstruct the splay (again- unlikely in reality).	<p>The zig-zag lines could be extended on the northern side of the carriageway, east of the crossing. Parking at this location would then only take place as shown. This can be dealt with at the detailed design stage.</p> <p>To the west, visibility has been taken to the carriageway edge. In reality, approaching vehicles will be travelling towards the centre of the carriageway and the 40m splay can easily be achieved at a realistic offset from the carriageway edge.</p>
Reducing the length of the zig zag marking on the north side of the road (west of the crossing) to get around the conflict of having a layby behind the zig zags (in the controlled area) is not the answer. This reduces the warning provided to an approaching driver at a crossing placement which offers the absolute (if that- see above) minimum visibility distances for pedestrians.	Traffic Signs Manual Chapter 6 guidance (paragraph 15.8.13) allows an unequal number of zig-zag marks to be provided. Warning for approaching drivers will be provided by the beacons which will be clearly visible to approaching vehicles.
The tactile paving arrangement is incorrect for a formalised crossing	This is a matter for detailed design.

7. RULE 6 PARTY STATEMENT OF CASE & THIRD PARTY COMMENTS

7.1 The Rule 6 Party Statement of Case is supported by three Highway Technical Notes prepared by Miles White Transport provided at Appendices A-C of the SoC. The matters raised by the Rule 6 Party are summarised as follows:

- Appeal Scheme access;
- Vehicle movement conflict between difference users;
- Recorded traffic flows;
- Sustainable access; and
- Road Safety.

7.2 I have dealt with each of the above matters in turn below.

Appeal Scheme Access

7.3 The Statement of Case (paragraph 2.1) refers to a simple priority access serving the Appeal Scheme. As I have set out in my Evidence, the Appeal Scheme will be served by a ghost island right turn lane.

7.4 Technical Note 3 (CDI.12), prepared by Miles White Transport states at paragraph 2.12 that “*the site access will not be safe due to lack of visibility to the west*”.

7.5 Speed surveys were undertaken either side of the site access and visibility splays are based on the recorded 85th percentile speeds. To the west visibility splays are taken to the centre of the oncoming carriageway and a solid white centreline is proposed. This will prohibit eastbound vehicles from crossing the centreline.

7.6 I have demonstrated in my Evidence that any vehicle approaching the Appeal Scheme access from the east will be visible to a vehicle at the site access at a distance commensurate with the recorded approach speed.

7.7 Paragraph 2.4 of Technical Note 3 (CDI.12) states that the y-dimension should include an allowance for bonnet length. This is incorrect and is based on a misunderstanding of Manual for Streets guidance. Paragraph 7.7.10 of MfS states that “*the Y distance should be based on values for SSD*”, i.e., not SSD adjusted for

bonnet length (ref. Table 7.1). Furthermore, the y-dimension relates to the distance an exiting driver can see in both directions, the exiting driver only has to see the front of the approaching vehicle, not its driver. The allowance for bonnet length is therefore not required when calculating the appropriate y-dimension.

7.8 An allowance for bonnet length is added when considering forward visibility and I have included this when considering forward visibility.

7.9 In any event, the proposed visibility splays, including their length and location are agreed with the Highway Authority.

Vehicle Movement Conflict

7.10 The Statement of Case (paragraph 2.3) refers road safety hazards being created by proposed vehicle movements to and from the Appeal Site due to conflict between different users.

7.11 Paragraph 3.28 of Technical Note 1 (CDI.10) states there is the “*potential for conflict between different users of the access road, particularly if larger vehicles are visiting the farm at peak times when there could be queuing at the site access junction*”.

7.12 I have demonstrated in my Evidence that larger vehicles will access the site on a very infrequent basis, predominantly outside of the peak hour periods. The Appeal Scheme access represents an improvement over the current situation and will allow safe and suitable access to be achieved for all vehicles.

Recorded Traffic Flows

7.13 The Statement of Case (paragraph 2.4) refers to the weekday traffic volumes used within my Transport Assessment as not accurately represent normal traffic volumes, citing the Covid-19 pandemic. This is also raised by a number of local residents.

7.14 The 2019 surveys were undertaken on 9th July 2019 which was pre-pandemic and during term time (the last day of term was 23rd July 2019 – see [Appendix 41](#)). In my experience, Highway Authorities are generally content with a single day’s worth of survey data however in this instance, the Highway Authority requested that we obtain data from 7 consecutive days.

7.15 The follow up 7-day surveys were undertaken in October and November 2020 and the 5-day average vehicle flows were very similar to those recorded in 2019. On some arms flows were marginally higher and some lower, but there was no material difference in the recorded flows.

7.16 There is no basis with which to discredit the recorded flows and the Highway Authority consider them representative of the typical vehicle flows at these junctions. Their acceptance of these flows is sensible.

7.17 The vehicle flows recorded by the Highway Authority in July 2023 (prior to the end of the school term) recorded lower flows on the local highway network than were recorded in 2019 and 2020. This is likely the result in a change in work habits post Covid-19 with more people now working from home.

7.18 The assessment I have undertaken to analyse the impact of the Appeal Scheme traffic on the local highway network has utilised the flows as recorded in 2020 and agreed with the Highway Authority. This has allowed a robust assessment of the impacts of the Appeal Scheme traffic on the local highway network to be undertaken, particular in Uckfield town centre.

7.19 Despite criticising the recorded flows, no additional surveys have been undertaken by the Rule 6 Party to support their claims.

Sustainable Access

7.20 The Statement of Case (paragraph 2.5) refers to cycle and foot access via the NMU access, and states that this will not maximise sustainable travel to and from the site to Uckfield.

7.21 Technical Notes 1 (CDI.10) and 2 (CDI.11) comment on pedestrian and cycle access and focus primarily on the suitability of the existing footway network along Framfield Road. I noted in my Transport Assessment that the existing footways vary in width albeit are generally in excess of 1.5m – 1.8m wide which is appropriate for all users with reference to Manual for Streets and Inclusive Mobility guidance.

7.22 The footway network is existing and already serves a large number of dwellings on Framfield Road. These are the same footways that residents of the recently

consented Mallard Drive scheme would use to access Uckfield town centre which were considered acceptable by the Highway Authority at the time.

7.23 There are footways on both sides of Framfield Road which provide direct access to the facilities in Uckfield. Future residents of the Appeal Scheme will therefore have the opportunity to walk to/from Uckfield to access these facilities which accords with the NPPF.

7.24 Regarding cycle access, Technical Notes 1 (CDI.10) and 2 (CDI.11) state there are no on-carriageway cycle facilities and in their view *“few residents will cycle to/from the site without the provision of additional facilities”*.

7.25 As I have set out in my Evidence, there are existing cycle facilities at the two town centre signalised junctions. The Appeal Scheme is within cycling distance of all facilities in Uckfield and future residents of the Appeal Scheme will have the opportunity to access these facilities using this mode of travel.

7.26 I have commented extensively on the accessibility of the application site and it is clear the Appeal Scheme is highly accessible to a range of destinations including employment, education, leisure and retail facilities by foot, bicycle and public transport. As concluded by the Secretary of State for the previous Appeal, *“the site’s very convenient location would promote sustainable travel choices”*.

Collision Data

7.27 I have assessed the collision record for the local highway network in the vicinity of the Appeal Scheme for the most recent 7-year period. This is far in excess of the 3 year period typical considered in line with Planning Practice Guidance. The assessment reveals there to be no accident or safety problem on the local highway network that would be exacerbated by the Appeal Scheme.

Third Party Comments

7.28 I have reviewed the comments received from third parties and the main issues I believe to be relevant are as follows:

- Traffic Impact;
- Appeal Scheme Access;
- Traffic Surveys;

- Accessibility;
- Placement of Street Furniture; and
- Construction Traffic.

I have considered each matter in turn below.

Traffic Impact

7.29 A number of residents have expressed concerns regarding the impact of traffic from the Appeal Scheme on the local highway network, particular at the Uckfield town centre junctions.

7.30 I have undertaken comprehensive analysis of the impact from the Appeal Scheme on the local highway network in Sections 3 and 5 of my Evidence.

7.31 This analysis demonstrates that with the improvements agreed with the Highway Authority, the impact from the Appeal Scheme will be sufficiently mitigated. Indeed, the operation of the junctions in question will improve by comparison with what would occur without the Appeal Scheme and the improvements it promotes.

Appeal Scheme Access

7.32 A number of residents have expressed concerns regarding the safety of the proposed site access to serve the Appeal Scheme.

7.33 My Evidence demonstrates that the Appeal Scheme can be accessed in a safe manner. Commensurate visibility splays are achievable which are based on recorded vehicle speeds. Swept path analysis demonstrates that larger vehicles serving the Appeal Scheme and the retained uses at Bird in Eye Farm can be accommodated,

7.34 I have shown that the larger vehicles associated with the retained Bird in Eye Farm uses access the site on a very infrequent basis and predominantly outside of the network peak hour periods.

Traffic Surveys

- 7.35** A number of residents have expressed concerns regarding the timing of the traffic surveys, stating that the 2019 survey was undertaken during the school holidays and the 2020 surveys were affected by the Covid-19 pandemic.
- 7.36** My Evidence shows that the 2019 surveys were undertaken during term time and there were no significant differences in the recorded flows between 2019 and 2020 i.e., no significant impact as a result of Covid-19. Furthermore, traffic surveys undertaken in 2023 during term time by the Highway Authority show fewer vehicles on Bird in Eye Hill than were recorded in 2019. The analysis undertaken is therefore robust.
- 7.37** As I have set out in my Evidence, a speed survey was undertaken on Framfield Road in August 2023. Whilst this was during the school holidays, the purpose of this survey was to record vehicle speeds only, not the number of vehicle movements. It is therefore unaffected by the school holidays.

Accessibility

- 7.38** A number of residents state that the location of the Appeal Scheme will make trips by sustainable modes of travel unlikely.
- 7.39** I have demonstrated in my Evidence that the Appeal Scheme is within walking and cycling distances of all facilities that future residents may wish to use on a day to day basis. This includes a significant amount of employment opportunities for future residents, all of which are within walking/cycling distance of the Appeal Scheme.

Placement of Street Furniture

- 7.40** Several residents have concerns regarding the placement of street furniture associated with the proposed 30mph speed limit extension at the location of the proposed NMU access.
- 7.41** The plans showing the off-site highway works are indicative at this stage and do not represent the final design.
- 7.42** At the detailed design stage, it will be ensured that the placement of any street furniture will not restrict visibility for any existing resident.

7.43 Some residents have also expressed concerns regarding road widening at this location however I can confirm that the proposal will not widen the carriageway at this location. The only widening is to the footway on the southern side of Bird in Eye Hill to facilitate the shared footway/cycleway.

Construction Traffic

7.44 A number of residents have expressed concerns regarding the impact of construction traffic along Framfield Road and Bird in Eye Hill. Should the Appeal be allowed and planning consent be granted, a Construction Management Plan will be a condition of this.

7.45 The Construction Management Plan will consider the most suitable routes for construction traffic to take to/from the development to lessen the impact as much as possible.

8. SUMMARY & CONCLUSIONS

- 8.1** I have considered the Reasons for Refusal and the justification given by the Highway Authority for sustaining their objection to the scheme and have addressed each matter in turn within my Evidence.
- 8.2** My Evidence has shown that the Appeal Scheme is within walking and cycling distances of all facilities that future residents may wish to use on a day to day basis. Opportunities for future residents to travel by sustainable modes have been maximised, with due regard to the location of the Appeal Scheme, and there are adequate services and facilities which can be accessed without needing to rely on the private car.
- 8.3** The Appeal Scheme will provide a dedicated non-motorised user (NMU) access for pedestrians and cyclists at the north-western corner of the application site. This will connect directly to the existing footway network along Bird in Eye Hill/Framfield Road and allow safe and suitable access to be achieved for these users.
- 8.4** The existing footway widths vary but generally accord with Inclusive Mobility guidance on footway widths and are appropriate to cater for the additional demand generated by the Appeal Scheme. Tactile paving will be provided at all crossing points along this route.
- 8.5** The Appeal Scheme will provide a financial contribution to fund significant improvements to the existing bus service.
- 8.6** Putative reason for refusal 4 asserts that future residents of the Appeal Scheme will be heavily reliant on the private car. My evidence has demonstrated that this will not be the case, the Appeal Scheme is highly accessible to a range of facilities including jobs, leisure and retail which can be accessed either on foot, by bicycle or by public transport. As such, the concerns set out in putative reason for refusal 4 relating to the Appeal Scheme's accessibility have been addressed.
- 8.7** The impact of the traffic generated by the Appeal Scheme on the local highway network, particularly within Uckfield town centre has been assessed. Detailed modelling of the town centre junctions has been undertaken and the improvements

proposed and agreed with the Highway Authority will provide a significant improvement to these junctions for the benefit of existing users.

- 8.8** It is agreed with the Highway Authority that the impact of Appeal Scheme traffic within the centre of Uckfield can be suitably mitigated through an appropriate financial contribution made by the Appellant.
- 8.9** The vehicular access to Appeal Scheme will incorporate a ghost island right turn lane which my Evidence has demonstrated can provide safe and suitable access for all vehicles expected to use it. Including those from the Appeal Scheme and the retained Bird in Eye Farm uses.
- 8.10** As such, the concerns set out in putative reason for refusal 5 relating to the Appeal Scheme's impact on the local highway network and its means of access have been addressed.
- 8.11** The Appeal Scheme therefore accords with all relevant national and local policies, as set out in the NPPF; Saved Policies of the Wealden Local Plan; Spatial Planning Objectives; and the Wealden Core Strategy Local Plan.
- 8.12** I therefore conclude that the highway and traffic implications of the Appeal Scheme will not have an unacceptable impact on highway safety, nor will they give rise to cumulative impacts which would be severe. Paragraph 111 of the NPPF sets those two tests as the thresholds below which development should not be prevented or refused on highway grounds.