Land at Downlands Farm, Uckfield

Highways and Transport Evidence on behalf of Gleeson Land and John Alison Land and Research Ltd

of

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TEXT

PINS Reference: APP/C1435/W/23/3321978
LPA Reference: WD/2022/1637/MEA

motion

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1.0 Introduction

Qualifications and Experience

1.1 I hold a First Class Bachelor of Engineering Degree in Civil Engineering and a Royal Society for the Prevention of Accidents (RoSPA) accreditation in advanced road safety engineering. I am a chartered member of the Chartered Institution of Highways and Transportation and a member of the Institute of Logistics and Transport. I have over 30 years' experience in the field of transportation planning, traffic engineering and highway safety.

1.2 I have extensive experience of highways and transport planning within the residential sector and currently act for many of the major land promoters and housebuilders operating in south-east England. In addition, I have extensive experience of major development proposals within the retail, leisure and commercial sectors.

1.3 My experience includes a period in the Development Studies Department of Wootton Jeffreys Consultants. Subsequently, I worked for Mayer Brown for over 14 years. I was jointly responsible for setting up Motion Consultants Limited in August 2004.

1.4 Motion specialises in advising developers and professionals in the development field on all matters concerning transportation, highways, traffic and road safety and our clients comprise a wide variety of private and public-sector organisations.

Scope of Evidence

1.5 My evidence is provided on behalf of Gleeson Land and John Alison Land and Research Limited, the 'Appellants' and relates to a hybrid planning application as follows:

"Outline application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts Road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks; and full planning application comprising creation of a strategic SANG, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from Rocks Road, associated landscaping, infrastructure and earthworks."

1.6 The planning application that is the subject of this Appeal (ref. WD/2022/1637/MEA) was refused by Wealden District Council on 21st April 2023. The Decision Notice (**CD5/1**) lists nine reasons for refusal. My evidence deals specifically with matters relating to highways, traffic and transportation, which are covered by the sixth and seventh reasons for refusal as follows:

"6 The proposal has not demonstrated that a safe and suitable access arrangement can be achieved for all users and to reduce dependence on the private car.

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

7. 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."

1.7 It is apparent from these reasons for refusal that they relate to a lack of information on highways and transportation matters, rather than any fundamental objections to the proposals. Indeed, it is noted on the decision notice that reason 7 can be secured through an appropriate legal agreement and Statement of Common Ground. It is now confirmed within the Transport Statement of Common Ground (**CD1/9**), that subject to the payment of a financial contribution towards the installation and maintenance of an enhanced control system for the town centre junctions, ESCC considers that reason for refusal 7 can be withdrawn.

1.8 I consider these reasons for refusal in the following sections of my evidence where I demonstrate that safe and suitable access can be achieved for all users and that the proposals will contribute towards reducing dependence on the private car. Furthermore, my evidence demonstrates that the proposed development will not lead to an unacceptable or severe impact on the surrounding highway network, including Uckfield town centre. My evidence should be considered alongside the Transport Statement of Common Ground (**CD1/9**).

1.9 On the basis of my evidence, I am of the professional opinion that the transport aspects of the proposed development are compliant with the National Planning Policy Guidance, the Wealden Local Plan 1998 and the Wealden Core Strategy Local Plan 2013, and therefore should not have been refused on highways, traffic or transportation grounds.

2.0 Planning Policy

2.1 The following policies and documents are specifically referred to in the Council's fourth reason for refusal:

- National Planning Policy Framework, September 2023– chapter 9 and paragraph 110;
- Wealden Local Plan 1998 – saved policies EN1, EN2, TR3, TR13 and TR16; and
- Wealden Core Strategy Local Plan 2013 – spatial planning objectives SPO2, SPO7. SPO12, SPO13, SPO15 and policies WCS7 and WCS14.

2.2 I do not consider it necessary or appropriate to reproduce any of the above in my evidence as they are included within the Core Documents (**CD6/1**, **CD6/3** and **CD6/4**). However, I do consider it helpful to highlight the main thrust of the National Planning Policy Framework, insofar as it relates to the transport aspects of the proposed development.

2.3 Paragraph 104 requires opportunities to promote walking, cycling and public transport use to be identified and pursued, and to ensure that patterns of movement and streets contribute to high quality placemaking. Paragraph 105 seeks to ensure that significant development (such as that in question) is focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

2.4 Within the section entitled 'Considering development proposals', paragraph 110 seeks to ensure that opportunities to promote sustainable transport modes are taken up and that safe and suitable access can be achieved for all users. In the context of reason for refusal 7, paragraph 110 also seeks to ensure that any significant impacts from the development on the transport networks can be cost effectively mitigated to an acceptable degree.

2.5 Importantly, paragraph 111 makes it clear that development proposals should only be refused on highways grounds if either there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.

2.6 Paragraph 112 states that applications for development should prioritise pedestrian and cycle movements and facilitate access to high quality public transport. Paragraph 112 also seeks to ensure that places are safe, secure and attractive, and minimise the potential for conflicts between pedestrians, cyclists and vehicles.

3.0 Development Proposals and Transport Sustainability

Overview

3.1 The proposed development includes up to 424 dwellings (including 35% affordable units) on land at Downlands Farm, located to the north-west of Uckfield and east of the A22. Access to the site for vehicles is proposed from the A22, which also provides pedestrian and cycle links into the development. Further pedestrian and cycle links are proposed to Rocks Road and Snatts Road. Whilst the application is in outline form, the illustrative masterplan submitted with the planning application (**CD2/6**) illustrates the following.

Unit Size	Private	Affordable	Total
1 bedroom apartment	28	74	102
2 bedroom apartment	26	38	64
2 bedroom house	80	16	96
3 bedroom house	98	15	113
4 bedroom house	28	5	33
5 bedroom house	16	0	16
TOTAL	**276**	**148**	**424**

Table 3.1 – Indicative Schedule of Development

3.2 A full planning application has also been submitted in relation to the proposed Suitable Alternative Natural Greenspace (SANG) provision associated with the residential development proposals.

Sustainable Transport Strategy

3.1 The site is located to the north-west of Uckfield and east of the A22. Uckfield town centre provides a range of local services and facilities, including a selection of places to eat and drink, shops and banks, as well as employment, schools and health facilities. The table below summarises the range of amenities available in Uckfield.

Amenity Type	Amenity
Employment Areas	Bellbrook Industrial Estate, Bellfarm Road/Bell Lane Uckfield Town Centre
Education	Rocks Park Primary School, Lashbrooks Road Holy Cross Church of England Primary School, Belmont Road Manor Primary School, Downsview Crescent Uckfield College (secondary school), Downsview Crescent
Shops/retail/High Street	Uckfield Town Centre includes a range of shops, banks, places to eat and drink and supermarkets are also located in the town (Tesco and Waitrose)
Health	Meads Medical Centre, Bellfarm Road Uckfield Community Hospital, Framfield Road
Leisure & recreation	Uckfield Leisure Centre, Downsview Crescent (pool, sports pitches, hall and fitness studios) West Park recreation ground and play area (north of Bellfarm Road) Luxford Field (off Belmont Road/Library Way) Cinema, High Street
Transport	Uckfield Bus Station, Bell Lane Uckfield Railway Station, B2102 New Town
Community	The Luxford Centre (community centre), Library Way Uckfield Library, High Street The Belmont Centre (community centre), Belmont Road

Table 3.2 – Amenities Within Uckfield

3.2 The adopted Wealden District Core Strategy Local Plan (2013) identifies Uckfield as a District Centre, whereby its function is described 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."

3.3 The Wealden Local Plan Direction of Travel Consultation document (November 2020) identifies Uckfield as one of the larger market towns in the District where main shopping centres are located.

3.4 To assist future residents in making more active and sustainable transport choices, a Sustainable Transport Strategy has been developed. The strategy, which is set out in detail in Section 5 of the Transport Assessment has been developed having regard to the non-motorised user (NMU) audit, introduced in Section 3. This provides a review of the pedestrian and cycle route options between the site and core amenities (including the town centre and railway station) within 2 kilometres. It also considers existing access to bus services in terms of the location of existing bus stops and maximum walk-distances outlined in Section 3 of the Transport Assessment.

3.5 The NMU audit, included as Appendix B to The Transport Assessment, has been used to inform the provision of new connections to existing networks and identify potential enhancement works to existing pedestrian and cycle routes to existing local amenities to ensure continuous routes are provided for future residents. Any suggested enhancement works have been made in reference to the Uckfield LCWIP introduced in section 2 of the Transport Assessment.

Walking & Cycling

3.6 As identified in section 3 of the Transport Assessment, it is recognised that existing provision for pedestrians and cyclists is limited reflecting the undeveloped nature of the site. Pedestrian and cycle access to the site is proposed via the main access off the A22, Rocks Road and Snatts Road, as shown on the illustrative masterplan (**CD2/95**).

3.7 The approach to supporting active modes of travel seeks to provide a range of options for future residents, depending on their location within the development, level of mobility and destination. The strategy seeks to integrate the site with the wider area by providing and enhancing existing pedestrian routes, as well as creating pedestrian/cycle connections to Rocks Road and Snatts Road, and a new strategic link for pedestrians and cyclists along the A22 and Bellfarm Road. These links have been designed to take account of the following issues identified within the NMU audit:

- Gaps and narrow sections of footway along existing pedestrian and/or cycle routes between the site and the town, railway station and industrial estate;
- Poor, or no crossing provision on desire lines between the site and core destinations that are suitable for intended user groups;
- Short sections of existing routes with steep gradients, overgrown paths and unmade surfacing; and
- Poor pedestrian and cycle priority on the approaches to the town.

3.8 To address these issues, the NMU audit recommended a series of improvements, focusing on providing new routes and enhancing existing routes between the site and the identified core destinations. In summary, the recommended works include:

- Provision of new pedestrian and/or cycle infrastructure to connect the site to existing networks (e.g. along Rocks Road, Snatts Road and the proposed vehicular access off the A22) where there is no existing provision;
- Installation of appropriate crossing facilities for pedestrians and/or cyclists on Rocks Road (to aid connections to the town, railway station, and industrial estate), Snatts Road (to link to existing footways/paths), London Road (to assist movements towards Uckfield college and leisure centre) and Bellfarm Road (to enhance provision to the industrial estate);
- Improvements to existing steps at the end of Downland Copse (along footpath 3a) and surfacing of public footpath between steps and Hunters Way;
- Widening existing pedestrian/cycle routes where currently not suitable for intended user groups (e.g. along sections of Rocks Road, Church Street, and the existing foot/cycle path along Bellfarm Road);
- Installing measures to reduce vehicle speeds on the approach to the town and enhance pedestrian and cycle priority at junctions;
- Installation of suitable signage along existing public footpaths to core destinations; and
- Ensuring appropriate lighting of any new connections/routes.

3.9 The drawings in Appendix E of the Transport Assessment (**CD2/28**) outline a series of proposed off-site highway works, which seek to address the identified issues and recommendations of the NMU audit. While these drawings have been subject to minor amendments, the proposed works are all deliverable within the public highway or land forming part of the application site. It is anticipated that the works related to direct access to the site and connecting to existing pedestrian/cycle networks, i.e. the access points to the A22 (including the new pedestrian/cycle route to Bellfarm Road), Rocks Road and Snatts Road will be completed under a Section 278 Agreement.

3.10 The wider off-site highway works could either be secured under the same agreement, or a contribution could be secured as part of any planning permission granted to be used by WDC or ESCC towards any pedestrian/cycle improvements planned to enhance routes to the town centre and other amenities, such as those outlined in the LCWIP. In this regard, the Appellants have suggested a planning condition offering to instal cycle parking within Uckfield town centre where the existing provision is poor. As such, it is considered appropriate mitigation works can be secured by a planning condition or obligation to deliver enhanced walking and cycling provision to support development of the site.

3.11 The residential area to the south-east of the site includes good quality, lit footways and a network of pedestrian routes (including alleyways and shared surfaces) that provide numerous links for pedestrians to the town, existing bus stops and other local amenities. The residential roads through this estate are also considered suitable for cyclists travelling to/from the town.

Bus

3.12 When the planning application was submitted, it was assumed that a new community bus service would be provided to serve the development, providing connections to the rail station, local employment, schools and the town. A technical note setting out how the community bus service would be operated, managed and funded, was included at Appendix H of the Transport Assessment (**CD2/28**).

3.13 However, during discussions with East Sussex County Council since the submission of the planning application, it has been agreed that a financial contribution of £1,100 per dwelling will be paid to ESCC through a Section 106 Agreement to facilitate the diversion of service 31 along the A22 and into the site. Subject to such a contribution and the provision of public transport infrastructure such as a bus turnaround and real-time passenger information within the site, ESCC considers public transport accessibility to be acceptable as set out in the Transport Statement of Common Ground (**CD1/9**).

Rail

3.14 Uckfield station forms part of the Southern network and provides regular services to London Bridge via Oxted and the station includes cycle storage and car parking. The Sustainable Transport Strategy seeks to ensure suitable connections to the railway station for pedestrians and cyclists, as well as by bus (via the bus station), to enable rail to form part of a linked trip.

3.15 Uckfield railway station is located within 1.6 kilometres of the centre of the site via Rocks Road/Church Street or Rocks Park Road, and 2.7 kilometres via the proposed strategic pedestrian/cycle link along the A22/Bellfarm Road. The station is therefore within the distance recognised by the Department for Transport's 'Manual for Streets (March 2007, MfS) where walking offers the greatest potential to replace short car trips, particularly those under 2 kilometres. The Chartered Institute for Highways and Transportation (CIHT) identifies in the 2014 publication, 'Planning for Cycling' that the majority of cycling trips are for short distances, with 80% being less than 5 miles (8 kilometres) and with 40% being less than 2 miles (3.2 kilometres). The document also notes that the majority of trips by all modes are also short distances, therefore the bicycle is a potential mode for many of these trips. The station is well within the distance referenced in this guidance whereby the bicycle is a potential mode of travel.

Encouraging Sustainable Travel Choices

3.16 A residential Framework Travel Plan (**CD2/29**) has been prepared and forms part of the planning application. This Plan brings together the infrastructure measures proposed as part of the development (e.g. cycle parking, pedestrian/cycle route enhancements) along with a number of softer measures (including provision of Travel Information Packs) and outlines an action plan for implementation and monitoring the effectiveness of the Plan against objectives and targets.

3.17 It is anticipated that a Full Travel Plan will be secured by suitably worded planning condition and be subject to regular monitoring and review. A Travel Plan Coordinator will be appointed to implement the measures set out in the Plan and complete the monitoring programme in liaison with ESCC to achieve the objectives and final targets set out in the approved Full Travel Plan.

Vehicular Access

3.18 Access to the proposed development will be via a new roundabout junction on the A22 located north of Lake Wood and approximately 1 kilometre to the north of Copwood roundabout and 1.2 kilometres south-west of Black Down roundabout. The access arrangement, shown on drawing 2001061-101C, included at **Appendix PAB-A**, has been designed in accordance with relevant standards outlined in the Design Manual for Roads and Bridges (DMRB) and includes 215 metre forward visibility splays along the A22 based on the 60 mph speed limit.

3.19 The proposals include the creation of a new vehicular access to Snatts Road to serve a small parking area associated with the strategic SANG. A drawing numbered 2001061-107B illustrating the proposed access along with visibility splays of 2.4 metres by 43 metres in each direction is included at **Appendix PAB-A**.

3.20 An emergency access is also proposed as illustrated on drawing numbered 2001061-102D, included at **Appendix PAB-A**. The emergency access is located off an existing layby, positioned circa 700 metres to the south-west Black Down roundabout and 500 metres north-east of the proposed site access. Due to the position of the access (off the layby) the arrangement is for left in/left out movements only. Use of the access will be controlled by a removable barrier/bollard, appropriately secured to prevent use by unauthorised vehicles.

3.21 All of the off-site highway improvements are entirely contained within the public highway land and full details of the proposed access arrangements and off-site highway improvements are set out in the Transport Assessment (**CD2/27**) and in the two documents entitled 'Response to ESCC Highway Comments' dated 21st December 2022 and 24th July 2023 (**CD2/102** and **Appendix PAB-B**) described in Section 5 of my evidence.

Parking and Other Internal Layout Considerations

3.22 The residential element of the development is in outline form. Car and cycle parking will be provided with reference to the guidance outlined within the Transport Assessment (**CD2/27**) and any subsequent guidance. It is intended that the final car and cycle parking provision will be agreed as part of the reserved matters application(s).

3.23 Details of the internal layout will also be determined at the reserved matters stage, and it is anticipated that all internal roads will be designed in accordance with 'Manual for Streets'. Furthermore, the internal road layout will follow the requirements of Active Travel England, who will be a mandatory consultee in any future reserved matters application.

3.24 In relation to servicing, the following design principles will be applied in accordance with the normal requirements of Wealden District Council and East Sussex County Council:

- Residents do not have to carry waste more than 30 metres to a collection point;
- Refuse operatives do not have to transport 4-wheeled containers more than 10 metres, or walk more than 25 metres to a collection point for household collections;
- Refuse vehicles do not have to reverse more than 12 metres;
- Fire appliances can get within 45 metres of the entrance of each dwelling; and
- Fire appliances do not need to reverse more than 20 metres.

3.25 It is envisaged that a car club will be located in a prominent position within the site and that this will include electric vehicle charging capability located in a prominent position. It is noteworthy that both Enterprise and Co-Wheels operate in and around the Uckfield area. The provision of the car club will be covered by the reserved matters application.

4.0 Planning History and Comparison with Previous Scheme

4.1 A previous planning application for approximately 750 dwellings including a neighbourhood centre, employment and community uses as well as a primary school, was refused in November 2006 (planning reference: WD/2006/2855/MEA). In respect of highway/transport matters, the cited reasons for refusal included:

- *The proposal does not satisfactorily demonstrate that adequate provision will be made to facilitate walking and cycling and reduce dependency on the private car* (reason 4);
- *The proposal does not satisfactorily demonstrate that there would be an acceptable impact on the surrounding highway network, particularly in Uckfield town centre which is already heavily congested at peak times* (reason 5); and
- *The applicant has failed to demonstrate to the satisfaction of the district planning authority that the proper provision and delivery of the necessary infrastructure improvements can be secured to meet the additional needs arising from the proposed development* (reason 6).

4.2 The application was the subject of a conjoined public inquiry with two other sites (known as Bird In Eye North and Bird In Eye South), all of which were recommended to be dismissed in November 2008. The Inspector's Report was subsequently considered by the Secretary of State in February 2009, who agreed with the original Inspector's recommendation to dismiss the appeals.

4.3 Neither I nor Motion was involved in the previous scheme or the Public Inquiry.

4.4 The Officer's Report for the present appeal (**CD5/2**) states within the Executive Summary on page 11:

"As will be set out, large parts of the site were the subject of a previous scheme refused by the Council and subject of multi week public inquiry (that also considered other land in Uckfield). Whilst that appeal was plainly some time ago and related to a larger site and form of development, it is clear that very many of the issues remain material to these deliberations. They have not been unaddressed and/or the scheme does not present a persuasive case to overcome these points. Whilst the site is reduced from that larger scheme, it also now includes a dwelling and its curtilage. That site has been introduced in order to try and address some of the earlier connectivity complaints and criticisms of development here. Except that site and area is wholly within Ancient Woodland. The case presented that primary pedestrian and cycling connections through this site can occur without harm to the Ancient Woodland is very highly optimistic to say the least."

4.5 It is assumed that the reference to *"have not been unaddressed"* is an error and should read as *"have not been addressed"*. If so, I consider the assertion that many of the previous issues remain unaddressed to be inaccurate. The following paragraphs of my evidence set out the differences between the previous appeal scheme and the current scheme.

Vehicle Site Access

4.6 The main access to the site was originally proposed via Black Down roundabout (A22/A26 junction), however, this was amended during the appeal process due to concerns over impact on ancient woodland. A new roundabout was then proposed approximately 1 kilometre to the south of Black Down roundabout in a similar position to the current proposal.

4.7 In terms of the appeal decision, the Inspector's report identifies ESCC's objection to the principle of a new roundabout on the A22 (para 773). However, the Inspector agreed with the appellants, "*that there is no clear-cut policy objection derived either from national or local policy, which would in principle prelude such a junction*". The Inspector further comments that the A22 is not a trunk road or motorway, or part of a properly defined strategic route.

Bus Only Link

4.8 A bus only link to Snatts Road was also proposed, which it is understood would have been used by the diverted 245 shuttle bus, with the diverted 31 service accessing the site via the A22. The bus link would also be utilised by pedestrians and cyclists. No bus link to Snatts Road is proposed as part of the current appeal scheme.

Snatts Road Link

4.9 Two points of non-car access were previously proposed to Snatts Road. The first in the position of the access track serving Downlands Farm (southern link, forming part of the 'Snatts Road Link'). The second located approximately in the position of the SANG car park proposed as part of the current scheme (and bus link of the previous scheme described above), further north along Snatts Road. It is understood these links would provide access for pedestrians and cyclists.

4.10 The proposals also included provision of pedestrian/cycle link utilising land to the east and west of Snatts Road and to the south or Rocks Road, known as the 'Snatts Road Link'. I have seen a number of options for the Snatts Road Link. These include provision of a 3 metre wide foot/cycle route with ramp/steps adjacent to Snatts Road or advisory cycle markings on the carriageway and adjacent 1.8 metre wide footway, with an at grade or bridge crossing on Rocks Road. The works extend as far as Rocks Park Road, with no works proposed further towards the town centre along Church Street. A significant issue considered at Inquiry was the deliverability of the Snatts Road Link (in terms of land control).

4.11 The current proposals do not rely on a link along Snatts Road but instead include a new pedestrian and cycle route known as the Fir Tree Grove route, which links to the junction of Snatts Road and Rocks Road and is in the control of the Appellants.

4.12 Additional land has been acquired since the previous appeal, namely at Chicory Cottage, located at the corner of Rocks Road with Snatts Road (the Fir Tree Grove route). This has enabled a pedestrian/cyclist route to be provided into the site via Rocks Road including provision of a new ramp/steps arrangement. Enhancements to the existing footway are proposed along Rocks Road and Church Street (where constraints permit), such as widened footways and additional crossing points. The proposed works extend to Regency Close, located a short distance from Uckfield High Street.

A22 Pedestrian/Cycle Route

4.13 The proposals considered at the previous appeal also included a new cycleway adjacent to the A22 and Bellfarm Road. I have seen two drawings, one indicating a 2 metre wide cycleway with 1 metre wide verge and the other indicating a 3 metre wide foot/cycleway in the vicinity of Copwood roundabout continuing along Bellfarm Road. The 3 metre wide foot/cycleway was located immediately adjacent to the A22 carriageway and was considered by the Inspector to be indirect and in close proximity to heavy flows of fast traffic.

4.14 In the current appeal scheme, the proposed route along the A22 comprises a 3 metre wide foot/cycleway separated from the carriageway by up to around 5 metres.

Bellfarm Road Pedestrian/Cycle Route

4.15 It is understood that improvements were also proposed along Bellfarm Road, also adjacent to the carriageway, as far as the existing allotments to the east of the Fire Station.

4.16 The current proposals continue from the A22 along Bellfarm Road to Batchelor Way, initially segregated from the carriageway and then along the existing foot/cycleway, which is to be widened to 3 metres. To the east of Batchelor Way, the existing footway is to be widened to 3 metres to create a shared footway cycleway. This section of the route is segregated from the Bellfarm Road carriageway by around 10 metres. The route then ties into an existing 3 metre wide shared footway/cycleway, which runs parallel to Bellfarm Road but is segregated by over 20 metres. Beyond Streatfield Road, there is an existing footway/cycleway that will be widened to 3 meters. The route ultimately joins the existing footway/carriageway in the vicinity of the Fire Station with a new pedestrian refuge island facilitating crossing to the Industrial Estate via Bell Lane. Pedestrian crossing points are also to be enhanced on the northern arm of the Bellfarm Road/Bell Lane roundabout and proposed on side roads on the southern side of the road leading to the High Street. In contrast to the scheme considered at the previous appeal, this link is almost completely separated from the carriageway, by more than 20 metres in places.

Other Works

4.17 Additional works are also proposed as part of the current appeal scheme to enhance the route into Uckfield via the existing Public Right of Way (footpath 3a and 3b) and alleyways through the residential estate. These include new footways to connect to existing footways on Snatts Road, leading towards Downlands Copse and enhancement to width/surfacing where possible. A new informal crossing point comprising dropped kerbs with tactile paving and a refuge island is also proposed on London Road to enhance access towards Uckfield College and Leisure Centre. Provision of new bus stops on Church Street and enhancements to existing stops along the existing alleyways through the residential estate have also been included at the request of ESCC.

Summary

4.18 The previous appeal scheme related to a far greater quantum of residential development (approximately 750 dwellings). The scheme also included provision of a new neighbourhood centre with employment uses, community uses, small retail facilities and a primary school. In this respect, the previous appeal proposals also included a number of different uses with the potential to attract new trips to the site, as well as more limited off-site highway works to support active travel, some of which were not considered to be deliverable.

5.0 Consultation with East Sussex County Council

5.1 The proposals have been subject to pre-application discussions with the District and County Councils, as the relevant local planning and highway authorities, from mid-2020. The Transport Assessment (**CD 2/27**) was prepared having regard to advice received at pre-application stage and relevant guidance.

5.2 It was agreed during pre-application discussions that the impact of the development on the A22/A26 corridor as well as Uckfield town centre should be determined using the ESCC Saturn model.

5.3 The planning application was validated in July 2022 and ESCC's first consultation response was dated 18th October 2022 (**CD1/1**). Motion responded to this in a report titled 'Response to ESCC Highway Comments', dated 21st December 2022 (**CD2/102**).

5.4 Discussions continued with ESCC and a further consultation response dated 23rd March 2023 (**CD1/1**) was prepared by ESCC, although this was not received until 21st April 2023, the day that the planning application was refused. Notwithstanding the fact that the application had been refused, Motion continued to seek to address ESCC's concerns and a further 'Response to ESCC Highway Comments' dated 24th July 2023 (**Appendix PAB-B**) was prepared and issued to ESCC.

5.5 Collectively, these documents set out the ongoing liaison between Motion and ESCC following the submission of the planning application.

6.0 Current Position with East Sussex County Council

6.1 ESCC's current position is set out in its Statement of Case (**CD1/7**). Paragraph 1.10 states ESCC's three grounds of objection as follows:

> *"a. The acceptability of the proposed new junction on A22 Uckfield Bypass which is proposed to provide all vehicle access to the proposed development (including by buses proposed to serve the development) and some non-motorised user (NMU) access to the proposed development. This SoC first addresses this under the collective heading of 'The Proposed Site Vehicle Access'.*
>
> *b. The suitability and acceptability of the proposed means of providing for pedestrian and cyclist connections between the site and key destinations in the town centre and elsewhere within the town. This SoC addresses this under the heading of 'Sustainable Accessibility'.*
>
> *c. The SoC concludes with ESCC's position relating to the impact of the proposed development on the safe and efficient operation of the wider town centre highway network."*

6.2 The topics are expanded upon in sections 2, 3 and 4 of the Statement of Case (**CD1/7**) and further clarification has been provided through discussions associated with the Transport Statement of Common Ground (**CD1/9**). I set out below my understanding of the current position, under the headings used in the Statement of Case.

The Proposed Vehicle Site Access

6.3 It is understood that ESCC has concerns over drivers exiting the roundabout in a northbound direction accelerating at a point when drivers in front are decelerating to enter the layby. Furthermore, ESCC is concerned that a left signal may be interpreted as an uncancelled exit signal from the roundabout.

6.4 ESCC has also raised concerns that the proposed lighting and kerb treatments of the site access road on its approach to the proposed roundabout will lead to an unacceptable risk to highway safety.

Sustainable Accessibility

6.5 ESCC's Statement of Case (**CD1/7**) alleges that the Appellants have given no consideration to any need to provide for pedestrian or cycle access to other local centres of employment such as the Ashdown Business Park at the junction of the A22 and A272.

6.6 ESCC also contends that the proposed pedestrian and cycle connections are inappropriate in terms of quality and attractiveness and, as such, will not be realistic or effective. In this regard, there are three principal points of access to the proposed dwellings, which are identified as 'strategic pedestrian/cycle routes' on the Illustrative Masterplan (**CD2/95**). In the interest of clarity, I deal with these below under the headings of 'A22 Route', 'Snatts Road Route' and 'Fir Tree Grove Route', consistent with ESCC's Statement of Case (**CD1/7**).

A22 Route

6.7 ESCC's concerns are that the route is indirect and, due to high volume of fast moving traffic on the A22, it would not be likely to be considered safe, comfortable or attractive, particularly in inclement weather or time of reduced lighting.

Snatts Road Route

6.8 In the case of the Snatts Road route, ESCC is concerned that the existing off-road footways leading from Snatts Road to Pudding Cake Lane are narrow, unlit, not overlooked and involve negotiating steps and significant gradients in places.

Fir Tree Grove Route

6.9 ESCC identifies that the most important route for active travel modes is the Fir Tree Grove route in the south-east corner of the site. However, ESCC claims that this route entails an unattractive, lengthy, convoluted climb from Rocks Road with no proposed mechanism to connect to Rocks Road in a safe manner. Furthermore, ESCC considers the pedestrian route along Rocks Road and Church Street to be inadequate, even with the significant improvements proposed. ESCC also raises concerns in relation to the lack of specific provision for cyclists along with the connection between Rocks Park and Bell Farm Road. ESCC concludes that these issues represent a significant deterrent to pedestrian or cycle use by residents of the site.

Impact on Town Centre Junctions

6.10 ESCC acknowledges that the approach taken to traffic modelling was as agreed during pre-application discussions but claims that the development proposals will have a severe impact on the operation of signal controlled junctions within the town centre. However, ESCC now acknowledges that any such impact could be mitigated through a financial contribution towards an 'enhanced control system' at those junctions as confirmed in the Transport Statement of Common Ground (**CD1/9**).

7.0 Consideration of Outstanding Matters

7.1 In this section of my evidence, I consider each of ESCC's grounds for objection and seek to demonstrate that none of them represents a reasonable basis for refusing planning permission.

The Proposed Vehicle Site Access

7.2 Section 2 of ESCC's Statement of Case (**CD1/7**) raises outstanding concerns relating to the proposed vehicular site access roundabout on the A22. These concerns are summarised as follows:

> *"a. the proximity of the entry of the existing northbound layby on the Bypass of the northern exit from the proposed new roundabout; and*
>
> *b. the proposed treatment of the site access road on its approach to the new roundabout junction to facilitate the proposed dormouse 'hop-over' feature. The current proposals include lighting and kerb treatments that ESCC consider represent an unacceptable risk to general highway safety."*

7.3 The concerns raised by ESCC regarding the proximity of the lay-by to the roundabout have been considered as part of the design process. The two northbound exit lanes from the roundabout were extended beyond the entry to the lay-by, thereby moving the merging section northwards beyond the nose of the layby. This addresses the concerns raised regarding vehicles accelerating from the roundabout being in conflict with vehicles decelerating to enter the lay-by, by accommodating those drivers that want to accelerate northwards from the roundabout in the offside lane, allowing them to safely pass slower vehicles in the nearside lane, such as vehicles that are intending to enter the lay-by. The proposed arrangement was considered in the independent Stage 1 Road Safety Audit included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**). The Safety Audit identified no problems in this regard.

7.4 The dormouse hop-over feature is required for ecology mitigation purposes. It will consist of a 40-metre-long central island with traffic lanes on either side and trees alongside carriageways that will be set back by a minimum distance of 0.5 metres from edge of carriageway, as is standard practice for any roadside feature on a 30mph road. The arrangement also includes 45-degree splayed kerbs over the 40-metre length to facilitate dormouse movements. The central island will have illuminated or retroreflective bollards with 'keep left' arrows at each end of the island, and this section of the site access road is to be lit in accordance with ESCC's existing A22 lighting policy to dim the street lighting levels to 50% between 22:00 and 06:00 hours, which is understood to be sufficient to meet the ecology mitigation requirements. Therefore, this feature will not lead to an increased likelihood of vehicles colliding with roadside trees. Notwithstanding this, I understand that the highway authority has concerns regarding errant vehicles colliding with roadside hazards, it would be normal practice for an assessment to be carried out at the detailed design stage to determine whether vehicle restraint barriers are required. Roadside vehicle restraint barriers could be provided at this location if such an assessment deemed it to be necessary. Again, the Stage 1 Road Safety Audit included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**) identified no problems in this regard.

Sustainable Accessibility

7.5 ESCC's Statement of Case (**CD1/7**) refers specifically to paragraphs 104 and 106 of the NPPF. In relation to active travel modes, paragraph 104 requires that opportunities to promote walking and cycling are identified and pursued. Paragraph 106 relates to policy making and is arguably less relevant to the determination of a planning application. However, paragraph 105, which is clearly relevant to this case, requires significant development to be focussed in areas that are or can be made sustainable, through limiting the need to travel anassistd offering a genuine choice of transport modes. Fundamentally, I consider the test to be whether the routes in question will be used by residents of the site to travel by foot or cycle, or whether any deficiencies are such that these would deter residents from using active travel modes.

7.6 Paragraph 3.1 of ESCC's Statement of Case (**CD1/7**) states that,

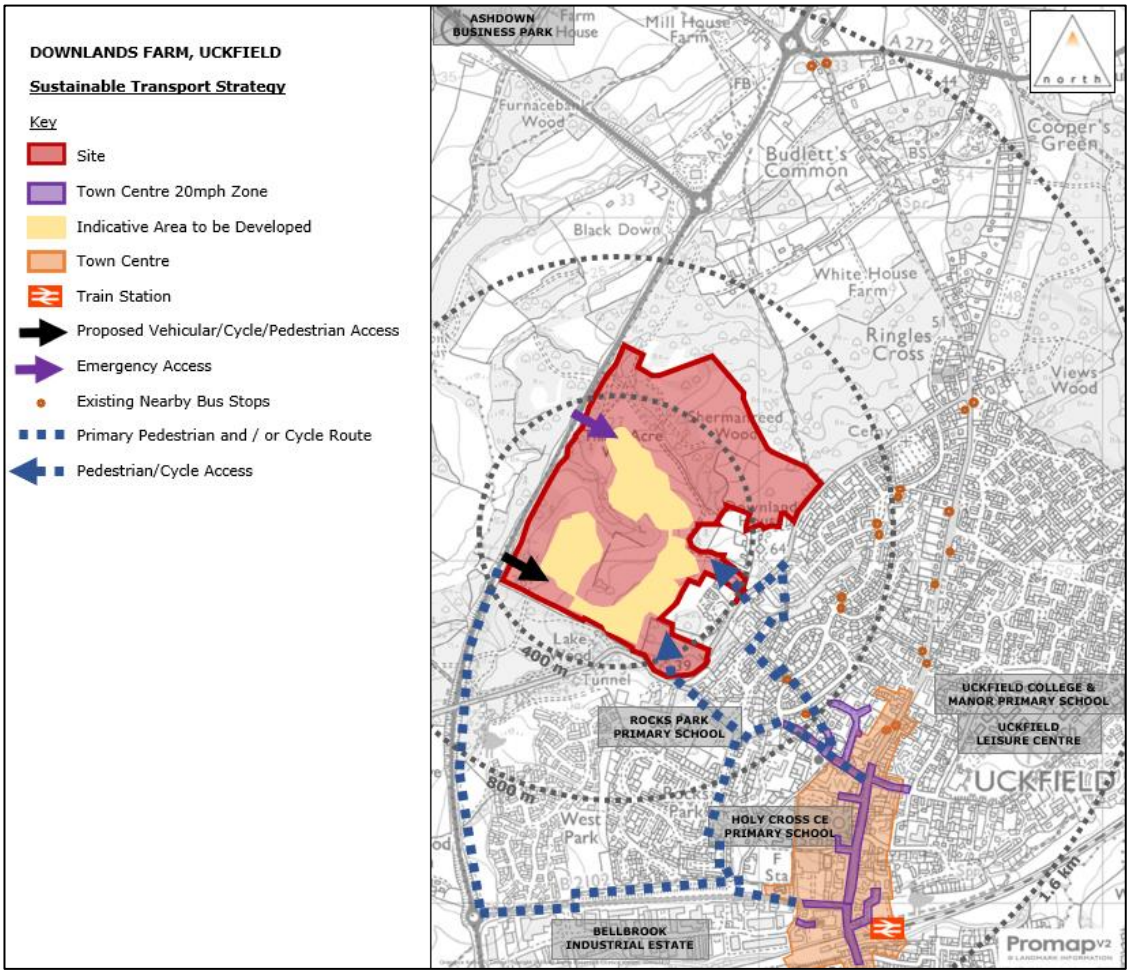
"*…the Appellant has given no consideration to any need to provide for pedestrian or cycle access to other local centres of employment that could be important, for instance the major Ashdown centre at the junction of A22 and A272 at Maresfield, for which the only alternatives would be riding on the A22 carriageway or, indirectly, via Snatts Road / London Road to the A22/A272 Budletts roundabout.*"

7.7 It is clear that Ashdown Business Park has been considered given that paragraph 1.5 of the Non-Motorised User (NMU) Audit, included as Appendix B to the Transport Assessment (**CD2/28**) states:

"*There are some amenities within 2 kilometres of the site located to the north, such as within Maresfield and Ashdown Business Park. However, the amenities within Uckfield are closer in terms of proximity to the area of the site proposed for residential development and offer a wider selection compared to those in Maresfield. Further employment opportunities are available in the town and access to Ashdown Business Park is considered as part of the proposed community bus service. As such, the audit does not cover routes to these destinations*."

7.8 It is further noteworthy that bus service 31, which is proposed to be diverted through the site, serves Ashdown Business Park.

7.9 The diagram below illustrates the routes to/from the site in the context of the indicative area of the site to be developed and the town centre.



Pedestrian and Cycle Routes

7.10 In the following sections of my evidence, I consider each of the pedestrian and cycle routes identified on the above diagram and demonstrate that there is no evidence to support the contention that any deficiencies in the routes would deter future residents from using them.

A22 Route

7.11 The route comprises a new shared footway/cycleway extending from the site access on the A22, southwards to the Copwood Roundabout and then eastwards along Bellfarm Road to the edge of the town centre. The proposed footway/cycleway is 3 metres wide with the exception of a short 20 metre long section of the route beneath the Rock Road overbridge, where the available space is restricted by the bridge supports and the width is reduced to 2 metres. An overview of the route is illustrated on drawing 2001061-110A, and drawings 2001061-111C, 112B, 113B, 114B, 115B, 116, 117A and 118B (see **Appendix PAB-C**) provide indicative details of the proposals.

7.12 ESCC's Statement of Case (**CD1/7**) claims that *"the route is not direct for most potential users, and is not likely to be considered safe, comfortable or attractive, particularly in inclement weather or times of reduced lighting"*.

7.13 Dealing first with whether or not the route is direct, this route represents just one of the routes that will be available to future residents, with the Fir Tree Grove route being more direct for the majority of journeys. Furthermore, I acknowledge that people travelling to and from the site on foot would be unlikely to use this route in significant numbers unless they were doing so for recreational purposes.

7.14 To compare the relative directness of the A22 route with the Fir Tree Grove route, I have considered the distances from the closest dwelling to the start of each route to the junction of Bell Lane with High Street. I have also considered the time it would take to cycle the routes based on a cycling speed of 20mph for the A22 route and 10mph for the Fir Tree Grove Route. These speeds are based on guidance in paragraph 5.1.2 of the Department for Transport Local Transport Note (LTN) 1/20 (**CD 8/4**) entitled 'Cycle Infrastructure Design', which provides guidance for use when designing new cycling schemes. The distances/times are illustrated on the diagrams included as **Appendix PAB-D** to my evidence and are summarised in the table below.

	Distance (metres)/Cycle Time via A22 Route (minutes/seconds)	Distance (metres)/Cycle Time via Fir Tree Grove Route (minutes/seconds)
Dwelling closest to A22 route	2,330 metres/ 4 minutes 21 seconds (at 20mph)	1,750 metres/ 6 minutes 31 seconds (at 10mph)
Dwelling closest to Fir Tree Grove route	2,700 metres/ 5 minutes 2 seconds (at 20mph)	1,370 metres/ 5 minutes 6 seconds (at 10mph)

Table 7.1: Cycle Distance/Time Comparison

7.15 Based on the above, it can be seen that the A22 route would be a quicker route for cyclists regardless of where people live within the site. So, while I accept that the A22 route is less direct than the Fir Tree Grove route, I do not consider that it would result in increased journey times.

7.16 LTN 1/20 (**CD8/4**) deals with directness at paragraphs 4.2.7 and 4.2.8 and acknowledges that minimising stopping and starting and enabling cyclists to maintain momentum is an important aspect of directness. While longer than the Fir Tree Grove route, the A22 route is very direct in the context of maintaining momentum on the basis that it is almost entirely uninterrupted by side roads and accesses.

7.17 Turning to safety, LTN 1/20 deals with cycling along busy strategic routes at paragraph 4.2.11, which states:

"On busy strategic roads where a significant reduction in traffic speeds and volumes is not appropriate, safety will need to be achieved by providing dedicated and protected space for cycling…"

7.18 In this case, the proposed cycle route is completely segregated from vehicle traffic and the section along the A22 crosses no side roads or accesses, while the section along Bell Farm Road and Bell Lane, crosses only six side roads or accesses before reaching the High Street. In my experience it is highly unusual for a 2,300 metre long cycle route into a town centre to experience so little conflict with vehicular traffic. As such, it is difficult to see how the route could reasonably be considered unsafe.

7.19 Additionally, the A22 route was considered in the independent Stage 1 Road Safety Audit included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**). The Safety Audit identified no problems with the proposals.

7.20 With regard to comfort, LTN 1/20 states the following:

"4.2.14 Comfortable conditions for cycling require routes with good quality, well-maintained smooth surfaces, adequate width for the volume of users, minimal stopping and starting, avoiding steep gradients, excessive or uneven crossfall and adverse camber. The need to interact with high speed or high-volume motor traffic also decreases user comfort by increasing the level of stress and the mental effort required to cycle.

4.2.15 Adequate width is important for comfort. Cycling is a sociable activity and many people will want to cycle side by side, and to overtake another cyclist safely. It is important that cyclists can choose their own speed so that they can make comfortable progress commensurate with the amount of effort they wish to put in.

4.2.16 Designers should consider comfort for all users including children, families, older and disabled people using three or four-wheeled cycles. Families are more likely to use off-carriageway facilities. Young children may need additional space to wobble or for an accompanying parent to ride alongside."

7.21 In this case, the vast majority of the route will be new and ultimately maintained by ESCC, and it can therefore be assumed that the surfaces will be smooth and well maintained. Stopping and starting will be minimised by virtue of the fact that the 2,300 metre route crosses only six side roads or accesses, and there is no direct conflict with high speed or high-volume motor traffic. There will be no steep gradients, as the route is relatively flat, and no uneven crossfalls or adverse camber. With the exception of a short 20 metre section below the Rocks Road bridge, the route to the town centre will be 3 metres wide, consistent with guidance in LTN 1/20.

7.22 As far as attractiveness is concerned, LTN 1/20 encourages routes to be free from litter or broken glass and wide enough for people to cycle two abreast. Routes should be finished using attractive materials and street furniture well maintained. There is no reason to think that any of these factors will be issues in this case.

7.23 I do, however, recognise that the section of the proposed cycleway alongside the A22 is compromised to some extent by the presence of high speed and high-volume vehicular traffic. In this regard, the A22 is a single carriageway road in this location, with just one lane in each direction. In designing the cycleway, my firm has sought to achieve as much separation as possible, with a verge width of up to around 5 metres being achieved between the cycleway and carriageway.

7.24 The ESCC Statement of Case (**CD1/7**) states that that its concerns relating to safety, comfort and attractiveness would be particularly relevant during inclement weather or times of reduced lighting. I agree that cycling the route during inclement weather would be less comfortable and attractive but would consider this to be the case with any cycle route. Indeed, it is well known that cyclists will be more inclined to use alternative modes of travel during inclement weather.

7.25 As far as reduced lighting is concerned, I understand that ESCC's policy is for street lighting to be dimmed by 50% on all A roads, main routes, bus routes and town centres between 22:00 and 06:00 hours. It is reasonable to assume that demand for cycling during these periods will be significantly lower than during daylight hours, and I assume that this was an important consideration when ESCC implemented its policy.

7.26 Notwithstanding the above, it is important to note that future residents of the site will have a choice of routes. While there are no material issues with the A22 route that would discourage people from using it, I recognise that some people may prefer a route that does not follow a high-speed and busy road. In this case there are alternative routes, including the Fir Tree Grove route that I consider in the following sections of my evidence. As I explain, the Fir Tree Grove route is different to the A22 route insofar as a significant section of it is remote from roads and vehicular traffic while the remainder utilises relatively lightly trafficked and slow speed streets.

7.27 In response to the comment at paragraph 3.7 of ESCC's Statement of Case (**CD1/7**) I should point out that the extract quoted from paragraph 271 of the previous Inspector's Report to the Secretary of State is part of a summary of Wealden District Council's Case, and not the "view of the Inspector" as stated. Furthermore, the intimation that the proposals are similar to those associated with the previous appeal scheme are unfounded and Section 4 of my evidence outlines the key differences between the previous scheme considered at appeal and the current scheme. In summary, the proposals for the A22 cycleway associated with previous appeal were adjacent to the A22 and Bellfarm Road carriageways. The proposals for the A22 foot/cycleway route associated with the current appeal include a 3 metre wide foot/cycleway that is separated from the carriageway by up to around 5 metres.

Fir Tree Grove Route

7.28 The Fir Tree Grove route is a proposed connection between the southeast corner of the site and Rocks Road, via the curtilage of the residential property known as Chicory Cottage. The route is illustrated in detail on drawings 2001061- 135E, 136B, 137B, 138, 139 and 140, which are included in **Appendix PAB-E** to my evidence. Computer generated images have also been prepared showing the southern end of the boardwalk (looking south towards the ramp/steps) and the northern end of the boardwalk (looking north towards the proposed dwellings), and are included in **Appendix PAB-F** to my evidence.

7.29 In its Statement of Case (**CD1/7**), ESCC recognises that this is the most important route in terms of walking and cycling but claims that the route *"entails an unattractive lengthy, convoluted climb from the site to Rocks Road with no proposed mechanism to connect to Rocks Road in a safe manner"*. As regards the section of the route to the east of the Snatts Road junction, ESCC comments that *"Rocks Road and Church Street are both narrow with inadequate footways and no specific provision for cyclists"*.

7.30 Paragraph 3.11 of ESCC's Statement of Case (**CD1/7**) states *"ESCC's consistent view throughout its consideration of the proposed development has been that those inadequacies are a significant deterrent to its potential pedestrian or cycle use by residents of the site"* whereas paragraph 5.30 of Wealden District Council's Statement of Case (**CD1/6**) states *"There can be no doubt this route will see frequent comings and goings, high use and activity, lighting etc"*. It seems to me that these two statements are contradictory.

7.31 The proposed link from the development site to Rocks Road is to be 3 metres wide which I consider to be suitable for the anticipated level of usage. It consists of a boardwalk through an area of Ancient Woodland and two alternative routes beyond, one stepped and the other ramped. The boardwalk will be of timber construction which is intended to create an aesthetically pleasant route through the woodland. It will be lit and will follow a straight alignment, approximately 100 metres in length, between the proposed residential properties within the development site and the open area at the southern end of the boardwalk, providing a clear line of sight between these two areas. In terms of overlooking, I accept that the boardwalk will not be directly overlooked. In this respect, there are other examples within Uckfield such as much of the existing shared foot/cycleway along Bellfarm Road and Lime Tree Avenue, which runs between Downsview Crescent and Hempstead Road next to Uckfield College and Leisure Centre, which are not directly overlooked. However, these routes are well used, as demonstrated by survey results presented later in this section of my evidence.

7.32 The existing topography on the approach to Rocks Road consists of a steep level change, necessitating a solution consisting of both a stepped route and a ramped route to provide users with a choice depending on their mobility needs. The construction of the ramp and steps will include regrading earthworks, which will result in an attractive open landscaped environment with planting and lighting. The regrading works will enable the ramp and steps to be visible from Rocks Road, ensuring that this area benefits from natural surveillance from the public highway.

7.33 The stepped route comprises a direct route between the end of the boardwalk and Rocks Road. The arrangement is designed such that the steps can be constructed in accordance with the DfT's Inclusive Mobility guidance, with a width of 2.5 metres, handrails and tactile corduroy hazard paving. They will be constructed with a maximum rise of no greater than 170mm and a going of 300mm, arranged into discrete flights of no more than 12 steps with flat landings in between. The resulting arrangement will consist of around 64 steps, and the total climb is the equivalent of around three floors in a typical office or retail building.

7.34 The ramped route alignment will be curved to accommodate the change in levels at this location, with a length of approximately 170 metres. Although the ramped route is the longer of the two options, it is intended to accommodate the change in level whilst minimising unnecessary and lengthy deviations from the desire line. The initial section of the boardwalk from the development site is virtually flat and the section through the ancient woodland and to Rocks Road varies between gradients of 8% (1 in 12.5) and 5% (1 in 20). The gradient does not exceed the maximum of 8% set out in LTN 1/20 (**CD8/4**) and I consider that the proposed arrangement provides an appropriate balance between the directness of the route and the effort required to climb. When considering this balance, it should be reiterated that the proposed route alongside the A22 provides an alternative option for those active travel users who prefer to use an alternative, ramp free route.

7.35 In relation to cycling along the incline through Fir Tree Grove, I do not consider that this will represent a significant deterrent to cyclists using conventional bikes. Moreover, it is relevant that the sales of electric bikes have increased significantly over recent years and are expected to continue to rise. I attach an article from February 2023 summarising Mintel research on the growth of electric bikes at **Appendix PAB-G** to my evidence. The article states that the sales of electric bikes have increased significantly in recent years and tripled from around 55,000 bikes in 2017 to 155,000 in 2022. It is my view that the 8% incline through Fir Tree Grove will not represent any deterrent to cyclists using electric bikes.

7.36 I should also point out that an 8% gradient is by no means unusual in the context of Uckfield. In order to assist the Inquiry, I have measured the gradients on a number of existing routes and there are several places where the gradients are at or in excess of 8%. These include, but are not limited to, the southern end of Snatts Road, the alleyway from Snatts Road to Downland Copse, the northern end of Scarletts Close, the southern end of the alleyway from Scarletts Close to Bellfarm Road and a section of Hunters Way. In addition, the main section of Uckfield High Street to the south of Church Street has a gradient of around 7%, which is very close to the 8% gradient of the Fir Tree Grove route.

7.37 At the point where the ramped route joins Rocks Road it is proposed that a short section of guardrail is provided to mitigate against pedestrians or cyclists inadvertently entering the carriageway. A dropped kerb crossing point with tactile paving will be provided on Rocks Road which has visibility splays that are consistent with the observed 85th percentile speeds, as necessary to allow users to safely cross Rocks Road. Based on the above factors I consider that the proposed solution provides a route that is safe, attractive and coherent. Furthermore, I consider the route to be as direct and comfortable as can reasonably be achieved within the constraints of the existing topography, and therefore meeting the core objectives set out in LTN 1/20 (**CD8/4**).

7.38 This section of the Fir Tree Grove route was considered in the independent Stage 1 Road Safety Audit included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**). The Safety Audit identified no problems with the proposals that could not be readily addressed at the detailed design stage.

7.39 Turning to the section of the route beyond Fir Tree Grove, significant improvements are proposed to this route as illustrated on drawings 2001061-130A, 131G, 132A, 133C and 134C, which are included as **Appendix PAB-H**. The proposals include a new 2 metre wide footway along the south side of Rocks Road extending to Rocks Park Road and widening of the existing footways on the north side of Rocks Road in the vicinity of the Hunters Way and The Drive junctions to 2 metres. A footway width of 2 metres is generally considered to be suitable in most cases and I do not believe that ESCC takes issue with this.

7.40 From the end of the proposed footway on the south side of Rocks Road, people walking to the southern end of the town centre (including the train station), The Bellbrook Industrial Estate and Rocks Park Primary School would do so via Rocks Park Road, Scarletts Close and Bellfarm Road. Rocks Park Road and Scarletts Close are lightly trafficked quiet residential streets with street lighting and good quality pedestrian facilities. From Scarletts Close, there in an alleyway approximately 50 metres in length that leads to an existing shared footway/cycleway that runs parallel to Bellfarm Road. The existing shared footway/cycleway is 2 metres in width, and the proposals include widening this to 3 metres, consistent with guidance set out in LTN 1/20.

7.41 As set out in Table 5.3 of the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**) it is estimated that the proposals will lead to around 115 additional pedestrian movements on this route during both the morning and evening peak hours. The December 2022 'Response to ESCC Highway Comments' (**CD2/102**) outlines at Appendix B how the increase in pedestrian movements has been calculated and assumptions applied. Some assumptions were updated in response to ESCC's further comments as addressed in the subsequent July response (**Appendix PAB-B**).

7.42 Those pedestrians travelling to/from Holy Cross Primary School, Manor Primary School, Uckfield College and the northern end of the town centre would be likely to continue past Rocks Park Road on Church Street. Based on Table 5.3 of the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**) it is estimated that the proposals will lead to around 42 additional pedestrian movements on this route during both the weekday morning and evening peak hours, which is the equivalent of one additional pedestrian every one to two minutes on average. The predicted increase during the evening peak hour represents a robust worst case as it assumes that both school trips and work trips will occur during the same period, which they will not in practice.

7.43 In order to identify existing pedestrian and cycle flows on Church Street, surveys were carried out during June 2023. The survey results are included at **Appendix PAB-I** to my evidence and identify 27 and 31 pedestrians using Church Street during the weekday morning and evening peak hours respectively. I have also considered the daily pedestrian flows along Church Street recorded during the surveys and the table below provides a summary of the movements between 07:00 and 19:00 hours on Thursday 22nd and Saturday 24th June 2023.

Time Period	Thursday 22nd June	Saturday 24th June
Daily (07:00-19:00)	265	263

Summary of Pedestrian Survey Results of Church Street (June 2023)

7.44 The existing pedestrian flows referred to above were recorded to the west of Pudding Cake Lane. The existing pedestrian flows to the east are considerably higher, as these include pedestrians travelling to/from the town centre via Pudding Cake Lane, Church Walk and Belmont Road.

7.45 I acknowledge that the existing footway along sections of Church Street is below the recommended minimum width set out in various design publications. While I do not consider the route unsuitable to accommodate the projected increase in pedestrian movements or that this would lead to any safety issues, the proposals seek to improve pedestrian facilities where possible, in line with the recommendations of the Non-motorised User (NMU) Audit introduced in Section 3 of the Transport Assessment (**CD2/27**).

7.46 In September 2021, ESCC published its Local Cycling and Walking Infrastructure Plan (LCWIP) (**CD8/5**), which includes the 'Proposed Cycling Network' plan for Uckfield. Appendix 5I to the LCWIP is the 'East Sussex Cycling and Walking Strategy', June 2018, which includes a number of recommendations for the Church Street and Belmont Road-Manor Way routes (242 and 232), including:

232.2.1 Install signalised pedestrian crossings/zebra crossings at crossings to Belmont Road.

242.1.1 Resurface pavement at level difference.

242.1.2 Widen footway at junction with Pudding Cake Lane through introduction of one-way priority section, allowing widening of footway to 3 metres.

242.1.3 Install traffic calming along road. Tighten radii of junction over Regency Close and install continuous footway treatment.

7.47 While I do not consider the projected increase in pedestrian movements to be significant, improvements are proposed to the section of Church Street between Rocks Park Road and High Street as illustrated on drawings 2001061-132A, 133C and 134C (**Appendix PAB-H**). These works include the following:

- Widening the existing footway on the north side of Rocks Road and Church Street to 2 metres up to a point approximately 25 metres east of The Drive,
- Localised footway widening on the north side of Church Street to the east of Pudding Cake Lane, including an enhanced pedestrian crossing facility between Pudding Cake Lane and Church Walk/Belmont Road, and
- Reducing the kerb radii at the junction of Regency Close with Church Street in order to provide an enhanced pedestrian crossing facility.

7.48 The proposed improvements to the route are consistent with the recommendations of the LCWIP.

7.49 The previous appeal scheme did not include any proposals to enhance provision for pedestrians or cyclists along Church Street beyond Rocks Park Road. The works proposed as part of the previous appeal between the site and town were focused on Snatts Road and section of Rocks Road between Snatts Road and Rocks Park Road. As referred to in Section 4 of my evidence, it is my understanding from the appeal decision that the inspector had concerns about the deliverability of the proposed works, commenting as follows:

"While the proposed Snatts Road Link would provide a reasonably direct, generally safe, and in places quite attractive route into the northern part of the town centre via Church Street, the evidence suggests that, for reasons of land ownership, it may well not be deliverable" (Paragraph 747)

and

"I agree with the Council that there are reasonable concerns about these matters, and particularly the Snatts Road Link, which, as all parties agree, is an essential component of the Downlands scheme. In part they relate to legal ownership and contractual matters – such as fiduciary duties – upon which I am not qualified to comment… However, I cannot report that there is a reasonable prospect of delivery of the Snatts Road Link; on the contrary, the evidence suggests that there is virtually no prospect of that. Therefore I doubt the efficacy of the suggested Grampian condition." (paragraph 779)

7.50 In paragraph 3.11 of the Statement of Case (**CD1/7**), ESCC claims that the footway widening is neither deliverable in practice nor safe in operation. Dealing first with the safety implications of the proposals, these have been subject to an independent Stage 1 Road Safety Audit, which is included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**). The Safety Audit did not identify any problems with the proposed pedestrian improvements on Rocks Road or Church Street.

7.51 In terms of deliverability, it is understood that ESCC's concern relates to the improvements to the pedestrian crossing between Pudding Cake Lane and Church Walk/Belmont Road along with the associated priority working arrangement as illustrated on drawing 2001061-134C (**Appendix PAB-H**). As set out in the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**), these proposals have been included in response to the recommendation of the Uckfield LCWIP, specifically recommendations 232.2.1 and 242.1.2. However, I acknowledge that the short section of widened footway in this location provides limited benefit and could therefore be omitted or modified at the detailed design stage.

7.52 Any improvements to the route will benefit existing users and not just future residents of the proposed dwellings, consistent with paragraph 100 of the NPPF.

7.53 Turning to cycling, paragraph 3.11 of ESCC's Statement of Case (**CD1/7**) states that the proposed improvements on Rocks Road and Church Street include no specific provision for cyclists. In this regard, it is important to consider traffic speeds and volumes. Two automatic traffic counts (ATCs) have been conducted on Rocks Road and Church Street. The first ATC was located on Rocks Road to the west of the Snatts Road junction and the results are included as Appendix C to the December 2022 'Response to ESCC Highway Comments' (**CD2/102**). This survey recorded a 7 day average 24 hour traffic flow of 3,299 and 85th percentile speeds of 31.4mph southbound and 30.3mph northbound. The second ATC was located on Church Street between Pudding Cake Lane and Belmont Road and the results are included as Appendix D to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**). This survey recorded a 7 day average 24 hour traffic flow of 4,768 and 85th percentile speeds of 23.9mph southbound and 23.0mph northbound. On this basis, I consider the route to be relatively lightly trafficked and slow speed, and therefore an environment that is conducive to cyclists sharing road space with motorised traffic.

7.54 This section of road was also included within the study area for the road safety review introduced in Section 3 of the Transport Assessment (**CD2/27**). The road safety review identified no incidents involving cyclists on either Rocks Road or Church Street during the 5-year period ending 31st March 2022.

7.55 While I am familiar with the guidance in Section 4 of LTN 1/20 (**CD8/4**), which would encourage some kind of segregation for cyclists based on the traffic flows and speeds, this needs to be considered in context. The introduction to the document explains that it provides guidance and good practice for the design of new cycling schemes and cycle infrastructure.

7.56 In this case, Rocks Road and Church Street are existing streets which, like all arterial routes into towns, are constrained by the properties fronting the streets. In such cases, there are rarely opportunities to provide segregated cycle facilities and that is undoubtedly the case here as well as on other routes into Uckfield. In order to understand existing levels of cycle use on Church Street, surveys were carried out in June 2023 (see **Appendix PAB-I**). The surveys indicate existing cycle flows of 19 on a weekday and 35 on a Saturday, over the 12 hour period from 07:00 to 19:00 hours.

7.57 Given the lack of segregated facilities for cyclists, and despite the relatively lightly trafficked and low speed nature of the route, some people may have safety concerns that could discourage them from using it. However, as set out earlier in this section of my evidence, there is an alternative route proposed for cyclists via the A22 and Bell Farm Road. This route is almost completely segregated from vehicular traffic and will provide a genuine alternative route for any people who may be deterred from cycling on Rocks Road and Church Street.

Snatts Road Route

7.58 The Snatts Road route follows the existing farm access before joining Snatts Road, from which point pedestrians will be able to utilise a new section of footway on the south side of Snatts Road for a distance of approximately 150 metres. The route then follows footpath 3a into the existing residential area, from where there are a variety of route options depending on where people are travelling to/from.

7.59 This route is the least attractive for cyclists as the off-road sections would require cyclists to dismount and the flight of steps on this route does not make the route suitable for all users. However, this is not the only route and the Fir Tree Grove route considered in the previous section of my evidence is suitable for all users and provides an alternative.

7.60 Paragraph 3.9 of ESCC's Statement of Case (**CD1/7**) states that the route is narrow, unlit and not overlooked and, even with the proposed improvements to lighting and surfacing, is not considered to be a sufficiently safe and attractive route to use by all. I have already acknowledged that the route is unlikely to be attractive to cyclists and that the steps on the public footpath would preclude its use by some pedestrians. However, it is an existing route that is relatively well used, despite there being only limited existing development to the north and east of the route.

7.61 In order to understand existing use of this route, a survey was commission of the steps at the end of Downland Copse, leading to the public right of way. Surveys were completed between 07:00 and 19:00 hours on Thursday 22nd and Saturday 24th June 2023. The table below provides a summary of the recorded pedestrian movements up and down the steps. Full survey results are included in **Appendix PAB-J**.

Time Period	Thursday 22nd June	Saturday 24th June
Daily (07:00-19:00)	24	42

Summary of Pedestrian Survey Results of Footpath 3a/Steps at end of Downlands Copse (June 2023)

7.62 As set out in Section 3 of the December 2022 'Response to ESCC Highway Comments' (**CD2/102**), public rights of way are an integral part of the transport network in providing access to local services and facilities, including schools.

7.63 The route was considered as part of a Non-motorised User (NMU) Audit considered in sections 3 and 5 of the Transport Assessment (**CD2/27**), which identified a number of improvements focussing on the most direct routes between the site and identified core destinations. The route in question is not new and there are limitations on the extent of any improvements due to land constraints. However, it is important to recognise that the route is well used and that any improvements will benefit existing users as well as future residents of the proposed development. Indeed, the proposed improvements are consistent with paragraph 100 of the NPPF, which states that planning decisions should take opportunities to enhance public rights of way and provide better facilities for users.

7.64 The section of the route along Church Street is covered earlier in this section of my evidence. Dealing with the section between Snatts Road and Church Street, it is recognised that there are several sections that do not follow roads. The alleyways that connect between Snatts Road and the residential streets Downlands Copse, Hunters Way, The Drive, Manor Way and Pudding Cake Lane are generally in the order of 2 metres wide, which is considered to be a suitable footway width, although some sections are slightly narrower and the tarmac surfacing does not extend the full width of the alleyways in places, particularly the alleyways either side of The Drive.

7.65 In terms of overlooking, the alleyways are generally not directly overlooked. However, they are straight routes with good visibility from one end to the other and without hiding places. It is also relevant that such links are commonplace in residential areas and there are other examples within Uckfield such as much of the existing shared foot/cycleway along Bellfarm Road and Lime Tree Avenue. The Bellfarm Road route serves the residential area to the north/west of the town. The Lime Tree Avenue link serves the residential area to north/east of the town and runs between Downsview Crescent and Hempstead Road next to Uckfield College and Leisure Centre. These routes include sections that are not overlooked or visible from nearby roads. To understand existing levels of pedestrians using these routes, further surveys were completed in June 2023. The table below provides a summary of the recorded pedestrian movements on this route. Full survey results are included in **Appendix PAB-K**.

Time Period	Thursday 22nd June	Saturday 24th June
Daily (07:00-19:00)	479	359

Summary of Pedestrian Survey Results of Bellfarm Road (June 2023)

Time Period	Thursday 22nd June	Saturday 24th June
Daily (07:00-19:00)	470 to 557	198 to 227

Summary of Pedestrian Survey Results of Lime Tree Avenue (June 2023)

7.66 In summary, the Snatts Road route mainly relies on existing links, which are well used and considered fit for purpose for the vast majority of users. For those who are unable to navigate the steps, there is an alternative route via Fir Tree Grove. I have seen no evidence to indicate that any deficiencies in the route would be a deterrent to able bodied pedestrians travelling to and from the site.

7.67 The Snatts Road route was considered in the independent Stage 1 Road Safety Audit included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**). The Safety Audit identified no problems with the proposals that could not be readily addressed at the detailed design stage.

7.68 As with the Rocks Road and Church Street route any improvements will benefit existing users and not just future residents of the proposed dwellings, consistent with paragraph 100 of the NPPF.

7.69 To assist the Inquiry and to give an indication of potential daily pedestrian and cycle trips to and from the development, reference has been made to the TRICS database. Weekday multi-modal surveys from the category 'mixed private/affordable housing' have been selected for the same search parameters as applied to establish vehicular trip rates set out in the submitted Transport Assessment. These parameters included sites in England (excluding Greater London) in suburban/edge of town locations for developments between 200 and 1,000 dwellings from the default year. The TRICS output report is available in **Appendix PAB-L** for reference. In terms of distribution of pedestrian and cycle trips along the three active travel routes, for simplicity it has been assumed that:

- Pedestrians: 90% use Fir Tree Grove with a 50/50 split between those then accessing the town via Rocks Park Road and Church Street, with the remaining 10% using the route to Snatts Road, assuming all pedestrians walking this route use the steps at the end of Downland Copse, with then a 50/50 split between pedestrians walking to the town via Pudding Cake Lane and travelling east; and
- Cyclists: A 50/50 split between the A22 route and the Fir Tree Grove route, in view of the similar journey times outlined previously in my evidence. Of the 50% using the Fir Tree Grove route half would continue along Rocks Road/Church Street with the remainder continuing along Rocks Park Road.

7.70 I have prepared the diagrams included in **Appendix PAB-M**, which indicate existing daily pedestrian and cycle flows on a number of routes within Uckfield based on surveys carried out in June 2023 along with an indication of the likely additional pedestrian and cycle flows resulting from the proposed development.

Impact on Town Centre Junctions

7.71 The impact of development traffic on town centre junctions is considered in detail in Section 5 of the December 2022 'Response to ESCC Highway Comments' (**CD2/102**). The Transport Assessment Scoping Report proposed a study area to be considered in the traffic assessment and did not propose to undertake any modelling of town centre junctions as it is considered that the proposed development will not have a material impact on those junctions. No response was received from ESCC in relation to the scope of junctions proposed to be assessed in the Transport Assessment Scoping Report and no request was received from ESCC to include modelling town centre junctions within the scope of the Transport Assessment.

7.72 However, ESCC's first consultation response following the submission of the planning application (**CD1/1**) included the following:

"Town centre modelling has not been carried out to understand the High Street operation with and without the development proposals. In particular the routes to the town centre to include the Bell Lane roundabout and signalised junctions Bell Lane/High Street and Church Street/High Street currently experience high volumes of traffic resulting in significant queuing and delays. In terms of scope to improve flows in town centre roads, there is little scope to do this and as such it is critical that development sites have ease of accessibility by other modes than the private car."

7.73 During the run up to the Inquiry, I have continued discussions with East Sussex County Council to consider mitigation measures that would address their concerns. The agreed position as set out in the Transport Statement of Common Ground (**CD1/9**) is that the Appellants will fund the installation and maintenance of an enhanced control system at the town centre junctions. Subject to a Section 106 obligation to pay the contribution, ESCC considers that reason for refusal 7 can be withdrawn.

8.0 Third Party Representations

8.1 A number of representations on highways and transport matters have been made in response to the Appeal by third parties, namely local residents. In this section of my evidence, I seek to summarise those representations insofar as they relate to highways and transport and provide a response.

Snatts Road

8.2 Several third parties have questioned the suitability of Snatts Road to accommodate additional development traffic flow. This includes commentary on the perceived lack of passing spaces, narrow width, suggested excessive speeds, as well as the lack of a footway in sections. A number of third parties have also raised concern with the provision of the SANG car park on Snatts Road, and questioned whether this will lead to increased traffic. It is also suggested that Snatts Road is used as a rat run to avoid the High Street.

8.3 In response to these points, the only vehicular access to the site via Snatts Road, is for the SANG car park, which comprises 20 spaces. It would be completely illogical for any other traffic associated with the site to use Snatts Road as it does not follow any logical desire line to or from the proposed vehicular access on the A22. As far as the impact of the SANG car park traffic is concerned, this is covered in Section 7 of the December 2022 'Response to ESCC Highway Comments' (**CD2/102**), which refers to a survey carried out at the Horsted Green Park SANG in October 2022, the results of which are included in Appendix J to that document.

8.4 The maximum number of vehicle movements in any hour was recorded as 38 (15 arrivals and 23 departures) between 09:00 and 10:00 hours on the weekday survey, with 42 recorded on the Sunday (23 arrivals and 19 departures) between 10:00 and 11:00 hours. The weekday vehicle movements generally occur outside the typical network peak hours. Furthermore, it is likely that arrivals and departures to the car park would be split between the two junctions at either end of Snatts Road. As such, it is considered that more detailed junction assessment is not necessary, and it is my understanding that ESCC is in agreement with this position.

Town Centre Congestion

8.5 A number of third parties have suggested that Uckfield town centre experiences heavy congestion during peak periods, and that the development proposal will exacerbate this. There is mention by a third party of a scheme in 2009 to improve traffic within Uckfield, which never materialised.

8.6 As set out in Section 7 of my evidence, impact on the town centre junctions is considered in detail in Section 5 of the December 2022 'Response to ESCC Highway Comments' (**CD2/102**), which demonstrates that the greatest increase predicted at any of the junction is only 1.8%. I consider that any such increase would be imperceptible to users of the junction and would not result in a material impact on its operation. Notwithstanding this ESCC has requested a contribution towards the installation and maintenance of an enhanced control system, which I understand will provide a solution to any capacity issues at the town centre junctions.

Public Transport Improvements

8.7 There is a suggestion that the proposal does not offer material improvements to public transport provision, and that the hourly rail service from Uckfield station is too infrequent. There is also a suggestion that the community transport proposal has not yet been agreed with the Passenger Transport Team at East Sussex.

8.8 As set out in Section 3 of my evidence, it has been agreed that a financial contribution of £1,100 per dwelling will be paid to ESCC through a Section 106 Agreement to facilitate the diversion of service 31 along the A22 and into the site. Subject to such a contribution and the provision of public transport infrastructure such as a bus turnaround and real-time passenger information within the site, ESCC considers public transport accessibility to be acceptable as set out in the Transport Statement of Common Ground (**CD1/9**).

8.9 With regard to the frequency of the rail services, these are covered in Section 3 of the Transport Assessment (CD2/27). I consider the hourly frequency to be appropriate for commuters working outside Uckfield, for example in Croydon or London, and note that rail frequency in not an issue that has been raised by ESCC.

Promoting Walking and Cycling

8.10 There is a suggestion that the gradient and topography of roads in the area mean that cycling/walking is unviable for less mobile people. There is also a suggestion that there is inadequate footway provision and lack of any provision linking to the town centre.

8.11 This topic is covered in detail in Section 7 of my evidence.

Access to Local Amenities

8.12 There is a suggested lack of local amenities in close proximity to the site, which will result in an over reliance on car travel.

8.13 Access to local amenities is covered in Section 3 of the Transport Assessment (**CD2/27**) and the walk and cycle isochrones included at Figure 3.3 and Figure 3.4 respectively demonstrate that there are numerous local amenities within walk and cycle distance of the site, particularly Rocks Park Primary School to the south of the site. The plans attached to the Transport Statement of Common Ground deal with the distances to the town centre and other amenities and Section 7 of my evidence deals with the attractiveness of the various routes.

8.14 It is my professional opinion that there is nothing that would preclude the vast majority of residents from walking or cycling to the local amenities in and around Uckfield. Furthermore, I would note that the fact that the vehicular access is on the western boundary of the site (in the opposite direction to the town centre) should have some effect on whether people choose to drive rather than walk/cycle.

Access Arrangements

8.15 Third party comments also reference the proposed access junction onto the A22 having sub-standard visibility.

8.16 As set out in Section 3 of my evidence, the visibility at the proposed vehicle site access on the A22 is fully in accordance with the Design Manual for Roads and Bridges. Furthermore, ESCC raises no issue with visibility at the roundabout and the proposals have been the subject of a Stage 1 Road Safety Audit, which is included as Appendix A to the July 2023 'Response to ESCC Highway Comments' (**Appendix PAB-B**), which raised no problems in relation to visibility.

Wider Traffic Impact

8.17 Third party comments also reference growing congestion on the A22, with the road operating over capacity. Comments have also been raised in respect of a suggested increase in traffic through Ashdown Forest.

8.18 The impact of the proposals on the A22 corridor is covered in detail on Sections 6 and 7 of the Transport Assessment (**CD2/27**) and in Section 5 of the December 2022 'Response to ESCC Highway Comments' (**CD2/102**). These submissions consider a future year of 2039 and demonstrate that the proposed development will not have a material impact on the operations of the junctions on the A22 corridor within the agreed study area. It is my understanding that ESCC takes no issue with the impact of the development on the A22 corridor.

8.19 With regard to increased traffic through Ashdown Forest, I am not aware that this has ever been raised during pre-application discussions or by any of the statutory consultees. It is my view that any additional traffic passing through the western edge of Ashdown Forest on the section of the A22 to the south of Forest Row, would not be significant, particularly in the context of the existing traffic flows.

Car Ownership

8.20 A number of third parties have made incorrect assumptions as to likely levels of car ownership associated with the appeal site, and how this will manifest itself into vehicular trips.

8.21 The trip rates outlined in Section 6 of the Transport Assessment (**CD2/27**) are derived from the TRICS database, which is an industry standard database of traffic surveys carried out at various locations across the UK. As such, the trip rates are not derived from projected car ownership.

9.0 Summary and Conclusion

9.1 The planning application that is the subject of the Appeal seeks permission for the erection of up to 424 residential dwellings (including affordable housing), the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts Road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks, the creation of a strategic SANG, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from Rocks Road, associated landscaping, infrastructure and earthworks. The planning application is in hybrid form and seeks outline planning permission (with all matters reserved except for access) for the proposed residential dwellings and associated works; and detailed permission for the strategic SANG and associated works.

9.2 The planning application was refused by Wealden District Council on 21st April 2023. The Decision Notice (**CD5/1**) lists nine reasons for refusal and my evidence deals specifically with matters relating to highways, traffic and transportation, which are covered by the sixth and seventh reasons for refusal as follows:

> *"6 The proposal has not demonstrated that a safe and suitable access arrangement can be achieved for all users and to reduce dependence on the private car.*
>
> *The scheme would therefore be contrary to Saved Policies EN1, EN2, TR3 and TR13 of the Wealden Local Plan 1998, Spatial Planning Objectives SPO7 and SPO15 and Policies WCS7 and WSC14 [sic] of the Wealden Core Strategy Local Plan 2013 and the guidance within Chapter 9 of the NPPF.*
>
> *7. 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."*

9.3 It is apparent from these reasons for refusal that they related to a lack of information relating to highways and transport matters, rather than any fundamental objections to the proposals. Indeed, it is noted on the decision notice that reason seven can be secured through an appropriate legal agreement and Statement of Common Ground. Indeed, it is now confirmed within the Transport Statement of Common Ground (**CD1/9**), that subject to a financial contribution towards the installation and maintenance of an enhanced control system for the town centre junctions, ESCC considers that reason for refusal 7 can be withdrawn.

9.4 I have prepared a full summary of my Evidence in a separate document. Based on my evidence it is my professional opinion that the proposals are fully compliant with the transport related principles of the NPPF, particularly section 9, which relates to sustainable travel and impacts on the road network. Furthermore, I do not consider the transport related aspects of the proposals to be in conflict with either the saved policies of the Wealden Local Plan 1998 or the strategic planning objectives or policies of the Wealden Core Strategy Local Plan 2013. I therefore conclude that there are no highways or transport related grounds that would justify refusal of planning permission.