



Land at Hindsland, Eastbourne Road, Willingdon,
East Sussex

Report to Inform Inquiry

Client: Danescroft (FREOF V Willingdon) LLP

Appeal Ref: APP/C1435/W/22/3293970

Date: 06 June 2022

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FIGURE

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Section 1 Introduction

1.1 Qualifications and Experience

- 1.1.1** This Report has been produced to inform the Inquiry in relation to transport and highways matters. It has been written by Neil Simon Marshall, a Chartered Transport Planner, being a Chartered Member of the Chartered Institute of Logistics and Transport and a Member of the Chartered Institution of Highways and Transportation. Neil has an honours degree (BSc) in Geography from the University of Southampton, and is a Partner at i-Transport LLP, a specialist transport and highways planning consultancy of 85 Gresham Street, London, EC2V 7NQ.
- 1.1.2** Neil has worked in the transport, highways, and infrastructure fields for over 20 years, all in private practice in a development planning role. He is responsible for managing a wide variety of transport, environmental, and infrastructure planning projects across the UK. His experience covers transport impact and accessibility studies for residential, educational, commercial, retail, hotel, and leisure developments. He is experienced in preparing evidence for public inquiries and appearing at them as an Expert Witness (including those decided by the Secretary of State ('SoS')). A summary of his relevant experience is attached at Appendix A.
- 1.1.3** He has worked on numerous development sites across East Sussex, West Sussex, Kent, Surrey, Essex, and other home counties, and is currently working on residential schemes in other boroughs and districts of East Sussex, including Uckfield and Hastings.
- 1.1.4** Neil, and i-Transport, has been involved in this project since mid 2020, initially advising the Appellant on the details relating to the previous refusal of development on the site, through pre-application discussions with both the local highway and planning authorities, to the planning application and post-submission negotiations. He is fully familiar with the Appeal site and the surrounding transport network having visited on a number of occasions at different times of the day, week, and year.

1.2 Appeal Scheme

- 1.2.1** This report relates to the transport and highways matters of the Danescroft proposal:

Outline application with all matters reserved except for access (excluding internal estate roads beyond the access to serve the medical centre plot) for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing, and onsite open space.

- 1.2.2 The Appeal Scheme is located wholly within the planning jurisdiction of Wealden District Council (WDC), with the local highway authority (LHA) responsible for the surrounding network being East Sussex County Council (ESCC). To the north of the site, the A27 forms part of the strategic road network (SRN), and is managed by National Highways (NH).

1.3 Summary of Report

- 1.3.1 Overall, this report demonstrates that:

- The site is situated in a location that is genuinely sustainable with realistic opportunities to be accessed by modes of transport other than the private car; in fact it is one of the most accessible parts of WDC's area as reflected in it receiving an allocation in the Local Plan;
- It fully accords with all the key transport policy tests at both national and local level;
- It has been agreed with ESCC, as the LHA, that the adjacent highway network will be able to satisfactorily accommodate the predicted peak flow increases that will be generated by the development proposal;
- The LHA, ESCC, agrees that the proposed access onto the A2270 Eastbourne Road will provide safe and suitable access for the type and quantum of land uses proposed;
- All transport matters are agreed with the LHA which has raised no objection to the application subject to planning Conditions as set out in the separate Transport and Highways Statement of Common Ground presented to the Inquiry;
- NH raises no objection in relation to impact on the SRN, subject to Conditions;
- Further, the WDC Officer's Committee Report (dated 24th March 2022) also agrees with this position, with it concluding that the site is within easy walking distance to the public transport that connects to the facilities of Eastbourne, Polegate, and Hailsham, and therefore agrees that there are no reasons in transport terms to justify a refusal.

1.3.2 Overall, the report concludes that in the absence of any robust technical evidence to the contrary, there are no sound transport or highway reasons to preclude the development from proceeding in accordance with NPPF paragraph 111.

1.3.3 The Appeal site is supported by a Transport and Highways specific Statement of Common Ground (SoCG) between the Appellant and ESCC, that sets out the sustainable nature of the site, that it provides safe and suitable access for all, and that all anticipated impacts of the Appeal site can be mitigated to an acceptable level.

1.4 Scope and Nature of Report

1.4.1 Transport and highways matters for the Appeal Scheme have been thoroughly scrutinised and found acceptable by ESCC as the LHA, i.e. the statutory consultee appropriately qualified to comment on such matters. ESCC has no objection to the Appeal Scheme. This Report summarises the detailed assessment work that has been undertaken to enable ESCC to come to this conclusion, as well as establishing the wider benefits to all highway users that will come about as a result of the Appeal scheme proceeding.

1.4.2 Further, a number of third party submission have been made. This report will address the various interested parties' submissions throughout, and then summarise directly. It will demonstrate that all of the points have been fully considered as part of the planning application alongside relevant mitigation measures, and have been agreed with ESCC as the statutory highway authority.

1.4.3 To seek to assist the Inspector, this proof of evidence summarises the various items of transport work that have been undertaken, as well as the consultation responses of ESCC, NH, and the WDC committee report, to provide a comprehensive review of the transport acceptability of the Appeal Scheme.

1.4.4 In particular, it brings together the various strands of transport analysis and comment to identify whether the Appeal Scheme complies with the three key transport tests that are identified in paragraph 110 of the National Planning Policy Framework (NPPF), i.e.:

- Will there be appropriate opportunities for new residents to take up sustainable modes of transport?
- Will safe and acceptable access be provided for all users?
- Will the traffic impact be acceptable?

1.4.5 This report demonstrates that the response to all of these questions is 'yes'. As a result of it meeting all three of the individual tests, it then meets the overarching test at paragraph 111 of the NPPF, that there are no unacceptable impacts on highway safety, nor that the residual cumulative impacts on the road network would be severe. This view is shared by ESCC as the LHA.

1.4.6 This report should be read alongside the various transport reports produced by i-Transport LLP in support of the application and cross referenced throughout.

- ***CD 9.1: Transport Assessment***
- ***CD 9.2: Travel Plan Framework***

1.4.7 The remainder of this report is structured as follows:

- Section 2 identifies the key characteristics of the existing highway and transport networks;
- Section 3 summarises the development proposal and access strategy;
- Section 4 summarises the positions of the authorities with respect to transport matters;
- Section 5 briefly reviews relevant policy relating to transport matters;
- Section 6 considers matters raised by the third parties; and
- Section 7 sets out the conclusions.

Section 2 Existing Transport and Highways Situation

2.1.1 This section of the report summarises the baseline transportation conditions in the vicinity of the Appeal site, including updated since the production of the reports to support the original planning application.

2.2 Site Description

2.2.1 The Appeal site comprises of the former Hindsland Playing Fields, which are disused. When previously in occupation, use of the playing fields was for private use only and not open to the public. The site is currently overgrown and not maintained as playing fields. In addition to the former playing fields there are areas of hard standing associated with a former pavilion building, a single detached dwelling (vacant), and associated outbuildings.

2.2.2 The site is located to the south of Polegate and is bordered to the north by residential properties on Brightling Road and culs-de-sac from it (including Spurway Park), to the east and southeast by open agricultural land formed by Mornings Mill Farm, and to the south and west (on the western side of Eastbourne Road) by further residential areas.

2.2.3 The site's sole access to the wider area is via a simple vehicular crossover to the A2270 Eastbourne Road at its far southwest corner. This provided all access to the site's pavilion and single dwelling. The site and dwelling are currently vacant and fenced with no public access (there are no Public Rights of Way (PRoW) within or bordering the Appeal site).

2.3 Walking and Cycling

2.3.1 Full details of the walking and cycling infrastructure in the vicinity of the Appeal Site is set out in the Transport Assessment supporting the planning application.

- **CD9.1: Transport Assessment – Section 3.3**

2.3.2 What is clear is that that the site is extremely well catered for in terms of access to a well-connected series of footways on surrounding roads towards all everyday services and facilities. The ability for future site occupiers and existing road users to safely use the existing links and crossings in the area is reviewed in more detail in Section 6 of this report.

2.4 Public Transport

Bus

2.4.1 The closest bus stops to the site are located on Eastbourne Road, adjacent to the site boundary, with the northbound stop located some 130m southeast of the proposed site access, and the southbound stop is located some 60m south of the access on the opposite side of Eastbourne Road. The stops consist of a simple flag and pole. Further services are available from bus stops located near Brightling Road 300m to the north of the site, and Coppice Avenue 520m to the west of the site.

2.4.2 A summary of the typical frequencies of the bus services available from these stops is provided in Table 2.1 overleaf.

Table 2.1: Bus Destinations and Typical Frequencies

Bus Route	Stop Location	Destinations	Typical Frequency (shown for one direction)			First Bus	Last Bus
			Mon - Fri	Sat	Sun		
6	Coppice Avenue	Eastbourne – Langney	1 per hour	1 per hour	No service	09:02 (NB) 08:05 (SB)	17:51 (NB) 17:57 (SB)
44	Brightling Road	Berwick - Polegate - Langney - Eastbourne	2 per day on Tues & Thurs	No service	No service	12:03 (NB) 09:31 (SB)	16:39 (NB) 14:05 (SB)
45	Broad Road – SB only	Hailsham - Eastbourne	1 per day on Fri	No service	No service	10:13	-
51	Broad Road – NB only	Hailsham – Heathfield – Hellingly – Polegate – Willingdon – Eastbourne	2 per hour	2 per hour	2 per hour	07:07	23:23
	Farmlands Way Shops – SB only					06:17	23:21
54	Eastbourne Road (Broad Road)	Uckfield – Hailsham – Polegate – Willingdon – Eastbourne	1 per hour	1 per hour	No service	06:15 (NB) 08:25 (SB)	18:31 (NB) 20:17 (SB)

Bus Route	Stop Location	Destinations	Typical Frequency (shown for one direction)			First Bus	Last Bus
			Mon - Fri	Sat	Sun		
54A		Stone Cross – Dittons – Eastbourne	1 service	No service	1 per hour	09:36 (NB) 09:00 (SB)	18:36 (NB) 19:00 (SB)
98		St Helens – Polegate – Bexhill – Hastings Town Centre	1 per hour	1 per hour	No service	08:57 (NB) 08:02 (SB)	18:30 (NB) 16:38 (SB)
125		Lewes – Alfriston – Polegate – Eastbourne	1-2 per day	No service	No service	10:54 (NB) 10:11 (SB)	13:50 (NB) 13:09 (SB)

Source: Traveline (accessed May 2022).

2.4.3 Importantly, there are five different services that route to Eastbourne town centre, with the ability for future passengers to access these services in a walk shorter than 150m and can interchange across the services to the wider Eastbourne area. Journey times across the routes are in the region of 10 minutes to East Sussex College/Eastbourne District General Hospital, and 20 minutes to Eastbourne town centre.

2.4.4 In addition, a wide range of buses, serving a range of destinations such as Polegate town centre, Stone Cross, Uckfield and Lewes are available within a circa 400m walk of the site.

Rail Services

2.4.5 Polegate railway station is located some 850m walking distance north (equivalent to an 11-minute walk or a 4-minute cycle) from the site's proposed access on Eastbourne Road, via the station's access south of the railway.

2.4.6 The station provides cycle parking for up to 48 cycles with CCTV, and a pay and display 24-hour car park.

2.4.7 The station is served and managed by Southern Railway trains, with direct services to Eastbourne, Hastings, Brighton, London Victoria and Ore. The destinations, durations, peak hour and typical frequencies are summarised in Table 2.2.

Table 2.2: Summary of Rail Frequencies – Polegate Station

Destination	Journey Time	Peak Hour Frequency	Typical Frequency
Eastbourne	8 mins	4 per hour	3 per hour
Hastings (via Eastbourne)	44 mins	3 per hour	2 per hour
Brighton	32 mins	2 per hour	2 per hour
London Victoria	1 hour 22 mins	2 per hour	2 per hour
Ore	50 mins	2 per hour	2 per hour

Source: National Rail Enquiries (accessed May 2022)

- 2.4.8 In addition to the destinations above, services from Polegate to London Victoria also route via Lewes and London Gatwick Airport, with journey times of 16 minutes and 50 minutes respectively. Further services to Ashford International are accessible from Ore and Hastings, with journey times of around 90 minutes.

Summary

- 2.4.9 There is an extensive network of public bus services in the vicinity of the site, with stops adjacent to the site on Eastbourne Road, or within a short and reasonable walking distance on Coppice Avenue, Brightling Road and in the town centre. These provide frequent services towards Eastbourne town centre, as well settlements including Lewes and Hastings. Connections to London, Hastings and Brighton are also provided, for longer distance journey purposes.

2.5 Local Highway Network

A2270 Eastbourne Road

- 2.5.1 A full description of the local highway network in the vicinity of the Appeal Site is provided in the Transport Assessment supporting the planning application.

- **CD9.1: Transport Assessment – Section 3.5**

- 2.5.2 Since writing the Transport Assessment, National Highways (NH) – who manage the strategic road network of the A27 in the vicinity of the site – has almost completed the A27 East of Lewes improvement works in the area. This is a suite of committed, and currently being built, improvement works between Lewes and Polegate on the A27. The works seek to improve journey time along the corridor as well as improving the safety of all road users and supporting sustainable modes of travel. The work includes dualling the carriageway between Polegate and

Cop Hall roundabout (with the A22) and making alterations and improvement to the signal-controlled junction between the A27 and the A2270. At the time of writing, the majority of the works on the A27 between and including the Polegate traffic signals and the Cophall roundabout appear to have been completed.

2.6 Road Safety Review

2.6.1 Personal Injury Accident (PIA) data has been obtained from Sussex Police for the highway network in the vicinity of the site for the most recent five-year period available at the time of the request (01/12/2015 to 30/11/2020) when the TA was prepared. The study area includes an over 1km length of Eastbourne Road from the High Street/ Wannock Road junction in the north to the Tott Yew Road junction in the south.

2.6.2 In the study area, across the five-year period, a total of 27 PIAs were recorded. Of these, one resulted in serious injuries and the remaining 26 were slight in severity. It is noted that no PIAs were recorded along Eastbourne Road within the vicinity of the proposed site access.

2.6.3 A detailed review of these it provided in the TA supporting the planning application for the Appeal site.

- **CD9.1: Transport Assessment – Section 3.8**

2.6.4 A review of the PIA data in the vicinity of the site for the latest period available has been analysed. Whilst any accident is regrettable, the locations and causes of these accidents do not indicate any highway safety concerns or issues with the local highway geometry. The majority of these PIAs were as a result of driver error.

2.7 Base Traffic Flows / Traffic Surveys

2.7.1 Due to travel restrictions relating to the Covid-19 pandemic, collection of new traffic data representative of normal conditions was not possible at the time of the planning submission. It was therefore agreed that historic data sets held by ESCC be used as a basis for understanding current local conditions.

2.7.2 A suite of traffic data of the local highway network was obtained from ESCC for locations along the A2270 Eastbourne Road. These are detailed fully in the TA supporting the Appeal site's application.

- **CD9.1: Transport Assessment – Section 3.6**

2.7.3 The data demonstrates that traffic flows across the morning and evening peak periods are fairly consistent across the peak periods; this is, they exhibit a “flat profile”.

2.7.4 A summary of the free flows 85thtile traffic speeds recorded along Eastbourne Road, taken from an average of the two ATCs (both located in 40mph locations) was calculated and demonstrated that the majority of vehicles travelling past the site in free-flow conditions travel at 36 mph in both directions. This demonstrates that the majority of vehicles are therefore travelling at below the posted 40mph speed limit.

2.8 HPEMAC Improvements

2.8.1 The Hailsham, Polegate and Eastbourne Movement and Access Corridor (HPEMAC) is a committed and secured package of integrated transport improvements along the A22/A2270/A2021 corridor between Hailsham, Polegate and Eastbourne. The scheme is fully funded through ESCC and includes improvements such as bus lanes, shared footway and cycleways and new and improved pedestrian and cyclist crossings.

2.8.2 The proposals include improvements along the A2270 Eastbourne Road which commence to the south of the Appeal site’s southern frontage.

2.8.3 The improvements along the A2270 Eastbourne Road, outside of the site, include:

- A bus lane merge along the northbound carriageway;
- A 3.0m wide shared footway/cycleway along the southbound carriageway;
- A Toucan crossing of the A2270 Eastbourne Road located to the south of Broad Road connecting the 3.0m shared footway/cycleway along the northbound carriageway to the proposed shared footway/cycleway along the southbound carriageway;
- A southbound bus lane commencing to the south of the Broad Road junction; and
- A reduction in the speed limit from 40mph to 30mph along the length of the A2270 Eastbourne Road.

2.8.4 Furthermore, significant capacity enhancements to the A2270 Eastbourne Road / High Street / Wannock Road junction to the north will be delivered. This will introduce an additional

northbound ahead lane on the A2270 Eastbourne Road southern arm, and a new left turn slip lane on the High Street arm, as well as a series of pedestrian and cycle enhancements.

- 2.8.5 Works were due to commence in Spring 2022. However, due to further detailed design matters relating to drainage, it is understood that works will now commence at the beginning of 2023, with a circa 12 month construction period.

2.9 Access to Local Services and Facilities

- 2.9.1 The wide range of everyday services and facilities available to future occupiers of the site by active modes, and the high-quality link available to access them are established within this section, building on the high level review provided in the TA.

- **CD9.1: Transport Assessment – Section 5.3**

- 2.9.2 A review of National Statistics identifies the reasons as to why people make a journey, as summarised in Table 2.3 below. The main reasons for travelling include leisure, shopping, commuting/business and education/escort education trips. Together these account for over 80% of the reasons for making a journey.

Table 2.3 – Journey Purpose

Journey Purpose	Proportion of Trips
Commuting/Business	17.6%
Education (inc. Escort)	13.1%
Shopping	19.0%
Personal business and other Escort	18%
Leisure	25.9%
Other (including just walk)	6.4%

Source: Table NTS0409 of National Travel Survey 2019, published August 2020

- 2.9.3 The accessibility of the site with respect to these facilities and other key destinations by walking, cycling and public transport is detailed in the following paragraphs.
- 2.9.4 It is generally accepted that walking and cycling provide important alternatives to the private car, and should also be encouraged to form part of longer journeys via public transport. The Institute of Highways and Transportation (IHT) has published guidance that provides advice with

respect to the provision of sustainable travel in conjunction with new developments. Within these documents it is suggested that:

- Most people will walk to a destination that is less than one mile (approx. 2km) (Planning for Walking, 2015); and
- The bicycle is a potential mode of transport for all journeys under five miles (approximately 8km) (Planning for Cycling, 2014).

2.9.5 This correlates well with other data in the National Travel Survey which found that walking was the most frequent mode for short trips in 2019, where 80% of trips under one mile (c. 1,600m), and 31% of trips between one and two miles (c. 3,200m) were by walking. The most trips by bicycle were also made to destinations 2 to 5 miles from the origin of the trip. (*Ref: NTS Table 0308*).

2.9.6 Figure 1 summarises the routes in the context of the locations of interest to demonstrate the proximity of the bus routes to all of the locations of employment, education, health, retail, and leisure in the local area. Figure 2 clearly shows how the local bus services provide access to the key services and facilities beyond Polegate.

2.9.7 These, plus a selection of leisure and employment areas, are detailed along with the approximate walking and cycling distance in Table 2.4.

Table 2.4: Summary of Local Facilities

Purpose	Destination	Distance	Walking journey time (mins)	Cycling journey time (mins)
Retail	Tesco Express	360 m	4 mins	1 mins
	ATM Machine	360 m	4 mins	1 mins
	The Hair Shop	720 m	9 mins	3 mins
	Polegate News	820 m	10 mins	3 mins
	One Stop Stores	830 m	10 mins	3 mins
	Lower Willingdon Co-op & Post Office	860 m	10 mins	3 mins
	Brain's Butchers Ltd	850 m	10 mins	3 mins
	Frenchies Homeware & Gifts	930 m	11 mins	4 mins
	Co-op Food & Polegate Post Office	950 m	11 mins	4 mins

Purpose	Destination	Distance	Walking journey time (mins)	Cycling journey time (mins)
	Devotedly Discus Pet Shop	950 m	11 mins	4 mins
	Polegate Tandoori	960 m	11 mins	4 mins
	Polegate High Street	1,000 m	12 mins	4 mins
	Tesco Express, Freshwater Square	1,300 m	15 mins	5 mins
Education	Willingdon Community School	620 m	7 mins	2 mins
	Willingdon Primary School	800 m	10 mins	4 mins
	Step by Step Children's Nursery	1,390 m	17 mins	6 mins
	Polegate School	1,410 m	17 mins	6 mins
Employment	Polegate High Street	1,000 m	12 mins	4 mins
	Chaucer Industrial Estate	2,800 m	33 mins	11 mins
	Chaucer Business Park	3,000 m	36 mins	12 mins
Leisure	Horse & Groom	665 m	8 mins	3 mins
	Polegate Town FC	735 m	9 mins	3 mins
	Polegate Cricket Club	735 m	9 mins	3 mins
	The British Queen Pub	910 m	11 mins	4 mins
	Willingdon Community Hub Library	960 m	11 mins	4 mins
	Willingdon Scout Group	960 m	11 mins	4 mins
	Brightling Road Leisure Ground	1,100 m	13 mins	4 mins
	Polegate Skatepark	1,150 m	13 mins	4 mins
	Huggetts Lane Recreation Ground	1,240 m	15 mins	5 mins
	Willingdon Athletic Football Club	1,240 m	15 mins	5 mins
Health	Polegate Community Association	1,310 m	16 mins	5 mins
	Proposed Medical Centre	0 m	0 mins	0 mins
	Pure Dental Surgery	580 m	7 mins	2 mins
	Manor Park Surgery	650 m	8 mins	3 mins
	Polegate Dental Surgery	650 m	8 mins	3 mins
	Kamsons Pharmacy	850 m	10 mins	3 mins

Key:



Within Manual for Streets 'walkable neighbourhood' 800m distance

Within 1600m (1 mile), i.e. within a distance where 80% of journeys are on foot

Notes: Approximate journey times are rounded up. Shortest distance permissible by each travel mode. Distances all measured from closest site access point. Walking time based on 1.4m/s and cycling time based on 4.1m/s.

- 2.9.8 The Appeal site proposal includes a medical centre, ensuring health facilities are adjacent to future occupiers.

Walking Connections

- 2.9.9 Within a reasonable walking distance of the Appeal site are a range of retail, education, employment, and health facilities. The nearest and most convenient amenity is the Tesco Express located just 360m north of the Appeal site on Eastbourne Road, where most necessities can be purchased.
- 2.9.10 The site is located broadly equidistance between Polegate to the north and Lower Willingdon to the south. A range of local facilities are available in a circa 10 minutes walk from both locations and thus within the 10 minute walk distance considered a walkable neighbourhood for local facilities.; Lower Willingdon providing a Co-Op convenience store (with Post Office counter), butchers, and pharmacy, with Polegate High Street providing a more varied range of stores, also including a One Stop convenience store, newsagent, Co-op convenience store, and various other independent and chain cafes and stores.
- 2.9.11 Residents of the site can easily access both by walking - the southern end of the High Street retail offering is circa 600m from the main site access (an approximate nine minute walk or three minute cycle). The main pedestrian route would include routing along Eastbourne Road and either diverting onto Church Road or remaining on Eastbourne Road to meet the High Street. The High Street then leads northbound to the town centre as shown in Figure 1. The retail area on the High Street extends circa 500m, and includes a wide range of local facilities (including convenience retail stores, cafes, pharmacies, and hairdressers).
- 2.9.12 Primary and secondary education facilities are available within Willingdon, with Willingdon Community School (secondary education) located on Broad Road some 650m walk from the appeal site, and Willingdon Primary School accessed from Coppice Avenue some 800m from the Appeal site. The Appeal site facilitates access to these, by way of its own pedestrian provision alongside its access, and the provision of a new uncontrolled crossing (with central pedestrian refuge) to the north of the site, and a new shared foot/cycle way to the south of the access to meet the existing uncontrolled crossing (with pedestrian refuge) to the south of the Broad Road.
- 2.9.13 Wide footways, often separated from the carriageway by wide verges are available along Broad Road to the west, to provide attractive walking routes to the primary and secondary education facilities available along that corridor.

Cycle and Public Transport Connections

- 2.9.14 Although there are a number of facilities within walking distance of the Appeal site, the main location for retail, employment, and leisure is within Eastbourne town centre, some 6km to the south of the site.
- 2.9.15 Bus and rail provide direct access to Eastbourne town centre, the main centre for retail in East Sussex. It is home to a diverse variety of retailers, with many of the major high street operators in fashion, electronics, media, and other comparison retail having a presence, alongside further food retail, café, and restaurant provision. Within the centre are seven theatres, a cinema, three museums, an art gallery, and numerous café, restaurants, and other sports leisure facilities
- 2.9.16 Eastbourne town centre is accessible within a circa 20 minute bus journey (with a four per hour frequency), and 8 minutes rail journey from Polegate. It is therefore accessible by non-car modes of travel within a reasonable journey time.
- 2.9.17 Additionally, beyond Polegate and Lower Willingdon, large retail supermarkets are available in the vicinity of Hampden Park railway station, a single stop from Polegate station.
- 2.9.18 Advisory on carriageway cycle lanes are provided along most of the route, much of which will be further enhanced by the HPEMAC plans.
- 2.9.19 The Appeal site is also well placed to take advantage of sustainable links to further and higher education, with the East Sussex College Eastbourne campus located 3.4km to the south. This is within a 15 minutes cycle (along a route to be enhanced by the HPEMAC proposal), or served by up to four buses per hour in a journey time of less than 10 minutes. The major Eastbourne District Hospital is located adjacent to the College, providing a significant health facility (and employment location) for many local residents.

Section 3 Development Proposal Access Strategy

3.1.1 The Appeal site is to be accessed from two locations to Eastbourne Road – the retention of the existing path in the south west corner, and a new access consisting of all modes access to the centre of the western frontage to Eastbourne Road.

3.1.2 Full details are set out in the Transport Assessment, including detailed drawings of the new access.

- **CD9.1: Transport Assessment – Sections 4.2**
- **CD9.3: Drawing No. ITL15734-GA-003B – site access without HPEMAC**
- **CD9.4: Drawing No. ITL15734-GA-001F – site access with HPEMAC**

3.2 Site Vehicular Access Arrangements

3.2.1 The site will be accessed via a ghost island right turn priority junction to the A2270 Eastbourne Road. The proposed access will be located circa 90m north of the junction with Broad Road.

3.2.2 The proposed site access arrangements have been prepared for two scenarios; with and without the HPEMAC improvements as shown in the drawings:

- ITL15734-GA-003B – without HPEMAC (CD9.3)
- ITL15734-GA-001F – with HPEMAC (CD9.4)

3.2.3 The HPEMAC improvements are located along the site frontage and begin towards the southern frontage of the site. The HPEMAC drawings were obtained directly from ESCC's design team in December 2020 and the site access was designed around the proposal to ensure the site would not prejudice the HPEMAC.

3.2.4 The access proposal enhances the HPEMAC plans by allowing it to continue further north than currently planned, as the Hindsland site is able to deliver additional land on the eastern side of the carriageway. The main change is that the off carriageway cycle lane can now commence at the site access rather than at the new toucan crossing at Broad Road, providing a further 115m of off-carriageway cycle lane, and also allows the northbound bus lane to extend a further 40m north to beyond the site access.

3.2.5 The site layout is designed so that it makes no alterations to the western kerb line of the A2270 Eastbourne Road, so that the bus lanes can be fully implemented without any additional costs. Should the site access be constructed before the HPEMAC, then the only works required to facilitate the access by HPEMAC is a short section of white lining to incorporate the extension of the northbound bus lane beyond that originally planned for, and a change in the lining required in the centre of the carriageway to tie-in to the site access's ghost island (the HPEMAC would have to undertake lining here in any event to tie in with existing carriageway).

3.2.6 Should the HPEMAC be constructed before the site access, then the access proposal can be built around it, with no material changes.

Visibility Splays

3.2.7 Visibility splays at the access of 2.4m by 120m in accordance with the existing 40mph speed limit on Eastbourne Road (although stopping sight distance at 40mph is actually 65m).

3.3 Pedestrian and Cycle Site Access

3.3.1 A formal, uncontrolled pedestrian crossing, incorporating a 2.50m wide refuge island across the A2270 Eastbourne Road to the north of the site access will provide pedestrians with the ability to cross Eastbourne Road to the western footway – including footway connections and tactile paving and dropped kerbs.

3.3.2 In addition, a 3.0m wide shared foot / cycleway is provided along the eastern side of the carriageway, between the site access and a point just south of the junction with Broad Road, to tie in with existing footway provision – the shared foot/cycle way is to be separated from the carriageway by 0.5m wide verge. Dropped kerbs and signage will enable southbound cyclists to join the shared provision from the main carriageway.

3.3.3 Within the Appeal site, 2.0m footways are provided along both sides of the access, the northern one separated by a drainage swale. There will also be a continuation of the 3.0m shared footway/cycleway from Eastbourne Road into the first part of the site access;

3.3.4 The proposed form and location of access and crossing is fully appropriate for a safe pedestrian crossing.

3.4 Car Club

- 3.4.1 Car clubs offer an alternative model to private car ownership, whereby members can rent vehicles on a short-term service that allows them to pay by the minute, hour or day.
- 3.4.2 The development includes the provision of one electric car club parking space to be allocated for a car club close to the site access, and therefore in a highly visible location for all future residential occupiers, users of the medical centre, and the surrounding existing residential areas. Discussions have been held with Enterprise Car Club who have confirmed support of providing a car club(s) within the site.
- 3.4.3 The space will be equipped with an electric vehicle charging point and would be supplied with an electric car club.
- 3.4.4 As a result of car club membership resulting in members selling/not replacing private vehicles, CoMo (a charity supporting the introduction of sustainable transport modes) have calculated that for every car club vehicle, it leads to a removal of 10.5 private cars from the road network. Accordingly, the provision of a car club vehicle is equivalent to providing 10 - 11 additional car parking spaces.

3.5 Refuse and Servicing Arrangements

- 3.5.1 A vehicle swept path analysis of a large refuse vehicle (11.2m) at the proposed site access has been undertaken. In addition, swept path analysis of various vehicles at the junction, including large vehicles passing along Eastbourne Road with a vehicle in the right turn lane. This drawing demonstrates the ability for a large refuse vehicle to enter and exit the site access.

3.6 Stage 1 Road Safety Audits

- 3.6.1 A Stage 1 Road Safety Audit (RSA) has been undertaken of the proposed site layout. The RSA included two audits of the site access junction; one with and one without the proposed HPEMAC improvements. The proposed site access arrangements considered as part of the application and as found acceptable by the LHA reflect comments made within the RSA.

- **CD9.1: Transport Assessment – Section 4.3 and Appendix C**

- 3.6.2 It has therefore been demonstrated that the site's access can safely be delivered to the adopted highway network, with no remaining road safety concerns.

Section 4 Position of the Authorities

Introduction

- 4.1.1 This section of the report summarises the positions of the various authorities on transport matters under the headings of the LHA (ESCC), National Highways (NH), and the LPA (WDC).

The Local Highway Authority – East Sussex County Council

- 4.1.2 Extensive discussions were held with officers at ESCC both prior to and post the application relating to this Appeal being submitted. These resulted in officers at ESCC being satisfied with the technical analyses and raising no objection to the proposal.

- 4.1.3 The discussions with ESCC to date are detailed below in chronological order:

- Two pre-application meetings were held (in September and November 2020) to discuss the access principles and the methodology for assessing the impact of the development. Written meeting minutes were agreed and formed the basis for the application documents.
- Meetings were attended between ESCC, their consultant's Jacobs, and i-Transport to discuss the HPEMAC scheme in the vicinity of the site, including sharing of drawings.
- Discussion held between ESCC and i-Transport in January and February 2021 to agree traffic data collection and electric vehicle charging requirements.
- Following submission of the planning application, discussion held between ESCC and i-Transport in April 2021 to discuss the contents of the reports.
- ESCC issues consultation response on 22nd April 2021 confirming that ***“this application does no raise highway objection subject to s106 obligations and highway conditions”***. Other points to note in the ESCC response are as follows:
 - ***“This application is considered to be acceptable and can be accommodated on the highway network on the basis that there are a number of highway interventions that have been secured on the network for this area”*** (Executive Summary)
 - ***“It should be noted that the HPEMAC can be delivered independently of this development proposal”*** (Executive Summary)

- ***“Polegate centre is approximately 1km from a central position of the site and provides a limited selection of local shops and amenities that can be reached easily on foot or cycle from the site”*** (Existing Conditions)
- ***“Eastbourne is located to the south of the site and provides a more comprehensive town/commercial centre and can be reached by rail, bus, cycle and private car”*** (Existing Conditions)
- ***“access proposals were discussed with East Sussex County Highway Authority at pre-app stage and most recent HPEMAC drawings were shared with the applicant. The emerging proposal, although would tie into the HPEMAC, can be deliverable independently”*** (Access Proposal)
- ***“In terms of the access, this is considered to be acceptable in terms of the geometry, swept path provision for service vehicles, and non-motorised user provision. RSA review of the scheme promoter’s response has been provided and accepted on all matters (provided by email directly to applicant and forwarded to ESCC highway Authority).”*** (Vehicular Access)
- ***“The quantum of parking based on the flats and houses indicated is considered to be acceptable.”*** (Proposed Development)
- ***“The indicative layout demonstrates that both elements of this application can be accommodated within the site, with the required accessibility, parking provision and circulation in principle”*** (Proposed Development)
- ***“The site’s travel choices are regular rail and bus services, and proximity to dedicated cycle routes, all which have scope to reduce single occupancy car travel”*** (Highway impact on the existing network)
- ***“Looking at this application in isolation, this level of traffic impact is not likely to result in a significant impact on the network, on the basis that the medical centre would attract traffic that would be on the network to reach other local surgeries. The impact of 180 dwellings is unlikely to impact on the network in peak hour periods”*** (Highway impact on the existing network)
- i-Transport emailed ESCC on 6th July 2021 seeking clarification on the extent of traffic calming expected in Willingdon – ESCC responded on 19th July 2021 with comments.

- Further correspondence between the parties resulted in Highways and Transport specific SoCG being agreed and presented to this Appeal. This confirms that all matters are agreed between the Appellant and the LHA, and no highways objections are raised.

4.1.4 It is therefore clear that the ESCC, as the LHA, has thoroughly considered the impact of the development, over a number of years, and taken account of all matters relating to access to and from the site by all modes, to come to its recommendation of no objection subject to conditions and obligations. This matter has not been considered lightly, and therefore considerable weight should be placed on their conclusion.

The Strategic Highway Authority – National Highways

4.1.5 NH were engaged in the planning process following submission of the planning application. Numerous reports and discussion were held between NH and i-Transport (on behalf of the Appellant), as follows:

- The first NH consultation response received, dated 28th April 2021 requested further detail on the impact of the development on the SRN and a clarification on trip rates (CD 9.5: First NH response)
- i-Transport produced a response in reply to NH dated 13th May 2021 establishing that the proposal will result in a negligible change in vehicular flows on the SRN (CD9.6 i-Transport Technical Note Highways England Response).
- Following receipt of the response from i-Transport, NH provided a further request for further details on the impact on the A27 junctions.
- Further to the correspondence, i-Transport requested a meeting date with NH to discuss outstanding queries. A meeting with NH was scheduled, however the main officers failed to attend (without notice) and thus the meeting was unable to proceed. As a result, i-Transport issued a further update note dated 15th July 2021 (CD9.7 i-Transport Technical Note National Highways 3rd Response), summarising the responses to NH's comments and re-iterating the minimal impact of the development proposal on the SRN.
- NH confirm, via email in August 2021 that they did not accept the arguments put forward by i-Transport and request additional information on the impact of the development of the SRN. NH request strategic modelling to be undertaken to confirm impact on the SRN. The strategic modelling work is confirmed and commissioned by i-Transport using NH's own strategic model, as managed by NH's consultant's Atkins.

- A virtual meeting was held with NH and i-Transport on 24th September 2021 to discuss the outcome of the strategic modelling work and a follow up modelling note was issued to NH shortly afterwards on 29th September 2021 (CD9.8 i-Transport Technical Note 3rd). The note summarised the outputs of the modelling work and demonstrates no material impact on the SRN from the development.
- NH confirm on 20th October 2021 that the previously agreed improvements (approved and agreed as part of the previous Morning Mill Farm application) are sufficient to ensure safe operation of the SRN and the impact of the development.
- NH requested a view on the appropriate trigger points for a contribution toward the agreed improvement. i-Transport responded with a suggested contribution and trigger solution which suggested a financial to be put towards works at Cophall roundabout or any other transport mitigations that Wealden consider necessary to mitigate impacts of the development. This contribution would be provided pre-occupation and not fixed to any level of occupation.
- On 22nd November 2021, NH provides its final consultation response on the application which offers no objection to the Appeal scheme and includes a number of Conditions to attach to any planning permission (CD9.9 NH Consultation Response).
- Following this Appeal being lodged, i-Transport has made a number of attempts to agree a Statement of Common Ground with NH, but engagement in the process has not been forthcoming from NH.

The Local Planning Authority – Wealden District Council

- 4.1.6 The Planning Officer's views are set out in the report to the Committee (24th March 2022). The Officer's report states clearly that the District Council had no objections on highways grounds.
- 4.1.7 Section 3 of this report reviews the accessibility of the site and I have concluded that the site is sustainable and well related to existing and future local facilities via an extensive pedestrian infrastructure network. Further, section 4 of the officer's report confirms that ***"the site is located in close proximity and easy walking distance to the public transport which connect to the facilities of Eastbourne, Polegate and Hailsham"***.
- 4.1.8 In agreement with the findings of the LHA, the LPA's officer confirms (again in Section 4) that ***"having regard to Paragraph 111 of the NPPF it is not considered that the development would have an unacceptable impact on highway safety or that the likely residual***

cumulative impact of development would be 'severe', and therefore there are no reasons in transport terms to justify a refusal".

4.1.9 Subsequently, Members voted at the Committee Meeting to accept the officer's recommendation to not defend the appeal at Public Inquiry, partly on the basis that a highways reason for refusal would not be sound.

4.1.10 The Appellant has entered into a SoCG with WDC. This includes two areas equally relevant to the transport and highways position of the Appeal site, namely that ***"it is agreed that the appeal site is sustainable located in relation to the urban areas of Polegate and Willingdon"*** (paragraph 6.5), and ***"that the appeal proposal is acceptable in terms of highways and access"*** (paragraph 6.10).

Section 5 Policy Context

5.1 Introduction

5.1.1 As set out in the previous section, it is clear that WDC has considered the acceptability of the Appeal site against national transport policy tests. Within this section, the relevant planning policies are set out to aid an understanding of how the Appeal site complies with the relevant tests. It refrains from repeating policy text unless necessary.

5.2 National Planning Policy Framework (NPPF – 2021)

5.2.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It provides overarching guidance for local planning authorities and decision makers both in drawing up plans and in determining planning applications and focuses on the delivery of sustainable development.

5.2.2 Paragraph 73 recognises that policy making authorities should identify suitable locations for development and in doing so, they should ensure the size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.

5.2.3 Paragraph 130 notes planning policies and decisions should ensure development, amongst other things, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.

5.2.4 The specific transport policies are contained within Section 9 of the NPPF. The NPPF requires all developments that generate significant amounts of movement to provide a travel plan, and to be supported by either a Transport Statement or Transport Assessment. In this case, CD9.1 Transport Assessment, and CD9.2 Framework Travel Plan have been prepared.

5.2.5 Paragraph 110 establishes the 'three transport tests', i.e.:

- Will there be appropriate opportunities for new residents to take up sustainable modes of transport?

- Will safe and acceptable access be provided for all users?
- Will the traffic impact be acceptable?

5.2.6 Each of these is dealt with in turn in Section 6 of this report. A fourth test relates to design matters, which relates to future detailed design (Reserved Matters) elements of the scheme rather than the broad principles of the acceptability of the development.

5.2.7 The NPPF sets a very high bar for preventing development from coming forward for transport reasons. Paragraph 111 states that development ***“should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”***

5.2.8 There is no definition in the NPPF of what level ‘**severe**’ is because it should be based on local circumstances. The Department for Communities and Local Government (DCLG) letter dated 23 August 2016 identifies that there is no national definition of severe because the NPPF is designed to be interpreted and applied locally. The DCLG letter also sets out that:

“local authorities are best placed to decide whether the particular impacts of a development on the road system will be severe, taking into account local circumstances.”

5.2.9 In this case, the local authority/statutory consultee appropriately qualified to comment on transport and highways matters is ESCC who raise no objection to the Appeal Scheme. Significant weight should be given to their opinion in this case.

5.2.10 As an example of the application of the severe impact test, **Appendix C** provides the appeal decision (24th September 2015) at Land at Blackfield End Farm, Church Road, Warton (*ref: APP/M2325/A/14/2217060*). That scheme comprised 360 dwellings, i.e. larger than the appeal scheme.

5.2.11 Paragraph 125 of that Inspector’s report clearly considers that development can have an adverse impact, and in that case one that would be significant, without failing the NPPF test:

“I conclude that the proposed development would be likely to cause significant adverse effects for traffic movement at the Lytham Road/ Church Road/ Highgate Lane junction, and that there would be a limited adverse effect on highway safety. In consequence there would be conflict with criterion 9 in Policy HL2 of the Local Plan. However, taking account of the overall implications of the proposal on the local highway network, I do not consider that the residual cumulative effects of the proposal would be severe.”

5.2.12 The Secretary of State agreed. Paragraph 10 of the decision letter states (underlining added for emphasis):

“Having carefully considered the Inspector’s discussion on the Lytham Road/Church Road/Highgate Lane junction at IR107-121, the Lytham Road/Mill Lane/Ribble View Close junction at IR122, the Lytham Road/GEC junction at IR123, and the site accesses and Church Road at IR124, the Secretary of State agrees with his conclusions within those paragraphs and at IR125 that there would be significant adverse effects for traffic movements at the Lytham Road/Church Road/Highgate Lane junction, a limited adverse effect on highway safety and, as a consequence, conflict with criterion 9 in Policy HL2 of the Local Plan. However, the Secretary of State also agrees with the Inspector at IR125 that, taking account of the overall implications of the appeal proposal on the local highway network, the residual cumulative effects would not be severe. The Secretary of State therefore gives them only moderate weight in the overall balance.”

5.2.13 A further example of the application of the severe impact test can be found in the Secretary of State’s decision (22nd September 2016) for a scheme of 370 new homes at land at Bradford Road, East Ardsley, Leeds (*appeal ref: APP/N4720/W/15/3004034*). Relevant extracts are included in **Appendix D** of this proof of evidence.

5.2.14 Section 8.5 of the Inspector’s report deals with his conclusions of the effect on the highway network. In that case there was no agreement of highways matters between the highway authority and the appellant (*ref: para 8.5.1*). In that case the impacts were significant, particularly at a traffic signal junction where ***“extensive queuing already occurs”*** (*ref: para 8.5.7*). The impact of the development in that case would be noticeable – a greater than 50% increase in delay on one of the approach lanes (*ref: para 8.5.8*) and increases in delay of circa 50 seconds on two of the approaches (*ref: para 8.5.9*).

5.2.15 However, the Inspector recognised that ***“The intention in the Framework was to set the bar for refusal very high. Indeed, paragraph 32 requires any impact to be severe to justify a refusal on transport grounds.”*** (*ref: para 8.5.9*).

5.2.16 In that case the impacts were much more significant than those that are identified in the TA for this Appeal scheme. The Inspector at East Ardsley concluded that ***“I do not consider that the impact in this case could be considered severe”***. (*ref: para 8.5.9*)

5.2.17 The Secretary of State agreed and allowed the appeal:

“Having carefully considered the Inspector’s findings at IR8.5.1-8.5.10, the Secretary of State agrees with his conclusion at IR8.5.9 and IR8.9.6 that, if there are no improvements in the interim, the queuing that currently takes place at the Thorpe Lane junction would be made slightly worse by the proposal but not to such an extent that it would justify refusal under the terms of paragraph 32 of the Framework.” (ref: para 16 of the Secretary of State’s decision letter dated 22 December 2016)

5.2.18 Notwithstanding this, the Appeal Scheme will have a much less than severe, and therefore acceptable, impact on the local highway network in the TA and Section 6 of this report.

5.3 Local Policy

5.3.1 The local planning policy context relevant to the determination of this appeal is the Development Plan, the relevant components of which are set out below:

Wealden District Council Local Plan (February 1998)

5.3.2 A number of policies have been saved from the 1998 Local plan. In particular, EN1, TR3, and TR16 have been saved, and considered further in this section.

5.3.3 Policy EN1 requires the council to pursue sustainable development. As established in Section 2 and further detailed in Section 6, the site is in a sustainable location, with access to a variety of local facilities and higher order settlements facilitated by active and public transport modes.

5.3.4 Policy TR3 establishes the need to ensure that development is permitted where it does not create or perpetuate unacceptable traffic conditions, a satisfactory means of access (vehicular, cycle, and pedestrians) is provided to meet the needs of the LPA, and LHA, and where appropriate, the provision of public transport facilities. It has been agreed with both the LHA and LPA that the Appeal site meets all of these tests.

5.3.5 Finally, Policy TR16 requires the need for on-site parking to meet the provision set out in the Local Plan. As the site is in outline, the details of parking are not for determination – however, ESCC has confirmed that the parking provision is to an acceptable level.

Wealden District Council Core Strategy Local Plan 2013

5.3.6 The Core Strategy includes a number of strategic policies for the district. It establishes (in paragraph 2.3) that the five main towns in Wealden (of which Polegate is one) have not grown to be significant centres, due to the proximity of large towns such as Eastbourne, which exert a significant influence in terms of providing jobs, healthcare, leisure, further education, and retail.

Therefore, the Core Strategy focuses growth where it is most “accessible and sustainable” (paragraph 2.7). As a result, the Appeal site is including in a broad location for development in Polegate as “SD4: Land at South Polegate and East Willingdon” within Policy WCS4 Strategic Development Areas.

5.3.7 It is therefore clear that, in accordance with Section 73 of the NPPF, WDC allocated the site on the basis that it will support a sustainable community, with sufficient access to services and employment opportunities, particularly to Eastbourne. The Inspector to the Examination in Public to the Core Strategy agreed that a robust process had been undertaken in order to identify sustainable sites for allocation.

- **CD14.1: Inspectors Report paragraph 81.**

5.4 Summary

5.4.1 In accordance with the requirements of the NPPF, and local policy, the planning application was accompanied by a number of reports that set out how the Appeal Scheme complies with each of the three key transport tests identified by paragraph 110 of the NPPF, i.e.:

- Will there be appropriate opportunities for new residents to take up sustainable modes of transport?
- Will safe and acceptable access be provided for all users?
- Will the traffic impact be acceptable?

5.4.2 These matters are dealt with throughout this report, which summarises the work undertaken to enable ESCC Highways to raise no objection to the Appeal Scheme. The amount of transport work undertaken is significant, and this demonstrates that ESCC put the Appeal Scheme to particular scrutiny and did not reach their position of no objection quickly or lightly.

Section 6 Consideration Against the National Tests

6.1 Introduction

6.1.1 Whilst WDC has chosen not to defend the Appeal, it is important to demonstrate that such a decision was made on the basis that the Appeal site meets the overarching tests within the NPPF. In particular, this requires an assessment against the tests within paragraphs 110 and 111, to determine that the Appeal site will provide appropriate opportunities for new residents to take up sustainable modes of transport, provide safe and acceptable access be provided for all users, and that the residual traffic impact will be acceptable.

6.1.2 Each of these tests is considered in more detail within this Section.

6.2 Sustainable of the Site

6.2.1 The Transport Assessment (CD9.1) and other accompanying planning documents were fully reviewed by the ESCC (as the LHA qualified to comment on the suitability of the Appeal site), and as result no objection was raised. This is also agreed as part of the SoCG.

6.2.2 This first main transport policy test is clear that sustainable transport modes should be promoted to all future occupiers, particular accounting for the type of development and its location.

6.2.3 The relationship of the Appeal site to everyday destinations for food shopping, non-food shopping, health services, employment opportunities, education, and leisure was considered in the TA submitted with the application (CD9.1 Transport Assessment Section 5) and Table 2.4 of this report, setting out the main facilities as well as their distance and travel time from the appeal site. Figure 1 summarises the routes in the context of the locations of interest to demonstrate the proximity of the bus routes to all of the locations of employment, education, health, retail, and leisure in the local area. Figure 2 clearly shows how the local bus services provide access to the key services and facilities beyond Polegate.

6.2.4 A number of everyday retail and educational facilities are available within a reasonable (10 minutes) walking distance of the Appeal site. However, what sets this site apart is its existing high quality links to Eastbourne town centre, as well the committed improvements to the bus and cycle links (via HPEMAC) to Eastbourne. Eastbourne town centre is accessible within a circa 20 minute bus journey (with a four per hour frequency), and 8 minutes rail journey from

Polegate. The town's main higher and further education college and general hospital is also available on the same bus routes, within a 10 minutes journey time.

6.2.5 The range of services and facilities available within Polegate and its immediate environs is comparable with other service centres. Everyday top up facilities are available within a short walk, as well as primary and secondary education. However, what sets this site apart from most others in WDC is its existing frequent and fast services to the primary centre of Eastbourne. With services up to four times an hour, occupiers of the development are able to access further and higher education facilities and a major hospital within 10 minutes, and the wide range of employment, retail, and leisure opportunities available within Eastbourne town centre within 20 minutes. The fully committed HPEMAC improvements will further enhance these services, by enabling more services, with shorter and more reliable journey times.

6.2.6 All demands for everyday retail, health, leisure, and education appear to be catered for, across a range of independent and chain stores, ensuring that the needs for travel beyond Polegate and/or Eastbourne town centre are limited ensuring that travel by car is not essential to facilitate most journey demands.

6.2.7 Overall, the Appeal site is extremely well located to provide appropriate opportunities to promote sustainable transport modes to future residents to all journey purposes, and is on a corridor where public funds are already committed to enhance sustainable links further. In the context of the site's location on the edge of Polegate, it has the benefit of ease of access to local facilities, but most importantly direct and frequent access to Eastbourne town centre, the most important centre of retail, leisure and employment in the region.

6.3 Safe and Suitable Access

6.3.1 The development will be accessed via a ghost island right turn priority junction to the A2270 Eastbourne Road. The proposed access will be located circa 90m north of the junction with Broad Road. The design is shown in Drawing No. ITL15734-GA-003 Rev B (CD9.31).

6.3.2 The full details of the access, including dimensions and facilities for non-car modes is set out in the TA.

- **CD9.1 Transport Assessment: Section 4.2**

- 6.3.3 The proposed layout of the access junction has therefore taken account of anticipated use and traffic speeds, to provide an access form and layout that fully addresses the need for all road users.

HPEMAC Improvements

- 6.3.4 As set out previously, the HPEMAC improvements are located along the site frontage and begin towards the southern frontage of the site. Discussions were held with ESCC during the pre-application process to discuss and understand the impact of the HPEMAC improvements on the proposed site access. Crucially, it was agreed that the proposal should not introduce any measures or infrastructure that would hinder implementation of the HPEMAC, or increase its costs. Both the access and the HPEMAC plans should be able to be constructed in isolation of each other.
- 6.3.5 The HPEMAC drawings were obtained directly from ESCC's design team in December 2020 and the site access was designed around the proposal to ensure the site would not prejudice the HPEMAC. A drawing has been prepared which illustrates the proposed site access alongside the HPEMAC improvements. This is shown in drawing ITL15734-GA-001 Rev F (CD9.4)
- 6.3.6 The access proposal further enhances the HPEMAC plans by allowing it to continue further north than currently planned, as the Hindsland site is able to deliver additional land on the eastern side of the carriageway. The main change is that the off carriageway cycle lane can now commence at the site access rather than at the new toucan crossing at Broad Road, providing a further 115m of off-carriageway cycle lane, and also allows the northbound bus lane to extend a further 40m north.
- 6.3.7 The site layout is designed so that it makes no alterations to the western kerb line of the A2270 Eastbourne Road, so that the bus lanes can be fully implemented without any additional costs. Should the site access be constructed before the HPEMAC, then the only works required to facilitate the access by HPEMAC is white lining to incorporate the extension of the northbound bus lane beyond that originally planned for, and a change in the lining required in the centre of the carriageway to tie-in to the site access's ghost island (the HPEMAC would have to undertake lining here in any event to tie in with existing carriageway).
- 6.3.8 Should the HPEMAC be constructed before the site access, then the access proposal can be built around it, with no material changes.

- 6.3.9 This is a crucial point to note, as the one of the main reasons for refusal at Appeal of the previous site which this Appeal site was included within was because the site access proposals were considered to not be compatible with the HPEMAC scheme, and would have caused delays to bus users. The designs for this Appeal site ensure no impact on the ability to deliver the HPEMAC, and no delays to through movement for all users (including bus passengers).

Road Safety Audit

- 6.3.10 The Appeal site is supported by an independent Stage 1 Road Safety Audit (CD9.1), which considers the safety of the proposed access layout for all road users, both relating to the Appeal site and existing users of the A2270 Eastbourne Road.
- 6.3.11 The results of the RSA have been reviewed by ESCC's in-house engineers, to ensure that they are comfortable that the recommendations and resulting highways designs are safe and suitable for all road users. The ESCC response therefore acknowledges that ***"there has been sufficient detail provided relating to access for this site to enable a suitable audit outcome of this application to consider in safety terms"***. They have also confirmed that it remains safe and suitable in conjunction with the committed HPEMAC improvements. This is agreed by ESCC in their consultation response, that states ***"In terms of the access, this is considered to be acceptable in terms of the geometry, swept path provision for service vehicles, and non-motorised user provision. RSA review of the scheme promoter's response has been provided and accepted on all matters (provided by email directly to applicant and forwarded to ESCC highway Authority)."***
- 6.3.12 A review of the existing highway safety record on the highway in the vicinity of the site demonstrates that there a number of "slight" incidents relating to cyclists on the A2270 Eastbourne Road, and also rear end shunts caused by slow moving traffic.
- 6.3.13 The Appeal site's access provides for an off-carriageway cycle provision to and from the south, to facilitate movements to and from Eastbourne. This also incorporates and enhances the committed HPEMAC cycle improvements that will continue further to the south. The ESCC consultation response acknowledges that ***"the introduction of off-line formal cycle lanes as part of the HPEMAC scheme is likely to improve the cycling environment and reduce conflict between these vulnerable users"*** and that ***"with the HPEMAC the proposed speed limit will be 30 mph and Eastbourne will be provided with urbanising features which will promote and influence speed reduction"***.

6.3.14 It is therefore clear that the access proposal for the site (which is only matter to be considered in detail for this Outline Application), provides safe and suitable access for all users. This has been agreed by an independent road safety auditor and ESCC's own auditor.

6.3.15 The proposal also ties in with the committed HPEMAC corridor improvement, and actually enhances this by increasing the length of the off-carriageway cycle lane by over 100m (from a position opposite Broad Road to meet the site access) and increases the length of the bus priority lane by 40m.

6.3.16 The Appeal site therefore fully addresses the second main test of paragraph 110 of the NPPF in that it provides safe and suitable access for all users.

6.4 Mitigation of Significant Impacts

6.4.1 The third main test of the paragraph 110 of the NPPF is to ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

6.4.2 In relation to the Appeal site, this relates to the need to ensure that the impact on the local highway network, (being the A2270 Eastbourne Road and the existing residential roads in Willingdon to the west) is effectively mitigated as necessary. This has been the subject to detailed discussions and ultimate agreement with ESCC. Further to the north, the need to ensure no significant impact on the strategic road network of the A27 has also been assessed and demonstrated to NH.

6.4.3 Each of these is considered in turn.

Local Highway Network Impact

6.4.4 The Transport Assessment supporting the application establishes the full detail of the assessment methodology for determining the impact of the Appeal site.

- **CD9.1 Transport Assessment Section 6**

6.4.5 For brevity, the full methodology is not repeated here, but, as established the ESCC consultation response ***"the trip rates used for this application had been agreed at pre-application stage for the residential use"***. A number of committed developments were also included in the

assessment at the request of ESCC, including an assessment of the adjacent Mornings Mill Farm site for 700 dwellings, a medical centre, employment, education, and community uses.

- 6.4.6 As a result of the committed HPEMAC scheme, the assessment allows for a marginal growth in walking, cycling, and bus use to contribute to a 10% reduction in trips by private car. This is agreed with ESCC, with the consultation response confirming ***“that this is what the HPEMAC is expected to deliver, not just for this site but on a much wider scale, this is a reasonable assumption for car borne trips that originate in the locality”***.
- 6.4.7 The overall impact of the Appeal site on the local highway network, both in isolation and cumulatively with other committed developments, has been assessed in junction modelling software. These has been undertaken at the site access, the next signal controlled junction to the north (A2270 Eastbourne Road / High Street / Wannock Road), the Broad Road junction (opposite the Appeal site), and the next signal controlled junction to the south (Huggett’s Lane).
- 6.4.8 ESCC has reviewed the detail of the results, and confirmed that ***“Looking at this application in isolation, this level of traffic impact is not likely to result in a significant impact on the network, on the basis that the medical centre would attract traffic that would be on the network to reach other local surgeries. The impact of 180 dwellings is unlikely to impact on the network in peak hour periods”***.
- 6.4.9 For the cumulative assessment with Mornings Mill Farm, the results demonstrate that there is an impact at the Eastbourne Road / High Street signal controlled junction, and this was a position agreed at the previous Appeal at the site. Therefore, any development at the SD4 site requires this improvement. This position has been agreed as a planning condition that works need to have commenced on the improvement before the site is occupied, as set out in the highways and transport specific SoCG.
- 6.4.10 In addition, during peak periods there is known to be queuing on the A2270 Eastbourne Road, leading to some reassignment of through traffic into the residential roads around Wannock Avenue and Wannock Road. Whilst the HPEMAC proposal is to promote a modal shift away from car based travel along the corridor, and the traffic flows from the Appeal site are not anticipated to travel along these alternative routes, there is an opportunity that additional traffic on the A2270 Eastbourne Road as a result of the Appeal site may lead to addition non-development traffic routing along Wannock Road and Wannock Avenue. It is therefore agreed that a series of

traffic calming measures will be provided on the local roads to disincentivise such inappropriate movements. This is set out in the agreed SoCG.

6.4.11 The Appeal site therefore has the potential to result in congestion on Eastbourne Road and the traffic signals with High Street to the north, as well as, indirectly, inappropriate vehicular movements on residential roads to the west (with potential corresponding highway safety impacts). Therefore, improvements are proposed and agreed, to ensure that the impact is mitigated to an acceptable degree.

Strategic Road Network Impact

6.4.12 Overall, the position of the Appellant is that the Appeal site is within the land on Eastbourne Road that has an historic allocation (WD4) for new residential development, as well as wholly within the land that has previously been considered by the Planning Inspectorate for new housing for 700 dwellings (plus other land uses), for which no objection was made in relation to impacts on the Strategic Road Network (SRN) subject to an agreed set of mitigation measures.

6.4.13 However, NH requested that the impact be tested in addition to the wider historic allocation, and that the impact of the 180 dwellings proposed be tested within the agreed models of the A27 network utilised at the previous Appeal scheme.

6.4.14 NH's consultant Atkins was commissioned to rerun the model of the A27 Vissim that was utilised in support of the previous Appeal. This includes the following junctions:

- Cophall Roundabout – A22 / A27 Polegate Bypass / B2247 Hailsham Road / A27;
- A27 Polegate Signals – A27 / A2270 Eastbourne Road / A27 Lewes Road; and
- High Street Signals – A2270 Eastbourne Road / High Street / A2270 Eastbourne Road / Wannock Road.

6.4.15 The model was run for a 2037 assessment year for the AM and PM peak hours. It tested a "do minimum" scenario, whereby no improvements to the highway network were undertaken, and "do something" scenarios which included minor enhancements to the Cophall roundabout, the improvements to the A27 traffic signals that are currently constructed, and the works to the High Street traffic signals that are part of the HPEMAC plans.

- 6.4.16 The residential development traffic (without a 10% modal shift reduction) and the medical centre trips (without a shift to online appointments) were taken from the TA, with the same distribution and assignment.
- 6.4.17 As established at the Appeal, it is clear that with the inclusion of the 700 dwellings at Mornings Mill Farm, and the mitigation measures to be provided by that large application/allocation at all three junctions, the operation of the network significantly improves, to the stage that it will operate more efficiently with the development traffic and the highway mitigation measures, than without delivery of the housing and mitigation.
- 6.4.18 Similarly, with the combined 880 units from 700 dwellings on the Mornings Mill Farm site and this Appeal site, the local highway network will continue to operate more efficiently with all the mitigation measures in place than without.
- 6.4.19 Therefore, it is concluded that should the 180 dwellings at Hindsland be considered as an additional development to the 700 dwellings in the area, then the improvement to the highway to be provided by the larger sites in the area can continue to mitigate the impact of the Appeal scheme.
- 6.4.20 Whilst NH has requested that the impact of the Hindsland development be considered in the context of the 700 dwellings application at MMF, there was no certainty that the Mornings Mill Farm site would be approved planning in advance or at the same time as the Hindsland site at the time the assessment were undertaken. Since that time, the application has been refused, and a separate Appeal has been lodged. Therefore, it is important to determine the impact of the Hindsland site in isolation to determine whether its quantum of development has a significant impact on the SRN that requires mitigation.
- 6.4.21 The model results clearly show that the committed improvements at the A27 Polegate signals and the A2270 Eastbourne Road / High Street traffic signals will fully mitigate development impacts at these locations. The results demonstrate the junctions will operate more efficiently with the inclusion of development traffic and the mitigation measures than the junctions' current operation.

- **CD9.8: i-Transport Technical Note: Highways England 3rd Response, Section 3**

6.4.22 The only location where no committed mitigation is to be provided is at the A27 Cophall roundabout of the A27/A22. Therefore, further analysis of the impact on the Cophall roundabout of the traffic flows from the Appeal site was considered in more detail.

6.4.23 The results show that in the AM peak hour, the Cophall roundabout will actually operate more efficiently with the introduction of the Hindsland development traffic in the Do Minimum scenario. In the PM peak hour, the roundabout will experience an increase in queuing of just 4 vehicles on two arms, but will also experience a reduction of queuing by 5 vehicles on a third arm.

- **CD9.8: i-Transport Technical Note: Highways England 3rd Response – Section 4**

6.4.24 Clearly the results demonstrate that there is no material, let alone severe (in NPPF terms) impact on the NH network in either of the peak hours in either the Do Minimum or Do Something scenarios from the development proposed at the Appeal site. Therefore, in accordance with paragraph 56 of the NPPF, as well as Regulation 122(2) of the Community Infrastructure Levy Regulations (2010), no improvements at the junction are necessary as such as a request would not meet **all** (or in fact any) of the following tests:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

6.4.25 This is also the position of WDC as the LPA, who agree that no evidence has been provided by NH to substantiate any obligations or conditions at the junction.

6.4.26 The inputs to the model for the Hindsland development also make no allowance for the modal shift reduction in traffic flows to the new bus corridor, or the increase in on-line medical appointments, both of which have been agreed with ESCC as the LHA. They are therefore a worst case scenario, and result in greater traffic volumes from the site being assessed than is considered likely to be experienced in reality.

6.4.27 Indeed, NH's stated position that development should aim to achieve a nil detriment ('no worse off') on the SRN fails to account for their own planning guide: 'The strategic road network: Planning for the future - A guide to working with Highways England on planning matters' (September 2015) (CD9.10). This states their advice to local planning authorities will be to place conditions on developments only where the residual cumulative impacts of development on the

capacity of the strategic road network are still assessed to be severe, which may include when operating conditions significantly erode the safe operation of the SRN.

6.4.28 Using robust parameters, the analysis demonstrates that the Cophall Roundabout will operate within theoretical capacity in the 2037 design year scenario when taking into account the recent dualling scheme on the A27. The residual cumulative impact at the junction as a result of the proposed development will fall short of the severe test set by the NPPF should the proposed development come forward ahead of Mornings Mill Farm. It is clear that the safe operation of the junction is not significantly eroded as a result of the proposed development. As such, no mitigation is necessary to mitigate the minor impacts at the Cophall roundabout resulting from the development of the Appeal site.

6.5 Summary

6.5.1 This section of the report establishes that:

- The Appeal site is well connected to existing pedestrian and cycle facilities in the local area, providing safe and convenient access to local retail, employment, education, and leisure facilities for all users, utilising the enhanced pedestrian crossing facilities of the A2270 Eastbourne Road being delivered by the Appeal site;
- Frequent bus services are available from bus stop available within a less than five minute walk from the Appeal site providing high quality links with a journey time of circa 20 minutes to the centre of Eastbourne, which provides the principal centre of retail, leisure, employment, and higher education in the region (being the largest centre in the County);
- The County's committed HPEMAC Phase 1 proposal commences at the site, and further enhances the quality and reliability of public transport and cycling facilities from the Appeal site to the centre of Eastbourne available from the Appeal's site western boundary;
- The Appeal site will provide financial contributions towards increasing bus services on the HPEMAC corridor, for the benefit of both future site occupiers/visitors, and the wider community;

- A new ghost island right turn junction is provided to facilitate access to the site. It has been agreed by an independent road safety auditor, and the LHA's own engineers that this provides a safe and suitable access for all users;
- The delivery of the Appeal site's access, and the additional land it provides, enables a further enhancement to the County's HPEMAC scheme, providing a further 100m of off-carriageway cycle land and 40m of additional bus lane;
- The County's committed enhancements to the Eastbourne Road / High Street traffic signals to the north of the Appeal site will mitigate any impact from additional traffic from the Appeal site, whilst the site's priority junction access ensures no additional delays to through movements along the Eastbourne Road are created by the access (particular compared to a traffic signal controlled junction);
- The Appeal site will deliver a number of traffic calming measure in the residential areas to the west, to off-set any reassignment of traffic from the Eastbourne Road and to ensure the continued provision of a safe highway for all users;
- The impact of the Appeal site on the SRN of the A27 is minimal, insignificant, and not within the scale of necessitating any mitigation.

6.5.2 It is therefore clear that the Appeal site will meet all of the policy tests in relation to the NPPF. It has been demonstrated that it provides appropriate opportunities to promote sustainable transport modes (including walking) given the type of development and its location, safe and suitable access to the site can be achieved for all users, and the impact on the local highway network can be mitigation to an acceptable level, in compliance with paragraph 110 of the NPPF. It therefore follows that there is no impact on highway safety nor residual impact on the road network, and therefore the occupation of the Appeal site would fully comply with the tests in paragraph 111 of the NPPF, it not even having a significant impact, let alone severe.

Section 7 Consideration of Issues Raised by Third Parties

7.1 Introduction

7.1.1 A number of transport and highways matters have been raised by third parties. Whilst many and varied, the main submissions in relation to highways and transport can be summarised as follows:

- Concerns relating to congestion on the A2270 Eastbourne Road as a result of the Appeal site;
- A perception that the recent improvements to the A27 will be insufficient to accommodate additional vehicular flows from the Appeal site;
- That the introduction of additional traffic on to the A2270 Eastbourne Road from the Appeal site will lead to inappropriate reassignment of traffic on to local roads in Willingdon ("rat-running");
- That there are no mitigation measures proposed to enhance public transport facilities and enable safe pedestrian and cycle movements; and
- That the form and location of the proposed access may result in highway safety issues.

7.1.2 These are addressed in more detail under the headings of highway impact (accounting for congestion, operation, and safety), access form and location (accounting for highway safety and access details), and off-site impacts (public transport and "rat running").

7.2 Highway Congestion and Traffic Impact

7.2.1 Notwithstanding that it is agreed with both ESCC as the LHA and NH that the impact of the Appeal site on the highway network has been accurately assessed, and effectively mitigated as necessary, additional queries have been raised by interested parties about the ability of the A2270 Eastbourne Road to accommodate additional traffic volumes.

7.2.2 Many of the points relate to a misinterpretation of Department for Transport (DfT) data sets released earlier in the year, that have led a number of news sources to quote the A2270 as being the most congested road in England.

7.2.3 Having investigated the source data in more detail, it would appear that the story has come about from the average annual delay on the Strategic Road Network per year (Table CGN0405)¹ released by the DfT in March 2022. Whilst this does show the A2270 Eastbourne Road as the most congested in England during 2021; the following needs to be considered:

- The data relates to the SRN – in this context, the only part of the SRN that is the A2270 Eastbourne Road is the 50m approach to the A27 Polegate signals junction;
- During the whole of 2021, this short section of the SRN was subject to significant road works (including lane closure and temporary traffic lights) as part of NH's A27 East of Lewes improvement works; and
- Much of 2021 was subject to travel restrictions implemented by national government relating to the Covid 19 pandemic, resulting in much reduced travel (and therefore delay) on the majority of the country's highway network.

7.2.4 As such, the reliance on the data to suggest that the A2270 Eastbourne Road is the most congested road in England is flawed. The delay recorded on the short section of the A2270 during the period of road works in 2021 was 196.5 seconds per vehicle per mile (spvpm). However, on the remainder of the A2270 (that is within ESCC control), the average delay is 54.8 spvpm, putting the road as the 776th most congested road in England (DfT Table CGN0504)².

7.2.5 It is therefore clear that the concern of the many parties as to the ability of the A2270 Eastbourne Road to accommodate the traffic flow from the development is not shared by the professional bodies (ESCC and NH) who operate and manage the networks, and who have reviewed the submission documents in detail. This appeal relates to the 180 dwellings at the Hindsland land, and should not be confused with the impact of the wider and large historic allocation land, which is mainly being put forward as the Morning Mill Farm application (and now Appeal) which has its own set of assessment and mitigation to address the congestion issues created by its larger size.

7.2.6 Further, the accusations that the A2270 Eastbourne Road is the most congested in England relates to a single 50m section that was impacted by significant road works during 2021, and

¹ <https://www.gov.uk/government/statistical-data-sets/average-speed-delay-and-reliability-of-travel-times-cgn>

² <https://www.gov.uk/government/statistical-data-sets/average-speed-delay-and-reliability-of-travel-times-cgn>

does not apply to the rest of the route. The appeal site is therefore fully in agreement with the NPPF policy test at paragraph 111 in relation to having no residual impact on the highway network.

7.3 Access Form and Location

7.3.1 Willingdon Residents' Association's (WRA) submission has suggested some concerns with the location of the Appeal site's access to A2270 Eastbourne Road in relation to visibility and includes an accusation that ESCC would prefer a crossroads access to the site with Broad Road (and that this would be signal controlled).

7.3.2 The TA supporting the site provided the results of a free flow traffic speed survey on the A2270 Eastbourne Road, demonstrating that the majority of vehicles travelling below the 40mph posted speed limit (CD9.1 Section 3.6.8). However, the Appeal site's access junction demonstrates that visibility to the north to and from the access can be provided at 120m, which is suitable for the posted speed limit, as opposed to the lower speeds than drivers are travelling at.

7.3.3 The application was supported by an independent Stage 1 Road Safety Audit, and a Designers Response (CD9.1 Appendix C). This confirmed that appropriate visibility for the posted speed limit is provided. ESCC's own engineers reviewed the submission, and in their consultation response confirmed that **"a 120m driver sightline has been demonstrated on plan 15734-GA-009 (vertical visibility) which is appropriate for a 40mph speed limit"**. It also acknowledges that the committed HPEMAC scheme will bring a 30mph speed limit to the road, and therefore require even shorter sightlines.

7.3.4 The access location is therefore agreed to be in a safe location, with adequate visibility to maintain highway safety for all users from the brow to the north. This is confirmed in the ESCC consultation responses, that states **"In terms of the access, this is considered to be acceptable in terms of the geometry, swept path provision for service vehicles, and non-motorised user provision. RSA review of the scheme promoter's response has been provided and accepted on all matters (provided by email directly to applicant and forwarded to ESCC highway Authority)."**

7.3.5 The previous refused Appeal scheme was partly refused due to its impacts on the A2270 Eastbourne Road in relation to its signal controlled access junctions not permitting full

integration with the committed HPEMAC scheme. This would have resulted in additional delays to buses on the corridor, and therefore loss of the benefits of the scheme.

7.3.6 Therefore, one of the main aims of this Appeal site's access was to ensure that it could be delivered with no negative impacts on either the deliverability of the HPEMAC scheme, or on the future bus corridor itself. This was discussed throughout the various correspondence with ESCC outlined in Section 3. As a result, the access was purposely positioned in such a location that it can be facilitated by a non-signal controlled junction to ensure priority remains on the main carriageway at all times. The junction modelling supporting the application also confirms the access would not create any vehicle queuing on the mainline (CD9.1 Table 7.2). Therefore, the form and location of the access will not cause any delays to bus movements along the A2270 Eastbourne Road.

7.3.7 A crossroads junction would require traffic signal control to be introduced to enable safe and effective vehicular movements. There has been no suggestion from either the Appellant or ESCC that such a location and form of junction would be preferred or feasible. The access's form and location has been based solely on safe and effective operation of the local highway network and has no bearing on land ownership matters.

7.3.8 Therefore, it is clear that significant correspondence has been entered into with ESCC as the LHA to ensure that an all movements vehicular access to the site has been provided that is safe and effective for all users, in accordance with the relevant tests in paragraph 110 of the NPPF.

7.4 Off Site Impacts

7.4.1 A number of representations have been submitted in relation to the safety of other highway users, both along the A2270 Eastbourne Road and in the residential roads around Wannock Road and Wannock Avenue to the west. This position is fully considered in Section 6.4 of this report that establishes that the impacts of the development in the residential areas to the west of the Appeal site have been considered and mitigation.

Section 8 Summary and Conclusions

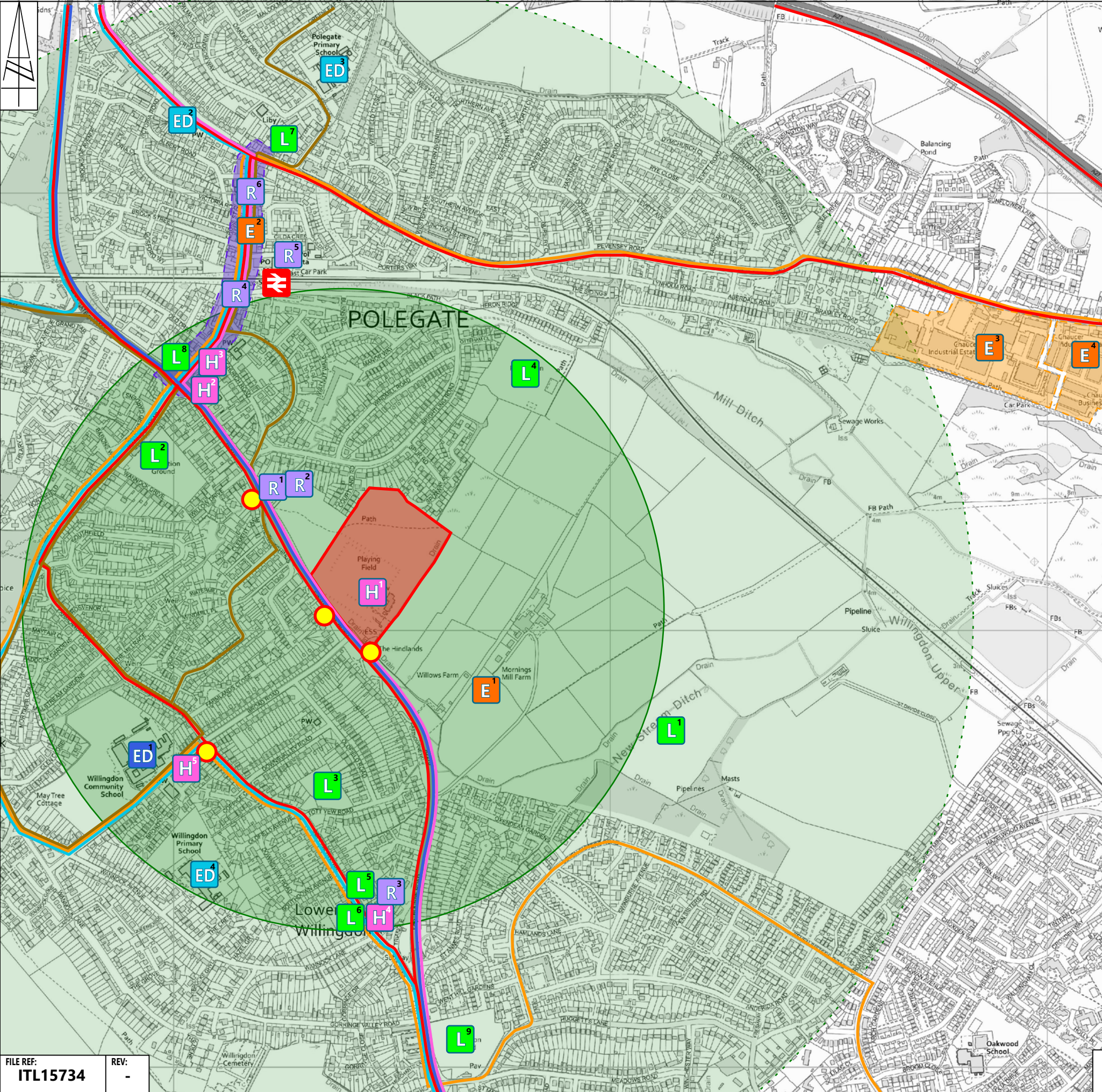
8.1.1 The overall conclusions of this report can therefore be summarised as:

- There are no transport or highways objections to the proposal from the Local Highway Authority, East Sussex County Council who has, considered the scheme in detail and not come to their conclusion lightly.
- The findings of the TA and other supporting submission documents are agreed with ESCC.
- All transport matters are agreed with the LHA which has raised no objection to the application. Further, the Officer's Committee Report raised no highways objections and recommended conditional approval subject to a S106 legal agreement.
- The Appeal site is well located to encourage future residents to take up the local frequent public transport facilities, which will be further enhanced by way of additional bus infrastructure.
- The Appeal site is located in a sustainable location to provide genuine and realistic opportunities to travel by modes of transport other than the private car to a wide range of retail, education, employment, leisure, and health purposes in accordance with national and local planning policy.
- All site accesses and off-site highway improvements necessary to mitigate the impact of the development have been agreed with the LHA as safe and suitable for the proposed type and quantum of land uses.
- The Appeal site will materially benefit the already good quality pedestrian network in the area, by introducing new pedestrian crossing facilities on the A2270 Eastbourne Road.
- A series of traffic calming measures are to be introduced on the residential roads to the west to mitigate the impacts of any reassignment of background traffic, further enhancing highway safety for existing and future road users (pedestrians, cyclists, and motor vehicle drivers and passengers). These measures have been agreed as acceptable by ESCC Highways.

- The local highway network will be able to satisfactorily accommodate the daily flow increases that will be generated by the development proposal, background growth, and other potential developments in the area with appropriately agreed mitigation measures where necessary, which have been agreed between the Appellant and the LHA.
- The Appeal site fully accords with the relevant tests in the NPPF (paragraph 110).

8.1.2 It is therefore concluded that in the absence of any robust technical evidence to the contrary, there are no sound transport or highway reasons to preclude the development from proceeding in accordance with NPPF paragraph 111. Indeed, there are wider benefits, which weigh in favour of the grant of consent.

FIGURES



KEY

- SITE BOUNDARY
- POLEGATE RAIL STATION
- POLEGATE TOWN CENTRE
- EMPLOYMENT AREA
- BUS STOP
- 800M RADIUS
- 1.6KM RADIUS

BUS ROUTES

- 6
- 44
- 45
- 51, 54
- 98
- 125

HEALTH

- PROPOSED MEDICAL CENTRE
- MANOR PARK SURGERY
- POLEGATE DENTAL SURGERY
- KAMSONS PHARMACY
- PURE DENTAL SURGERY

EMPLOYMENT

- FUTURE EMPLOYMENT / COMMUNITY LAND USES
- POLEGATE HIGH STREET
- CHAUCER INDUSTRIAL ESTATE
- CHAUCER BUSINESS PARK

EDUCATION

- WILLINGDON COMMUNITY SCHOOL
- STEP BY STEP CHILDRENS' NURSERY
- POLEGATE PRIMARY SCHOOL
- WILLINGDON PRIMARY SCHOOL

LEISURE

- NEW COMMUNITY SPORTS PITCH
- POLEGATE TOWN FC & CRICKET CLUB
- TOTT YEW PARK
- BRIGHTLING ROAD LEISURE GROUND
- WILLINGDON COMMUNITY LIBRARY
- 2ND SCOUT GROUP WILLINGDON
- POLEGATE COMMUNITY ASSOCIATION
- HORSE AND GROOM PUBLIC HOUSE
- HUGGETTS LANE RECREATION GROUND

RETAIL

- TESCO EXPRESS
- ATM MACHINE
- COOP FOOD WILLINGDON
- ONE STOP CONVENIENCE
- COOP FOOD POLEGATE & POST OFFICE
- POLEGATE HIGH STREET
- TESCO EXPRESS, FRESHWATER SQUARE



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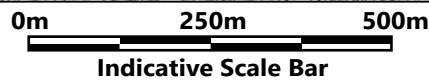
www.i-transport.co.uk

TITLE:
**LAND AT EASTBOURNE ROAD,
POLEGATE**
LOCAL FACILITIES PLAN

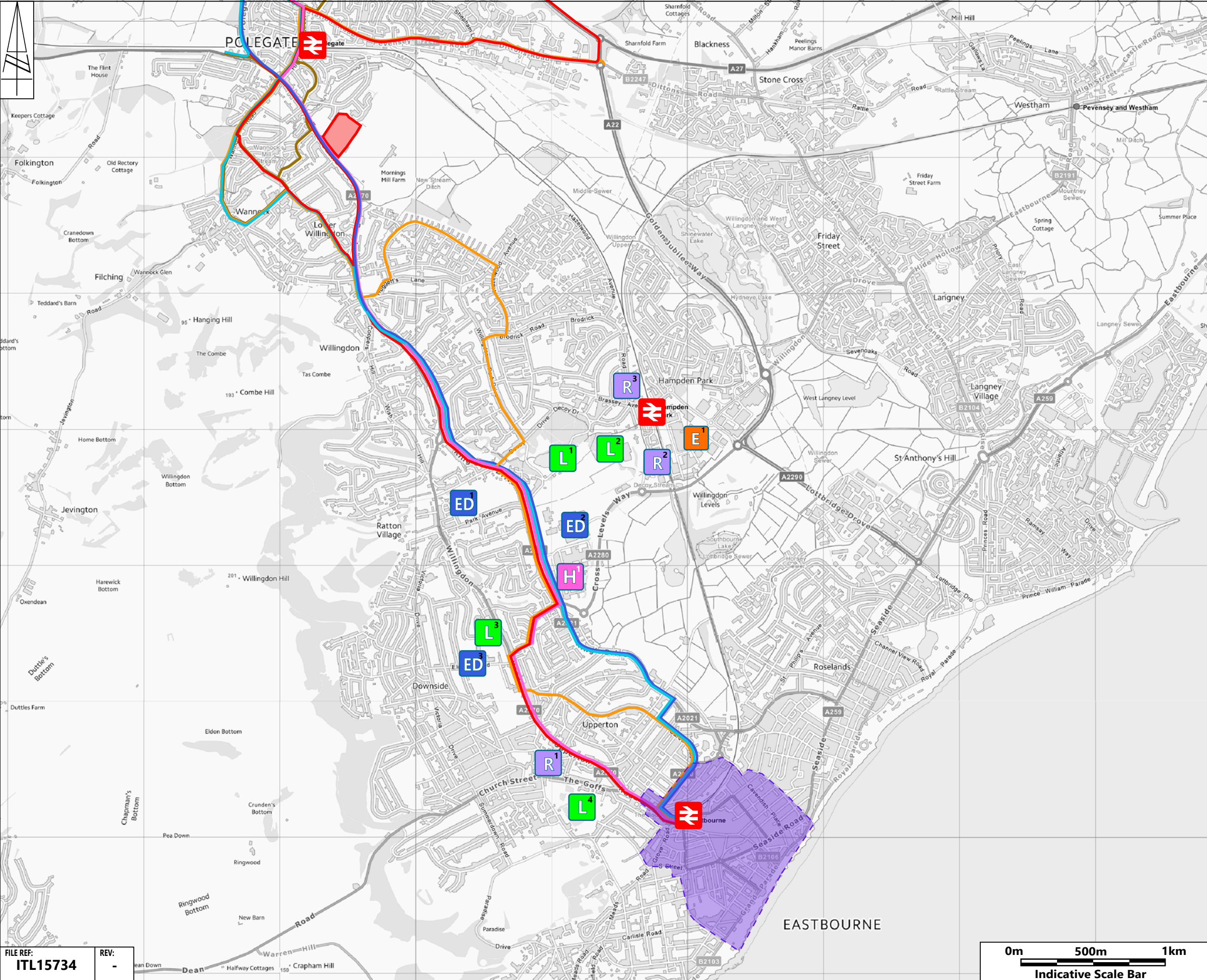
FIGURE No:
FIGURE 1

FILE REF:
ITL15734

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- KEY**
- SITE BOUNDARY
 - RAIL STATION
 - EASTBOURNE TOWN CENTRE
- BUS ROUTES**
- 6
 - 44
 - 45
 - 51, 54
 - 98
 - 125
- HEALTH**
- EASTBOURNE DISTRICT GENERAL HOSPITAL
- RETAIL**
- WAITROSE EASTBOURNE
 - SAINSBURYS SUPERSTORE
 - TESCO SUPERSTORE
- EMPLOYMENT**
- HAMPDEN PARK INDUSTRIAL ESTATE
- EDUCATION**
- RATTON SCHOOL ACADEMY TRUST
 - EAST SUSSEX COLLEGE EASTBOURNE
 - CAVENDISH SCHOOL
- LEISURE**
- HAMPDEN PARK
 - DAVID LLOYD GYM, EASTBOURNE ATHLETICS
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 - GILDREGE PARK

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TITLE:
**LAND AT EASTBOURNE ROAD,
POLEGATE**

EASTBOURNE LINKS

FIGURE No: **FIGURE 2**

FILE REF:
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APPENDIX A Summary of Experience of Neil Marshall (CMILT MIHT)

I have been / am involved in the following relevant projects (inter alia)

Public Inquiries

- Biopark, Broadwater Crescent, Welwyn Garden City – will appear as a highways witness for a planning appeal against refusal of the 289 unit brownfield development on the edge of Welwyn Garden City. Inquiry to sit in July 2022.
- Land at Appledore Road, Tenterden, Kent - appeared as highways witness at this appeal for 141 homes and a country park in Tenterden, Kent. The appeal was allowed in April 2022.
- Vale Avenue, Borehamwood – appeared as highways witness on accessibility matters for deregistration and exchange of Common Land in Borehamwood. Inquiry held in January and March 2022 – Application granted in May 2022.
- Land at Sweechbridge Road, Hillborough, Kent – appeared as highways witness at the SoS recovered appeal for 900 new homes on greenfield land in Herne Bay. SoS agreed with all matters of the case, and appeal was allowed in November 2021.
- Catford Timber Yard, Lewisham – appeared as highways witness on a mixed use scheme of 42 flats and commercial space in the centre of Catford. Appeal allowed.
- Land at Cockaynes Lane, Alresford, Essex – appeared as highways witness on behalf of appellant on a 145 dwellings scheme on greenfield land in Essex. Appeal allowed.
- Land at Sewardstone, Epping Forest, Essex – appeared as highways witness on behalf of the appellant on a 45 unit and community centre scheme on greenfield land. Appeal dismissed, but highways not a reason.
- Land at Bentfield Green, Stanstead Mountfitchet, Essex – appeared as highways witness on behalf of appellant on a 160 unit scheme on greenfield land. Inspector agreed with the transport and highways case, but appeal dismissed on conservation area matters.
- Equity Point Hotel, Westminster – appeared as a highways witness on behalf of the appellant on an enforcement appeal related to whether the premises operated as a hotel or a hostel.

