# Appendix D

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13th April 2011

**FAO: David Phillips**

Dear Mr Phillips

**WEALDEN DISTRICT COUNCIL CORE STRATEGY EVIDENCE BASE – SOUTH WEALDEN AND EASTBOURNE TRANSPORT STUDY**

In correspondence dated 13th April 2011 the Highways Agency submitted comments in relation to the proposed submission Core Strategy of Wealden District Council. We have now undertaken an assessment of the supporting transport evidence base and have outlined our comments below.

As you are aware, the HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in the Department for Transport (DfT) Circular 02/2007 (*Planning and The Strategic Road Network*). The SRN in Wealden consists of the A259 and the A27 which currently experiences congestion to the west of Polegate and stress is expected to increase throughout the plan period.

In order for Core Strategies to be sound, in accordance with PPS 12, they must be founded on a robust and credible evidence base. The South Wealden and Eastbourne Transport Study (SWETS) forms the transport evidence base for the Core Strategies of both Eastbourne and Wealden. As such, we have reviewed SWETS to ensure that the policy decisions and proposals detailed within the Core Strategy, specifically in relation to the SRN, are supported by SWETS and that the modelling has been undertaken in a robust manner.

Please find below our comments with respect to SWETS. We have also taken into account our letter of 9 July 2010 sent to Jon Wheeler of East Sussex County Council to ensure that our previous remarks have been taken into consideration.

<u>July 2010 Correspondence</u>

In July 2010 we provided technical comments on the SWETS Modelling Report Evaluation, PT Model Calibration Tech Note, SATURN Model Calibration Tech Note,

Stage 3 LDF Spatial Option Testing Tech Note and the Identification of Infrastructure Issues Tech Note.

It is noted that our comments have not been taken in to account within the final SWETS report. In order for the HA to be satisfied that the modelling has been undertaken in a robust manner it is important that our comments are addressed.

For convenience, I have detailed below the main points from our July correspondence for which we require information:

1. Detail should be provided regarding how the transport interventions were modelled and what exactly comprises the different interventions;

2. Detail should be provided clarifying what makes up the high, low and central growth scenarios;

3. Detail should be provided on what TEMPRO growth factors were utilised within the modelling;

4. Details of the TRICS sites and outputs used to calculate trip rates; and

5. How the 'attributable' effects noted in paragraph 3.17 have been calculated.

Our comments below therefore are subject to the satisfactory resolution of the above points raised.

Modelling Scenarios

SWETS models 3,550 dwellings including a windfall housing allocation of 340 dwellings between 2009 and 2027. Wealden's Core Strategy includes allocations up to 3,100 dwellings and does not include a windfall allowance. Whilst ideally the model scenarios within SWETS would match those detailed in the Core Strategy we are satisfied that a robust worst case scenario has been considered.

Modelling Results

SWETS phases 2 and 3 assess the impact of the revised development scenarios following the South East Plan revocation and closely reflect the distribution outlined in Wealden's Core Strategy.

It concludes that, providing several junction improvements are carried out, the development proposed within the Core Strategy could be delivered. The junction improvements on the SRN include; signalisation of the Cophall Roundabout, improvements to the A27/A2270 and improvements to the A27/A22 Dittons Road junction. Comments regarding the deliverability of these improvements have been made within our Core Strategy response.

It is acknowledged that, even with the proposed junction improvements, there will be detrimental impacts on the operation of the SRN, focussed on the junctions detailed above, as a result of Core Strategy allocations. It is noted however that the Cophall roundabout and A27/A2270 junction are modelled to be reaching capacity in the 2009 base year. It is also noted that that only a Folkington Link or similar scheme would be able to mitigate the impact of LDF development on the SRN. There is however, considerable uncertainty as to whether the link road will be delivered within the plan period.

We are generally content that SWETS provides a robust assessment of the impact of Core Strategy development on the SRN providing our above comments are satisfactorily addressed. We note that the conclusions are reflected in the Core Strategy and have been used to inform the development of policies and guide the associated Infrastructure Delivery Plan in accordance with PPS12.

I hope that the above information is helpful and we look forward to receiving the information requested. If you have any queries, please do not hesitate to contact me.

Yours sincerely

Howard Moore
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# Appendix D

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**FAO: Jacqueline Watson**

10 August 2007

Dear Jacqueline,

**WEALDEN LOCAL DEVELOPMENT FRAMEWORK**
**CORE STRATEGY ISSUES AND OPTIONS**

Thank you for inviting the Highways Agency (HA) to comment on the above draft document.

As you are aware the HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN i.e. the Trunk Road and Motorway network) in England as laid down in DfT Circular 02/2007 (*Planning and The Strategic Road Network*). I have included a link to the new circular for your convenience.

http://www.dft.gov.uk/pgr/regional/strategy/policy/circular207planningandstrategi

In the case of Wealden, this relates directly to the A27 and A259 trunk roads. As you will be aware, parts of this SRN through Wealden and beyond can become congested, particularly during the peak periods.

The HA are pleased to note that Wealden are working closely with Eastbourne Borough as development in Eastbourne is likely to add to the cumulative impacts on the trunk roads in Wealden. The HA would, therefore, strongly recommend that Eastbourne and Wealden produce a joint Transport Strategy that will set out methods of encouraging modal shift and reducing car trips in the Eastbourne, Hailsham area.

**Comments on Core Strategy – Issues and Options**

At paragraph 1.24 the document points out that the council may, if it wishes, justify a higher level of housing. As stated at the South East Plan Examination in Public, the HA would not support an additional allocation of housing on the Sussex Coast. The A27 is already at or nearing capacity and could not accommodate the traffic that would be generated by additional dwellings on top of the SEP allocations. The HA's evidence for the SEP can be viewed at:

http://www.eipsoutheast.co.uk/news/story.aspx?id=35.

Question Three
The HA would be looking for policies within the Wealden LDF to reduce the level of car based travel and encourage the use of sustainable travel modes. Of the options put forward the HA would suggest that option 3d has the greatest potential to reduce the number of car based trips generated by developments.

Question Four
While development at Hailsham is likely to have a lesser impact on the Trunk Road Network than development at Polegate the HA is not yet in a position to give a view on which of the options is the most appropriate location for business/employment development regarding transport issues and the impact on the SRN in particular. The transport implications of each of these options needs to be tested as part of an assessment of broad development locations.

Question Five and Six and Seven
Wherever possible development should be in locations where there are alternative transport modes available or where these can be readily improved or provided as this is likely to reduce the number of car trips generated by the development. When considering development outside settlement boundaries or in rural areas the options and opportunities for modal shift should be carefully assessed.

Question Eight
The HA has identified that development at Hailsham is likely to have a lesser impact on the Trunk Road Network than development at Polegate, but that Polegate has the greater opportunity for sustainable travel. Each of the options put forward under this question will need to be assessed for their transport implications as part of an assessment of broad development locations.

Wealden's Places
The HA would be looking to the Wealden LDF to include policies aimed at reducing the level of commuting in and out of the district by balancing housing and employment and matching skills to employers. The HA would be looking to Wealden to provide and encourage sustainable travel for both new and existing development.

Developments in Polegate and Hailsham will require improvements to the A27. In order for improvements to come forward within the plan period developer contributions will be required. A way to deliver this could be through a 'roof tax' per dwelling. Negotiations have taken place with some developers. The process could be formalised in a Developer Contributions SPD. The HA would be happy to work with the council to produce such a document.

Options for broad development locations should be tested for their transport impact in order to provide a suitable evidence base for the document. Ideally this assessment should be undertaken using a transport model. Wealden may be able to use the East Sussex transport model or the HA's Polegate Bypass model for this analysis. Testing could be undertaken in partnership with Eastbourne. Whilst unable to carry out the work ourselves, due to the number of planning authorities the HA supports, we would be happy to comment on the scope for any testing that is proposed. Until

testing has taken place we are unable to suggest which locations are most suitable for development. As stated within the document, development at Polegate is reliant on improvements to the A27/A22.

Transport Needs

I must point out that the Regional Assembly has only prioritised the A27 Wilmington Bypass for delivery by 2016. A Selmeston Bypass has received a very low priority from the Assembly; it has not been prioritised for delivery by 2016 and is unlikely to receive a high priority for the period beyond 2016. I must also point out that the HA is currently not looking at any options to the north of the Arlington Reservoir and has no remit to do so as such an option would not meet the requirements set out by the then Secretary of State for Transport in his announcement on the South Coast Multi Modal Study.

In addition will you please note that in the case of the Trunk Road Network in Wealden the HA will not support direct access off the network for development sites.

Question Twenty Seven

The HA supports policies that are aimed at encouraging modal shift away from the use of the private car and reduces the level of commuting in and out of the district.

Question Thirty

I note that you have separated the A27 improvements west of Polegate (30a) which for you consists of the Wilmington and Selmeston Bypasses from the A27-A22 Link (30b). However, the HA's schemes consist of the Wilmington and Selmeston Bypasses with the east end of the Wilmington Bypass being the A27-A22 Link. As noted above the Selmeston Bypass is unlikely to have a high priority in the period after 2016 and while the Wilmington Bypass has been prioritised for delivery in the period up to 2016 the HA has yet to identify a workable, deliverable improvement at Wilmington village itself.

However, as you will be aware, we working with you and the developers to identify a workable solution for the A27-A22 Link. In addition the HA is continuing with its programme of smaller scale improvements to the A27 between Polegate and Beddingham. Also, given that your LDF is likely to run to 2026, it is possible that some form of improvement over and above the small scale improvements could be delivered later in your plan period.

I hope that the above comments are helpful. We look to continuing to working with you, and the maintenance of our ongoing dialogue in relation to the various development sites currently under consideration. Please do not hesitate to contact me if you have any queries.

Yours sincerely

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Mr David Phillips
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28 September 2011

Dear Mr Phillips

**WEALDEN DISTRICT COUNCIL CORE STRATEGY SUBMISSION**

Thank you for your letters of 1 August and 19 September 2011 in reply to our comments on Wealden District Council's Core Strategy submission document (dated the 13th April 2011).

As you are aware, the Highways Agency (HA), on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in the Department for Transport (DfT) Circular 02/2007 (*Planning and The Strategic Road Network*).

The SRN in Wealden consists of the A259 to the east of Pevensey and the A27. The latter currently experiences congestion to the west of Polegate and as you are aware, there are currently no proposals to significantly enhance the capacity of this road. As a result stress is expected to increase throughout the plan period, particularly during peak times. It is therefore important that, wherever possible, the Core Strategy policies promote sustainable development with the view to reducing the likely impact of development on the SRN.

Planning Policy Guidance 13: Transport (PPG13) states in paragraph 20 that: *"Local authorities should seek to ensure that strategies in the development plan and the local transport plan are complementary: consideration of development plan allocations and local transport priorities and investment should be closely linked."* We will be looking for evidence demonstrating that the Core Strategy has been developed in accordance with these principles. The HA have been working with Wealden District Council for a number of years now working towards supporting the transport elements of your Core Strategy.

I have reviewed our files and found that we sent a letter on 13-4-11 which comprehensively lays out the HA's response in respect of the SWETS modelling. I have resent this by email (21-9-11) and am also enclosing it with this letter for ease of reference. I hope you find our comments helpful.



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In our meeting on 28th July we intended to clarify that under the current financial restrictions HA have no current plans to progress any of the identified schemes (i.e. signalisation of the Cophall roundabout, improvements to the A27/A2270 and improvements to the A27/A22 Dittons Road junction). It is also not felt appropriate to commission work into the costing of such schemes.

I would also like to confirm the note made by Mr Martin Wright in the meeting that the Agency is currently financially restricted from providing any of the identified improvements in the foreseeable future.

The priority afforded to each of the interventions identified in SWETS should be informed by the results of the SWETS study and will depend on when development comes forward. Wealden's transport strategy should link interventions with development in terms of timing and funding. Provision may need to be made for forward funding of improvements in the event that an improvement becomes necessary before all contributions from CIL have been received.

The HA cannot offer the confirmation you seek regarding the total level of housing deliverable in Wealden District. You refer to our comments made in response to your Council's Issues and Options consultation in 2007. I am attaching that response for your reference. As you will see, our comment was that HA would not support an additional allocation, on top of the SEP allocations, of housing on the Sussex coast.

Our interest is restricted to the A27 corridor and there are locations within Wealden where we would not expect housing growth to have a material impact upon the SRN. We are concerned that housing along the A27 corridor is delivered in a manner that does not materially affect the safety and operation of this trunk road. For example we could have accepted the housing proposed at Honey Farm by Pelham Homes so long as appropriate mitigation measures were put in place.

I understand that in the meeting (28-7-11) it was incorrectly stated that the HA did not attend the Pelham Homes Inquiry. The HA did attend all relevant sessions and made representations throughout as appropriate.

With regard to your query about the reference in Policy CC7 of the RSS to contributions from central Government for infrastructure, you will need to seek clarification from CLG. Our current understanding is that all TR3 funding will have to come from developers. Previously there was a prospect that central Government money may have been available through the RTB for the Folkington Link but there was no commitment from HA to fund the TR3 schemes.

Your letter asks us to clarify what should be reflected in your IDP. The comments made in our response of 13-4-11 still hold, and are repeated later in this letter. In essence, the IDP should include a list of the interventions required which should have a realistic funding mechanism and a degree of certainty that the schemes are deliverable in terms of land required. There needs to be evidence to demonstrate interventions can be

funded not only in totality but also that there will be money to fund each individual measure when it is needed.

We have previously reviewed the proposed Core Strategy document in line with PPG13 and Paragraphs 4.51 - 4.52 of PPS 12 (our response letter dated 13-4-11). We wish to reiterate the following comments made in our response of 13-4-11, which we still consider relevant:

Transport Evidence Base

It is important for the Core Strategy to demonstrate that the proposed LDF development is deliverable in transport terms in accordance with PPS12 Paragraph 4.52. As such, we will be looking for the Core Strategy to be based on the evidence tested within SWETS.

4. Vision and Spatial Planning Objectives

It is important that the spatial planning objectives are shown to be deliverable in accordance with PPS12. Relevant evidence should be provided throughout the Core Strategy to demonstrate deliverability particularly in transport terms. We are concerned that at this stage, relevant supporting evidence is not included to demonstrate deliverability in transport terms.

We also welcome the progress made with regard to the Uckfield Action Plan. We look forward to reviewing the plan when it is complete.

7. Core Delivery Policies

**Core Strategy Infrastructure Delivery Plan (IDP)**

We are concerned that a number of allocations in Polegate and Willingdon are identified as critically dependent on SRN junction improvements which, at present, are not certain to be delivered.

The improvements required consist of the signalisation of the Cophall roundabout, improvements to the A27/A22 and improvements to the A27/A2270 none of which are currently scheduled for delivery by the HA. Even as developer funded schemes there are risks – the need for third party land for example. The degree of uncertainty at this point would suggest the need for further work to be undertaken in order to develop the schemes beyond the 'concept' stage as detailed in the IDP (Appendix A) and demonstrate deliverability.

In accordance with PPS12 Paragraph 4.52, in order for the Core Strategy to be sound it must demonstrate that the plan is deliverable. To be deliverable the infrastructure needs, costs and funding sources should be identified. At present, the Core Strategy does not demonstrate sufficiently that the transport infrastructure required to deliver the Core Strategy allocations is deliverable and as such the plan is at risk of not being found sound in its current form.



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I hope that the above information is helpful. If you have any queries, please do not hesitate to contact me.

Yours sincerely

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Enc.
HA letter of 13-4-11 to Wealden District Council titled "Wealden District Council Core Strategy Evidence Base – South Wealden and Eastbourne Transport Study"

HA letter of 10-8-07 to Wealden District Council titled "Wealden Local Development Framework – Core Strategy Issues and Options"