Rule 6 Statement of Case on behalf of East Sussex County Council

Land at Downlands Farm, Uckfield TN22 3PU

Planning Application Ref: WD/2021/1637/MEA
PINS Ref No: APP/C1435/W/22/3321978



Client: ESCC TDC

Ref: 12664/2.3

Date: July 2023

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Appendix 1 ESCC Consultation Responses

Issue	Issue date	Compiled	Checked	Authorised
FINAL	20th July 2023	RN	LNS/KK	KK

1 Introduction

1.1 East Sussex County Council submits this Statement of Case (SoC) in respect of the forthcoming Public Inquiry into the appeal ref APP/C1435/W/22/3321978 by Gleeson Land and John Alison Land and Research Ltd ('the Appellants') pursuant to section 78 of the Town and Country Planning Act 1990.

1.2 The appeal is against Wealden District Council's refusal of planning permission for the hybrid application WD/2022/1637/MEA.

1.3 The application comprised (all on Land at Land at Downlands Farm, Uckfield, TN22 3PU):

Outline application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts Road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks; and

Full application comprising creation of a strategic SANG, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from Rocks Road, associated landscaping, infrastructure and earthworks.

1.4 As set out in Wealden District Council's SoC at para 2.12 under the heading Planning History, a previous application (WD/2006/2855/MEA) was made by Clarence Preston Will Trust & Barham Estates Ltd on 9 October 2006 ('the 2006 Application'). This was for Residential development for 750 dwellings; employment development for 9,600sqm of B1 and B8 uses; neighbourhood centres with primary school, community hall, land for community facilities; creation of new vehicular access from Black Down Roundabout (A22) and emergency and bus only accesses from Snatts Road; construction of estate roads and new cycle footway connections; provision of managed country park with warden's lodge/information point and education/interpretative facility, public and amenity open space, playing fields and associated development and changes of use. This was refused by the District Council on 22 February 2007. The 2006 Application was considered at Inquiry, conjoined with two other sites elsewhere at Uckfield, Bird in Eye North and Bird in Eye South. The Inquiry sat variously between 15 January and 18 July 2008, which closed in writing 14

October 2008. The appeal was recovered by the Secretary of State ('SoS') who issued her, as it was then, decision refusing the appeals on 24 February 2009.

1.5 It is acknowledged that the current application differs in a number of respects from the previous refused application. However, many of the principles are similar and the previous appeal decision, and its relevance and significance to the consideration of the transport aspects of the current application, will be referred to where appropriate in this SoC.

1.6 This SoC sets out the case to be presented by East Sussex County Council as County Highway Authority at the current Public Inquiry. The SoC has been prepared on behalf of ESCC by GTA Civils and Transport (GTA). GTA have been appointed by ESCC to assist in its consideration of and response to the proposed development, and in the presentation of its case at the Public Inquiry.

1.7 ESCC as the County Highway Authority has objected to the planning application in its formal consultation responses to Wealden District Council. ESCC's formal responses to the local planning authority of 18/10/2022 and 21/04/2023 are included at Appendix 1. Those record the detailed reasoning supporting the council's position as the proposals developed. The District Council Delegated Officer's Report summarises (page 33 of that document) ESCC's objection set out in its final response of 21st April 2023 as:

> *"As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:*
> *1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.*
> *2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.*
> *3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.*
> *4) Highway impact on the town centre roads has not been assessed*
> *5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities."*

1.8 The Delegated Officer's Report continued:

> *"The issue of connection of the site to the town and key facilities was given much air time at the earlier inquiry. This need not be repeated in full here but the Inspector did conclude that "Downlands would not be nearly so well connected with Uckfield town centre for pedestrians*

and cyclists, as its proponents claim. I think it self-evident that this would only tend to increase car-use at the expense of these other modes, whose use is in general strongly encouraged by relevant national and local policies. That tends to undermine Downlands' claim of not being excessively car-dependent. The other main factor which, to my mind, tends to increase the likelihood of car dependency at Downlands is its considerable ease of access by car onto the A22 Uckfield by-pass, and thence on to the wider road network, or into Uckfield town centre".

1.9 As set out in Wealden District Council's Rule 6 Statement of Case, the council's reasons for refusal included two that relate specifically to highways and transport:

"Safe Access and lack of non-car modes of transport

Reason for Refusal 6

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

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

Impact on highway network and site access

Reason for Refusal 7

The proposal does not satisfactorily demonstrate that there would be an acceptable impact on the surrounding highway network, particularly (though not limited to) Uckfield town centre which is already heavily congested at peak times, nor that safe access can be secured for all parts of the site and scheme, contrary to, to SPO2, SPO12, SPO13 and Policy WCS14 to the Wealden Core Strategy Local Plan 2013, Saved Policies TR3 andTR16 of the adopted Wealden Local Plan 1998, coupled with the requirements of paragraph 110 of the National Planning Policy Framework 2021.

5.64 Reasons for Refusal 6 and 7 will be addressed via a separate and bespoke Statement of Case on highway matters prepared by the Highway Authority. For the avoidance of doubt, the District Council will rely upon the evidence of the County Council in relation to these reasons for refusal."

1.10 ESCC's objection as County Highway Authority to the Appeal proposals are on three grounds. These relate to:

a. the acceptability of the proposed new junction on A22 Uckfield Bypass which is proposed to provide all vehicle access to the proposed development (including by buses proposed to serve the development) and some non-motorised user (NMU) access to the proposed development. This SoC first addresses this under the collective heading of 'The Proposed Site Vehicle Access'.

b. The suitability and acceptability of the proposed means of providing for pedestrian and cyclist connections between the site and key destinations in the town centre and elsewhere within the town. This SoC addresses this under the heading of 'Sustainable Accessibility'.

c. The SoC concludes with ESCC's position relating to the impact of the proposed development on the safe and efficient operation of the wider town centre highway network.

2 The Proposed Vehicle Site Access

2.1 The Transport Assessment submitted in support of the planning application showed the proposed form of vehicle site access in Drawing Number 2001061-101 Rev A. This showed a new roundabout to be formed between the A22 Uckfield Bypass and a proposed site access road towards the south western extremity of the site. This has subsequently been amended in Rev C which moves the roundabout further into the site.

2.2 ESCC are content that the design of the proposed new roundabout is generally consistent with the requirements of DMRB Technical Standard CD123, but there remain outstanding safety issues yet to be addressed / resolved by the Appellant relating to:

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

2.3 At present, the Appellants have not demonstrated that their access proposals are acceptable from a highway safety perspective.. It may be possible for an acceptable design to be arrived at from a highways perspective, however, if a revised design is produced then any other planning implications of such a design would have to be considered by the Council and other consultees.

2.4 Drawing 2001061-101 Rev A and Rev C also provide a shared footway / cycleway on the southern side of the access road, connecting to a proposed new shared facility on the eastern side of the A22 Uckfield Bypass from the site access road south to Copwood roundabout (the junction of the A22 Uckfield Bypass with the B2102 Bellfarm Road) and onwards to a proposed shared facility along the B2102 into the town centre.

2.5 The acceptability of the proposed shared facility as a means of providing for some pedestrian / cycle connectivity between the site and the town is addressed in the following section of this SoC dealing with Sustainable Accessibility.

3 Sustainable Accessibility

3.1 The site is not close to key facilities providing for the day to day requirements of residents in the proposed housing. Most key facilities are in the town centre or similarly distant from the site. It should be noted that the Appellant has given no consideration to any need to provide for pedestrian or cycle access to other local centres of employment that could be important, for instance the major Ashdown centre at the junction of A22 and A272 at Maresfield, for which the only alternatives would be riding on the A22 carriageway or, indirectly, via Snatts Road / London Road to the A22/A272 Budletts roundabout.

3.2 As regards access to the town centre and other key facilities, the application Transport Assessment (TA) at para 3.55 summarises the position as *" There are a range of amenities in Uckfield town centre and within 2 kilometres of the site"* basing this on actual distance by available routes rather than straight line crow-fly distance. Even on a straight line crow-fly basis the town centre is approx. 1.2km distant from the site as is the secondary college with Primary schools from 600 metres up to 2 kilometres distant. At such actual and crow-fly distances the use of bus services is likely to be significantly less attractive for many residents than walking or cycling.

3.3 The TA argues that such distances are compatible with published guidance dealing with provision for sustainable travel by walk or cycle in conjunction with new developments (quoting from Planning for Walking 2015 and Planning for Cycling 2015, both produced by the Chartered Institution of Highways and Transportation, and from Manual for Streets). However, walking, particularly so in view of the distances involved in relation to the application site, and cycling are only realistic, effective alternatives if the connections are appropriate in terms of quality and attractiveness.

3.4 Local Transport Note 1/20 (LTN 1/20) which deals with cycle infrastructure design (although the same principles would apply to facilities for pedestrians) states at para 4.2.2:

"When people are travelling by cycle, they need networks and routes that are:

- *Coherent;*
- *Direct;*
- *Safe;*
- *Comfortable; and*
- *Attractive."*

3.5 Active Travel England's Standing Advice Notereinforces this at para 2.12, stating:

Moreover, all new or improved cycle routes need to be fully accessible. Cycling infrastructure should be provided on-site, while this and any new or improved off-site infrastructure to destinations such as schools, local centres, employment centres, railway stations and the existing cycling network should conform to the five Core Design Principles (coherent, safe, comfortable and attractive), separation requirements (fig 4.1) and geometry requirements required by LTN 1/20.

3.6 Sustainable connectivity between the site and those town centre and other facilities is dependent on three corridors; the A22 / B2102, a route from the proposed pedestrian / cycle access to Snatts Road utilising existing off-road footways and Public Rights of Way to connect with Pudding Cake Lane and thence Church Street, and a route from the proposed new access in the southeast corner of the site to Rocks Road / Church Street.

3.7 As regards the A22 / B2102 route, whilst the Appellant argues that the proposed shared footway / cycleway accords with the requirements of LTN 1/20 in terms of its width and separation from the main road, and that a Road Safety Audit raised no issues that could not be addressed, in reality the route is not direct for most potential users, and is not likely to be considered safe, comfortable or attractive, particularly in inclement weather or times of reduced lighting, in light of the high volume of fast moving traffic on the bypass. This is recognised in the Appellant's 'Response to ESCC Highway Comments' at para 2.50 where the route is characterised only as being "very attractive to 'enthusiastic' cyclists". It also accords with the view of the Inspector at the previous appeal who stated at para 271 of the Decision Letter that, when considering pedestrian and cycle infrastructure needed properly to connect the site with the town centre and the suitability of the, then, proposals for a shared route alongside the A22 :

"Existing routes are few and very deficient, and the proposed new pedestrian / cycle links alongside the A22 and Snatts Road have serious limitations. The A22 route would be long and circuitous ..... and ..... follows a very busy and polluted main road, containing fast traffic. For all these reasons, it would not prove very attractive to many Downlands residents."

3.8 ESCC consider that encouraging pedestrian and cycle transit between the site and key destinations, and therefore the potential for maximising site sustainable accessibility, would be more dependent on the two routes connecting to Church Street.

3.9 The route from the proposed pedestrian / cycle access to Snatts Road utilising existing off-road footways to connect with Pudding Cake Lane and thence Church Street is narrow, unlit and not overlooked and involves negotiating steps as well as significant gradients in places. Improvements

in places are proposed by the Appellant but the character of the route as a whole is not considered by ESCC to present a sufficiently attractive route available to, and safe to use by, all.

3.10 The most important route in terms of likely contribution towards increased use of walking and cycling by site residents is the route from the proposed new access in the southeast corner of the site to Rocks Road / Church Street. In the current application, access from the site to Rocks Road is proposed to be via a new connection in the south east corner of the site. This connection entails an unattractive lengthy, convoluted climb from the site to Rocks Road with no proposed mechanism to connect to Rocks Road in a safe manner.

3.11 Rocks Road and Church Street are both narrow with inadequate footways and no specific provision for cyclists. Their deficiencies as a major sustainable transport corridor for non-motorised users has long been recognised and was a feature of the Inspector's consideration of previous proposals for the application site at the previous planning Appeal. ESCC's consistent view throughout its consideration of the proposed development has been that those inadequacies are a significant deterrent to its potential pedestrian or cycle use by residents of the site. No specific proposals to improve provision for cyclists have been put forward by the Appellant. Proposals for some limited footway widening in places are not considered by ESCC to be deliverable in practice or safe in operation given the constrained nature of the route, particularly on Rocks Road but also on Church Street.

3.12 As an alternative to using Church Street, the Appellant has suggested using Rocks Park Road from the eastern end of Rocks Road, connecting into existing and improved shared route facilities on the B2102. Rocks Park Road itself is not considered unsuitable for such use but the final connection to the B2102 facility would be via an existing footpath which is narrow, constrained by adjacent property boundaries, and unsuitable for concurrent use by opposing pedestrians and wheeled (dismounted) cycles and riders. Most importantly, this variant does nothing to overcome the major safety issues on Rocks Road itself.

3.13 As regards bus accessibility, the Appellant proposes a diversion into and out of the site, via the new A22 Uckfield Bypass roundabout, of service 31 which currently uses London Road. Given the distance of the site from the main town centre destinations, and taking account of waiting time and travel cost, unless access to routes is very convenient and services are frequent and cheap to use, buses is unlikely to constitute an attractive alternative to the use of the car or cycle for such journeys or to comprise a significant component of overall sustainable transport usage by site residents. Modal transfer rates suggested by the Appellant in its 'Response to ESCC Highway Comments' at para 7.7 are considered to be unrealistic and, in any event, to result in a predicted level of change

in bus use that would not significantly contribute to overall site sustainability or reduced levels of car use. It has also not been demonstrated that the Appellant's costings of its proposals is reasonable or that the diversion proposed can be accommodated within existing timetables.

3.14 The most important component of sustainable accessibility for this site is reliance on walk and cycle connections. None of the proposed pedestrian / cycle routes would be sufficiently attractive to most potential users and the potential use of buses would not comprise a significant component of overall sustainable transport usage by site residents. The application proposals would therefore not encourage the use of sustainable travel modes by site residents and would therefore be contrary to para 104 and 106 of the National Planning Policy Framework.

4 Impact on Town Centre Highway Network

4.1 The Appellant has carried out assessments of the impacts on key junctions local to the site access and on the town centre highway network using a strategic SATURN model. Whilst this was the agreed approach, the modelling results demonstrated that increased congestion in the town centre and on the bypass as a result of this site and in combination with others and other background growth could lead to a significant risk of strategic traffic reassignment away from those routes and onto much less suitable alternative routes using minor roads to the east and west of the town. In such circumstances, ESCC would expect that the model output results for the identified key junctions would be but one input informing a more comprehensive assessment of impacts, particularly on roads and junctions in the town centre.

4.2 Currently the town centre signals are operating as best they can with the existing operating system and linking, and there are significant issues of lack of capacity with associated queuing and delays. ESCC consider that the Appellant's modelling does not reflect the true likely impact of the proposed development which would be severe and require mitigation. The impacts of the proposed development could be sufficiently mitigated through the implementation of an enhanced control system, but that system would have to cover a more extensive area within the town centre than the junctions assessed by the Appellant. There is currently no such areawide scheme. Appropriate financial contributions towards the introduction and on-going maintenance of that system, and appropriate occupation restrictions, would need to be sought from the Appellant in the event that the proposed development was to be granted planning permission.

5 Conclusions

5.1 In relation to the proposed vehicle site access there remain concerns about the proposed design of the new roundabout junction on the A22 Uckfield Bypass. Those concerns relate to some fundamental issues that would have potentially significant safety consequences for all users of the junction. The Appellant has not demonstrated that its access proposals are feasible, deliverable and acceptable taking all relevant considerations into account. It may be possible for an acceptable design to be arrived at from a highways perspective, however, if a revised design is produced then any other planning implications of such a design would have to be considered by the Council and other consultees'

5.2 With regard to sustainable accessibility, ESCC's position remains that the site is dependent on Rocks Road / Church Street for sustainable connectivity between the site and important town centre and other facilities; that both currently provide very poorly for its necessary use as a major sustainable transport corridor serving the site; that the proposals do not provide a safe mechanism to connect the proposed new site pedestrian / cycle access to Rocks Road; and that the Appellant's proposals for improvements to facilities for vulnerable road users on Rocks Road and Church Street are not sufficient to overcome those deficiencies. Given the physical constraints, ESCC do not consider that an appropriate scheme can be developed and demonstrated to be safe for all road users, effective, feasible, deliverable and acceptable taking all relevant considerations into account.

5.3 ESCC consider that there would be an impact as a result of the proposed development on the safe and efficient operation of junctions within the town centre that would need mitigating, and that such a scheme would need to cover a more extensive area within the town centre than the junctions assessed by the Appellant. There is no current areawide scheme. Appropriate financial contributions towards the introduction and on-going maintenance of such an enhanced signal control system, and appropriate occupation restrictions, would need to be sought from the Appellant in the event that the proposed development was to be granted planning permission.

Appendix 1

ESCC Consultation Responses

Communities Economy and Transport

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FAO: Claire Turner

Date: 18.10.22 & 23.03.23
Our Ref: WD/2022/1637/MEA
District/Borough Ref: WD/2022/1637/MEA

Location: LAND AT DOWNLANDS FARM, UCKFIELD

Development: Hybrid planning application comprising: **Outline** application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts road, open spaces including children's play space, SUDS, associated landscaping, infrastructure and earthworks; **Full** application comprising creation of a strategic SANG, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from rocks road, associated landscaping, infrastructure and earthworks.

Road Name or Number	A22 Uckfield By-pass; UC7513 Snatts Road	**Consultation Date**	14 July 2022
National Grid Reference	546648 122536	**Contact Officer Details:**	Kal Kamboh 01273 482287 kal.kamboh@eastsussex.gov.uk

Recommendation:

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

Further information has been submitted by the applicant in response to the highway authority comments dated 18.10.22, provided in response to the initial planning submission.

The applicant is requested to engage with the Rights of Way Team East Sussex with regard to a local claim of a footpath through the site, submitted in 2021. This is ongoing and may impact on the proposed site layout for both the SANG and residential elements of the proposal. Essentially, this would be an impact on the site layout details which is a matter reserved at this stage.

The following response is made to the document titled 'Response to ESCC Highway comments' submitted to WDC on 21.12.22.

A summary of the transport related concerns are:

- **PEDESTRIAN/CYCLE ACCESS IN SOUTHERN CORNER (Rocks Road/Snatts Road link)**- A change in the speed limit is unlikely to alter the character of this section of the

carriageway and constraints are present in terms of visual awareness and conflict between motorised users and active travel users. Highway safety remains a concern for the non-motorised access in this position due to conflict with other road users having lack of awareness. Highway tree present.

- **SANGS SNATTS RD**– access and parking provision accepted, though provision to existing footpath Uck 1 is required. Footway requires extension to accommodate a safer pedestrian crossing.
- **PEDESTRIAN/CYCLE ACCESS AT EXISTING FARM ACCESS POINT**– noted that a footway on south side Snatts Road is proposed, but no crossing point or formal provision to link to the site is indicated, conflict with other users who have historic use. Noted that the land may be unregistered at this point.
- **ROCKS RD HIGHWAY SCHEME** - although the speeds are demonstrated to be lower than the limit, there is a lack of conducive environment to instigate an appropriate commencement point. The risk of imposing a commencement/termination of a new 30mph limit may result in misjudged changes to driver speeds when leaving the zone, thus creating hazards. A gateway feature or means to highlight a stand-alone connection for active travel provision may be appropriate, though scope for inclusion on what is solely carriageway with very little verge and restricted forward visibility and lack of lighting is likely to be problematic to provide sufficient advance awareness to drivers approaching from west.
- **CHURCH STREET HIGHWAY SCHEME** – concerns with priority working since vehicle speeds are generally low but have high volumes. Issue is the walking and cycling environment is substandard and inconsistent and issue of lack of safe crossing provision remains. This would be the main route for pedestrians and cyclists from the site to the town centre whether entire route or part of the route is used. Safety of increase in active travel users during peak demand periods is raised when growth is added.
- **PRoWS 3a/3b** - the proposed improvements for active travel for the site are expected to accommodate all users, and even with improvements, there would be limitations to what can be achieved in so far as lighting and widening. The PRoW routes connect to Church Street where the constraints have been highlighted.
- **Site Access (A22)** – this has been reconfigured and requires further RSA. Lighting concerns are raised.
- **Emergency Access** – clear marking required to ensure that the access position remains unobstructed.
- **Cycle/footway (A22)** – amendments have been provided to include widened verge separation, path width and coordination with design at Copwood Roundabout, though concerns regarding the principle of this route remain valid as stated in the original highway response. Concerns remain in terms of connections for active users in Bell Farm roundabout location and deliverability of the widened shared footway/cycle adjacent to Tesco that would not compromise the highway trees. Cycle parking in High Street suitable High Street position that is overlooked and busy would encourage cycling as a mode.
- **Bus infrastructure/service provision** – RSA for bus stop provisions required; discussions ongoing with passenger transport team at ESCC.
- **Modelling** – The current submission considers that there is little impact from the development on the town centre roads. To date no modelling has been provided on High Street and adjacent junctions to consider the growth of traffic impact onto the town centre. The principles of 'decide and provide' would be based on the effectiveness of the active travel initiatives and realistic outcomes of the routes proposed for regular journeys towards the Uckfield local amenities. However, distance and ease of routes were highlighted in the previous appeal decision. Although the Uckfield modelling work was carried out as a method to assess prospective development sites prior to Regulation 18 screening, this was not completed as would be required for a local plan evidence to determine the level of town-wide mitigation to support planned growth. It is concluded that any growth in traffic as a result of major development will impact on High Street junctions and compound the present exceedance of capacity not limited to peak times.

RESPONSE

A) Access and Accessibility for Active Travel

ROCKS ROAD/SNATTS ROAD

1) The route between the proposed development within the site and Rocks Road would be traffic free and has suitable width and gradient. However, it is not overlooked and is remote from the development. One issue would be its suitability through the ancient woodland which I note is not a highway concern per se, but a highway concern is the distance of 200m within the site (from indicated dwellings to edge of site) and then a further 200m before reaching Hunters Way junction feels very isolated and detached from any built form to provide comfort or security if walking alone and/or in darkness. I note that street lighting is limited west of Hunters Way. It is not disputed that the proposed works are in accordance with LTN1/20 for the main, through the transition section where it meets Rocks Road junction with Snatts Road is a cause for concern.

2) Safety - view from the road safety team is that they prefer 30mph to start at the beginning of visible development with frontages of minimum 20 properties and not on rural lengths of road. I note the speeds have been demonstrated as below 30mph (mean) and around 31mph (85th percentile) when measured at the position of the sign just west of Buckswood Grange and Chicory Cottage. However, on the basis that there is no frontage development, and the road conditions include a sunken carriageway with banked verges, there is no expectation that a footway/cycleway is likely to be present to drivers, especially as the proposed entry point would only be visible when a driver reaches it, and not in advance of it. The prominence of the active travel provision in the carriageway has been raised previously to highlight driver awareness and potentially a means of enclosure to prevent cyclists egressing the site from joining the carriageway at an inappropriate section of the highway where there is limited visibility of oncoming traffic. The pedestrian crossing point has limited visibility and this is not demonstrated should the vegetation be cut back sufficiently. Noted there is a mature highway tree which would be lost as part of the access scheme. *Views of the County Landscape Architect is awaited. Tree removal is not supported if this is a healthy tree - being checked.*
   The RSA for the Rocks Road/Snatts Road link has highlighted the safety issues relating to a guardrail on the ramped section and cutting back vegetation northwest of the pedestrian crossing point. Pedestrian sightlines are not shown and this element is not agreed, and the removal of the highway tree has not been accepted to date.

SNATTS ROAD

1) Actual speeds have been measured by ATC equipment on 14th October 2022 for 7 days, close to the junction with Rocks Rd. Volumes are 575-620 NB; 680-730 SB on weekdays and lower at weekends. 85th percentile speeds are 28mph NB and SB, mean speeds are ~24mph.

2) Route to connect the site by foot from Snatts Road is indicated by a proposed footway between Downland Copse footpath link and the existing access to Downland Farm, adjacent to Swallow Barn, on the south side of Snatts Road. There is no crossing point or any formal proposals to indicate a formal route. The RSA1 highlighted the need for an edge restraint at the back of the footway with street lighting, and the designer response agrees these provisions. The footway and street lighting would be a benefit to the location to assist the connection, but it would feel confused an incomplete to not have a distinct means to connect to the site as the private driveway intended for use is a narrow lane with no proposals to accommodate active travel users alongside the existing dwellings using the driveway for access. For this scale of development, this route would serve the central and northern segments of the site, but the route lacks cohesive or distinct passage.

3) SNATTS ROAD (SANGS ACCESS) - The access proposal in terms of position, configuration and driver sightline provision would be acceptable. Connections to the existing footway network are shown by a link on the east side of the access for a short distance of~5-6m. Mentioned previously, vehicles turning left are focussed on vehicles approaching from the right, so an extension of the footway is requested to prevent conflict between vehicles and pedestrians crossing. Also, given there is a postal box to the west of the access positioned in a narrow, unmade lay-by, it requested that this is reinstated with a footway to accommodate safety of users close to the access. The parking surveys provided from the Horsted Green SANGS indicate that there are days where the car park is full and overspill occurs outside the height barrier, with maximum capacity of

19 vehicles. The proposed car park accessed form Snatts Road is indicated with 19 spaces and cycle spaces which should not result in overspill to a concerning level on Snatts Rd. It is recommended that the car park area is formally laid out with marked spaces to prevent poor parking behaviour to ensure efficient capacity/occupation. A connection to footpath Uck1, which runs along its north to south boundary, from the proposed Woodland Park SANG should be provided.

4) Snatts Road has vehicle volumes which are conducive to cycling, and provides connections to residential streets connecting to the town centre (towards UTC and leisure centre) though some sections require dismount such as North Row and Crown Close.

ROCKS ROAD

1) On Rocks Road, the footway width widening to 2m was raised through narrowing the carriageway width, compromising the road marking arrangement. The applicant suggests that there would be a consistent width of 5.5m though the Road Safety related comments relating to the need for carriageway lining due to tree coverings, existing alignment and lack of lighting is not addressed.

2) Vehicle speeds and traffic flow on Rocks Road was raised when considering the proposed pedestrian/cycle access proposed close to the junction with Snatts Road. It is acknowledged that a speed survey has been provided which demonstrates the 85th percentile speeds in the location 100m northwest of the proposed cycle/pedestrian access are well below the derestricted speed limit and have been recorded as 30-31mph in both directions, with mean speeds 26-28mph. Whilst this gives some rationale for the reduction of the current speed limit from 60mph to 30mph, comments provided earlier stating that frontage presence is a pre-requisite, cannot be met. So, although the speeds are demonstrated to be lower than the limit, there is a lack of conducive environment to instigate an appropriate commencement point. The risk of imposing a commencement/termination of a new 30mph limit may result in misjudged changes to driver speeds when leaving the zone, thus creating hazards.

3) As stated earlier the speed limit change is unlikely to be supported, even though evident speeds are contained within the limit proposed. There is a need for a suitable commencement point and adherence to policy which requires visible frontage, of which there is not. A gateway feature or means to highlight a stand-alone connection for active travel provision may be appropriate, though scope for inclusion on what is solely carriageway with very little verge and restricted forward visibility and lack of lighting is likely to be problematic to provide sufficient advance awareness to drivers approaching from west.

CHURCH STREET

1) LCWIP document highlights constraints and provided recommendations based on existing conditions which are described being those affecting mobility of pedestrians and cyclists. It is noted that this proposal does not include the recommended crossing point to accommodate users between Pudding Cake Lane and Belmont Road. The traffic calming proposed has raised concerns with the County Road Safety Team due to the priority working arrangement and though the applicant references these as being recommended part of the LCWIP (242.1.2), it would appear that that reference is not listed. It is questioned if traffic calming features are appropriate on Church Street on the basis that speeds are generally low due to the carriageway width constraints and sections with obstructed forward visibility. The LCWIP does note that the road carries high volumes of traffic with few gaps for crossing purposes, and so the focus should be to enhance active traveller experience and their safety. The inclusion of priority working has potential to generate driver confusion, particularly where forward visibility may be compromised; and the infrastructure it would require such as signage may obstruct pedestrian infrastructure.

2) Highway scheme Church Street would need to demonstrate deliverability at this stage and an in-principle scheme would need to be accepted by this authority. It should be recognised that this route would not only be used by users of the proposed development

site but by others including people travelling to work, schools and shopping. This route is already substandard currently in terms of the pedestrian and cycling infrastructure, so this will need to be addressed based on the outcome of the LCWIP and development demand. Therefore, any scheme that is proposed to enable a suitable route for active travel users would need to be considered at this stage as it would be an element of 'access' for the site, and proposed schemes unfinished in principle at this stage cannot rely on technical detailed design stage.

3) For a site proposing 424 dwellings, on the basis that all are houses 2+ bedrooms, it has been derived from the education team (standard formula) that there would be expected to be 106 primary school age pupils and 74 secondary school aged pupils. The modal trips set out in table 2.1 include school journeys between the site and various locations using 3 routes between the site and common destinations. What is not clear from this table is how the expected pupil numbers were acquired, and whether there would in fact be places available at the schools to estimate distribution across the town. For secondary school age pupils the applicant estimation is 47 in total, but only 24 would walk to school locally as the figures are based on 53% who would walk between 1 and 2 miles. The secondary school is 1 mile from the centre of the site which would suggest 85% would walk. Escorted primary school pupils would presumably include some return trips within the same peak period on the same route which is not accounted for in the table.

4) The purpose of the table is to predict the pedestrian demand on the route using Rocks Road, but this doesn't consider other users on this route during the same periods. Concerns have been previously expressed on sections between the Church Street junction and The Drive where the footway is narrow and where pedestrians may be forced to step into the carriageway when faced with opposing travellers who may be with small children or elderly for example. By stating that an additional 32 pedestrians would require access along Church Street does not set out how the existing demand would be compounded by the anticipated increase in demand given that this route accommodates a wide catchment already. There remains concern that within a constrained section of the footway network there is expected to be concentrations of pedestrian movement during peak periods which may result in highway safety issues. It has been assumed that active travel flows are tidal, and perhaps to and from the site they may be, but otherwise, tidal movements from other origins/destinations requiring this route would also have a need to be considered.
5) Two new bus stops adj to The Drive would require a safe crossing provision.

PRoWs

Amendments have been proposed to improve and enhance the Public Rights of Way 3a/3b.

1) The proposal now retains the historic steps at footpath 3a, due to consultation comments made previously and redresses them to an improved standard. This improvement does not necessarily provide a more accessible route from the site as it would be restricted to persons more mobile and cannot accommodate wheel assisted means such as wheelchairs, prams/buggies. Therefore, the route 3a-3b is limited in its ability to direct active travel to and from the town centre area. Resurfacing proposed on routes could be agreed as part of a s278 agreement to consider the best options for surfaces. It is noted that the Rights of Way Team have recommended HDM as a surfacing option, but these are likely to vary depending on the existing conditions such as gradients, root heave and proximity to drainage areas. Plan 104 rev C suggests lighting(1) which may not be welcomed where they are close to rear gardens of properties, and where some sections are very narrow, the infrastructure to accommodate lighting would consume widths. It is unclear where widening of footpaths could occur (3). Wayfinding signs/fingerposts would be welcomed, though positions should be highlighted. On the plan, there is a section of footpath Between Hunters Way and The Drive which is already adopted, highlighted as unmade, though any identified improvements required to this would be beneficial.

Shared **cycle/footway A22**

1) Revisions have been provided along the A22 section entailing verge separation widths and path widths, these are generally accepted though the narrowed short section may require a departure from standards (LTN1/20). Facilities at the Bell Farm Road section do not

include crossings to Bell Lane at the roundabout for pedestrians or cyclists and the footway widening to a shared cycleway along the boundary with Tesco will require the removal of highway trees (which may not be supported), relocation of signage and lighting columns. This is not to say that active provisions cannot be enhanced here but needs to consider the trees root systems can be protected. Signage and lighting could be relocated in my view subject to detailed design. Upgrade of the pelican crossing to a toucan crossing would require the wider footway on the north side to be achievable. Town Centre cycle parking provision to High Street visitors would allow cycling as a connection and to have a safe place for short term parking.

GENERAL
Walking options in general from the site using routes to Church Street, even with the proposed improvements are far from ideal to encourage this mode, which should be the most available option to most. Combination of length of journeys and substandard quality of the routes cannot support Downlands Farm as a sustainable site to accommodate travel to the town centre on foot on a regular basis. The proposed crossing on London Road is of general benefit to the local area for connection to schools/leisure centre. Does this have a RSA to support this inclusion.

Cycling on Rocks Road and Church Street would be limited to confident cyclists given the high vehicle volumes and already narrow sections and restricted forward visibility. This view is unchanged even though Snatts Road has been demonstrated to be a cyclable route. Though ongoing journeys on London Road where the speed limit is 40mph for 250m towards the High Street, before it changes to 30mph limit. Routes through North Row, Hughes Way and Norfolk Way require rider dismount as sections are footpaths.

B) Vehicular Access

Site Access A22

1) The roundabout proposal has been amended to be positioned further eastwards into the site, requiring realignment of the A22. A further RSA should be provided to support this revised design as deflection is different and swept path drawings are required; to include the proximity to the NB lay-by.
2) Street lighting at this access provision would ned to be conducive to its operation as a visible access as well as respecting the landscape ecology in the vicinity. The lighting currently is identified as being dimmed after 10pm, and this dimming may compromise the junction, whereas currently with no junction it would not.

Emergency Access

1) The position is the only point this access could go on grounds that it is surrounded by ancient woodland. Agreed that there is unlikely risk of shunts though it should be ensured that an appropriate radius for entry is available for approaching vehicles at emergency speeds. Also, markings on the layby should be provided to ensure that the access and the area required for turning remains unobstructed, when layby is used by resting drivers. This element of the site cannot be used as a regular vehicle route by vehicles such as buses due to ecological constraints (ancient woodland).

Bus Transport provision

1) Infrastructure proposals include enhancements to existing stops on Manor Way and The Drive; relocation of the bus stop and raised kerbing on London Road (nr Southview Rd); new stops on Church Street. All are subject to the outcome of a RSA1 which would determine the acceptance in principle.
2) Bus services – a bus strategy is under discussion with the Passenger Transport team. This involves adapting the existing service 31 (Cuckfield to Uckfield via Maresfield), which would need to be supplemented with the Community bus offered by the applicant, the details of which require business case acceptance to ensure that it can integrate wider than the proposed development site.

It is considered that even with the infrastructure mitigation proposed being achievable, the site is standalone and detached from the town and does not form linkage or any cohesive continuity to the urban form to relate in transport terms. There are capacity issues in the town centre relating to traffic impact which have been assumed to be acceptable.

It remains that the Highway Authority retains objection to:

i) **the means of access (roundabout) based on details being incomplete;**
ii) **Snatts Road/Rocks Rd cycle/footway link in terms of highway safety**
iii) **Church Street proposals in terms of inconsistent standards to support growth of active travel modes/users**
iv) **Highway impact on town centre**
v) **Stand alone development, detached from urban linkages to enable user friendly and secure connections.**

END

(Original response below)

Executive Summary

As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:

1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.
2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.
3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.
4) Highway impact on the town centre roads has not been assessed
5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities

Response

This application seeks planning consent for an outline proposal for up to 424 dwellings to include details for access and accessibility (24.7ha); and a detailed proposal for a SANG with associated parking provision (18.1ha).

For the outline application, the submission seeks approval for 'access' only. The remainder of matters would be addressed at reserved matters stage (layout, appearance, landscaping and scale). Pre-application stage discussions with the Highway Authority involved agreement of the scope for the Transport Assessment and modelling provision required for this site with 3 other major Uckfield sites being considered ahead of Wealden Local Plan preparation.

The access matters relating to this application are:

- Policy and Planning History
- Site and location
- access/Accessibility for non-car users
- Impact of development traffic on the highway network
- Transport modelling
- Parking and servicing
- Travel Plan

1. Policy & Planning History

1.1 Core Strategy Local Plan adopted February 2013

This document is considered out of date (Wealden Local Plan -Direction of Travel Document). The allocation of 1000 dwellings within that have been met through planning consent at Ridgewood Farm. This site has not been allocated in this document or local plans preceding it. The emerging local plan is in its early stages and publishing of the Reg 18 consultation is imminent.

1.2 History

WD/2006/2855 – Residential development for 750 dwellings, 2000sqm B1/B8 uses, village centre, primary school, community hall, retail facilities. Refused 22/07/2007, dismissed at appeal 24/02/2009 including significant highway concerns relating to constrained accessibility by non-motorised users between the site and local amenities and consequential impact within the town centre.

2. Site and Location

This application site is currently agricultural/open land with direct access from Snatts Road, from a driveway serving the farmland, Swallow Barn, Partridge's Oast and Oast Cottage. In terms of location, the land subject of both elements of this hybrid application is between A22 Uckfield bypass to the northwest and Snatts Road to the southeast. The A22 is part of the major highway network and Snatts Road is an unclassified road serving land uses including residential, a cemetery aside from the current use (agricultural and open space used for recreational leisure walking).

Snatts Road – An unclassified road, no data provided to indicate the flows or vehicle speeds. Speed limit is derestricted, and footways are absent, and verges are narrow and generally impassable until one reaches Downland Copse link when a footway is available on the south side approximately 1m wide up to London Road. The carriageway width is variable between 4.3m and 5.5m

A22 Uckfield Bypass is a strategic route linking to the A26 and A272 and providing connections to Lewes, Haywards Heath, Eastbourne and Crowborough. It currently carries an average of 23,830 vehicles on a daily basis (2019 Annual Average Daily Trips-AADT). Speeds are derestricted in the vicinity of the site. The character and design of the A22 is a motor vehicle dominated major route.

Uckfield is the closest commercial centre from the site and is approximately 1.8km from a central position of the site. It provides a good selection of local shops and amenities. However, to reach these by foot or cycle from the site is posed with challenges and constraints. Rocks Park School is the closest primary school approximately 1.8km walk and Uckfield College and leisure centre 2km away.

Uckfield Town centre is located to the southeast of the site and provides a choice of travel options by rail and/or bus.

3. Access - RESIDENTIAL

3.1 Vehicular access

Vehicular access is proposed at 2 points onto the A22 Uckfield Bypass. The main access into the site is a full roundabout and the secondary access is shown as an emergency/bus route. The position of the roundabout is approximately 1.2km north of Copwood Roundabout and 100m from the boundary with Lake Wood. The emergency access is approximately 500m south of Black Down Roundabout. The distance between the access points is also approximately 500m.

In principle, the access points appropriate for the A22, though several concerns are raised:

1) An emergency access onto the A22 is unlikely to be practical if for any reason there is a RTC on the A22 resulting in its closure. It would mean that the site would not be accessible as both access points would be closed to vehicle movement. Urgent journeys from the site by vehicle would be difficult in the event of an accident or persons needing medical attention for example.
2) The emergency access is only accessed by vehicles approaching from the north due to its position within a lay-by. For emergency vehicles needing to reach the site from the south, they would use the main access.
3) Its use as a bus access would require the bus to approach from the north via Budletts Roundabout, which would be a convoluted route for any bus service to serve the site, having to drive out of town to reach the site and to then route peripherally back into the town. The efficiency of a service that would have its main journey on the Bypass is questioned. The County Passenger Transport Team have provided comments on this aspect.
4) The main access additionally provides cycle and pedestrian access. The proposed roundabout is shown to DMRB standards.
5) The accesses have been subject of a RSA1 and a designer's response has been provided. The County Traffic and Safety Team have provided comments on this aspect.

Additional comments: the RSA requires vegetation to be cut back/removed at emergency access point to ensure the sightlines are available in perpetuity, especially if the route would be taken on by buses.

The roundabout access has been relocated further east into the site to avoid embankment works on westerns side of the A22. It is noted that the deflection on the north bound access has been revised and an updated RSA1 should be provided, along with vehicle tracking.

3.2 Active user Accessibility

Pedestrian access provision for the site comprises of several existing and proposed links. A Non-motorised user audit was requested at pre-application stage to evaluate the existing conditions to identify strengths, weaknesses and opportunities in the areas surrounding the site. The applicant considers that a 2km distance is acceptable to reach local amenities, equivalent of 25-minute walk. From identifying the routes to the town centre for employment and transport connections and educational establishments nearby (destinations likely to be required on a daily basis), although these would appear to have proximity to the site on plan, on the ground some of the routes are considered to be inconveniently long, constrained, or difficult in terms of gradient and surface.

- Between the town centre and the site, the pedestrian routes identified in the NMU audit are:

W1a – using Snatts Road to connect to an adopted path and then PRoW, one encounters a steeply stepped section and narrow unsurfaced and unlit alleyways until reaching Pudding Cake Lane, onto Church Lane and up to the junction with High Street. The route is underestimated by the applicant as 1.3km, and has been measured as 1.6km. The closest bus stop when using this route is 1.25km (The Drive). The route is unlikely to be regularly used after dark and has an incline which would not be appropriate for less mobile users. The alleys are narrow and are not overlooked and do not consistent alignment or forward visibility to feel secure. During wet weather the surface is unlikely to be usable. Pudding Cake Lane is a shared surface with vehicles which is narrow and may be difficult when using the lane whilst a vehicle is manoeuvring within it. Church Street has narrow footways with a section that has an elevated section and incline. This route is not suited to less mobile, people wishing to walk side by side (adults with young children), security conscious, bad weather conditions.

W1b uses the initial section of W1a and diverts to Hunters Way and still encounters steps to the south of Downland Copse. From Hunters Way, one can walk along good quality adopted footways that are lit up to the junction with The Drive/Rocks Road, where after the footways narrow as stated earlier that have little scope for improvement between The Drive and High Street. The narrow footways pose issues when there is an increase in pedestrian activity and there are pedestrians walking in opposing directions, wishing to pass one another. This may cause stepping out into the carriageway, increasing risk of collision or tripping. This route has been measured as 1.8km from the centre of the site.

W1c the initial section of this route is proposed form the site through a dwelling known as Chicory Cottage acquired by the applicant. This crosses the Snatts Road junction with Rocks Road and connects to the existing footway network which then becomes Church Street with the constraints highlighted in earlier routes. This route is measured as 1.35km.

W1d – along the A22 and Bellfarm Road, which has lighting but vehicle dominated with a route measured in excess of 2.7km. This requires a footway/cycleway installation as there is not current provision. This route is not convivial and is a long one-way route and so the prospect of a return journey would be unattractive, particularly on foot.

W1e – is a route that starts as W1c and routes through Rocks Park Road towards Bellfarm Road through estate roads until reaching a short section of adopted footpath between 12a and 14 Scarlett Way and Bellfarm Road. Between the site and junction with Rocks Park Road, Rocks Road is partly derestricted and the footway has seen vegetation overgrown into it making it narrow, and potentially having a narrowing effect adjacent for pedestrians walking adjacent to vehicles travelling at speed. The entire route is adopted and lit. This is the best route towards the town centre in terms of quality subject to improvements to the network between the site and Rocks Park Road, but is lengthy and indirect.

Routes to the High Street are acceptable only through the modern housing estates where there are good quality footways that are lit and have good surveillance. Church Street is part of the historic part of the town centre that is not built to modern standards and has limited scope for improvement.

- Between the railway station and the site, the pedestrian routes identified in the NMU audit are:

The routes highlighted by the applicant are extensions of the above routes which are through High Street and Bell Farm Road which are appropriately designed to accommodate pedestrians. However, the distances to the railway station are in excess of 2km, given that the distance from Church Street junction to the station is ~0.5km. This exceeds the generally accepted walking distance of 2km as set out in guidance document IHT Providing for Journeys on Foot.

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

- Between the Bellbrook Industrial Estate and Meads Medical Centre and the site, the pedestrian routes identified in the NMU audit are:

The routes highlighted include A22 route form the main site access and route through the Rocks Park estate. These routes are 2km distant. For trips to the medical centre (patients), when poorly one is not likely to be walking or cycling and these are likely to be car borne trips as buses do not reach this part of the town. Journeys to the industrial estate are likely to be employment related and as referred earlier, this route is not convivial and would exceed 2km.

- Between Uckfield College/Leisure Centre and the site, the pedestrian routes identified in the NMU audit are:

W4a – the route is indirect and measures slightly in excess of 2km. There is absence of a crossing point on London Road to connect to the south side of the High Street. The route is walkable and generally of good walking surface with lighting and surveillance but has a minimum distance of 2km which is the preferred maximum. For the secondary school, a route requires a safe crossing point on London Road.

W4b – This route is equally indirect and also is 2km+ with a combination of unlit sections of alleyway and steep steps. Again London Road has absence of a crossing

W4c – 2.25km distance on more of a formal route with lighting but has gradients which may be challenging for some.

W4d – approximately 1.9km using Church Street and Rocks Road, with constraints as described earlier.

Summary of pedestrian routes are that all local amenities are ~2km away and routes are not entirely suitable for all users, or direct. To walk into town from the site is around 30 minutes each way which would not be a method of travel agreeable for most residents on a daily basis. Furthermore, journeys on foot for primary aged children or families are posed with challenges such as distances, gradients, and narrow footways.

Cycle Routes Audit

Route C1a: Snatts Road/The Drive/Church Street – it is questioned why the route does not use Snatts Road south section which would be a much shorter route to reach Church Street than via The Drive. It is noted that Snatts Road has derestricted speeds, and the applicant has not provided a speed survey to demonstrate acceptability of it use as either a pedestrian route or cycle route. Noted that the route is downhill towards town and would be uphill on the return journey which may not be as attractive.
Route C1b: Rocks Road/Church Street – this route from the site uses the section of the site currently Chicory Cottage where a designed cycle ramped route is proposed. This leads to Rocks

Road which is derestricted where it joins at the junction with Snatts Road. En-route towards the town centre, just north of Hunters Way, the speed limit becomes 30 mph, though speed surveys do not demonstrate that actual speeds are contained to justify its suitability for cycle users. Church Street has a 20mph limit just south of The Drive towards the town centre. Church Street is narrow and when both lanes are occupied, there is no overtaking provision. The section of Rocks Road is also narrow, unlit and with derestricted speeds.

Route C1c: A22/Bellfarm Road – this is a longer route, with suitable gradient, but shared with general traffic. The A22 is designed for motorised traffic travelling at speed and so the A22 is not suitable for cyclists. The applicant is proposing measures to accommodate cyclists, discussed later in this report.

Route C1d: Rocks Road/Rocks Park Road towards Bellfarm Road and High Street – this is the same route as C1b, with a restricted section between Scarletts Close and Bellfarm Rd.

Routes to the railway station, medical centre (Meads) and Bellbrook are the same routes as for pedestrians. Dismounting is necessary in alleys, and a cycle route is available to travel west along Bellfarm Rd.

Routes to the College and Leisure centre are along the same routes as shown for pedestrians.

The routes are similar as for pedestrians, but cycling cannot replace walking journeys for reasons relating to ability, confidence or when adults are accompanying small children. All the routes have inclines and indirectness which may not encourage cycling though from routes listed, sections of them are suitable. When considering the entire routes, they may well be appropriate for active single user journeys but limited to those more confident as there are no traffic free routes.

The scoring system used to assess the routes is flawed as there is inclusion within the methodology to score the internal route (yet unsubstantiated as the internal layout is not part of the outline application) which brings the average score up. The assessment should be how the site can be connected externally.

The walking audit scores are therefore lower than stated and distances that are in fact marginally longer. The ~2km routes which would on average take 25-30mins (4-5kph average walking speed), are likely to take longer due to inclines, and crossing roads.

The applicant has identified the weaknesses in both the pedestrian and cycle routes and offered mitigation measures.

- Provision of new pedestrian and/or cycle infrastructure to connect the site to existing networks (e.g. along Rocks Road, Snatts Road and the proposed vehicular access off the A22) where there is no existing provision; Comments: this proposal was put forward for the previous proposal which was dismissed at appeal. The Inspector considered this route lengthy, indirect and unattractive. This factor remains that for a route that would link to the town and nowhere else, it transits around the town to reach it, alongside potentially heavy and fast-moving traffic levels including HGVs and noise. The highway works on Bellfarm Road have not been taken into account the accessibility improvements secured as part of Gridserve development on the west side of the Copwood Roundabout.
- Installation of appropriate crossing facilities for pedestrians and/or cyclists on Rocks Road (to aid connections to the town, railway station, and industrial estate), Snatts Road (to link to existing footways/paths), London Road (to assist movements towards Uckfield college and leisure centre) and Bellfarm Road (to enhance provision to the industrial estate). Comments: it is noted that there is a proposed speed limit change to extend the 30mph at the point of a proposed crossing point. No speed survey data to justify the change in speed limit nor proposals to alter the visual appearance and character of this section of Rocks Rd other than widening of the footway and new footway close to the junction of Snatts Road.
- Replacement of existing steps at the end of Downland Copse (along footpath 3a) and surfacing of public footpath between steps and Hunters Way; Comments: The Rights of Way Team have provided comments which are against the removal of the steps. These comments are provided later in this report.
- Widening existing pedestrian/cycle routes where currently not suitable for intended user groups (e.g. along sections of Rocks Road, Church Street, and the existing foot/cycle path

along Bellfarm Road); Comments: ESCC Traffic and Safety Team have provided comments which are provided later in this report
- Installing measures to reduce vehicle speeds on the approach to the town and enhance pedestrian and cycle priority at junctions; Comments: ESCC Traffic and Safety Team have provided comments which are provided later in this report
- Installation of suitable signage along existing public footpaths to core destinations; Comments: details of signage has not been provided
- Ensuring appropriate lighting of any new connections/routes. Comments: Suitability of lighting for highway safety and security within the greener areas of the site are dependent on ecology comments, which may define whether some routes are in fact reliable active links to the site.

ESCC PRoW comments regarding the pedestrian improvements:

I am limiting my comments here to the unadopted sections of footpath proposed for improvement, i.e. the section marked A-B-C-D-E on the attached plan between Downlands Copse and the footpath connecting to The Mount.

A-B (steps)
I have significant concerns about the proposal to remove the existing steps. From the photographs, these are sandstone steps, partially hewn in to the outcrop of sandstone bedrock. Aside from the practical challenge of significantly remodelling the steps, I imagine their removal would meet with strong opposition locally and from the Town Council. I also assume that the Planning Conservation Officer and High Weald AONB Unit would oppose any fundamental interference with to the sandstone outcrop. There might also be ecology considerations. Therefore it is impractical or desirable to remove the existing steps and I think the most that can be done to improve them is to re-dress them with stone or concrete slabs of suitable character.

B-C (woodland path)
I am not convinced that the steps need to be extended. The wooded path is a continuous slope, and I don't think extending the steps will make any significant improvement.

A path of rural construction with compacted stone and timber edges is proposed. I do not think that will be a suitable construction unfortunately, because of the steep incline. We would also not want timber edges, as these would have a relatively short lifespan and limit the lifespan of the path.

The gradient will require a bound path of some kind. It is very clear from the large water catchment at the bottom of this section of path where it meets the rear of the properties on Hunters Way (point C) that the path carries a lot of water. An unbound surface would inevitable scour quickly and material would be washed in to the water catchment, causing potential blockages and an ongoing maintenance issue.

So, an alternative surface will need to be considered. A tarmac path would be not greatly in keeping with the character of the wood. An alternative option may be a stone surface comprising cement, e.g. this product Hydraulically Bound Materials (HBM) | Roadways (road-ways.co.uk).

C-D-E (footpath at rear of Hunters Way)
There is clearly an error on the proposal plan where it labels this section as 'Existing asphalt footpath: Inspect surface condition and repair defects or resurface as required'. This is a narrow section of unsurfaced footpath running between the rear gardens of the properties on Hunters Way and The Mount.

A tarmac surface for this section is likely to be problematic, due both to the width and likely root heave from the row of trees along the boundary of the properties on The Mount. I would suggest that this section could also be improved with a semi bound surface, if that is the choice for the woodland path (B-C). Although this section is considerably less steep, a rural surface of compacted stone may be sufficient. However, again, we would not want timber edging. For a short section at point D edging may be unavoidable, where the path has a severe camber and is badly affected by tree roots.

E onwards (adopted but partially unmade footpath connecting Hunters Way to The Drive)
From point E the path is technically adopted, but only has a partially made stone surface of around half a metre width to where it joins a tarmac path at the junction with the footpath

leading to The Mount. The improvements to this section and the continuation will need to be considered by and agreed with Transport Development Control.

A Safety Audit (stage 1) has been commissioned for the off-site highway works and comments from the Traffic and Safety Team have been provided in response to the proposals:

Site access road (north of Bellfarm) 2001061-101A

- Drawing indicates a 4-metre wide central island at hop over. There does not appear to be the available road width to accommodate. Is there a technical plan as the 4m wide lanes, and 3m shared footway/cycleway do not appear to scale.
- Reducing street lighting on south eastern arm of roundabout (approach from site to A22) is not acceptable, ensure feature is adequately lit in line with standards
- No forward visibility splay provided for access road to roundabout. This may be detrimentally impacted by tree planting at the verge and centre islands at the dormouse hop over.
- Proximity of hop over to roundabout is not provided or extent of planting.
- Unlit feature in centre of carriageway liable to be struck/ issues with disorientated drivers exiting lit roundabout into darkness at a point where an unlit obstruction (island) is present in the road. Flush or reduced height kerbs may lead to vehicles mounting the island/ potentially striking the trees proposed.
- Proximity of the new access/ roundabout to the northbound layby. There is a safety concern with drivers exiting the roundabout accelerating at a point when drivers in front are quickly decelerating to enter the layby. A left signal may be interpreted as an uncancelled exit signal from the roundabout.
- Very short merge on the exit arms/ high speed road. Potential for side swipes.
- Is there a case for preventing right turns into the north and southbound laybys (with the provision of the additional roundabout)
- The northbound layby should ideally be upgraded to modern standard

Emergency Access Road 2001061-102B

- Risk of shunts vehicles following emergency vehicles may not be expectant of the vehicle ahead of them to turn upon entering the layby. There will be no way to signal this manoeuvre.
- The radius of the access will require a low-speed entry which may not be appropriate for high speeds of emergency vehicles
- It is questioned if there is sufficient length ahead of the barrier for a vehicle to wait.
- Are visibility splays exiting reliant on maintenance of vegetation?
- Signing would need to indicate westbound only on exit.
- Layby should be upgraded to modern standard

A22/Bellfarm Road shared route 2001061-111 to 116 A22

- (As highlighted in the RSA) the horizontal separation between the carriageway and the shared route reduces to 1.5m in places. For a 60mph speed limit, the desirable minimum is 2.5m and absolute minimum is 2m (LTN 1/20). Additional protection is recommended at these points.
- Rocks Road overbridge narrowing (from 3 to 2 metres) over a longer distance than is recommended.
- Various traffic signs located within the highway verge where shared route is proposed, will need to be re-sited/ raised ensuring they remain within the optimum sight range for drivers.
- Bellfarm Road shared route proposals - how do they tie in with the proposals for Gridserve electric charging facility at Copwood Roundabout (see WD/20/1244).
- No provision for westbound cyclists (coming from the High Street) to join the shared route
- Proposed block paved pedestrian crossing infers priority over vehicles and may lead to careless crossing movements. While the new guidance in the highway code says that vehicles should give way to pedestrians waiting to cross at a side road and that pedestrians (that have started crossing) at side roads have priority, pedestrians should still exercise due care and attention.
- Existing proposals for the bus station – A technical design is still being prepared by the County Council as element of the town centre scheme. It is considered that the proposals

offered by the applicant could be considered further once a final design is available, so that an appropriate tie-in can be considered.

- Raised crossing east of the roundabout (at bus station) will need to be adequately lit and appropriate warning provided. This would need to tie-in with the bus station proposals.
- Splitter island north of roundabout will need to be wide enough to accommodate waiting cycles (2m)
- Look at appropriate treatment on all arms of the roundabout (2 arms facilitate pedestrian crossing movements/ 2 do not).
- Footway widening on north-eastern corner of roundabout- ensure that larger vehicles turning north to east can make the turn without encroaching on the widened footway
- Cyclists guided to re-join the carriageway just prior to Bellfarm Lane- issues with conflict in markings (controlled area). Re-joining at conflict point. Look to extend facility east.

Church Street 2001061-134

- Regency Close reduction in junction radii - ensure adequate forward visibility south eastbound (bend in road opposite Belmont Road not obvious on plan). Rear access to stores/ waste collection points are located within Regency Close; vehicle tracking required to ensure larger vehicles can still access/exit safely.
- Priority working at Pudding Cake Lane forward visibility restricted by bend - drivers would be unable to make an informed judgement before negotiating narrowing.
- Approx. 1m wide footway at Pudding Cake Lane- where would a priority working sign be placed without causing an obstruction to pedestrians?
- Narrowing southeast of Pudding Cake Lane places vehicles on the wrong side of the road just before a junction (Belmont Road). A south eastbound driver's visibility into Belmont Road of any approaching traffic is restricted by the church wall.
- The narrowing on both sides currently signed extends between The Drive and Belmont Road making it difficult to provide warning of the build out in the south eastbound carriageway between Pudding Cake Lane and Belmont Road.
- Is the road north west of Pudding Cake Lane wide enough to accommodate queuing vehicles and passing traffic?

Rocks Road 2001061-132

- Widened footway on south side of Rocks Road (northwest of Rocks Park Road) appears to be into the carriageway reducing the effective width of the carriageway. Presently the width (roughly just over 6 metres) allows for centre lines and edge of carriageway markings through this tree covered winding road. If the width is reduced the current road marking arrangement will not be possible.
- There does not appear to be drainage provision upstream of the crossing point northwest of Hunters Way. There does appear to be evidence of ponding (on account of the detritus/ mud collected at the crossing point)- possibility of slips/ falls in wet or icy conditions. Review provision.
- The waiting area on the northeast side of Rocks Road (northwest of Hunters Lane) is not accessible for pedestrians, due to lack of maintenance (see photo). Also, a defect in the road in the pedestrian line, which may lead to a fall.

In addition, the proposed pedestrian/cycle access at the corner of the junction Snatts Road/Rocks Road requires a prominent appearance so that drivers are aware from all approaches of its presence. It is largely wooded and may not be obvious to drivers to expect non-motorised activity given its current rural surroundings. The approach from Rocks Road is likely to require traffic calming to ensure that drivers are travelling at appropriate speeds and awareness of approaching built form. It is likely that a more urban appearance would require continuity from a point west of the active access point, to highlight the environment change to the current defined built up area. The distance over where the 30mph is proposed is largely rural with vegetation dominating the route up to the junction with Hunters Way. It is likely that an engineered solution will be required, given that there is little in the way of frontage development over the ~200m distance.

SUMMARY OF ACCESS/ACCESSIBILITY

There are identified problems associated with the design of the proposed access points and the mitigation measures on the accessible routes which are likely to affect their deliverability and overall effectiveness in serving the site safely and conveniently. It is acknowledged that the rural nature of the site and immediate surroundings, in particular the strong ecological and woodland

features, would likely present conflict in providing the necessary highway and accessibility requirements for this site.

4 Impact of development traffic on the highway network

4.1 Traffic

The proposal is expected to generate vehicular trips on the highway network and the applicant has set these out within the TA. The daily trip rate of 4.376 per dwelling has been presented which is based on samples of sites, 11 in total in edge of town locations for privately owned dwellings. I have reviewed each of the sample sites and these are accepted as a trip rate for this site.

The estimated traffic generation is 1855 trips per day, including 225 in each peak period [0800-0900;1700-1800hrs]. All vehicle trips would be accessing to/from the site via the A22 proposed roundabout. The trips rate indicated is vehicular only and multi modal trips have not been indicated.

Journey to work data form the 2011 census provides information regarding the methods of travel for defined areas. For the Ringles Cross area, the dominant method of travel to work as a main mode is by private car 77%, 10% on foot, 3% bus, 6% train, 1% powered 2 wheeled vehicles, 2% cycle, 1% taxi, 3% passenger in car/van.

6 junctions have been tested for the proposal, using base flows from 2018 forming the Saturn model developed for testing development scenarios in Uckfield for 4 major sites (Horstedpond Farm, Bird In Eye North and South, Downland Farm). These are:

1) Site access roundabout junction with the A22;
2) A22 roundabout junction with Bell Farm Road (Copwood roundabout);
3) A22 roundabout junction with A26 (Black Down roundabout);
4) A26 roundabout junction with A272 (Budletts roundabout);
5) A22 roundabout junction with A272 (Batts Bridge roundabout);
6) A22 roundabout junction with A26 (Little Horsted roundabout); and
7) A22 Ridgewood Farm access

The impact from the development, using ARCADY software, considers the ratio of flow to capacity during the busiest periods (peak hours 0800-0900 and 1700-1800hrs) .

1) **Site access roundabout junction with the A22** – operates within theoretical capacity with A22 north arm reaching close to practical capacity (0.82) in the PM when forecast to 2039.
2) **A22 roundabout junction with Bell Farm Road (Copwood roundabout)** – this is proposed to have 4 arms, with the GRIDSERVE committed development which has commenced on site. The testing only considers 3 arms which happen to operate within capacity in 2039 with the development. As the GRIDSERVE development has not been included, this is an incomplete test. This roundabout is expected to have capacity improvement works as part of the secured package of works for Ridgewood Farm committed development. It is not clear if these improvements have been included in the modelling.
3) **A22 roundabout junction with A26 (Black Down roundabout)** – this junction has capacity constraints on A26 arm and A22 west arm in AM; and A22 west arm in the PM without the development in 2039. When adding the development traffic, although there is very little difference in term of the queue lengths on all arms, the analysis indicates that this junction has capacity problem on the A22 west looking forward to 2039 with and without the development.
4) **A26 roundabout junction with A272 (Budletts roundabout)** – without development the London road west (Maresfield) arm is expected to reach above practical capacity with queues of 10 PCUs in 2039 in the PM peak. With the development the same arm sees the queues increase to 14 PCUs. This arm would reach close to theoretical capacity.
5) **A22 roundabout junction with A272 (Batts Bridge roundabout) –** in both scenarios with and without development 2039, this roundabout operates without any capacity stress.
6) **A22 roundabout junction with A26 (Little Horsted roundabout) –** in both scenarios with and without development 2039, this roundabout operates without any capacity stress. This roundabout is expected to have capacity improvement works as part of the secured package of works for Ridgewood Farm committed development. It is not clear if these improvements have been included in the modelling.

7) **A22 Ridgewood Farm Access -** in both scenarios with and without development 2039, this roundabout operates without any capacity stress.

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

Strategic modelling has been initiated using SATURN software to account for other major sites that had been promoted last year, of which 2 of these have now been submitted as planning applications, yet undetermined.

Although the modelling work has to an extent been carried out, the modelling has not been validated, nor have any mitigation solutions been presented to address capacity issues that would arise as a result. Wealden District Council are due to release their Regulation 18 document for the first stage publication of the Local Plan consultation process. It is anticipated that the release of identified sites will firm the strategic modelling for Uckfield and highlight areas requiring mitigation and junction improvements to accommodate anticipated future growth.

At this stage, as the strategic modelling is incomplete, this application is effectively premature to the current position of the local plan. However, from the initial data that has been released to the major sites' proponents, the application site has been modelled, though it is understood that there have been problems identified within it and so requiring further review.

Comments of the proposed mitigation for the strategic modelling using all 4 of the major sites has highlighted 2 roundabouts that will require mitigation – Blackdown and Budletts. Blackdown roundabout has a known highway safety record which required the hatched lane on the north arm due to a camber posing hazards to HGVs. It is noted that the mitigation proposed by the applicant removes this hatching to open up two approach lanes to improve capacity. This is not accepted as a viable mitigation measure.

At this stage, the modelling work to date accounting for this site only and committed up to 2039 does not consider the level of traffic that would enter the highway network within the town centre that is already at capacity. As these roads (High Street, Bell Lane, Newtown) already see significant delays, it is most likely that site related traffic will add more activity onto these routes, further exacerbating delays on the network.

Multi user trips have not been provided, nor are any demand flow diagrams to demonstrate the impact of the proposal (housing element) and how it affects the town centre.

SUMMARY OF TRAFFIC IMPACT

Without a doubt there would be traffic demands associated with this site which would be required to access the town and town centre along roads currently experiencing long queues and congestion. The sustainable mitigation measures (for active travel) have been identified with highway safety problems and the deliverability of these are not certain, which puts further pressure onto the road network for journeys to and from Uckfield town centre. Furthermore, the A22 roundabouts mitigation identified have constraints. In light of the modelling to date, this has not been completed to a stage that has been finalised/validated, nor have mitigation schemes to overcome the future local plan sites impact been considered in full.

5 Parking and servicing

As the outline element of the application seeks consent for access only, parking and servicing for the housing element of the application is not necessary but would be part of a future reserved matters application, should outline consent succeed. Swept path plans have been shown for the access which shows a 16.5m long articulated vehicle traversing the proposed roundabout. Car and cycle parking is required to meet the County parking standards as set out in the car parking demand calculator and cycle parking standards.

6 Travel Plan

A framework travel plan has been provided as required by NPPF and County Council policy guidance.

6.1 Public transport – Buses

The closest bus stops are at The Drive for services 248 and 249. These are community services running only on Mondays, Wednesdays and Fridays and do not cover standard commuting times. The more regular services 29, 31/31A are more frequent and cover commuting periods but are available further away, close to the junction Snatts Road/London Road. It is understood that as a result of distant existing bus stop provision and access to them having constraints, that the applicant has proposed a site-specific bus solution. Comments from the County Passenger Transport Team are as follows:

General Points

- *There is a significant concern that the site would generate a very high proportion of car based journeys. Car drivers will have easy access to the A22.*
- *The site location is very poor in terms of sustainable public transport access, with no service provision in the area. Pedestrian connectivity appears to be proposed in an easterly direction to Uckfield High Street, a distance of some 900 metres to the site boundary and in excess of 1300 metres to the north west part of the site. The pedestrian route that appears to be proposed, using sections of Right of Way south of Snatts Road, also has sections with steps. Not only do these walking routes need to accessible and safe (including for the needs of school pupils – see below) they should be attractive so to encourage active travel.*
- *In the absence of a bus gate being provided off Snatts Road and/or Rocks Road, the only bus access between Uckfield town centre and the development would be via the Uckfield A22 bypass and Bellfarm Road. This would require the establishment of a new bus route.*
- *The consultant's suggestion that as much as one third of peak time journey movements and one quarter at other times, between the development and Uckfield town centre will be transferred to the community bus service, is not credible.*

School Transport

- *It should be noted that school pupils would be unlikely to be entitled to free school transport, the pre-requisite being the nearest available school for pupils under 11s is 2 miles and the nearest school for pupils over 11s is 3 miles. This assumes the off-site works proposed are put in place to ensure safe pedestrian routes between the site and the schools, noting in particular the current unsuitability of Rocks Road as a walking route.*

- *With up to 424 homes there will be significant home to transport travel movements which, unless the pedestrian/cycling routes are extremely attractive, will need to be provided for by public transport to avoid high car trip generation. This bus travel demand would completely overwhelm the school transport solution envisaged by the consultant, with a route intended to serve two primary schools and the secondary school, which relies on the use of two community bus vehicles with only 16 seats each. A further obstacle is that the morning start times of the three schools all fall within the time range of 08:45 to 0900, and the afternoon finishing times between 15:05 and 15:35. This means that there is little or no scope to alleviate peak loadings by 'double running' the minibuses as, particularly in the morning peak, all pupils would have travel at the same period to arrive at school on time. In any event, this would leave no space on the minibuses for other peak time service users.*
- *It should be noted that access to Holy Cross School is particularly difficult to access by vehicle, the proposal for the community minibus to set down and pick up in the nearby Wealden District Council car park would be subject to the agreement of the District Council and dedicated safe dropping off/picking up space being provided.*

1) The consultant should be asked to estimate the number of school pupils from the new development, split by school. In addition, they should demonstrate the modal split of journeys, including the numbers to be catered for on each minibus journey. The consultant should also be asked to confirm the number of journeys by bus users, excluding school pupils, in the morning peak period, afternoon peak period and inter-peak.

- *Subject to the consultant's response to (1), it is unlikely that the size of vehicles proposed, nor the frequency, will be able to meet the likely level of school bus transport demand. Providing larger capacity buses would incur significant expense. The cost of providing a full size bus, for a stand-alone Uckfield College school journey both morning and afternoon (noting that a full size bus would struggle, is currently in the region of £49,400. This would be for a bus with approximately 38 seats, and room for approximately 22 standing passengers. Assuming 50 pupils paying £2 each for a return trip per day (children are charged half fare) this would generate fares income of only £19,000 per annum, leaving a shortfall of £30,400 per annum.*

- *Providing a larger bus (or buses) to cater for demand for school travel would also require the route, turning arrangements and bus stops within the new development that is suitable for such vehicles (see below).*

- *Likely Outcome – It will not be feasible to provide additional transport provision to meet the needs of all school pupils. This though would result in a very serious operational risk that any bus route serving the development, provided for other purposes such as access to employment, would be swamped by school pupils. Only providing partially for school transport demand, ie. risking leaving some pupils unable to board the service, would be untenable.*

2) The school access issues might be significantly reduced if a new primary school provision was part of the development proposal. Has the view of our Childrens Services Department been sought, or are they content with existing primary school provision in the area and access to them?

Public Transport Provision

- *Foremost, the County Council would expect an outcomes based solution which maximises sustainable travel modes, including bus use, over car use. There is a need to integrate service provision with the wider public transport network, which is an expectation in the Government's National Bus Strategy. This is important for onwards bus journeys, including to Eastbourne, Brighton, Lewes, Haywards Heath and Tunbridge Wells, in terms of information provision, timetable coordination and ticketing.*

- *The East Sussex Bus Service Improvement Plan (BSIP) was submitted to Government in October 2021 as part of the National Bus Strategy process. Bus Service Improvement Plan for East Sussex County Council | East Sussex County Council . Jointly developed by East Sussex County Council and the bus operators in East Sussex, the BSIP proposes that bus services in the Uckfield are provided by way of Digital Demand Responsive Transport (DDRT), using minibuses. This is not specified in detail, but could range from a semi-flexible bus service (with only some route sections timetabled) to a fully flexible service (where all journeys would only run if pre-booked by passengers). Bookings would be made either on-line through an app or by telephone. This approach would not preclude the provision of wholly timetabled journeys, say at busier times of the day. Importantly, the service provision would also be available evenings and weekends. The DDRT service would be integrated with other longer distance bus routes serving Uckfield, as well as the Uckfield rail service, in line with the principles of the National Bus Strategy. The DDRT service would be dependent upon third party funding from development contributions though, subject to passenger use, we would expect over time the service to be nearing commercial viability.*

- *Additionally, with other new developments in the Uckfield area (eg. Horstedpond Farm and Bird in Eye North and South), there is the need for a common approach to establishing new bus service provision by making the most effective use of vehicle resources and bus routing. Such an approach is vital to maximise the prospect of longer term bus service viability and to ensure public transport connectivity.*

- *The above does not preclude the potential for developing and improving existing 'fixed route' bus services. In this context a potential solution, or possibly in tandem with DDRT, would be to revise current bus service 31. This runs between Uckfield bus station, Maresfield, Ashdown Business Park and Haywards Heath, and could instead run via Downlands Farm and Bellfarm Road instead of via Ringles Cross. Its current frequency is hourly, Monday to Saturday only, so this would need to be augmented.*

Consultant's Proposal for a Community Bus Service

- *The consultant has put forward community bus based solution. There are significant concerns in relation to their proposal, not least that it appears not to take into consideration many of the requirements identified above. If a community bus based solution were established, it would need to be available to the public under a Section 22 Permit arrangement, not Section 19. The operational costings provided appear to underestimate the funding required.*

- *The proposal's quoted contract hire estimate of £5,000 per annum per vehicle, plus £5,000 per vehicle for insurance, does not appear to sufficiently allow for contract hire and maintenance costs. There would also need to be robust spare vehicle back-up arrangements in place to cover for breakdowns and accident repairs. ESCC's experience is the cost of a 5 year contract hire of a coach built fully accessible 15 seat community minibus with tail lift, 10 week safety inspections, all maintenance, MOT, insurance will be around £18,000 per annum, so £36,000 for 2 vehicles.*

- *Overheads relating to secure parking of vehicles when not in service, including overnight, have not been included. Note that there would not be space at Uckfield bus station for such parking.*

- *The consultant envisages that an agreement will be reach 'to use a local private hire firm' to provide qualified paid drivers for the service. ESCC has concerns that such an arrangement is not compatible with the terms Community Bus Permits. Whilst the use of paid drivers is not precluded in terms of Community Bus operation, specialised legal advice would need to be obtained to ensure that a commercial agreement to use paid drivers from a separate local private hire firm allowable.*

- *The management and governance of a Community Bus operation should not be under-estimated, particularly for a new start-up arrangement. If the service provision was to be provided by way of Community Bus arrangement, then existing community transport operators are likely to be interested in taking this on. Community Transport for the Lewes Area already operate services in the Uckfield area, including Section 22 public routes 248 and 249 under contract to ESCC. East Surrey Rural Community Transport Partnership may also be interested, as they have a base in Uckfield running 4 school services under contract to ESCC.*

- *The consultant has budgeted £30,000 per annum for 'operator/staff' costs without providing further detail. This seems wholly inadequate. Based on the proposed weekday operating hours spanning 06:30 to 19:30 Mondays to Fridays (13 hours) plus say a further 5 hours for the second vehicle's peak time and school route operation, this indicates a very minimum of 18 paid drivers' hours on weekdays. An hourly service on Saturdays between say 07:30 and 18:30 would be a minimum of 11 paid hours. Assuming a cost of £13 per hour, including an allowance for on-costs, the cost per annum would be in the region of the following: Weekdays: (18 hours x 253 days x £14 = £63,756) + Saturdays: (11 hours x 52 days x £14 = £8,008). Total: £71,764 per annum.*

- *ESCC's requirement for an evening and Sunday/Bank Holiday service (see below) would further add the following staff costs: Weekdays: (3.5 hours x 253 days x £14 = £12,397) + Saturdays (4.5 hours x 52 days x £14 = £3,276) + Sundays and Bank Holidays (14 hours x 58 days £14 = £11,368). Total: £27,041 per annum.*

- *The indicative routes of the core bus service suggested by the consultant would appear to meet the majority of local travel demand, with the notable exception being that they do not appear to directly serve the bus station. There is also some demand to Uckfield Community Hospital, which would not be served by the proposed community bus service. There is no bus stop provision in Uckfield railway station forecourt so this would need to be secured if the minibus service is to call there.*

- *ESCC estimates the off-peak core bus service routing would take approximately 16 minutes to complete, without including the deviation to/from Uckfield railway station. It would be clearly very poor user of driver and vehicle resources if they were only being used for this period of time in each hour. Whilst it would be desirable to use this*

available time to increase the off peak service frequency to half-hourly, this would still result in the minibus standing at Downlands Farm for 2 periods of 14 minutes each hour at off-peak times. This lends further to the need to provide a more holistic approach to the travel access needs of Uckfield, rather than stand-alone provision for Downlands Farm.

- *It is not clear, however, how the consultant envisages there will be sufficient time in the timetable schedules to provide both the school service and achieve a half-hourly service at peak times It would have been helpful to have provided with the indication bus timetable schedule.*

- *In line with National Bus Strategy and the East Sussex Bus Service Improvement Plan, it would also be a requirement to provide an evening and Sunday/Bank Holiday service, which the consultant currently does not propose to offer.*

On-Site Highways and Estate Design

- *The statement that bus stops on the site would be within 400 metres of all dwellings is welcome.*

- *In terms of estate design, our preference will be influenced by whether there is any likelihood of future development to the north of the site. If so, it is imperative that provision for a future inter-connection between estates be preserved at design stage, suitable for the use of standard buses (this could be by way of a bus gate). This is necessary for the bus service provided for the development area(s) to stand the best chance of financial sustainability in future years.*

- *The type of bus routing proposed within the estate is not one we would normally favour, as the bus would run on the same route in and out of the estate which is not the best way of maximising service coverage whilst minimising bus journey time.*

- *We would strongly prefer an option that allowed buses to use the emergency access road (at least in an interim period before any future development to the north). In doing southbound buses on the A27 would enter Downlands Farm by way of the emergency access road and exit via the main access road. Subject to future bus routing, buses arriving from the direction of Bellfarm Road would enter via the main access road. They would exit left via the emergency access road and then potentially continue north by turning at the new roundabout. This arrangement would allow, for example, for the re-routed bus service 31 proposal (see above section on Public Transport Provision). It should be noted that to accommodate Downlands Farm within the route 31 bus schedule, without incurring the cost of another all day vehicle and drivers, it would be absolutely necessary to minimise the time needed to serve the development.*

- *Any estate roads that might form part of the bus route must be designed to accommodate standard sized buses, with any traffic calming suitable for the operation of buses and minibuses.*

- *High quality bus waiting facilities will be required at each on sit bus stop location, including a raised kerb, bus stop clearway, shelter, seating and real time bus information provision.*

Off-Site Highways Works (all drawings)

- *Figure 1.1 in the consultant's Community Bus Service note shows the position of bus stops on the existing nearest bus route serving The Drive (northbound) and Manor Way (southbound). The most westerly bus stop on each of these roads are adjacent to the off-site highways works (which are proposed to include drop kerbs and tactile paving) in relation to the pedestrian route improvements (drawing 2001062-104). We ask that a raised bus stop kerb and bus stop clearway markings are provided for each of these two bus stops.*

- *With the proposed new pedestrian crossing in London Road, it is noted that the existing bus stop is retained. A raised bus stop kerb should be incorporated as part of the associated work.*

- *At the entrance to Uckfield bus station, off Bell Lane, the developer proposes a block raised pedestrian crossing. The bus station is subject to a programme of improvements in 2022, led by East Sussex Highways . The suitability of the developer's proposal, including its suitability in terms of height, will need to be confirmed by the scheme designer at East Sussex Highways, when this is finalised*

- *In relation to the works in Church Street drawing, we ask that a raised kerb for a new bus stop be provided in the layby immediately south of the junction with The Drive (in drawing 2001061-133). This to include a raised kerb and bus stop clearway markings. We also ask that a new bus stop be provided in the northbound direction of Church Street in this vicinity. Church Street is on a current bus route and bus stops have previously been requested by residents in this area.*

It would appear that the County Council's view of the applicant's community bus proposal for the site is that it would be unrealistic to support the site in terms of public transport, and to add further concern relating to traffic concerns on the town approach roads, there would be delays from the site into the town centre due to the heavy traffic, and so during peak times the journeys are unlikely to be efficient or attractive. There may be scope, however, to enhance the existing service 31 which runs between Cuckfield and Uckfield which could divert into the site and although there would be no other option than to route into Uckfield on an already heavily trafficked route (Bellfarm Road) though service 31 has wider destinations on its route and has scope to reduce traffic on the network should this existing service be enhanced. Further discussions would need to be made with the Passenger Transport Team and bus service provider to explore this option as well as further support to the Community Bus solution which would have greater benefit if a holistic and more integrated approach to encompass the future local plan sites in Uckfield was tabled, to support local growth.

6.2 Travel Plan Framework/Residents Information Pack

The content of the Travel Plan as set out in paragraph 8.7 (Travel Information Pack) is broadly accepted as this lists the incentives and promotional provision of the travel plan. Several comments are provided:

1) Car club – this is proposed and there would be expectation that at least 2 EV cars are provided with charging points within the site along with membership for at least 2 years for 1 member of each household with an initial 50 miles of drivetime. Car club designated spaces should ideally be on adopted roads and have good accessibility to Snatts Road so that there is a wider customer base available.
2) £200 of flexible travel vouchers for use on public transport, cycle equipment, shopping delivery charges per household would be required, managed via the Travel Plan Coordinator.
3) With regard to Easit membership, this is usually through an employment site for which there is not one on the site. How Easit would benefit the site would largely depend on how many employers sign up to Easit where Downlands residents would be employed. This is an unrealistic placement in this framework document as it cannot be influenced by a Travel Plan.

Monitoring is stated to commence at 75% occupancy. This is too late and established travel habits would have been developed without the recognition of the measured being successful or if in fact they aren't. It is expected that the initial monitoring to reveal baseline trips should be 20% (85 dwellings) and then staged over each phase so that monitoring continues for 5 years after the initial survey of the final phase. This is so that the travel plan targets can be measured against and reviewed, with the developer actively applying further or alternative measure if required, tailoring these to suit the travel behaviour over time. The travel plan would also need to rely on the public transport element of the proposal being viable and reliably available to all residents for free for a limited period before being available at an affordable cost and convenience which would be more attractive than using private motor vehicles.

The travel plan auditing fee for this site is £6000 and a bond to secure failure to meet the objectives (to be agreed) within the timeframes of the phased Travel Plans (to be agreed) to the count of £100 per dwelling.

7 Full application – SANGS with access and car park

This application seeks consent for a sustainable green open space to support the application for housing growth as submitted in outline. This proposal is made on land to the north/northeast and

west of the housing proposal with a new access onto Snatts Road. Car parking provision is shown in two positions, one being from the proposed access onto Snatts Road and a further area for parking is on the western side of the site, accessed through a proposed estate road, south of Longwood Gill.

7.1 Access Snatts Road

Opposite properties 'Padstow' and 'Dean Bank'. This is a standard construction design used for general access points, allowing two-way flows of vehicles and short section of footway on the north side to connect to the existing footway network on the south side of Snatts Road. Maintenance vehicles will likely need to access this element of the proposal and it is usual to see a wider bellmouth and a height barrier. This proposal indicates 43m x 2.4m driver sightlines which accords with the 30mph speed limit. However, for a new access to land currently undeveloped that would attract new vehicle trips, of quantum unknown, requires an indication of the expected traffic likely to be generated. It is understood that the applicant is providing a survey of the Horsted Green SANG to obtain the traffic generation and popularity, to consider the impact it would have on Snatts Road.

7.2 Parking

The parking provision is shown to be 19 spaces, which is similar to the Horsted Green SANG. It is known that this SANG experiences peak periods where the car park is full and results in overspill parking in the bell mouth area. Snatts Road has had complaints reported regarding parking on street causing obstructions, and it is imperative that there is sufficient parking provision made for this element of the proposal. I note that the additional parking area within the housing proposal provides additional spaces. However, if visitors arrive to a full car park at Snatts Road, it is unlikely that they would drive around Uckfield to reach the alternative car park from the A22 access and instead would park on street in Snatts Road. For this reason, a trip and parking demand survey is necessary to be able to verify the impact on Snatts Road that would result from the proposed SANG. The applicant should confirm if the access to the SANG was included in the Road Safety Audit, on basis that the position of the crossing point is close to the proposed access and vehicles turning left and looking right for oncoming traffic may not be focussed on pedestrians that may be crossing the road.

SUMMARY of FULL APPLICATION

Further review of this submission is required to ascertain the suitability of the access and parking provision and what the anticipated impact is likely to be on Snatts Road. The applicant is aware of the concerns of this and it currently undertaking survey work.

Overall Summary

There are areas of this planning application that require further investigation. I have listed the areas where a highway view cannot fully be provided due to insufficient information or incomplete assessment with the series of section summaries.

It is considered that even with the mitigation proposed being achievable, the site is standalone and detached from the town and does not form linkage or any cohesive continuity to the urban form to relate in transport terms. The quoted distances for walking are not measured to the illustrated dwellings located furthest away which would be expected to walk a further 500m+. When considered against the ease of access in terms of reaching the major road network by car, this is likely to be the favoured option. The provision of pedestrian/cycle access from the position of Chicory Cottage requires prominence of the access in the largely rural setting, speed limit reduction and character change to raise awareness to drivers that there is frontage and active movement on carriageway edges and pedestrians crossing the road, though even with this point of access, the continuation of the route towards the town centre via Church street has narrow footways with an elevated section, areas of narrow carriageway and limited places to cross. That is not to say that some sections are unsuitable, but that the route does not offer a consistent good standard, for what is likely to be a 30-minute walk.

As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:

1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.
2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.

3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.
4) Highway impact on the town centre roads has not been assessed
5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities

Further assessment work is forthcoming and can be reviewed on receipt.

On behalf of the Highway Authority
For Director of Communities, Economy and Transport
(Sent by email)

Communities Economy and Transport

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

FAO: Claire Turner
Copy: ESCC Passenger Transport; PRoW, Traffic and Safety
Date: 18.10.22
Our Ref: WD/2022/1637/MEA
District/Borough Ref: WD/2022/1637/MEA

Location: LAND AT DOWNLANDS FARM, UCKFIELD

Development: Hybrid planning application comprising: **Outline** application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts road, open spaces including children's play space, SUDS, associated landscaping, infrastructure and earthworks; **Full** application comprising creation of a strategic SANG, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from rocks road, associated landscaping, infrastructure and earthworks.

Road Name or Number	A22 Uckfield By-pass; UC7513 Snatts Road	**Consultation Date**	14 July 2022
National Grid Reference	546648 122536	**Contact Officer Details:**	Kal Kamboh 01273 482287 kal.kamboh@eastsussex.gov.uk

Recommendation:

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

Executive Summary
As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:

1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.
2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.
3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.
4) Highway impact on the town centre roads has not been assessed
5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities

Response
This application seeks planning consent for an outline proposal for up to 424 dwellings to include details for access and accessibility (24.7ha); and a detailed proposal for a SANG with associated parking provision (18.1ha).

For the outline application, the submission seeks approval for 'access' only. The remainder of matters would be addressed at reserved matters stage (layout, appearance, landscaping and scale). Pre-application stage discussions with the Highway Authority involved agreement of the scope for the Transport Assessment and modelling provision required for this site with 3 other major Uckfield sites being considered ahead of Wealden Local Plan preparation.

The access matters relating to this application are:

- Policy and Planning History
- Site and location
- access/Accessibility for non-car users
- Impact of development traffic on the highway network
- Transport modelling
- Parking and servicing
- Travel Plan

1. Policy & Planning History

1.1 Core Strategy Local Plan adopted February 2013
This document is considered out of date (Wealden Local Plan -Direction of Travel Document). The allocation of 1000 dwellings within that have been met through planning consent at Ridgewood Farm. This site has not been allocated in this document or local plans preceding it. The emerging local plan is in its early stages and publishing of the Reg 18 consultation is imminent.

1.2 History
WD/2006/2855 – Residential development for 750 dwellings, 2000sqm B1/B8 uses, village centre, primary school, community hall, retail facilities. Refused 22/07/2007, dismissed at appeal 24/02/2009 including significant highway concerns relating to constrained accessibility by non-motorised users between the site and local amenities and consequential impact within the town centre.

2. Site and Location

This application site is currently agricultural/open land with direct access from Snatts Road, from a driveway serving the farmland, Swallow Barn, Partridge's Oast and Oast Cottage. In terms of location, the land subject of both elements of this hybrid application is between A22 Uckfield bypass to the northwest and Snatts Road to the southeast. The A22 is part of the major highway network and Snatts Road is an unclassified road serving land uses including residential, a cemetery aside from the current use (agricultural and open space used for recreational leisure walking).

Snatts Road – An unclassified road, no data provided to indicate the flows or vehicle speeds. Speed limit is derestricted, and footways are absent, and verges are narrow and generally impassable until one reaches Downland Copse link when a footway is available on the south side approximately 1m wide up to London Road. The carriageway width is variable between 4.3m and 5.5m

A22 Uckfield Bypass is a strategic route linking to the A26 and A272 and providing connections to Lewes, Haywards Heath, Eastbourne and Crowborough. It currently carries an average of 23,830 vehicles on a daily basis (2019 Annual Average Daily Trips-AADT). Speeds are derestricted in the vicinity of the site. The character and design of the A22 is a motor vehicle dominated major route.

Uckfield is the closest commercial centre from the site and is approximately 1.8km from a central position of the site. It provides a good selection of local shops and amenities. However, to reach these by foot or cycle from the site is posed with challenges and constraints. Rocks Park School is the closest primary school approximately 1.8km walk and Uckfield College and leisure centre 2km away.

Uckfield Town centre is located to the southeast of the site and provides a choice of travel options by rail and/or bus.

3. Access - RESIDENTIAL

3.1 Vehicular access

Vehicular access is proposed at 2 points onto the A22 Uckfield Bypass. The main access into the site is a full roundabout and the secondary access is shown as an emergency/bus route. The position of the roundabout is approximately 1.2km north of Copwood Roundabout and 100m from the boundary with Lake Wood. The emergency access is approximately 500m south of Black Down Roundabout. The distance between the access points is also approximately 500m.

In principle, the access points appropriate for the A22, though several concerns are raised:

1) An emergency access onto the A22 is unlikely to be practical if for any reason there is a RTC on the A22 resulting in its closure. It would mean that the site would not be accessible as both access points would be closed to vehicle movement. Urgent journeys from the site by vehicle would be difficult in the event of an accident or persons needing medical attention for example.
2) The emergency access is only accessed by vehicles approaching from the north due to its position within a lay-by. For emergency vehicles needing to reach the site from the south, they would use the main access.
3) Its use as a bus access would require the bus to approach from the north via Budletts Roundabout, which would be a convoluted route for any bus service to serve the site, having to drive out of town to reach the site and to then route peripherally back into the town. The efficiency of a service that would have its main journey on the Bypass is questioned. The County Passenger Transport Team have provided comments on this aspect.
4) The main access additionally provides cycle and pedestrian access. The proposed roundabout is shown to DMRB standards.
5) The accesses have been subject of a RSA1 and a designer's response has been provided. The County Traffic and Safety Team have provided comments on this aspect

3.2 Active user Accessibility

Pedestrian access provision for the site comprises of several existing and proposed links. A Non-motorised user audit was requested at pre-application stage to evaluate the existing conditions to identify strengths, weaknesses and opportunities in the areas surrounding the site. The applicant considers that a 2km distance is acceptable to reach local amenities, equivalent of 25-minute walk. From identifying the routes to the town centre for employment and transport connections and educational establishments nearby (destinations likely to be required on a daily basis), although these would appear to have proximity to the site on plan, on the ground some of the routes are considered to be inconveniently long, constrained, or difficult in terms of gradient and surface.

- Between the town centre and the site, the pedestrian routes identified in the NMU audit are:

W1a – using Snatts Road to connect to an adopted path and then PRoW, one encounters a steeply stepped section and narrow unsurfaced and unlit alleyways until reaching Pudding Cake Lane, onto Church Lane and up to the junction with High Street. The route is underestimated by the applicant as 1.3km, and has been measured as 1.6km. The closest bus stop when using this route is 1.25km (The Drive). The route is unlikely to be regularly used after dark and has an incline which would not be appropriate for less mobile users. The alleys are narrow and are not overlooked and do not consistent alignment or forward visibility to feel secure. During wet weather the surface is unlikely to be usable. Pudding Cake Lane is a shared surface with vehicles which is narrow and may be difficult when using the lane whilst a vehicle is manoeuvring within it. Church Street has narrow footways with a section that has an elevated section and incline. This route is not suited to less mobile, people wishing to walk side by side (adults with young children), security conscious, bad weather conditions.

W1b uses the initial section of W1a and diverts to Hunters Way and still encounters steps to the south of Downland Copse. From Hunters Way, one can walk along good quality adopted footways that are lit up to the junction with The Drive/Rocks Road, where after the footways narrow as stated earlier that have little scope for improvement between The Drive and High Street. The narrow footways pose issues when there is an increase in pedestrian activity and there are pedestrians walking in opposing directions, wishing to pass one another. This may cause stepping out into the carriageway, increasing risk of collision or tripping. This route has been measured as 1.8km from the centre of the site.

W1c the initial section of this route is proposed form the site through a dwelling known as Chicory Cottage acquired by the applicant. This crosses the Snatts Road junction with Rocks

Road and connects to the existing footway network which then becomes Church Street with the constraints highlighted in earlier routes. This route is measured as 1.35km.

W1d – along the A22 and Bellfarm Road, which has lighting but vehicle dominated with a route measured in excess of 2.7km. This requires a footway/cycleway installation as there is not current provision. This route is not convivial and is a long one-way route and so the prospect of a return journey would be unattractive, particularly on foot.

W1e – is a route that starts as W1c and routes through Rocks Park Road towards Bellfarm Road through estate roads until reaching a short section of adopted footpath between 12a and 14 Scarlett Way and Bellfarm Road. Between the site and junction with Rocks Park Road, Rocks Road is partly derestricted and the footway has seen vegetation overgrown into it making it narrow, and potentially having a narrowing effect adjacent for pedestrians walking adjacent to vehicles travelling at speed. The entire route is adopted and lit. This is the best route towards the town centre in terms of quality subject to improvements to the network between the site and Rocks Park Road, but is lengthy and indirect.

Routes to the High Street are acceptable only through the modern housing estates where there are good quality footways that are lit and have good surveillance. Church Street is part of the historic part of the town centre that is not built to modern standards and has limited scope for improvement.

- Between the railway station and the site, the pedestrian routes identified in the NMU audit are:

The routes highlighted by the applicant are extensions of the above routes which are through High Street and Bell Farm Road which are appropriately designed to accommodate pedestrians. However, the distances to the railway station are in excess of 2km, given that the distance from Church Street junction to the station is ~0.5km. This exceeds the generally accepted walking distance of 2km as set out in guidance document IHT Providing for Journeys on Foot.

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

- Between the Bellbrook Industrial Estate and Meads Medical Centre and the site, the pedestrian routes identified in the NMU audit are:

The routes highlighted include A22 route form the main site access and route through the Rocks Park estate. These routes are 2km distant. For trips to the medical centre (patients), when poorly one is not likely to be walking or cycling and these are likely to be car borne trips as buses do not reach this part of the town. Journeys to the industrial estate are likely to be employment related and as referred earlier, this route is not convivial and would exceed 2km.

- Between Uckfield College/Leisure Centre and the site, the pedestrian routes identified in the NMU audit are:

W4a – the route is indirect and measures slightly in excess of 2km. There is absence of a crossing point on London Road to connect to the south side of the High Street. The route is walkable and generally of good walking surface with lighting and surveillance but has a minimum distance of 2km which is the preferred maximum. For the secondary school, a route requires a safe crossing point on London Road.

W4b – This route is equally indirect and also is 2km+ with a combination of unlit sections of alleyway and steep steps. Again London Road has absence of a crossing

W4c – 2.25km distance on more of a formal route with lighting but has gradients which may be challenging for some.

W4d – approximately 1.9km using Church Street and Rocks Road, with constraints as described earlier.

Summary of pedestrian routes are that all local amenities are ~2km away and routes are not entirely suitable for all users, or direct. To walk into town from the site is around 30 minutes each way which would not be a method of travel agreeable for most residents on a daily basis. Furthermore, journeys on foot for primary aged children or families are posed with challenges such as distances, gradients, and narrow footways.

Cycle Routes Audit

Route C1a: Snatts Road/The Drive/Church Street – it is questioned why the route does not use Snatts Road south section which would be a much shorter route to reach Church Street than via The Drive. It is noted that Snatts Road has derestricted speeds, and the applicant has not provided a speed survey to demonstrate acceptability of it use as either a pedestrian route or cycle route. Noted that the route is downhill towards town and would be uphill on the return journey which may not be as attractive.
Route C1b: Rocks Road/Church Street – this route from the site uses the section of the site currently Chicory Cottage where a designed cycle ramped route is proposed. This leads to Rocks Road which is derestricted where it joins at the junction with Snatts Road. En-route towards the town centre, just north of Hunters Way, the speed limit becomes 30 mph, though speed surveys do not demonstrate that actual speeds are contained to justify its suitability for cycle users. Church Street has a 20mph limit just south of The Drive towards the town centre. Church Street is narrow and when both lanes are occupied, there is no overtaking provision. The section of Rocks Road is also narrow, unlit and with derestricted speeds.

Route C1c: A22/Bellfarm Road – this is a longer route, with suitable gradient, but shared with general traffic. The A22 is designed for motorised traffic travelling at speed and so the A22 is not suitable for cyclists. The applicant is proposing measures to accommodate cyclists, discussed later in this report.

Route C1d: Rocks Road/Rocks Park Road towards Bellfarm Road and High Street – this is the same route as C1b, with a restricted section between Scarletts Close and Bellfarm Rd.

Routes to the railway station, medical centre (Meads) and Bellbrook are the same routes as for pedestrians. Dismounting is necessary in alleys, and a cycle route is available to travel west along Bellfarm Rd.

Routes to the College and Leisure centre are along the same routes as shown for pedestrians.

The routes are similar as for pedestrians, but cycling cannot replace walking journeys for reasons relating to ability, confidence or when adults are accompanying small children. All the routes have inclines and indirectness which may not encourage cycling though from routes listed, sections of them are suitable. When considering the entire routes, they may well be appropriate for active single user journeys but limited to those more confident as there are no traffic free routes.

The scoring system used to assess the routes is flawed as there is inclusion within the methodology to score the internal route (yet unsubstantiated as the internal layout is not part of the outline application) which brings the average score up. The assessment should be how the site can be connected externally.

The walking audit scores are therefore lower than stated and distances that are in fact marginally longer. The ~2km routes which would on average take 25-30mins (4-5kph average walking speed), are likely to take longer due to inclines, and crossing roads.

The applicant has identified the weaknesses in both the pedestrian and cycle routes and offered mitigation measures.

- Provision of new pedestrian and/or cycle infrastructure to connect the site to existing networks (e.g. along Rocks Road, Snatts Road and the proposed vehicular access off the A22) where there is no existing provision; Comments: this proposal was put forward for the previous proposal which was dismissed at appeal. The Inspector considered this route lengthy, indirect and unattractive. This factor remains that for a route that would link to the town and nowhere else, it transits around the town to reach it, alongside potentially heavy and fast-moving traffic levels including HGVs and noise. The highway works on

Bellfarm Road have not been taken into account the accessibility improvements secured as part of Gridserve development on the west side of the Copwood Roundabout.

- Installation of appropriate crossing facilities for pedestrians and/or cyclists on Rocks Road (to aid connections to the town, railway station, and industrial estate), Snatts Road (to link to existing footways/paths), London Road (to assist movements towards Uckfield college and leisure centre) and Bellfarm Road (to enhance provision to the industrial estate). Comments: it is noted that there is a proposed speed limit change to extend the 30mph at the point of a proposed crossing point. No speed survey data to justify the change in speed limit nor proposals to alter the visual appearance and character of this section of Rocks Rd other than widening of the footway and new footway close to the junction of Snatts Road.
- Replacement of existing steps at the end of Downland Copse (along footpath 3a) and surfacing of public footpath between steps and Hunters Way; Comments: The Rights of Way Team have provided comments which are against the removal of the steps. These comments are provided later in this report.
- Widening existing pedestrian/cycle routes where currently not suitable for intended user groups (e.g. along sections of Rocks Road, Church Street, and the existing foot/cycle path along Bellfarm Road); Comments: ESCC Traffic and Safety Team have provided comments which are provided later in this report
- Installing measures to reduce vehicle speeds on the approach to the town and enhance pedestrian and cycle priority at junctions; Comments: ESCC Traffic and Safety Team have provided comments which are provided later in this report
- Installation of suitable signage along existing public footpaths to core destinations; Comments: details of signage has not been provided
- Ensuring appropriate lighting of any new connections/routes. Comments: Suitability of lighting for highway safety and security within the greener areas of the site are dependent on ecology comments, which may define whether some routes are in fact reliable active links to the site.

ESCC PRoW comments regarding the pedestrian improvements:

I am limiting my comments here to the unadopted sections of footpath proposed for improvement, i.e. the section marked A-B-C-D-E on the attached plan between Downlands Copse and the footpath connecting to The Mount.

A-B (steps)
I have significant concerns about the proposal to remove the existing steps. From the photographs, these are sandstone steps, partially hewn in to the outcrop of sandstone bedrock. Aside from the practical challenge of significantly remodelling the steps, I imagine their removal would meet with strong opposition locally and from the Town Council. I also assume that the Planning Conservation Officer and High Weald AONB Unit would oppose any fundamental interference with to the sandstone outcrop. There might also be ecology considerations. Therefore it is impractical or desirable to remove the existing steps and I think the most that can be done to improve them is to re-dress them with stone or concrete slabs of suitable character.

B-C (woodland path)
I am not convinced that the steps need to be extended. The wooded path is a continuous slope, and I don't think extending the steps will make any significant improvement.

A path of rural construction with compacted stone and timber edges is proposed. I do not think that will be a suitable construction unfortunately, because of the steep incline. We would also not want timber edges, as these would have a relatively short lifespan and limit the lifespan of the path.

The gradient will require a bound path of some kind. It is very clear from the large water catchment at the bottom of this section of path where it meets the rear of the properties on Hunters Way (point C) that the path carries a lot of water. An unbound surface would inevitable scour quickly and material would be washed in to the water catchment, causing potential blockages and an ongoing maintenance issue.

So, an alternative surface will need to be considered. A tarmac path would be not greatly in keeping with the character of the wood. An alternative option may be a stone surface comprising cement, e.g. this product Hydraulically Bound Materials (HBM) | Roadways (road-ways.co.uk).

C-D-E (footpath at rear of Hunters Way)

There is clearly an error on the proposal plan where it labels this section as 'Existing asphalt footpath: Inspect surface condition and repair defects or resurface as required'. This is a narrow section of unsurfaced footpath running between the rear gardens of the properties on Hunters Way and The Mount.

A tarmac surface for this section is likely to be problematic, due both to the width and likely root heave from the row of trees along the boundary of the properties on The Mount. I would suggest that this section could also be improved with a semi bound surface, if that is the choice for the woodland path (B-C). Although this section is considerably less steep, a rural surface of compacted stone may be sufficient. However, again, we would not want timber edging. For a short section at point D edging may be unavoidable, where the path has a severe camber and is badly affected by tree roots.

E onwards (adopted but partially unmade footpath connecting Hunters Way to The Drive)
From point E the path is technically adopted, but only has a partially made stone surface of around half a metre width to where it joins a tarmac path at the junction with the footpath leading to The Mount. The improvements to this section and the continuation will need to be considered by and agreed with Transport Development Control.

A Safety Audit (stage 1) has been commissioned for the off-site highway works and comments from the Traffic and Safety Team have been provided in response to the proposals:

<u>Site access road (north of Bellfarm) 2001061-101A</u>

- Drawing indicates a 4-metre wide central island at hop over. There does not appear to be the available road width to accommodate. Is there a technical plan as the 4m wide lanes, and 3m shared footway/cycleway do not appear to scale.
- Reducing street lighting on south eastern arm of roundabout (approach from site to A22) is not acceptable, ensure feature is adequately lit in line with standards
- No forward visibility splay provided for access road to roundabout. This may be detrimentally impacted by tree planting at the verge and centre islands at the dormouse hop over.
- Proximity of hop over to roundabout is not provided or extent of planting.
- Unlit feature in centre of carriageway liable to be struck/ issues with disorientated drivers exiting lit roundabout into darkness at a point where an unlit obstruction (island) is present in the road. Flush or reduced height kerbs may lead to vehicles mounting the island/ potentially striking the trees proposed.
- Proximity of the new access/ roundabout to the northbound layby. There is a safety concern with drivers exiting the roundabout accelerating at a point when drivers in front are quickly decelerating to enter the layby. A left signal may be interpreted as an uncancelled exit signal from the roundabout.
- Very short merge on the exit arms/ high speed road. Potential for side swipes.
- Is there a case for preventing right turns into the north and southbound laybys (with the provision of the additional roundabout)
- The northbound layby should ideally be upgraded to modern standard

<u>Emergency Access Road 2001061-102B</u>

- Risk of shunts vehicles following emergency vehicles may not be expectant of the vehicle ahead of them to turn upon entering the layby. There will be no way to signal this manoeuvre.
- The radius of the access will require a low-speed entry which may not be appropriate for high speeds of emergency vehicles
- It is questioned if there is sufficient length ahead of the barrier for a vehicle to wait.
- Are visibility splays exiting reliant on maintenance of vegetation?
- Signing would need to indicate westbound only on exit.
- Layby should be upgraded to modern standard

<u>A22/Bellfarm Road shared route 2001061-111 to 116 A22</u>

- (As highlighted in the RSA) the horizontal separation between the carriageway and the shared route reduces to 1.5m in places. For a 60mph speed limit, the desirable minimum is 2.5m and absolute minimum is 2m (LTN 1/20). Additional protection is recommended at these points.
- Rocks Road overbridge narrowing (from 3 to 2 metres) over a longer distance than is recommended.

- Various traffic signs located within the highway verge where shared route is proposed, will need to be re-sited/ raised ensuring they remain within the optimum sight range for drivers.
- Bellfarm Road shared route proposals - how do they tie in with the proposals for Gridserve electric charging facility at Copwood Roundabout (see WD/20/1244).
- No provision for westbound cyclists (coming from the High Street) to join the shared route
- Proposed block paved pedestrian crossing infers priority over vehicles and may lead to careless crossing movements. While the new guidance in the highway code says that vehicles should give way to pedestrians waiting to cross at a side road and that pedestrians (that have started crossing) at side roads have priority, pedestrians should still exercise due care and attention.
- Existing proposals for the bus station – A technical design is still being prepared by the County Council as element of the town centre scheme. It is considered that the proposals offered by the applicant could be considered further once a final design is available, so that an appropriate tie-in can be considered.
- Raised crossing east of the roundabout (at bus station) will need to be adequately lit and appropriate warning provided. This would need to tie-in with the bus station proposals.
- Splitter island north of roundabout will need to be wide enough to accommodate waiting cycles (2m)
- Look at appropriate treatment on all arms of the roundabout (2 arms facilitate pedestrian crossing movements/ 2 do not).
- Footway widening on north-eastern corner of roundabout- ensure that larger vehicles turning north to east can make the turn without encroaching on the widened footway
- Cyclists guided to re-join the carriageway just prior to Bellfarm Lane- issues with conflict in markings (controlled area). Re-joining at conflict point. Look to extend facility east.

Church Street 2001061-134

- Regency Close reduction in junction radii - ensure adequate forward visibility south eastbound (bend in road opposite Belmont Road not obvious on plan). Rear access to stores/ waste collection points are located within Regency Close; vehicle tracking required to ensure larger vehicles can still access/exit safely.
- Priority working at Pudding Cake Lane forward visibility restricted by bend - drivers would be unable to make an informed judgement before negotiating narrowing.
- Approx. 1m wide footway at Pudding Cake Lane- where would a priority working sign be placed without causing an obstruction to pedestrians?
- Narrowing southeast of Pudding Cake Lane places vehicles on the wrong side of the road just before a junction (Belmont Road). A south eastbound driver's visibility into Belmont Road of any approaching traffic is restricted by the church wall.
- The narrowing on both sides currently signed extends between The Drive and Belmont Road making it difficult to provide warning of the build out in the south eastbound carriageway between Pudding Cake Lane and Belmont Road.
- Is the road north west of Pudding Cake Lane wide enough to accommodate queuing vehicles and passing traffic?

Rocks Road 2001061-132

- Widened footway on south side of Rocks Road (northwest of Rocks Park Road) appears to be into the carriageway reducing the effective width of the carriageway. Presently the width (roughly just over 6 metres) allows for centre lines and edge of carriageway markings through this tree covered winding road. If the width is reduced the current road marking arrangement will not be possible.
- There does not appear to be drainage provision upstream of the crossing point northwest of Hunters Way. There does appear to be evidence of ponding (on account of the detritus/ mud collected at the crossing point)- possibility of slips/ falls in wet or icy conditions. Review provision.
- The waiting area on the northeast side of Rocks Road (northwest of Hunters Lane) is not accessible for pedestrians, due to lack of maintenance (see photo). Also, a defect in the road in the pedestrian line, which may lead to a fall.

In addition, the proposed pedestrian/cycle access at the corner of the junction Snatts Road/Rocks Road requires a prominent appearance so that drivers are aware from all approaches of its presence. It is largely wooded and may not be obvious to drivers to expect non-motorised activity given its current rural surroundings. The approach from Rocks Road is

likely to require traffic calming to ensure that drivers are travelling at appropriate speeds and awareness of approaching built form. It is likely that a more urban appearance would require continuity from a point west of the active access point, to highlight the environment change to the current defined built up area. The distance over where the 30mph is proposed is largely rural with vegetation dominating the route up to the junction with Hunters Way. It is likely that an engineered solution will be required, given that there is little in the way of frontage development over the ~200m distance.

SUMMARY OF ACCESS/ACCESSIBILITY

There are identified problems associated with the design of the proposed access points and the mitigation measures on the accessible routes which are likely to affect their deliverability and overall effectiveness in serving the site safely and conveniently. It is acknowledged that the rural nature of the site and immediate surroundings, in particular the strong ecological and woodland features, would likely present conflict in providing the necessary highway and accessibility requirements for this site.

4 Impact of development traffic on the highway network

4.1 Traffic

The proposal is expected to generate vehicular trips on the highway network and the applicant has set these out within the TA. The daily trip rate of 4.376 per dwelling has been presented which is based on samples of sites, 11 in total in edge of town locations for privately owned dwellings. I have reviewed each of the sample sites and these are accepted as a trip rate for this site.

The estimated traffic generation is 1855 trips per day, including 225 in each peak period [0800-0900;1700-1800hrs]. All vehicle trips would be accessing to/from the site via the A22 proposed roundabout. The trips rate indicated is vehicular only and multi modal trips have not been indicated.

Journey to work data form the 2011 census provides information regarding the methods of travel for defined areas. For the Ringles Cross area, the dominant method of travel to work as a main mode is by private car 77%, 10% on foot, 3% bus, 6% train, 1% powered 2 wheeled vehicles, 2% cycle, 1% taxi, 3% passenger in car/van.

6 junctions have been tested for the proposal, using base flows from 2018 forming the Saturn model developed for testing development scenarios in Uckfield for 4 major sites (Horstedpond Farm, Bird In Eye North and South, Downland Farm). These are:

1) Site access roundabout junction with the A22;
2) A22 roundabout junction with Bell Farm Road (Copwood roundabout);
3) A22 roundabout junction with A26 (Black Down roundabout);
4) A26 roundabout junction with A272 (Budletts roundabout);
5) A22 roundabout junction with A272 (Batts Bridge roundabout);
6) A22 roundabout junction with A26 (Little Horsted roundabout); and
7) A22 Ridgewood Farm access

The impact from the development, using ARCADY software, considers the ratio of flow to capacity during the busiest periods (peak hours 0800-0900 and 1700-1800hrs) .

1) **Site access roundabout junction with the A22** – operates within theoretical capacity with A22 north arm reaching close to practical capacity (0.82) in the PM when forecast to 2039.
2) **A22 roundabout junction with Bell Farm Road (Copwood roundabout)** – this is proposed to have 4 arms, with the GRIDSERVE committed development which has commenced on site. The testing only considers 3 arms which happen to operate within capacity in 2039 with the development. As the GRIDSERVE development has not been included, this is an incomplete test. This roundabout is expected to have capacity improvement works as part of the secured package of works for Ridgewood Farm committed development. It is not clear if these improvements have been included in the modelling.
3) **A22 roundabout junction with A26 (Black Down roundabout)** – this junction has capacity constraints on A26 arm and A22 west arm in AM; and A22 west arm in the PM without the development in 2039. When adding the development traffic, although there is very little difference in term of the queue lengths on all arms, the analysis

indicates that this junction has capacity problem on the A22 west looking forward to 2039 with and without the development.

4) **A26 roundabout junction with A272 (Budletts roundabout)** – without development the London road west (Maresfield) arm is expected to reach above practical capacity with queues of 10 PCUs in 2039 in the PM peak. With the development the same arm sees the queues increase to 14 PCUs. This arm would reach close to theoretical capacity.
5) **A22 roundabout junction with A272 (Batts Bridge roundabout) -** in both scenarios with and without development 2039, this roundabout operates without any capacity stress.
6) **A22 roundabout junction with A26 (Little Horsted roundabout) -** in both scenarios with and without development 2039, this roundabout operates without any capacity stress. This roundabout is expected to have capacity improvement works as part of the secured package of works for Ridgewood Farm committed development. It is not clear if these improvements have been included in the modelling.
7) **A22 Ridgewood Farm Access -** in both scenarios with and without development 2039, this roundabout operates without any capacity stress.

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

Strategic modelling has been initiated using SATURN software to account for other major sites that had been promoted last year, of which 2 of these have now been submitted as planning applications, yet undetermined.

Although the modelling work has to an extent been carried out, the modelling has not been validated, nor have any mitigation solutions been presented to address capacity issues that would arise as a result. Wealden District Council are due to release their Regulation 18 document for the first stage publication of the Local Plan consultation process. It is anticipated that the release of identified sites will firm the strategic modelling for Uckfield and highlight areas requiring mitigation and junction improvements to accommodate anticipated future growth.

At this stage, as the strategic modelling is incomplete, this application is effectively premature to the current position of the local plan. However, from the initial data that has been released to the major sites' proponents, the application site has been modelled, though it is understood that there have been problems identified within it and so requiring further review.

Comments of the proposed mitigation for the strategic modelling using all 4 of the major sites has highlighted 2 roundabouts that will require mitigation – Blackdown and Budletts. Blackdown roundabout has a known highway safety record which required the hatched lane on the north arm due to a camber posing hazards to HGVs. It is noted that the mitigation proposed by the applicant removes this hatching to open up two approach lanes to improve capacity. This is not accepted as a viable mitigation measure.

At this stage, the modelling work to date accounting for this site only and committed up to 2039 does not consider the level of traffic that would enter the highway network within the town centre that is already at capacity. As these roads (High Street, Bell Lane, Newtown) already see significant delays, it is most likely that site related traffic will add more activity onto these routes, further exacerbating delays on the network.

Multi user trips have not been provided, nor are any demand flow diagrams to demonstrate the impact of the proposal (housing element) and how it affects the town centre.

SUMMARY OF TRAFFIC IMPACT

Without a doubt there would be traffic demands associated with this site which would be required to access the town and town centre along roads currently experiencing long queues and congestion. The sustainable mitigation measures (for active travel) have been identified with highway safety problems and the deliverability of these are not certain, which puts further pressure onto the road network for journeys to and from Uckfield town centre.

Furthermore, the A22 roundabouts mitigation identified have constraints. In light of the modelling to date, this has not been completed to a stage that has been finalised/validated, nor have mitigation schemes to overcome the future local plan sites impact been considered in full.

5 Parking and servicing

As the outline element of the application seeks consent for access only, parking and servicing for the housing element of the application is not necessary but would be part of a future reserved matters application, should outline consent succeed. Swept path plans have been shown for the access which shows a 16.5m long articulated vehicle traversing the proposed roundabout. Car and cycle parking is required to meet the County parking standards as set out in the car parking demand calculator and cycle parking standards.

6 Travel Plan

A framework travel plan has been provided as required by NPPF and County Council policy guidance.

6.1 Public transport – Buses

The closest bus stops are at The Drive for services 248 and 249. These are community services running only on Mondays, Wednesdays and Fridays and do not cover standard commuting times. The more regular services 29, 31/31A are more frequent and cover commuting periods but are available further away, close to the junction Snatts Road/London Road. It is understood that as a result of distant existing bus stop provision and access to them having constraints, that the applicant has proposed a site-specific bus solution. Comments from the County Passenger Transport Team are as follows:

General Points

- *There is a significant concern that the site would generate a very high proportion of car based journeys. Car drivers will have easy access to the A22.*
- *The site location is very poor in terms of sustainable public transport access, with no service provision in the area. Pedestrian connectivity appears to be proposed in an easterly direction to Uckfield High Street, a distance of some 900 metres to the site boundary and in excess of 1300 metres to the north west part of the site. The pedestrian route that appears to be proposed, using sections of Right of Way south of Snatts Road, also has sections with steps. Not only do these walking routes need to accessible and safe (including for the needs of school pupils – see below) they should be attractive so to encourage active travel.*
- *In the absence of a bus gate being provided off Snatts Road and/or Rocks Road, the only bus access between Uckfield town centre and the development would be via the Uckfield A22 bypass and Bellfarm Road. This would require the establishment of a new bus route.*
- *The consultant's suggestion that as much as one third of peak time journey movements and one quarter at other times, between the development and Uckfield town centre will be transferred to the community bus service, is not credible.*

School Transport

- *It should be noted that school pupils would be unlikely to be entitled to free school transport, the pre-requisite being the nearest available school for pupils under 11s is 2 miles and the nearest school for pupils over 11s is 3 miles. This assumes the off-site works proposed are put in place to ensure safe pedestrian routes between the site and the schools, noting in particular the current unsuitability of Rocks Road as a walking route.*

- *With up to 424 homes there will be significant home to transport travel movements which, unless the pedestrian/cycling routes are extremely attractive, will need to be provided for by public transport to avoid high car trip generation. This bus travel demand would completely overwhelm the school transport solution envisaged by the consultant, with a route intended to serve two primary schools and the secondary school, which relies on the use of two community bus vehicles with only 16 seats each. A further obstacle is that the morning start times of the three schools all fall within the time range of 08:45 to 0900, and the afternoon finishing times between 15:05 and 15:35. This means that there is little or no scope to alleviate peak loadings by 'double running' the minibuses as, particularly in the morning peak, all pupils would have*

travel at the same period to arrive at school on time. In any event, this would leave no space on the minibuses for other peak time service users.

- *It should be noted that access to Holy Cross School is particularly difficult to access by vehicle, the proposal for the community minibus to set down and pick up in the nearby Wealden District Council car park would be subject to the agreement of the District Council and dedicated safe dropping off/picking up space being provided.*

1) The consultant should be asked to estimate the number of school pupils from the new development, split by school. In addition, they should demonstrate the modal split of journeys, including the numbers to be catered for on each minibus journey. The consultant should also be asked to confirm the number of journeys by bus users, excluding school pupils, in the morning peak period, afternoon peak period and inter-peak.

- *Subject to the consultant's response to (1), it is unlikely that the size of vehicles proposed, nor the frequency, will be able to meet the likely level of school bus transport demand. Providing larger capacity buses would incur significant expense. The cost of providing a full size bus, for a stand-alone Uckfield College school journey both morning and afternoon (noting that a full size bus would struggle, is currently in the region of £49,400. This would be for a bus with approximately 38 seats, and room for approximately 22 standing passengers. Assuming 50 pupils paying £2 each for a return trip per day (children are charged half fare) this would generate fares income of only £19,000 per annum, leaving a shortfall of £30,400 per annum.*

- *Providing a larger bus (or buses) to cater for demand for school travel would also require the route, turning arrangements and bus stops within the new development that is suitable for such vehicles (see below).*

- *Likely Outcome – It will not be feasible to provide additional transport provision to meet the needs of all school pupils. This though would result in a very serious operational risk that any bus route serving the development, provided for other purposes such as access to employment, would be swamped by school pupils. Only providing partially for school transport demand, ie. risking leaving some pupils unable to board the service, would be untenable.*

2) The school access issues might be significantly reduced if a new primary school provision was part of the development proposal. Has the view of our Childrens Services Department been sought, or are they content with existing primary school provision in the area and access to them?

Public Transport Provision

- *Foremost, the County Council would expect an outcomes based solution which maximises sustainable travel modes, including bus use, over car use. There is a need to integrate service provision with the wider public transport network, which is an expectation in the Government's National Bus Strategy. This is important for onwards bus journeys, including to Eastbourne, Brighton, Lewes, Haywards Heath and Tunbridge Wells, in terms of information provision, timetable coordination and ticketing.*

- *The East Sussex Bus Service Improvement Plan (BSIP) was submitted to Government in October 2021 as part of the National Bus Strategy process. Bus Service Improvement Plan for East Sussex County Council | East Sussex County Council . Jointly developed by East Sussex County Council and the bus operators in East Sussex, the BSIP proposes that bus services in the Uckfield are provided by way of Digital Demand Responsive Transport (DDRT), using minibuses. This is not specified in detail, but could range from a semi-flexible bus service (with only some route sections timetabled) to a fully flexible service (where all journeys would only run if pre-booked by passengers). Bookings would be made either on-line through an app or by telephone. This approach would not preclude the provision of wholly timetabled journeys, say at busier times of the day. Importantly, the service provision would also be available evenings and weekends. The DDRT service would be integrated with other longer distance bus routes serving Uckfield, as well as the Uckfield rail service, in line with the principles of the National Bus Strategy. The DDRT service would be dependent upon third party funding from development contributions though, subject to passenger use, we would expect over time the service to be nearing commercial viability.*

- *Additionally, with other new developments in the Uckfield area (eg. Horstedpond Farm and Bird in Eye North and South), there is the need for a common approach to establishing new bus service provision by making the most effective use of vehicle resources and bus routing. Such an approach is vital to maximise the prospect of longer term bus service viability and to ensure public transport connectivity.*

- *The above does not preclude the potential for developing and improving existing 'fixed route' bus services. In this context a potential solution, or possibly in tandem with DDRT, would be to revise current bus service 31. This runs between Uckfield bus station, Maresfield, Ashdown Business Park and Haywards Heath, and could instead run via Downlands Farm and Bellfarm Road instead of via Ringles Cross. Its current frequency is hourly, Monday to Saturday only, so this would need to be augmented.*

Consultant's Proposal for a Community Bus Service

- *The consultant has put forward community bus based solution. There are significant concerns in relation to their proposal, not least that it appears not to take into consideration many of the requirements identified above. If a community bus based solution were established, it would need to be available to the public under a Section 22 Permit arrangement, not Section 19. The operational costings provided appear to underestimate the funding required.*

- *The proposal's quoted contract hire estimate of £5,000 per annum per vehicle, plus £5,000 per vehicle for insurance, does not appear to sufficiently allow for contract hire and maintenance costs. There would also need to be robust spare vehicle back-up arrangements in place to cover for breakdowns and accident repairs. ESCC's experience is the cost of a 5 year contract hire of a coach built fully accessible 15 seat community minibus with tail lift, 10 week safety inspections, all maintenance, MOT, insurance will be around £18,000 per annum, so £36,000 for 2 vehicles.*

- *Overheads relating to secure parking of vehicles when not in service, including overnight, have not been included. Note that there would not be space at Uckfield bus station for such parking.*

- *The consultant envisages that an agreement will be reach 'to use a local private hire firm' to provide qualified paid drivers for the service. ESCC has concerns that such an arrangement is not compatible with the terms Community Bus Permits. Whilst the use of paid drivers is not precluded in terms of Community Bus operation, specialised legal advice would need to be obtained to ensure that a commercial agreement to use paid drivers from a separate local private hire firm allowable.*

- *The management and governance of a Community Bus operation should not be under-estimated, particularly for a new start-up arrangement. If the service provision was to be provided by way of Community Bus arrangement, then existing community transport operators are likely to be interested in taking this on. Community Transport for the Lewes Area already operate services in the Uckfield area, including Section 22 public routes 248 and 249 under contract to ESCC. East Surrey Rural Community Transport Partnership may also be interested, as they have a base in Uckfield running 4 school services under contract to ESCC.*

- *The consultant has budgeted £30,000 per annum for 'operator/staff' costs without providing further detail. This seems wholly inadequate. Based on the proposed weekday operating hours spanning 06:30 to 19:30 Mondays to Fridays (13 hours) plus say a further 5 hours for the second vehicle's peak time and school route operation, this indicates a very minimum of 18 paid drivers' hours on weekdays. An hourly service on Saturdays between say 07:30 and 18:30 would be a minimum of 11 paid hours. Assuming a cost of £13 per hour, including an allowance for on-costs, the cost per annum would be in the region of the following: Weekdays: (18 hours x 253 days x £14 = £63,756) + Saturdays: (11 hours x 52 days x £14 = £8,008). Total: £71,764 per annum.*

- *ESCC's requirement for an evening and Sunday/Bank Holiday service (see below) would further add the following staff costs: Weekdays: (3.5 hours x 253 days x £14 = £12,397) + Saturdays (4.5 hours x 52 days x £14 = £3,276) + Sundays and Bank Holidays (14 hours x 58 days £14 = £11,368). Total: £27,041 per annum.*

- *The indicative routes of the core bus service suggested by the consultant would appear to meet the majority of local travel demand, with the notable exception being that they do not appear to directly serve the bus station. There is also some demand to Uckfield Community Hospital, which would not be served by the proposed community bus service. There is no bus stop provision in Uckfield railway station forecourt so this would need to be secured if the minibus service is to call there.*

- *ESCC estimates the off-peak core bus service routing would take approximately 16 minutes to complete, without including the deviation to/from Uckfield railway station. It would be clearly very poor user of driver and vehicle resources if they were only being used for this period of time in each hour. Whilst it would be desirable to use this available time to increase the off peak service frequency to half-hourly, this would still result in the minibus standing at Downlands Farm for 2 periods of 14 minutes each hour at off-peak times. This lends further to the need to provide a more holistic approach to the travel access needs of Uckfield, rather than stand-alone provision for Downlands Farm.*

- *It is not clear, however, how the consultant envisages there will be sufficient time in the timetable schedules to provide both the school service and achieve a half-hourly service at peak times It would have been helpful to have provided with the indication bus timetable schedule.*

- *In line with National Bus Strategy and the East Sussex Bus Service Improvement Plan, it would also be a requirement to provide an evening and Sunday/Bank Holiday service, which the consultant currently does not propose to offer.*

On-Site Highways and Estate Design

- *The statement that bus stops on the site would be within 400 metres of all dwellings is welcome.*

- *In terms of estate design, our preference will be influenced by whether there is any likelihood of future development to the north of the site. If so, it is imperative that provision for a future inter-connection between estates be preserved at design stage, suitable for the use of standard buses (this could be by way of a bus gate). This is necessary for the bus service provided for the development area(s) to stand the best chance of financial sustainability in future years.*

- *The type of bus routing proposed within the estate is not one we would normally favour, as the bus would run on the same route in and out of the estate which is not the best way of maximising service coverage whilst minimising bus journey time.*

- *We would strongly prefer an option that allowed buses to use the emergency access road (at least in an interim period before any future development to the north). In doing southbound buses on the A27 would enter Downlands Farm by way of the emergency access road and exit via the main access road. Subject to future bus routing, buses arriving from the direction of Bellfarm Road would enter via the main access road. They would exit left via the emergency access road and then potentially continue north by turning at the new roundabout. This arrangement would allow, for example, for the re-routed bus service 31 proposal (see above section on Public Transport Provision). It should be noted that to accommodate Downlands Farm within the route 31 bus schedule, without incurring the cost of another all day vehicle and drivers, it would be absolutely necessary to minimise the time needed to serve the development.*

- *Any estate roads that might form part of the bus route must be designed to accommodate standard sized buses, with any traffic calming suitable for the operation of buses and minibuses.*

- *High quality bus waiting facilities will be required at each on sit bus stop location, including a raised kerb, bus stop clearway, shelter, seating and real time bus information provision.*

Off-Site Highways Works (all drawings)

- *Figure 1.1 in the consultant's Community Bus Service note shows the position of bus stops on the existing nearest bus route serving The Drive (northbound) and Manor Way*

(southbound). The most westerly bus stop on each of these roads are adjacent to the off-site highways works (which are proposed to include drop kerbs and tactile paving) in relation to the pedestrian route improvements (drawing 2001062-104). We ask that a raised bus stop kerb and bus stop clearway markings are provided for each of these two bus stops.

- *With the proposed new pedestrian crossing in London Road, it is noted that the existing bus stop is retained. A raised bus stop kerb should be incorporated as part of the associated work.*

- *At the entrance to Uckfield bus station, off Bell Lane, the developer proposes a block raised pedestrian crossing. The bus station is subject to a programme of improvements in 2022, led by East Sussex Highways . The suitability of the developer's proposal, including its suitability in terms of height, will need to be confirmed by the scheme designer at East Sussex Highways, when this is finalised*

- *In relation to the works in Church Street drawing, we ask that a raised kerb for a new bus stop be provided in the layby immediately south of the junction with The Drive (in drawing 2001061-133). This to include a raised kerb and bus stop clearway markings. We also ask that a new bus stop be provided in the northbound direction of Church Street in this vicinity. Church Street is on a current bus route and bus stops have previously been requested by residents in this area.*

It would appear that the County Council's view of the applicant's community bus proposal for the site is that it would be unrealistic to support the site in terms of public transport, and to add further concern relating to traffic concerns on the town approach roads, there would be delays from the site into the town centre due to the heavy traffic, and so during peak times the journeys are unlikely to be efficient or attractive. There may be scope, however, to enhance the existing service 31 which runs between Cuckfield and Uckfield which could divert into the site and although there would be no other option than to route into Uckfield on an already heavily trafficked route (Bellfarm Road) though service 31 has wider destinations on its route and has scope to reduce traffic on the network should this existing service be enhanced. Further discussions would need to be made with the Passenger Transport Team and bus service provider to explore this option as well as further support to the Community Bus solution which would have greater benefit if a holistic and more integrated approach to encompass the future local plan sites in Uckfield was tabled, to support local growth.

6.2 <u>Travel Plan Framework/Residents Information Pack</u>

The content of the Travel Plan as set out in paragraph 8.7 (Travel Information Pack) is broadly accepted as this lists the incentives and promotional provision of the travel plan. Several comments are provided:

1) Car club – this is proposed and there would be expectation that at least 2 EV cars are provided with charging points within the site along with membership for at least 2 years for 1 member of each household with an initial 50 miles of drivetime. Car club designated spaces should ideally be on adopted roads and have good accessibility to Snatts Road so that there is a wider customer base available.
2) £200 of flexible travel vouchers for use on public transport, cycle equipment, shopping delivery charges per household would be required, managed via the Travel Plan Coordinator.
3) With regard to Easit membership, this is usually through an employment site for which there is not one on the site. How Easit would benefit the site would largely depend on how many employers sign up to Easit where Downlands residents would be employed. This is an unrealistic placement in this framework document as it cannot be influenced by a Travel Plan.

Monitoring is stated to commence at 75% occupancy. This is too late and established travel habits would have been developed without the recognition of the measured being successful or if in fact they aren't. It is expected that the initial monitoring to reveal baseline trips should be 20% (85 dwellings) and then staged over each phase so that monitoring continues for 5 years after the initial survey of the final phase. This is so that the travel plan targets can be measured against and reviewed, with the developer actively applying further or alternative measure if required, tailoring these to suit the travel behaviour over time. The travel plan would also need to rely on the public transport element of the proposal being viable and reliably available to all residents for free for a limited period before being available at an affordable cost and convenience which would be more attractive than using private motor vehicles.

The travel plan auditing fee for this site is £6000 and a bond to secure failure to meet the objectives (to be agreed) within the timeframes of the phased Travel Plans (to be agreed) to the count of £100 per dwelling.

7 Full application – SANGS with access and car park

This application seeks consent for a sustainable green open space to support the application for housing growth as submitted in outline. This proposal is made on land to the north/northeast and west of the housing proposal with a new access onto Snatts Road. Car parking provision is shown in two positions, one being from the proposed access onto Snatts Road and a further area for parking is on the western side of the site, accessed through a proposed estate road, south of Longwood Gill.

7.1 Access Snatts Road

Opposite properties 'Padstow' and 'Dean Bank'. This is a standard construction design used for general access points, allowing two-way flows of vehicles and short section of footway on the north side to connect to the existing footway network on the south side of Snatts Road. Maintenance vehicles will likely need to access this element of the proposal and it is usual to see a wider bellmouth and a height barrier. This proposal indicates 43m x 2.4m driver sightlines which accords with the 30mph speed limit. However, for a new access to land currently undeveloped that would attract new vehicle trips, of quantum unknown, requires an indication of the expected traffic likely to be generated. It is understood that the applicant is providing a survey of the Horsted Green SANG to obtain the traffic generation and popularity, to consider the impact it would have on Snatts Road.

7.2 Parking

The parking provision is shown to be 19 spaces, which is similar to the Horsted Green SANG. It is known that this SANG experiences peak periods where the car park is full and results in overspill parking in the bell mouth area. Snatts Road has had complaints reported regarding parking on street causing obstructions, and it is imperative that there is sufficient parking provision made for this element of the proposal. I note that the additional parking area within the housing proposal provides additional spaces. However, if visitors arrive to a full car park at Snatts Road, it is unlikely that they would drive around Uckfield to reach the alternative car park from the A22 access and instead would park on street in Snatts Road. For this reason, a trip and parking demand survey is necessary to be able to verify the impact on Snatts Road that would result from the proposed SANG. The applicant should confirm if the access to the SANG was included in the Road Safety Audit, on basis that the position of the crossing point is close to the proposed access and vehicles turning left and looking right for oncoming traffic may not be focussed on pedestrians that may be crossing the road.

SUMMARY of FULL APPLICATION

Further review of this submission is required to ascertain the suitability of the access and parking provision and what the anticipated impact is likely to be on Snatts Road. The applicant is aware of the concerns of this and it currently undertaking survey work.

Overall Summary

There are areas of this planning application that require further investigation. I have listed the areas where a highway view cannot fully be provided due to insufficient information or incomplete assessment with the series of section summaries.

It is considered that even with the mitigation proposed being able to success, the site is standalone and detached from the town and does not form linkage or any cohesive continuity to the urban form to relate in transport terms. The quoted distances for walking are not measured to the illustrated dwellings located furthest away which would be expected to walk a further 500m+. When considered against the ease of access in terms of reaching the major road network by car, this is likely to be the favoured option. The provision of pedestrian/cycle access from the position of Chicory Cottage requires prominence of the access in the largely rural setting, speed limit reduction and character change to raise awareness to drivers that there is frontage and active movement on carriageway edges and pedestrians crossing the road, though even with this point of access, the continuation of the route towards the town centre via Church street has narrow footways with an elevated section, areas of narrow carriageway and limited places to cross. That is not to say that some sections are unsuitable, but that the route does not offer a consistent good standard, for what is likely to be a 30-minute walk.

As submitted, the application for both the outline and full consent cannot be supported for reasons relating to:

1) All 3 accesses and accessibility measures for active travel cannot be accepted as being deliverable from both a design and highway safety perspective.
2) PRoW routes are inappropriate for everyday use as surfaces and gradients are unsuited to vulnerable users, prams/buggies, and require solid footwear.
3) The community transport option has received objection from the Passenger Transport Team, though there is a further option to explore and discuss.
4) Highway impact on the town centre roads has not been assessed
5) The scheme is detached from the urban fabric of the town, and this prevents any efficient connectivity to the local amenities

Further assessment work is forthcoming and can be reviewed on receipt.

On behalf of the Highway Authority
For Director of Communities, Economy and Transport
(Sent by email)



Civil Engineering - Transport Planning - Flood Risk

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