APPEAL UNDER SECTION 78(1) OF THE TOWN AND COUNTRY PLANNING ACT 1990

PREPARED ON BEHALF OF DANESCROFT (FREOF V WILLINGDON) LLP BY MIDDLEMARCH ENVIRONMENTAL LTD.

HINDSLAND, EASTBOURNE ROAD, WILLINGDON, EAST SUSSEX

REPORT TO INFORM HABITATS REGULATIONS ASSESSMENT: STAGE 1 SCREENING

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Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
Tel: 01676 525880 Fax: 01676 521400
E-mail: admin@middlemarch-environmental.com Web: www.middlemarch-environmental.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Checked by:	Approved by:
Final	04/03/2021	Chris Walsh (Principal Consultant)	Hannah Train ACIEEM (Principal Consultant)	Tom Docker CEcol MCIEEM (Managing Director)
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The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

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1 INTRODUCTION

1.1.1 This shadow Habitats Regulations Assessment has been completed by Mr Chris Walsh, a Principal Consultant a Middlemarch Environmental Ltd. Having obtained a Bachelor of Science and Master of Science in Zoology, Mr Walsh has over 13 years' experience working as a Local Government Ecologist, Special Area of Conservation Officer, and Consultant Ecologist in the planning system. Mr Walsh specialises in matters relating to Habitats Regulations Assessment; quantification of ecological impacts; attainment of nitrogen and phosphate neutrality; provision of water neutrality; the impacts of recreational disturbance; and the impacts of atmospheric deposition of pollutants upon European and UK statutory designated sites.

1.2 PROJECT BACKGROUND

1.2.1 Middlemarch Environmental Ltd was commissioned by Danescroft (FREOF V Willingdon) LLP to review and update the shadow Habitats Regulations Assessment (sHRA): Stage 1 Screening, as part of the appeal to the Planning Inspectorate (ref: APP/C1435/W/22/3293970). The information within this report forms part of the Proof of Evidence submitted to allow the competent authority (the Planning Inspectorate) to undertake and complete Habitats Regulations Assessment (HRA).

1.2.2 This Shadow HRA report considers the likely impact upon European sites of the following proposed scheme at Hindsland, Eastbourne Road, Willingdon, East Sussex:

1.2.3 *"Outline permission with all matters reserved except for access (excluding internal estate roads beyond the access to serve the Medical Centre Plot), for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and a new community medical centre and/or a care home together with all parking, servicing and onsite open space."*

1.2.4 To assist the competent authority in its undertaking of Habitats Regulations Assessment the following information is provided in this report:

- Detailed methodology of process undertaken (see Chapter 2),
- Identification of European sites which could be potentially impacted by the proposed scheme, and determination of potential impact pathways (see Chapter 3),
- Identification of the qualifying features, or criterion for selection, of the European sites potentially impacted (see Chapter 3),
- Details of the conservation objectives of the European sites potentially impacted (see Chapter 3),
- Determination of the likelihood of significant impacts (Screening), in isolation (see Chapter 4),
- Determination of the likelihood of significant impacts (Screening), in combination (see Chapter 5), and,
- Conclusions based upon the evidence assessed and recommendations to the competent authority (see Chapter 6)

1.2.5 Where possible, all reports and documents which form the evidence base of this report's conclusions and recommendations are provided within the Appendix section. Where evidence detailed within this report cannot be provided within the Appendix (i.e., they represent electronic resources, etc.) links to these evidence bases are provided within the footnotes of the relevant pages.

1.3 SITE AND REPORT HISTORY

1.3.1 The site of proposed development previously formed part of a much larger site, including a substantial area to the east around Mornings Mill Farm, for which an outline planning application was submitted in 2017 (Ref: WD/2017/1942/MEA). As part of application WD/2017/1942/MEA, Middlemarch Environmental Ltd completed a range of survey work and assessments and a sHRA: Stage 1 Screening report (Report RT-MME-119119-11[1]) was prepared, which focused on potential impacts on the following European sites: Pevensey Levels Special Area of Conservation (SAC) and Ramsar site and Ashdown Forest SAC and Special Protection Area (SPA).

[1] sHRA: Stage 1 Screening Report RT-MME-119119-11 is not provided within the Appendix of this report due to its conclusion no longer being deemed relevant. This is due to both change in HRA process, and since its creation, and its considerations, not being in context with the current development scheme.

1.3.2 A revised planning application for the wider Mornings Mill Farm site was prepared in 2018, for which Middlemarch Environmental Ltd compiled an updated sHRA: Stage 1 Screening report (Report

1.3.3 RT-MME-128845-01[2]). A planning decision was not reached by Wealden District Council and as such, the applicant appealed to the Planning Inspectorate on grounds of non-determination. In order to support the appeal process, in 2019 Middlemarch Environmental Ltd prepared an updated sHRA: Stage 1 Screening and Stage 2 Appropriate Assessment report (Report RT-MME-130198-01[3]) focused on Pevensey Levels SAC and Ramsar site and Ashdown Forest SAC and SPA, and a sHRA: Stage 1 report (Report RT-MME-130198-02[4]) focused on Lewes Downs SAC. The appeal (Ref: APP/C1435/W/19/3230484) was dismissed on highway grounds.

1.3.4 This shadow Habitats Regulations report (RT-MME-154291-01, RevA) was submitted to Wealden District Council in March 2021, in support of the proposed development at a site located off Eastbourne Road, Willingdon, Eastbourne (planning ref: WD/2021/0594/MEA).

1.3.5 This report was reviewed and revised in May 2022 (RT-MME-154291-01, RevB) and further amended in June (RT-MME-154291-01, RevC) prior to its submission to the Planning Inspectorate as part of the proof of evidence of appeal ref: APP/C1435/W/22/3293970.

1.4 HABITATS REGULATIONS ASSESSMENT

1.4.1 The need for projects with the potential to affect European designated sites to be assessed is stated in Article 6 of the European Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (hereafter 'the Habitats Directive'). Articles 6(3) and 6(4) of the Habitats Directive state that an 'Appropriate Assessment' is required for any plan or project that is considered likely to have a significant effect on a European site, either individually or in combination with other plans or projects. The land and marine aspects of the Habitats Directive, as well as certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known collectively as the Nature Directives) are transposed into English and Welsh law through the Conservation of Habitats and Species Regulations 2017 as amended ('the Habitats Regulations 2017').

1.4.2 Regulations 63, 64, 65 and 66 of the Habitat Regulations transpose the requirements of Articles 6(3) and 6(4) of the Habitats Directive into domestic law, as regards a competent authority deciding to undertake, or give any consent, permission, or other authorisation for, a plan or project. Additionally, regulations 75, 76, 77 and 78 of the Habitats Regulations incorporate the requirements of Articles 6(3) and 6(4) of the Habitats Directive, regarding the competent authority's granting of a planning permission by a general development order (permitted development). The requirements of Articles 6(3) and 6(4) of the Habitats Directive are further transposed into regulations 105 and 106 of the Habitats Regulations regarding the requirements of a competent authority (plan-making authority) to undertake an appropriate assessment of implications of any land use plan before the plan is given effect.

1.4.3 Changes have been made to parts of the Habitats Regulations so that they operate effectively from 1st January 2021 following the UK's departure from the European Union ('EU') and the end of the Brexit transition period. The changes are made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 ('Habitats Regulations 2019), among other things which transferred functions from the European Commission to the appropriate authorities in England and Wales.

[2] sHRA: Stage 1 Screening Report RT-MME-128845-01 is not provided within the Appendix of this report due to its conclusion no longer being deemed relevant. This is due to both change in HRA process, and since its creation, and its considerations, not being in context with the current development scheme.

[3] sHRA: Stage 1 Screening Report RT-MME-130198-01 is not provided within the Appendix of this report due to its conclusion no longer being deemed relevant. This is due to both change in HRA process, and since its creation, and its considerations, not being in context with the current development scheme.

[4] sHRA: Stage 1 Screening Report RT-MME-130198-02 is not provided within the Appendix of this report due to its conclusion no longer being deemed relevant. This is due to both change in HRA process, and since its creation, and its considerations, not being in context with the current development scheme.

1.4.4 All other processes and provision in the Habitats Regulations remain unchanged and existing guidance is still relevant. The obligations of a competent authority in the Habitats Regulations for the protection of designated sites or species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

1.4.5 The Habitats Regulations 2019 have created a National Site Network on land and at sea, including both the inshore and offshore marine areas in the UK to replace the EU's Natura 2000 network. The National Site Network includes:

- Existing Special Areas of Conservation (SACs), which are designated due to their importance to the habitats and species listed in Annexes I and II of the Habitats Directive;
- Existing Special Protection Areas (SPAs), which are designated due to their importance for wild birds in accordance with the Wild Birds Directive; and,
- New SACs and SPAs designated under these Regulations.

1.4.6 SACs and SPAs in the UK no longer form part of the EU Natura 2000 ecological network. Any references to Natura 2000 in the Habitats Regulations and in guidance now refers to the new National Site Network. However, guidance provided by Freeths (2020a)[5] recommends that existing SACs and SPAs in the UK can continue to be referred to as 'European sites' and 'European marine sites'.

1.4.7 Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the National Site Network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats. All Ramsar sites remain protected by national policy in the same way as SACs and SPAs and are treated, for planning purposes, as European sites.

1.4.8 Under Regulation 63 of the Habitats Regulations, the competent authority may only agree to a proposed plan or project which is likely to have a significant effect on a European site after having undertaken an appropriate assessment to ascertain that it will not adversely affect the integrity of any European site either alone or in-combination with other plans and projects. Where likely significant effects on a European Site are anticipated and/or cannot be ruled out, at the appropriate assessment stage the plan or project may only be permitted by the competent authority by grant of derogation where the plan or project meets the following 3 tests, namely (a) that there are no alternative solutions; (b) that the proposed development needs to be carried out for imperative reasons of overriding public interest; and (c) the necessary compensatory measures are secured.

1.5 CONSULTATION

1.5.1 As part of their scoping consultation, in relation to the (then) future application WD/2021/0594/MEA, Natural England provided the following opinion to Wealden District Council on the 21st January 2021 (NE Ref 338825, See Appendix 1):

1.5.2 *"Habitats Regulations Assessment*

1.5.3 *Natural England advises that as this proposal for up to 180 residential properties is within 3km of Pevensey Levels SSSI, SAC and Ramsar site, it has the potential to have a likely significant effect through increased surface water run-off. Natural England therefore advises that information on this potential impact should be provided in a report to inform a Habitats Regulations Assessment, which should be submitted with any planning application for the site:*

[5] Freeths. (2020a). *The Habitats Regulations Assessment regime after 31 December 2020 – how will it look?* 22nd October 2020. Available at: https://www.freeths.co.uk/2020/10/22/the-habitats-regulations-assessment-regime-after-31-december-2020-how-will-it-look/?cmpredirect

1.5.4 *Pevensey Levels SSSI, SAC and Ramsar site is an internationally important wetland designated predominantly for wetland features such as: birds, invertebrates and vegetation. These interest features rely on a high quality of water and stable water levels. As such, development proposals must demonstrate how negative impacts to water quality and water levels are avoided and/or minimised. As this development will result in a net gain of hard standing surfaces, there is the risk of increased, potentially contaminated, surface water run-off into the designated site. To appropriately mitigate this impact, the development should implement an appropriate surface water drainage scheme such as a Sustainable Drainage System (SuDS). We advise any surface water drainage mitigation measures may need to be considered by the Council, as the competent authority, via an Appropriate Assessment to ensure there is no adverse effect on the integrity of the site(s) in accordance with the Conservation of Habitats & Species Regulations 2017.*

1.5.5 *If the above mitigation measures are secured, Natural England's view is that this will address the likely significant effect of increased surface water run-off to the Pevensey Levels."*

1.5.6 After the submission of the shadow HRA report to Wealden District Council (as part of application WD/2021/0594/MEA), a planning consultee response was provided by Natural England to Wealden District Council on the 7th of April 2021 (NE Ref 347330, See Appendix 2). The response states:

1.5.7 *"Natural England notes that the HRA has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.*

1.5.8 *Furthermore, Natural England notes that the applicant's 'Shadow Habitats Regulations Assessment: Stage 1 Screening' (March 2021) has screened the proposal to check for the likelihood of significant effects. The assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. This conclusion has been drawn having regard for the measures built into the proposal that seek to avoid all potential impacts.*

1.5.9 *On the basis of information provided, Natural England's advice is that this proposed development may contain (or require) measures intended to avoid or reduce the likely harmful effects on a European site(s) which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an Appropriate Assessment (following the People Over Wind ruling by the Court of Justice of the European Union).*

1.5.10 *For this reason, we advise that on the basis of the information supplied that the application may have a likely significant effect on the site(s). These measures therefore need to be formally checked and confirmed by your authority, as the competent authority, via an Appropriate Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). These measures, and any additional measures that can avoid or reduce any likely harmful effects, can be considered as part of the Appropriate Assessment, to determine whether a plan or project will have an adverse effect on the integrity of the European site."*

1.5.11 It is important to note that Natural England's April 2021 recommendations to Wealden District Council (that an Appropriate Assessment should be undertaken prior to any planning determination), is a comment solely considering the correct procedural process for a competent authority to follow when conducting HRA, and not that Natural England believes the proposed scheme would (all matters considered), result in a significant impact to any European site. Natural England's April 2021 comments do not challenge the robustness of evidence base to inform HRA provided to Wealden District Council in March 2021 (i.e., shadow HRA report RT-MME-154291-01, RevA), nor do they consider the final conclusions of the report unsound.

1.5.12 However, Natural England's comments, as related to the need for the competent authority to progress to Stage 2 of HRA (Appropriate Assessment) conflict with standard practice for conducting HRA, as detailed in the governments Planning Practice Guidance[6].

1.5.13 The 2019 PPG states:

1.5.14 *"Measures which have been specifically added to achieve the purpose of avoiding or reducing* [a schemes] *harmful effects on a habitats site should not be considered at the screening stage…One way of determining whether measures should not be considered at the screening stage may be to consider whether the particular aspects have been included primarily to mitigate the likely habitats-related effects on the site. If they have, this may suggest that an appropriate assessment is required."*

1.5.15 The primary purpose of the schemes flood water / surface water attenuation, filtration, and treatment measures (which are incorporated into the proposed developments design, as described in detail within the 2021 Flood Risk Assessment and Drainage Strategy, see Appendix 3), is not to mitigate impacts upon any European sites, but to meet other legal compliances. It is correct to state that the recommendations within the 2021 Flood Risk Assessment and Drainage Strategy would be the same even if the Pevensey levels SAC / Ramsar sites did not exist.

1.5.16 However, the provisions in the 2021 Strategy, which have been fully incorporated into the schemes design, also have the additional positive effect of preventing any water pollution (due to surface water run-off) ever reaching the Pevensey Levels SAC / Ramsar sites, as such, this represents avoidance not mitigation. For this reason, within this report, the effects of the 2021 Flood Risk Assessment and Drainage Strategy are considered at Screening (see Chapter 4), and it is concluded that an Appropriate Assessment needn't be undertaken by the competent authority (see Chapter 7).

1.5.17 That notwithstanding, it should noted that the issue raised by Natural England in their correspondence to Wealden District Council in April 2021 is a moot point.

1.5.18 Regulation 63 (2) of the Conservation of Habitats and Species Regulations 2017 (as amended)[7] states that:

1.5.19 *"A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required."*

1.5.20 A detailed rationale, taking account of best practice guidance, has been provided to the competent authority (the Planning Inspectorate) as to why progressing to appropriate assessment is not required in this instance. However, should the competent authority be minded to undertake an appropriate assessment (as it is their role to determine its necessity) then the information provided within this report and its appendices is sufficient to undertake this assessment. Should the competent authority deem the flood and drainage prescriptions which are in-built into the scheme (and detailed within the 2021 Flood Risk Assessment and Drainage Strategy), represent mitigation for impacts to European sites (and not an avoidance of impacts ever likely occurring), then the information provided in both Chapter 4 and Appendix 3 should instead merely be considered at the appropriate assessment stage.

[6] Gov.uk, Transport analysis guidance, (2021), Available at: https://www.gov.uk/guidance/transport-analysis-guidance-tag
[7] Legislation.gov.uk (no date), The Conservation of Habitats and Species Regulations, 2017 (as amended), Regulation 63 (2), Available at: https://www.legislation.gov.uk/uksi/2017/1012/regulation/63/made

1.5.21 There is no challenge from Natural England (or any other consultees) that the recommendations within the 2021 Flood Risk Assessment and Drainage Strategy would not fully account for any likely impacts (due to water pollution via surface water run-off) occurring to the Pevensey Levels SAC / Ramsar sites. As all the recommendations detailed in the 2021 Flood Risk Assessment and Drainage Strategy can be secured via planning condition it would therefore represent a proportional and securable mitigation scheme (if minded to be viewed in that manner).

1.5.22 Although this procedural process would be an alteration to the one considered most appropriate within this report, the end results of the competent authorities HRA would remain the same.

2 METHODOLOGY

2.1 INTRODUCTION

2.1.1 The current assessment is based on the best practice for HRA as outlined in The Habitats Regulations Handbook (DTA Publications, 2013[8] and subsequent updates). This document expands upon previous guidance published by the Impacts Assessment Unit at Oxford Brookes University (2001)[9] and the Department for Communities and Local Government (2006)[10].

2.1.2 Best practice guidance identifies that the Habitats Regulations Assessment process is broadly divisible into four stages, with the need to complete each stage determined by the results of the previous stage. In summary, these stages are:

2.1.3 Stage 1: Evidence Gathering and Screening

2.1.4 This stage is associated with collecting evidence regarding those parts of the National Site Network (SACs and SPAs) that have the potential to be impacted by a project or plan, either alone or in combination with other projects or plans. Where no significant effects are perceived, sites may be screened out of the need for further assessment during Stage 2.

2.1.5 The April 2018 decision by the Court of Justice of the European Union (CJEU) in the case of *People Over Wind and Sweetman v Coillte Teoranta* (C-323/17) ('People Over Wind') means that mitigation measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the HRA' screening stage' when judging whether a proposed plan or project is likely to have a significant effect on the integrity of a European site. This is a reversal of a previously settled principle in English and Welsh law. As such, where a proposed development is proximate to a SAC or SPA and could give rise to likely significant effects, even if these effects can be effectively mitigated for, an Appropriate Assessment (Stage 2) is still required.

2.1.6 Regarding CJEU judgments given prior to 31st December 2020, referred to as retained EU case law, section 6 of the European Union (Withdrawal) Act 2018 as amended by the European Union (Withdrawal) Act 2018 (Relevant Court) (Retained EU Case Law) Regulations 2020 confirms that the courts in the UK below appellate level , with the exception of the UK Supreme Court; the Court of Appeal in England and Wales; the Court, will continue to be bound by judgments handed down by the CJEU and by domestic courts prior to 31st December 2020 when interpreting retained EU law. This is the case as long as the relevant piece of legislation remains unmodified by Parliament.

2.1.7 Under these regulations, the appellate courts may depart from retained EU case law, except in so far as "there is post-transition case law which modifies or applies that retained EU case law and which is binding on the relevant court".

2.1.8 Stage 2: Appropriate Assessment of Significant Impacts

2.1.9 Where it is considered a European site may experience likely significant effects from a project or plan, either alone or in combination with other projects or plans, an appropriate assessment of the likelihood and severity of the perceived impact on the integrity of the European site and the National Site Network is undertaken. This appropriate assessment is based on a detailed review of the proposed project or plan in conjunction with the structure, function and conservation objectives of the designated European site(s). This stage may also include a preliminary assessment regarding the potential for the identified impacts to be mitigated

[8] DTA Publications (2013 and subsequent updates). The Habitat Regulations Assessment Handbook. DTA Publications, Nottingham.
[9] Oxford Brookes University. (2001). 'Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the 'Habitats' Directive 92/43/EEC. European Commission DG Environment.'
[10] Department for Communities and Local Government (2006). Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.

2.1.10 Stage 3: Assessment of Alternative Solutions

2.1.11 Where adverse impacts on the integrity of the European site and the National Site Network are perceived, this stage examines alternative ways of achieving the objectives of the project or plan in order to avoid these impacts.

2.1.12 **Stage 4: Imperative Reasons of Overriding Public Interest and Compensation Measures**

2.1.13 Where the potential for adverse impacts on integrity remain, and where it is deemed that a project or plan should proceed for Imperative Reasons of Overriding Public Interest (IROPI), an investigation of appropriate compensatory measures is undertaken.

2.1.14 This report focuses on Stages 1 of the Habitats Regulations Assessment process.

2.2 THE 'PRECAUTIONARY PRINCIPLE'

2.2.1 Oxford Brooks (2001) Methodological Guidance on Articles 6(3) and 6(4) Habitats Directive states that "Implicit in the habitats directive is the application of the precautionary principle, which requires that the conservation objectives of Natura 2000 should prevail where there is uncertainty". The European Commission's Final Communication from the Commission on the Precautionary Principle (European Commission, 2000a[11]) states that the use of the precautionary principle presupposes:

- Identification of potentially negative effects resulting from a phenomenon, product or procedure;
- A scientific evaluation of the risks which because of the insufficiency of the data, their inconclusive or imprecise nature, makes it impossible to determine with sufficient certainty the risk in question (CEC, 2000).

2.2.2 According to best practice guidance, this means that the emphasis for assessment should be on objectively demonstrating, with supporting evidence, that there will be no significant effects on a European site. The publication 'Managing Natura 2000 Sites: The Provision of Article 6 of the 'Habitats' Directive 92/43/EEC' (European Commission, 2000b[12]) provides explanatory guidance regarding this point, which is paraphrased below.

2.2.3 *It is clear from the context and from the purpose of the directive that the 'integrity of the site' relates to the site's conservation objectives. For example, it is possible that a plan or project will adversely affect the integrity of a site only in a visual sense or only habitat types or species other than those listed in Annex I or Annex II. In such cases, the effects do not amount to an adverse effect for the purposes of Article 6(3), provided that the coherence of the network is not affected.*

2.2.4 *The expression 'integrity of the site' shows that focus is here on the specific site. Thus, it is not allowed to destroy a site or part of it on the basis that the conservation status of the habitat types and species it hosts will anyway remain favourable within the European territory of the Member State.*

2.2.5 *As regards the connotation or meaning of 'integrity', this can be considered as a quality or condition of being whole or complete. In a dynamic ecological context, it can also be considered as having the sense of resilience and ability to evolve in ways that are favourable to conservation. The 'integrity of the site' has been usefully defined as 'the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or levels of populations of the species for which it was classified' (IEEM, 2006).*

2.2.6 *The integrity of the site involves its ecological functions. The decision as to whether it is adversely affected should focus on and be limited to the site's conservation objectives.*

2.2.7 Conservation objectives for the European sites considered in this assessment are presented in Chapter 3.

[11] European Commission (2000a). Final Communication from the Commission on the Precautionary Principle. Available at: https://op.europa.eu/en/publication-detail/-/publication/21676661-a79f-4153-b984-aeb28f07c80a/language-en
[12] European Commission. (2000b). Managing Natura 2000 Sites: The Provision of Article 6 of the 'Habitats' Directive 92/43/EEC. Available at: https://op.europa.eu/en/publication-detail/-/publication/2c9f4a14-8f97-43ac-a274-4946c142b541/

3 STAGE 1: RELEVANT EUROPEAN SITES

3.1 IDENTIFICATION OF EUROPEAN SITES

3.1.1 As detailed in Section 1.3, Natural England, in their January 2021 scoping consultation (see Appendix 1) requested that potential impacts on Pevensey Levels SAC and Ramsar site (as a result of the proposed development) would need to be assessed, and information provided to inform a Habitats Regulations Assessment.

3.1.2 While potential effects on other European sites have not been identified by Natural England, potential impacts on Lewes Downs SAC and Ashdown Forest SAC and SPA were considered as part of the 2019 planning appeal (Ref: APP/C1435/W/19/3230484) for the wider Mornings Mill Farm development. The potential for the new proposed development scheme to impact upon the qualifying features of these sites will also be considered as a matter of consistency of approach.

3.1.3 The relative distances of these European sites from the application site and the justification for scoping them in or out of further assessment are provided in Table 3.1.

European Site	Distance from Application Site	Justification for Scoping In/Out of Further Assessment
Pevensey Levels SAC	2.8 km north-east	Pevensey Levels SAC is designated for its national and international important population of little whirpool ramshorn snail *Anisus vorticulus* Due to the distance between the site of proposed development and the SAC there is not anticipated to be any potential for likely significant impact upon the site during the construction phase of the development. The habitats upon which the qualifying feature is reliant are known to be susceptible to increased levels of water pollution. The proposed scheme will result in an increase in sealed surfaces and residential (C3) development which could result in additional surface water run-off and/or foul-water discharge which (if not managed via an appropriate drainage and attenuation scheme) could result in an increase in water pollution to the SAC or water bodies within the SAC's fluvial catchment. It is considered that the proposed development has the potential to result in a significant indirect impact upon the SAC during its operational phase, due to increase water pollution. Pevensey Levels SAC is therefore considered further within this assessment.
Pevensey Levels Ramsar	2.8 km north-east	Pevensey Levels Ramsar is designated for its outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species. The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is considered the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles *Coleoptera* spp., and supports an outstanding assemblage of dragonflies, *Odonata* spp.. Due to the distance between the site of proposed development and the Ramsar site there is not anticipated to be any potential for likely significant impact upon the site during the construction phase of the development. The designated habitats and species of the Ramsar are known to be susceptible to increased levels of water pollution. The proposed scheme will result in an increase in sealed surface and residential (C3) development which could result in additional surfaces water run-off and/or foul-water discharge which (if not managed via an appropriate drainage and attenuation scheme) could result in an increase in water pollution to the Ramsar site or water bodies within the Ramsar site's fluvial catchment. It is considered that the proposed development has the potential to result in a significant indirect impact upon the Ramsar site during its operational phase, due to increase water pollution. Pevensey Levels Ramsar site is therefore considered further within this assessment.

Table 3.1: Summary of European Sites (continues)

European Site	Distance from Application Site	Justification for Scoping In/Out of Further Assessment
Lewes Downs SAC	14 km north-west	Lewes Downs SAC is designated for it nationally and internationally important areas of semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuca-Brometalia*). Due to the great distance between the site of proposed development and the SAC there is not anticipated to be any potential for likely significant impact upon the site during the construction phase of the development. The habitats (calcareous grasslands and scrubland) that constitute the qualifying features of the Lewes Downs SAC are sensitive to impacts derived via increased atmospheric deposition of nitrogen. The proposed re-development would not result in any direct increase (i.e. additional process contribution (PC)) of harmful atmospheric emissions of the types known to harm the qualifying features for the site (i.e. oxides of nitrogen (collectively NOx), gaseous ammonia (NH3), or sulphur dioxide (SO2)) either during its construction or operational phases. During its operational phase there is potential for the proposed development to result in increased indirect air pollution (i.e. vehicular emissions) upon the SAC due to increasing the annual average daily traffic (AADT) rate along major roads within 200 m of the site's boundary. The proposed development could result in an increase in AADT via traffic generated in association with the creation of up to 180 residential units (C3) and a new community medical centre and/or a care home (D1/C2). It is considered that the proposed development has the potential to result in a significant indirect impact upon the SAC during its operational phase, due to increase atmospheric deposition of nitrogen. Lewes Downs SAC is therefore considered further within this assessment.
Ashdown Forest SAC	24.6 km north-west	Ashdown Forest SAC is designated for it nationally and internationally important areas of Northern Atlantic wet heaths with *Erica tetralix,* European dry heaths and its population of great crested newts. Due to the great distance between the site of proposed development and the SAC there is not anticipated to be any potential for likely significant impact upon the site during the construction phase of the development. The habitats (heaths) that constitute the qualifying features of the Ashdown Forest SAC are sensitive to impacts derived via that increased atmospheric deposition of nitrogen. The species (great crested newts) that constitute the qualifying features of the Ashdown Forest SAC are not directly sensitive to harm from increased levels of nitrogen. However, increased atmospheric deposition of nitrogen is harmful to habitats, and ecological functions of those habitats, upon which great crested newts are reliant. The proposed re-development would not result in any direct increase (i.e. additional process contribution (PC)) of harmful atmospheric emissions of the types known to harm the qualifying features for the site (i.e. oxides of nitrogen (collectively NO_x), gaseous ammonia (NH_3), or sulphur dioxide (SO_2)) either during its construction or operational phases. During its operational phase there is potential for the proposed development to result in increased indirect air pollution (i.e. vehicular emissions) upon the SPA due to increasing the annual average daily traffic (AADT) rate along major roads within 200 m of the sites boundary. The proposed development could result in an increase in AADT via traffic generated in association with the creation of up to 180 residential units (C3) and a new community medical centre and/or a care home (D1/C2). It is considered that the proposed development has the potential to result in a significant indirect impact upon the SAC during its operational phase, due to increase atmospheric deposition of nitrogen. Ashdown Forest SAC is therefore considered further within this assessment.

Table 3.1 (continued): Summary of European Sites (continues)

European Site	Distance from Application Site	Justification for Scoping In/Out of Further Assessment
Ashdown Forest SPA	24.6 km north-west	Ashdown Forest SPA is designated for it national and internationally important breeding populations of European nightjar *Caprimulgus europaeus* and Dartford warbler *Sylvia undataa.* Due to the great distance between the site of proposed development and the SPA there is not anticipated to be any potential for likely significant impact upon the site during the construction phase of the development. The bird species that constitute the qualifying features of the Ashdown Forest SPA are not directly sensitive to harm from increased levels of nitrogen. However, increased atmospheric deposition of nitrogen is harmful to habitats, and ecological functions of those habitats, upon which both bird species are reliant. The proposed re-development would not result in any direct increase (i.e. additional process contribution (PC)) of harmful atmospheric emissions of the types known to harm the qualifying features for the site (i.e. oxides of nitrogen (collectively NOx), gaseous ammonia (NH3),or sulphur dioxide (SO2)) either during its construction or operational phases. During its operational phase there is potential for the proposed development to result in increased indirect air pollution (i.e. vehicular emissions) upon the SPA due to increasing the annual average daily traffic (AADT) rate along major roads within 200 m of the sites boundary.The proposed development could result in an increase in AADT via traffic generated in association with the creation of up to 180 residential units (C3) and a new community medical centre and/or a care home (D1/C2). It is considered that the proposed development has the potential to result in a significant indirect impact upon the SPA during its operational phase, due to increase atmospheric deposition of nitrogen. Ashdown Forest SPA is therefore considered further within this assessment.

Table 3.1 (continued): Summary of European Sites

3.1.4 The location of the sites in relation to the proposed development site is shown on Drawing C154291-01-01 in Chapter 8. The designation criteria, conservation objectives and known areas of vulnerability for each of the European sites listed in Table 3.1 are detailed in Sections 3.2 to 3.6.

3.2 PEVENSEY LEVELS SAC

The following information is taken from the JNCC Website[13].

Country: England
Administrative Region: Surrey, East and West Sussex
Latitude: 50.8525
Longitude: 0.350555556
Site Code: UK0030367
Status: Designated Special Area of Conservation (SAC)
Area (ha): 3585.38

3.2.1 Qualifying Features

The following Annex II species are primary reasons for the selection of this site:

- 4056 Little whirpool ramshorn snail *Anisus vorticulus*

3.2.2 Conservation Objectives

Conservation objectives for Pevensey Levels SAC are available in the Natural England document titled "European Site Conservation Objectives for Pevensey Levels Special Area of Conservation Site Code: "UK0030367"[14].

[13] JNCC, (no date), Pevensey Levels SAC, Site Information, Available at: https://sac.jncc.gov.uk/site/UK0030367
[14] Natural England, (2018), European Site Conservation Objectives for Pevensey Levels Special Area of Conservation Site Code: "UK0030367", Available at: http://publications.naturalengland.org.uk/publication/6293054151458816

According to this document, the conservation objectives for the SAC are as follows:

> *With regard to the SAC and the natural habitats and/or species for which the site has been designated… and subject to natural change;*
> *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*
> - *The extent and distribution of the habitats of qualifying species*
> - *The structure and function of the habitats of qualifying species*
> - *The supporting processes on which the habitats of qualifying species rely*
> - *The populations of qualifying species, and,*
> - *The distribution of qualifying species within the site.*

3.2.3 Issues Affecting the Qualifying Features

The Site Improvement Plan for Pevensey Levels[15] highlights the following pressures/threats affecting little ramshorn whirlpool snail:

- Inappropriate water levels;
- Invasive species; and,
- Water pollution.

Where the proposed works have the potential to interact with and/or exacerbate the pressures/threats listed (e.g. through pollution of supporting habitats), this is discussed further in Chapter 4.

3.3 PEVENSEY LEVELS RAMSAR

The following information is taken from the Ramsar Information Sheet[16].

Country:	England
Administrative Region:	East Sussex
Latitude:	50.8525
Longitude:	0.350555556
Site Code:	UK11053
Status:	Designated Ramsar Wetland
Area (ha):	3577.71

3.3.1 Ramsar Criteria

The site qualifies under Criteria 2a and 2b of the Ramsar Criterion for identifying wetlands of international importance:

- Ramsar 2a: The site supports an assemblage of wetland plants and invertebrates including many British Red Data Book species.
- Ramsar 2b: The site is of special value for maintaining the genetic and ecological diversity of the region.

3.3.2 Issues Affecting the Qualifying Features

Factors which are adversely affecting the Ramsar wetland are detailed in the Ramsar Information Sheet for the site, as follows:

- Vegetation succession;
- Eutrophication;
- Introduction/invasion of exotic animal species;
- Pollution – domestic sewage;
- Pollution – fertilisers;
- Pollution – pesticides/agricultural runoff; and,
- General disturbance from human activities.

[15] Natural England (2014),Site Improvement Plan: Pevensey Levels, Available at: http://publications.naturalengland.org.uk/publication/6057793526169600
[16] Ramsar Information Service, (no date) Pevensey Levels Ramsar, Available at: https://rsis.ramsar.org/ris/973

Where the proposed works have the potential to interact with and/or exacerbate the pressures/threats listed (e.g. through pollution of qualifying habitats), this is discussed further in Chapter 4.

3.4 LEWES DOWNS SAC

The following information is taken from the JNCC Website[17].

Country:	England
Administrative Region:	Surrey, East and West Sussex
Latitude:	50.86472222
Longitude:	0.0475
Site Code:	UK0012832
Status:	Designated Special Area of Conservation (SAC)
Area (ha):	146

3.4.1 Qualifying Features

The following Annex I habitats are primary reasons for the selection of this site:

- 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuca-Brometalia)*

3.4.2 Conservation Objectives

Conservation objectives for Lewes Downs SAC are available in the Natural England document titled "European Site Conservation Objectives for Lewes Downs Special Area of Conservation Site Code: UK0012832"[18].

According to this document, the conservation objectives for the SAC are as follows:

> *With regard to the SAC and the natural habitats and/or species for which the site has been designated…and subject to natural change;*
>
> *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:*
>
> - *The extent and distribution of qualifying natural habitats*
> - *The structure and function (including typical species) of qualifying natural habitats, and*
> - *The supporting processes on which qualifying natural habitats rely*

3.4.3 Issues Affecting the Qualifying Features

The Site Improvement Plan for Lewes Downs[19] highlights the following pressures/threats affecting the qualifying features:

- Game management: pheasant rearing;
- Undergrazing;
- Public Access/Disturbance; and,
- Air Pollution: impact of atmospheric nitrogen deposition.

Where the proposed works have the potential to interact with and/or exacerbate the pressures/threats listed (e.g. through habitat loss or damage, disturbance or pollution), this is discussed further in Chapter 4.

[17] JNCC, (no date), Lewes Downs SAC, Site Information, Available at: https://sac.jncc.gov.uk/site/UK0012832.
[18] Natural England, (2018), European Site Conservation Objectives for Lewes Downs Special Area of Conservation Site Code: UK0012832, Available a thttp://publications.naturalengland.org.uk/publication/4618459505754112
[19]Natural England, (2015) Site Improvement Plan: Lewes Downs, Available at http://publications.naturalengland.org.uk/publication/5857326774878208

3.5 ASHDOWN FOREST SAC

The following information is taken from the JNCC Website[20].

Country:	England
Administrative Region:	Surrey, East and West Sussex
Latitude:	51.05583333
Longitude:	0.070555556
Site Code:	UK0030080
Status:	Designated Special Area of Conservation (SAC)
Area (ha):	2715.88

3.5.1 Qualifying Features

The following Annex I habitats are primary reasons for the selection of this site:

- 4010 Northern Atlantic wet heaths with *Erica tetralix*; and,
- 4030 European dry heaths.

The following Annex II species are primary reasons for the selection of this site:

- 1166 Great crested newt *Triturus cristatus.*

3.5.2 Conservation Objectives

Conservation objectives for Ashdown Forest SAC are available in the Natural England document titled "European Site Conservation Objectives for Ashdown Forest Special Area of Conservation Site Code: UK0030080"[21].

According to this document, the conservation objectives for the SAC are as follows:

> *"With regard to the SAC and the natural habitats and/or species for which the site has been designated…and subject to natural change;*
>
> *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*
>
> - *The extent and distribution of qualifying natural habitats and habitats of qualifying*
> - *species*
> - *The structure and function (including typical species) of qualifying natural habitats*
> - *The structure and function of the habitats of qualifying species*
> - *The supporting processes on which qualifying natural habitats and the habitats of*
> - *qualifying species rely*
> - *The populations of qualifying species, and,*
> - *The distribution of qualifying species within the site.*

3.5.3 Issues Affecting the Qualifying Features

The Site Improvement Plan for Ashdown Forest[22] highlights the following pressures/threats affecting the Natura 2000 features:

- Change in land management;
- Air Pollution: impact of atmospheric nitrogen deposition;
- Public Access/Disturbance; and,
- Hydrological changes.

Where the proposed works have the potential to interact with and/or exacerbate the pressures/threats listed (e.g. through habitat loss or damage, disturbance to qualifying species or supporting habitats or pollution), this is discussed further in Chapter 4.

[20] JNCC, (no date), Ashdown Forest SAC, Site Information, Available at: https://sac.jncc.gov.uk/site/UK0030080
[21] Natural England, (2018), European Site Conservation Objectives for Ashdown Forest Special Area of Conservation Site Code: UK0030080, Available at: http://publications.naturalengland.org.uk/publication/6183967367626752
[22]Natural England, (2014), Site Improvement Plan for Ashdown Forest, Available at http://publications.naturalengland.org.uk/publication/5793096570765312

3.6 ASHDOWN FOREST SPA

The following information is taken from the JNCC Standard Date Form for Ashdown Forest SPA [23].

Country: England
Administrative Region: Surrey, East and West Sussex
Latitude: 51.06222222
Longitude: 0.07
Site Code: UK9012181
Status: Designated Special Protection Area (SPA)
Area (ha): 32070.7

3.6.1 Qualifying Features

The site qualifies under Article 4.1 of the Directive (2009/147/EC) by supporting populations of European importance of bird species listed on Annex II of the Directive. These species are summarised in Table 3.2.

SPECIES	STATUS ON SITE[1]
Annex 2 species; populations supported during the breeding season	
European nightjar *Caprimulgus europaeus*	35 pairs, 1% of the British population (2 year mean 1991 and 1992)
Dartford warbler *Sylvia undataa*	20 pairs, 1.3% of the British population (count as at 1994)
[1]As detailed in the 2015 SPA Citation, available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012181.pdf	

Table 3.2: Summary of Qualifying Species for Ashdown Forest SPA

3.6.2 Conservation Objectives

Conservation objectives for the Ashdown Forest SPA are available in the Natural England document titled European Site Conservation Objectives for Ashdown Forest SPA (UK9012181)[24]

The conservation objectives for the SPA are as follows:

> *With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified… and subject to natural change;*
>
> *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*
> - *The extent and distribution of the habitats of the qualifying features*
> - *The structure and function of the habitats of the qualifying features*
> - *The supporting processes on which the habitats of the qualifying features rely*
> - *The population of each of the qualifying features, and,*
> - *The distribution of the qualifying features within the site.*
>
> *This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.*

3.6.3 Issues Affecting the Qualifying Features

The Site Improvement Plan for Ashdown Forest[25] highlights the following pressures/threats affecting the qualifying features:

- Change in land management;
- Air Pollution: impact of atmospheric nitrogen deposition;
- Public Access/Disturbance; and,
- Hydrological changes.

Where the proposed works have the potential to interact with and/or exacerbate the pressures/threats listed (e.g. through habitat loss or damage, disturbance to qualifying species or supporting habitats or pollution), this is discussed further in Chapter 4.

[23] JNCC, (2015), Ashdown Forest SPA, Standard Date Form, Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012181.pdf
[24] Natural England, (2019), European Site Conservation Objectives for Ashdown Forest Special Protection Area Site Code: UK9012181, Available at: http://publications.naturalengland.org.uk/publication/6399918323269632
[25] Natural England, (2014), Site Improvement Plan for Ashdown Forest Available at: http://publications.naturalengland.org.uk/publication/5793096570765312

4 STAGE 1: DEVELOPMENT PROPOSALS AND POTENTIAL IMPACTS

4.1 CURRENT LAND USE

4.1.1 The site under consideration is a polygonal shaped parcel of land approximately 6.48 ha in size, located north of Eastbourne Road (A2270) in Willingdon (BN26 5BE, National Grid Reference TQ 584 041). The site is surrounded by existing residential development to its north, west and south and open agricultural land to the east. The sites comprises primarily open grassland (the former Hindsland Playing fields which are now disused), as well as areas of hard standing associated with a former pavilion building. A single detached dwelling (vacant) and associated outbuildings are sited adjacent to the site access.

4.2 SCOPE OF THE PROPOSED DEVELOPMENT

4.2.1 The development proposal is for an Outline Application, all matters reserved except for access (excluding internal estate roads beyond the access to serve the Medical Centre Plot), for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and a new community medical centre and/or a care home together with all parking, servicing and onsite open space.

4.2.2 The Site Layout (Drawing 20089-C101, CSP 2021) is provided in Chapter 8.

4.3 POTENTIAL IMPACTS AND EFFECTS ARISING AS A RESULT OF THE PROPOSALS

4.3.1 Following a review of the proposals and consideration of the wider issues which are affecting to the Pevensey Levels SAC, the Pevensey Levels Ramsar, the Lewes Downs SAC, the Ashdown Forest SAC and the Ashdown Forest SPA, it is considered that there are two impact pathways which could lead to potentially adverse effects on the integrity of European sites that form part of the National Sites Network:

- Operational Phase: Water pollution via surface water run-off and foul water discharge leading to impacts on the structure and function of the habitats upon which qualifying species rely and upon the supporting processes of the habitats upon which the qualifying species rely (Pevensey Levels SAC and the Pevensey Levels Ramsar); and,
- Operational Phase: Increased levels of air pollution (arising from increased vehicular usage within 200 m of the boundaries of the European sites in consideration), impacting upon qualifying habitats, the habitats upon which qualifying species rely and upon the supporting processes of the habitats upon which the qualifying species rely (Lewes Downs SAC, the Ashdown Forest SAC and the Ashdown Forest SPA).

4.3.2 Operational Phase: Water Pollution via Surface Water Run-Off and Foul Water Discharge

4.3.3 A Flood Risk Assessment and Drainage Strategy (Stuart Michael Associates Ltd, 2021, see Appendix 3) has been prepared as part of the proposed development scheme. It considers potential impacts of increased surface water run-off and foul water discharge likely to occur as a result of the proposed development and details appropriate remediation against the potential for harmful environmental effects which have then been incorporated into design of the scheme.

4.3.4 The measures detailed within the Flood Risk Assessment and Drainage Strategy are considered integral to the development scheme (i.e., they would be undertaken even if there was no potential for harm upon a European site). Paragraph 65-007-20190722 of the Planning Practice Guidance[26] ('PPG') confirms that features that are integral to the design or physical characteristics of a project that is being assessed, may be considered at the screening stage. As such, the effects on the likely impacts of the development scheme as a result of the Flood Risk Assessment and Drainage Strategy should be considered at Stage 1 of Habitats Regulations Assessment (Screening), rather than Stage 2 (Appropriate Assessment).

[26] Gov.uk, Guidance on the use of Habitats Regulations Assessment, (2019), Available at: https://www.gov.uk/guidance/appropriate-assessment

4.3.5 Surface Water Run-Off

4.3.6 Section 4 of the Flood Risk Assessment and Drainage Strategy (2021) states:

4.3.7 *"Surface Water Flooding occurs when the intensity of rainfall exceeds ground infiltration. Typically, this happens where the ground surface is impermeable, such as roads and paved areas within urban development and where there are impermeable soils, such as clay. The risk of flooding from surface water runoff is greater in locations that are situated adjacent to sloping land, within natural valleys and/or are within local depressions… The overall risk from surface water flooding is therefore considered to be low."*

4.3.8 Section 5 of the Flood Risk Assessment and Drainage Strategy (2021) states:

4.3.9 *"In order to ensure that surface water runoff from a developed site does not have a detrimental impact on the downstream catchment it is important to prioritise where surface water runoff is discharged, control how fast the runoff is discharged and also control how much runoff is discharged from the Site.*

4.3.10 *As the Site is predominantly greenfield, it is proposed to employ Sustainable Drainage Systems (SuDS) measures to ensure surface water is managed effectively.*

4.3.11 *Any development presents an opportunity to incorporate SuDS, which might include infiltration techniques or attenuation of flows to protect receiving sewers or watercourses. The choice of methods is dependent upon ground conditions and availability of suitable areas within the particular scheme layout.*

4.3.12 *The development proposals will incorporate SuDS to dispose of surface water runoff. The guidance given in the CIRIA report C753 'The SuDS Manual' will be followed during the design of the proposed sustainable drainage solution. Runoff will be managed both at source and across the Site as a whole…"*

4.3.13 The Strategy continues:

4.3.14 *"…discharge of surface water runoff from the proposed development will follow existing arrangements. Runoff will be discharged into the ditch located within the south east corner of the Site.*

4.3.15 *The primary form of attenuation will be provided within a retention basin located adjacent to the outfall. Further attenuation will be provided throughout the Site in the form of porous paving and swales.*

4.3.16 *… the drainage systems across the Site will be designed so that the surface water runoff from the proposed development is contained within the drainage network, with no flooding for all storms up to, and including, the 1 in 30-year event. Furthermore, the drainage system will be designed so that flooding to any new buildings does not occur during a 1 in 100-year rainfall event, including a +40% allowance for climate change."*

4.3.17 In addition, the Strategy states:

4.3.18 *"As runoff percolates through the sub-layers, pollutants and contaminates are filtered out by the surfacing layer and biological process in the sub-base.*

4.3.19 … [the] *Retention basins are permanently wet landscaped depressions that provide both attenuation and treatment of surface water runoff. Attenuation storage is provided above the permanent pool of water at the base of the retention basin. Runoff from rainfall events are retained by a flow control device and treated within the pool of water.*

4.3.20 *The standing pool of water helps settle out particulate pollutants and residual fine silts. The larger the storm event, the more time is provided for treatment to occur.*

4.3.21 … [the] *Swales are shallow, flat bottomed, vegetated open channels designed to convey, treat and attenuate surface water runoff. In addition, runoff collected by the system ponds temporarily on the surface and then filters through the vegetation and underlying soils.*

4.3.22 *Swale channels are broad and shallow and covered by vegetation as a means to encourage low flow velocities to facilitate sedimentation and filtration through the root and soil matrix providing effective pollutant removal."*

4.3.23 The Strategy concludes:

4.3.24 "…*It is considered that sufficient pollution treatment is provided within the proposed SuDS Management Train, minimising risk to water quality and to the receiving water bodies from the Site*."

4.3.25 As such, based upon the evidence available it is considered that the proposed development will not result in any impact upon Pevensey Levels SAC or the Pevensey Levels Ramsar due water pollution via surface water run-off.

4.3.26 Foul Water Discharge

4.3.27 In March 2022 Natural England provided new position statements to many local planning authorities relating to several aquatic and marine European sites across England. These statements informed authorities that, based upon the best available evidence, these European sites were now considered to be likely significantly impacted upon by any net-increase in dissolved nutrient load (Phosphate or Nitrogen), generated due to a new development scheme. These position statements resulted in the immediate establishment of several new 'nutrient neutrality zones'. Any new development within these zones would need to be supported with a calculation (utilising a Natural England nutrient metric, specific to the neutrality zone in consideration) to determine the likely extent of the scheme's nutrient impacts (due to either surface water run-off or foul water generation). These calculations would form part of the evidence base to allow the competent authority to conduct its HRA.

4.3.28 Should it be determined that the proposed scheme would result in a net-increase to nutrient pollution within the nutrient neutrality zone then an appropriate assessment would be necessitated and mitigation (either in the form of an amendment to the development proposals, or via the attainment of an off-site nutrient neutrality scheme) would need to be incorporated into the proposed development scheme, and suitable measures of securing this mitigation identified by the applicant.

4.3.29 The Pevensey Levels SAC / Ramsar sites were not among the European sites identified by Natural England in March 2022 as being likely significantly impacted upon by any net-increase in dissolved nutrient load. The proposed development scheme does not lie within a recognised nutrient neutrality zone.

4.3.30 The nearest nutrient-neutrality zone to the site constitutes the fluvial catchments of the Chichester and Langstone Harbours SPA / Ramsar sites and the Solent Maritime SAC. These zones lie approximately 70km west of the boundary of the proposed development[27].

4.3.31 There is no nutrient metric specifically associated with the Pevensey Levels SAC / Ramsar sites.

4.3.32 Although the Pevensey Levels SAC / Ramsar sites are sensitive to water pollution events, the current levels of dissolved available Nitrogen and Phosphate in the fluvial catchment, which supports the qualifying features / criterion of the Pevensey Levels SAC / Ramsar, do not exceed the site-specific critical levels (unlike the several new sites identified by Natural England in March 2022). This means that the levels of nutrients which enter these European sites are within the range where the natural processes that occur within the sites habitats, can absorb, metabolise, store or otherwise break them down. This is through a range of vegetative, microbial, or geological processes.

[27] Natural England, (2020), Advice on Achieving Nutrient Neutrality For New Development In The Solent Region, Available at: https://www.push.gov.uk/wp-content/uploads/2020/06/Natural-England%E2%80%99s-latest-guidance-on-achieving-nutrient-neutrality-for-new-housing-development-June-2020.pdf

4.3.33 The reason that the amount of Nitrogen and Phosphate being discharged into the Pevensey Levels remains within an ecological acceptable range (i.e., within the levels which the natural processes of the site can deal with without affect) is, in part, due to preventative action taken in 2018 to improve the filtration processes of the Waste Water Treatment Works (WWTW) which discharge into it.

4.3.34 Section 1.1. of Southern Water's September 2018 Wastewater Position Statement (see Appendix 7) details the following:

4.3.35 *"Hailsham North and Hailsham South WTWs discharge treated effluent into the Pevensey Levels, a sensitive natural environment afforded protection by European and National legislation. During the preparation of Wealden's Core Strategy (adopted February 2013) it became apparent that additional discharges into the Pevensey Levels might be constrained and so a commitment was made to limit growth until an acceptable solution for treating wastewater had been identified. Southern Water has considered various options and based on current information has concluded that the preferred solution is the provision of a high rate secondary treatment process at both WTWs in order to overcome this environmental constraint."*

4.3.36 Section 4.1 of Southern Water's September 2018 Wastewater Position Statement further states:

4.3.37 *"Hailsham North WTW serves the northern part of Hailsham, Horsebridge and several outlying villages. Hailsham South WTW serves the majority of Hailsham itself as well as Polegate and Willingdon. Both these WTWs discharge treated waste water into the Pevensey Levels, in line with Environmental Permits granted by the Environment Agency."*

4.3.38 It is identified that, in the scheme's operation phase, the sites foul water would be discharge to the Hailsham South WWTW.

4.3.39 Section 4.2 of Southern Water's September 2018 Wastewater Position Statement clarifies.

4.3.40 *"…Of particular concern is the impact of the treated effluent on the conservation objectives of the Pevensey levels, and as a result the Environment Agency has capped the amount of effluent that can be discharged. The growth strategy reflects this constraint and therefore development will only be allowed if it can be accommodated by the existing works…"*

4.3.41 Sections 5.1, 5.2, and 5.3 of Southern Water's September 2018 Wastewater Position Statement, detail the proposed works to be undertaken to provide additional wastewater treatment capacity without impacting upon the Pevensey Levels SAC / Ramsar sites:

4.3.42 *"Further review and trialling of current wastewater treatment technology identified a high rate biological treatment process that is capable of meeting the requirement to achieve a high quality effluent.*

4.3.43 *Southern Water is currently undertaking the engineering design with a view to construction, commissioning and operation of the process by 2022.*

4.3.44 *Whilst continuing with the design Southern Water is working with the Environment Agency and Natural England to develop an 'operating agreement' to achieve the required high quality effluent from the works. The permit will recognise the achievement of a phosphorous level in the treated effluent from the sites of 0.1 mg/l…"*

4.3.45 A further updated position statement was provided by Southern Water in December of 2018 (see Appendix 8). Section 5.4 of the December statement details further agreed reductions to nutrient discharge rates:

4.3.46 *"…Southern Water have committed to treat beyond this at the two Hailsham WTWs to support the protection of the Pevensey Levels. The Operating Agreement will set out the way in which Southern Water will run the works to reduce the annual average of phosphorous to 0.1mg/l at Hailsham South WTW and 0.08mg/l at Hailsham North WTW."*

4.3.47 Sufficient capacity exists at the Hailsham South WWTW to treat the foul water outputs from the proposed scheme. This ensures any foul water generated will be subjected to a sufficient level of treatment processes so that when it is discharged into the fluvial catchment of the Pevensey Levels SAC / Ramsar sites, its nutrient concentrations are well below the level of the Levels natural tolerances. However, to allow the proposed level of foul water outflow from the site to occur, the sewage system which will connect it to the WWTW will require upgrading.

4.3.48 Section 6 of the Flood Risk Assessment and Drainage Strategy (2021) states:

4.3.49 "*Southern Water has confirmed that there is currently insufficient capacity within this sewer to accept foul water flows from the proposed development, but If there is insufficient capacity within the network to accommodate the new flows either a new point of connection will be required or additional capacity within the existing system will be required. In either case this is considered to be network reinforcement and the cost will be absorbed by Southern Water and recovered through the Infrastructure Charges.*

4.3.50 *Southern Water's Developer Services have previously advised that the site is located within their Regional Forecast growth area, and sewer upgrade works providing improved capacity for the area are due to be completed in 2022. The upgrade works will provide sufficient capacity for the proposed development*.

4.3.51 *Under the new Infrastructure Charges Scheme (April 2018) the cost of connecting a new sewer to the nearest practicable point on the network where the existing sewer is at least the same diameter as the new sewer is included within the new charges."*

4.3.52 The proposed development is currently seeking Outline Permission with all matters reserved except for access. The earliest date that the whole development is likely to be operational (assuming attainment of reserved matter permission, no delay to proposed build rate and swift sale of all C3 units once completed) is 2030. It is considered unrealistic to contemplate that any part of the proposed scheme will enter its operational phase (and so be able to increase the level of foul water discharge to the Hailsham South WWTW) earlier than 2025.

4.3.53 Due to the likely temporal scope until the scheme enters it operational phase, compared to when both the upgrade to the existing sewerage network, and when the installation of the additional biological treatment process at the WWTW will be completed (i.e., 2022), it is considered that any potential impacts will be fully avoided.

4.3.54 However, to allow the Planning Inspectorate further assurance (beyond any reasonable doubt), that any harm to either the Pevensey Levels SAC or the Pevensey Levels Ramsar shall be avoided, full occupation of the Proposed Development would only occur once sufficient sewage capacity has been confirmed by Southern Water.

4.3.55 As such, based upon the evidence available and the ability of the competent authority to secure full avoidance, it is considered that the proposed development will not result in any impact to either the Pevensey Levels SAC or the Pevensey Levels Ramsar due water pollution via foul water discharge.

4.3.56 Operational Phase: Increased levels of air pollution

4.3.57 The qualifying features of the Lewes Downs SAC and Ashdown Forest SAC and the supporting habitats upon which the qualifying species of Ashdown Forest SPA are reliant, are recognised as being sensitive to increasing levels of atmospheric pollution. The European sites are most likely to be impacted upon in this manner by development, plans or projects, which would result (directly or indirectly) in the increased deposition of the oxides of nitrogen (nitrogen oxide, nitrate or nitrite, collectively NO_x), gaseous ammonia (NH_3),or sulphur dioxide (SO_2).

4.3.58 The proposed development will not directly generate additional air pollutants of the types known to harm the qualifying features / supporting habitats of any of the European sites in consideration (i.e. no direct increase of NO_x, NH_3 or SO_2 via a planned process).

4.3.59 However, there is the potential for a significant increase in NOx deposition upon the European sites occurring as an indirect result of this development; by emissions arising during it operational phase due to increased vehicular movements on roads within close proximity to the sites.

4.3.60 The Department of Transport's Transport Analysis Guidance[28] states *"Beyond 200m the contribution of vehicle emissions from roadside to local pollution levels in not significant"*.

4.3.61 Natural England's (2018) guidance ("Natural England's approach to advising competent authorities on the assessment of road traffic emission under the Habitats Regulations", (NEA001-2018))[29] determines that a Competent Authority should consider the implications of a plan or project on three 'nitrogen thresholds' when undertaking Stage 1 (screening) of HRA in relation to the impacts of increasing road traffic emissions from major roads upon a European site.

4.3.62 These thresholds are:

- An increase (on any single road) in Annual Average Daily Traffic (AADT) of 1000 domestic vehicles or greater;
- An increase (on any single road) in AADT of 200 HGV or greater; or,
- That the projected N deposition due to vehicular emissions and/or direct emissions from the development is equal to or greater than 1% of the sites Nitrogen Critical load ($Kg/N/ha^{-1}/year^{-1}$) as detailed on the UK Air Pollution Information System (APIS) website[30] .

4.3.63 If a development exceeds the threshold set out in ether '1' or '2' it may still be screened out if the level of emission ($Kg/N/ha^{-1}/year^{-1}$) is shown to be less than 1% of the Nitrogen Critical Load of the Site under consideration.

4.3.64 If the nitrogen critical load thresholds for the site are exceeded, then further consideration of the bespoke manner in which increased nitrogen deposition is likely to impact upon the European site in question can be undertaken. These considerations and any conclusions drawn are required to be robust and underpinned by the best scientific evidence available. Should it be deemed that the level of increased nitrogen deposition is likely to result in a significant impact to qualifying features of the site (or the critical functions of supporting habitats upon which the qualifying features are reliant) an Appropriate Assessment must be undertaken by the Competent Authority.

4.3.65 In line with Natural England's Guidelines (2018) and the Department of Transport's Transport Analysis Guidance, a Transport Assessment (i-Transport (2021) Ref: NM/MD/AT/ITL15734-004, 2021, see Appendix 4) has been completed to determine the proposed development's likely impacts (as regard increased AADT upon the national highway network). The Transport Assessment takes account of the schemes Framework Travel Plan (*i-Transport Ref: NM/MD/ITL15734-005, 2021*) which identifies opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling and public transport to reduce the demand for travel by less sustainable modes, most specifically single occupancy vehicle trips.

4.3.66 Information taken from these two documents is further supplemented by information provided by i-transport focusing on the specific sections of road under consideration (see Appendix 4).

4.3.67 The information from these sources was utilised to assess the scale of growth along major roads within 200 m of the boundary of the Lewes Downs SAC, Ashdown Forest SAC and Ashdown Forest SPA, to determine if likely additional traffic (directly associated with the proposed development's operational phase) would result in an increase in AADT of 1000 or more vehicles.

4.3.68 The proposed development's likely increase in AADT was calculated for all sections of the following major roads within 200 m of the Lewes Downs SAC:

- A26 (through South Malling), 0% increase in modelled likely trips, no increase to AADT; and,
- B2192 (north of South Malling), 0% increase in modelled likely trips, no increase in AADT.

4.3.69 The proposed development's likely increase in AADT was calculated for all sections of the following major roads within 200 m of the Ashdown Forest SAC and Ashdown Forest SPA:

- A22 (north of Maresfield), 5% increase in modelled likely trips, 109 increase in AADT;
- A26 (north of Maresfield), 6% increase in modelled likely trips, 130 increase in AADT;
- A275 (south of Wych Cross), 0% increase in modelled likely trip, no increase to AADT; and,
- B2026 (north of Maresfield), 0% increase in modelled likely trips, no increase in AADT.

4.3.70 The modelled likely increase in trips will not result in an exceedance in AADT above the threshold set by Natural England guidelines[31] (i.e., 1000 domestic vehicles or greater) along any major road within 200 m of the boundaries of the European sites considered.

4.3.71 Based upon the evidence available it is considered that the proposed development will not result in any impacts upon the Lewes Downs SAC due to increased levels of air pollution (atmospheric deposition of nitrogen) arising through increased vehicular usage.

4.3.72 Based upon the evidence available and it is considered that the proposed development will likely result in an insignificant impact to Ashdown Forest SAC and Ashdown Forest SPA due to increased levels of air pollution (atmospheric deposition of nitrogen) arising through increased vehicular usage.

4.3.73 Table 4.1 provides a summary of the potential impacts and the potential for significant effects on the Pevensey Levels SAC, the Pevensey Levels Ramsar, the Lewes Downs SAC, the Ashdown Forest SAC and the Ashdown Forest SPA which could occur as a result of the implementation of the proposed works in isolation of other plans and projects.

[28] Gov.uk, Transport analysis guidance, (2021), Available at: https://www.gov.uk/guidance/transport-analysis-guidance-tag
[29] Natural England (2018), approach to advising competent authorities on the assessment of road traffic emission under the Habitats Regulations, NEA001-2018 , Available at: http://publications.naturalengland.org.uk/publication/4720542048845824
[30] UK Air Pollution Information System (APIS), Available at: http://www.apis.ac.uk/
[31] Natural England (2018), approach to advising competent authorities on the assessment of road traffic emission under the Habitats Regulations, NEA001-2018 , Available at: http://publications.naturalengland.org.uk/publication/4720542048845824

European Site	Potential Impact Arising as a Result of the Development	Potential Effect on Designated Features	'Likely Significant Effect in Isolation'?
Operational Phase			
Pevensey Levels SAC	Water pollution via surface water run-off and foul water discharge	Impacts on the structure and function of the habitats upon which qualifying species rely and upon the supporting processes of the habitats upon which the qualifying species rely	No
Pevensey Levels Ramsar	Water pollution via surface water run-off and foul water discharge	Impacts on the structure and function of the habitats upon which qualifying species rely and upon the supporting processes of the habitats upon which the qualifying species rely	No
Lewes Downs SAC	Increased levels of air pollution	Decline in the extent, distribution, structure and function of the qualifying habitats	No
Ashdown Forest SAC	Increased levels of air pollution	Decline in the extent, distribution, structure and function of the qualifying habitats	LIsE
Ashdown Forest SPA	Increased levels of air pollution	Decline in quality of habitat used by qualifying species, leading to alteration of the structure and function of the habitats of the qualifying features and change in distribution of qualifying bird species	LIsE
Key: No – No Likely Effect LIsE – Likely Insignificant Effect			

Table 4.1: Stage 1 Screening – Assessment of Impacts and Effects of Proposed Project on European Sites in Isolation of Other Plans and Projects

5 STAGE 1: IN-COMBINATION ASSESSMENT

5.1 OTHER PROJECTS AND PLANS CONSIDERED IN-COMBINATION

5.1.1 In accordance with the legal requirement in the Habitats Regulations and best practice methodology, the potential for a project or plan to impact upon a European site must be considered '*either alone, or in combination with other projects or plans*'. As such it is necessary to consider the insignificant impacts the proposed development is likely to have upon the Pevensey Levels SAC, the Pevensey Levels Ramsar, the Lewes Downs SAC, the Ashdown Forest SAC or the Ashdown Forest SPA, in tandem with other plans and projects to determine if the in-combination impact could be considered likely to be significant.

5.1.2 The scope of an in-combination assessment is restricted to plans and projects which are 'live' at the same time as the assessment being undertaken (Natural England, 2018). These types of plans include:

- The incomplete or non-implemented parts of plans or projects that have already commenced;
- Plans or projects given consent or given effect but not yet started;
- Plans or projects currently subject to an application for consent or proposed to be given effect;
- Projects that are the subject of an outstanding appeal;
- Ongoing plans or projects that are the subject of regular review and renewal;
- Any draft plans being prepared by any public body;
- Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application;

5.1.3 Additionally, guidance from Natural England[32] makes clear that plans or projects deemed to cause significant impact within their own right (and so have either incorporated methods of avoidance or proportional mitigation within the proposed plan or scheme) should be dealt with in their own individual HRA's alone and not be considered in combination with other schemes where impacts (individually) were considered insignificant. Likewise, where a plan or project is considered to result in an insignificant impact in isolation it should not be considered in combination with plans or projects already determined to be significant.

5.1.4 Water Pollution to Pevensey Levels SAC and the Pevensey Levels Ramsar via Surface Water Run-off and Foul Water Discharge

5.1.5 The evidence available demonstrates that the prposed development will not impact upon the Pevensey Levels SAC and the Pevensey Levels Ramsar. All harmful impacts can be fully avoided. Therefore, no in-combination assessment of likely significant effects is required.

5.1.6 Increased levels of Air Pollution Arising from Increase Vehicular Usage within 200m of Lewes Downs SAC

5.1.7 The evidence available demonstrates that the proposed development would not result in any increase in AADT along either of the roads within 200 m of the boundary of the Lewes Downs SAC. As it has been shown that the proposed development will not result in any measurable impact upon the SPA via increasing the AADT along the stretches of the major roads in consideration it cannot reasonably contribute to a significant effect in combination with other plans and projects; zero additional predicted vehicular journeys cannot ever be made significant (i.e. increase above the 1000 AADT, or 1% of the Nitrogen critical load Kg $ha^{1}year^{1}$) by the addition of AADT numbers from other plans or projects which were in themselves deemed insignificant. Therefore, no in-combination assessment of likely significant effects is required.

[32] Natural England (2018), approach to advising competent authorities on the assessment of road traffic emission under the Habitats Regulations, NEA001-2018 , Available at: http://publications.naturalengland.org.uk/publication/4720542048845824

5.1.8 **Increased levels of Air Pollution Arising from Increase Vehicular Usage within 200m of the Ashdown Forest SAC and the Ashdown Forest SPA**

5.1.9 The evidence available (i-transport 2021) demonstrates that the proposed development is unlikely to result in any impact to Ashdown Forest SAC and the Ashdown Forest SPA (i.e. 0 car increase in AADT) along the A275 (south of Wych Cross), or the B2026 (north of Maresfield). The development's impact on parts of the SAC or SPA within 200 m of these roads are not considered in combination with other plans or projects.

5.1.10 The evidence available (i-transport 2021) demonstrates that the proposed development is deemed likely to result in an insignificant impact to the Ashdown Forest SAC and SPA (i.e. >1 car <1000 car increase in AADT) along the A22 (north of Maresfield) and A26 (north of Maresfield). The development's impact on parts of the SAC or SPA within 200 m of these roads must be considered in combination with other plans or projects.

5.1.11 The increases in AADT accountable to the proposed development along the remaining four roads were considered in combination with likely traffic growth predicted to occur due to other known plans and projects: Mornings Mill Farm development (assuming the full 700 units) and Brodericklands Farm development (440 units). Additionally, a regional growth factor was determined and also applied to roads under consideration as part of the in-combination assessment. Regional growth was model using Trip End Model Presentation Program software (TEMPro), the standard method to use the National Trip End Model (NTEM) to forecast the growth in trip origin and destination travel up to 2051. TEMPro data was used to predict the growth rate expected for 2030 when the whole of the proposed development (if approved) would be expected to be completed, and in its operational phase (i.e. occupation of all C3 units).

5.1.12 Modelling determined that the in-combination likely increase in AADT along the remaining four roads in consideration during the proposed developments operational phase would be:

- A22 (north of Maresfield) = 572 AADT
- A26 (north of Maresfield) = 687 AADT

5.1.13 After considering the likely traffic growth as a result of the proposed development in combination with the likely traffic growth predicted to occur via known plans and projects and including likely 'background' traffic growth (determined through use of TEMPro the modelling) it has been demonstrated that the development, in combination with other plans, projects and forecast local traffic growth, will not result in an increase in AADT along any of the roads considered which will meet or exceed the NEA001-2018 thresholds.

5.1.14 In accordance with Natural England guidance there is no reasonable likelihood that the proposed development will (alone or in combination with other plans or projects) result in significant harm, via increased levels of air pollution arising from increased vehicular usage, to either the qualifying habitats or critical functions of the supporting habitats upon which the qualifying species are reliant, of either of the Ashdown Forest SAC or Ashdown Forest SPA.

5.1.15 All issues for all Europeans sites considered should be screened-out at Stage 1 of HRA.

6 STAGE 1: SCREENING ASSESSMENT

6.1 SUMMARY OF SCREENING ASSESSMENT

6.1.1 Table 6.1 provides a summary of the potential impacts and effects arising from the project, both alone and in-combination with other projects and plans.

Site	Potential Effects – Project Alone	Significance of Effects	Potential Impacts – Other Plans and Projects	Risk from In-Combination Effects	Appropriate Assessment Required?
Pevensey Levels SAC	Water pollution via surface water run-off and foul water discharge	No	N/A	N/A	No
Pevensey Levels Ramsar	Water pollution via surface water run-off and foul water discharge	No	N/A	N/A	No
Lewes Downs SAC	Increased atmospheric pollution of qualifying habitats due to increased vehicular emissions.	No	N/A	N/A	No
Ashdown Forest SAC	Increased atmospheric pollution of qualifying habitats due to increased vehicular emissions.	LIsE	Yes (see 5.1)	In-combination effects considered	No
Ashdown Forest Ramsar	Increased atmospheric pollution of qualifying habitats due to increased vehicular emissions.	LIsE	Yes (see 5.1)	In-combination effects considered	No
Key: No – No Likely Effect N/A – Not Applicable LIsE – Likely Insignificant Effect					

Table 6.1: Assessment of Effects of Proposed Project on European Sites

7 CONCLUSIONS AND RECOMMENDATIONS

7.1 CONCLUSIONS

7.1.1 Evidence has been collected and an assessment has been undertaken to assist the competent authority, The Planning Inspectorate, in conducting its screening assessment to ascertain whether it can be certain that there will be no adverse effect as a result of the proposed development on the integrity of any area which forms part of the National Sites Network.

7.1.2 A scoping assessment concluded that there was the potential for the proposed development to result in a significant impact upon the qualify features of the Pevensey Levels SAC and the Pevensey Levels Ramsar during its operation phase through:

- Increased water pollution via surface water run-off and foul water discharge.

7.1.3 A scoping assessment concluded that there was the potential for the proposed development to result in a significant impact upon the qualify features of the Lewes Downs SAC, Ashdown Forest SAC and Ashdown Forest SPA during its operation phase through:

- Increased atmospheric pollution due to increased vehicular emissions.

7.1.4 Following Stage 1 of Habitats Regulations Assessment (Screening) it is concluded that the proposed development scheme is unlikely result in a significant impact to the Pevensey Levels SAC, the Pevensey Levels Ramsar, the Lewes Downs SAC, the Ashdown Forest SAC or the Ashdown Forest SPA, either alone or in combination with other plans and projects.

7.1.5 The Planning Inspectorate can gain further assurance that all possible impacts to the Pevensey Levels SAC and the Pevensey Levels Ramsar will be avoided as occupation for the proposed development shall only occur once sufficient sewage capacity has been confirmed Southern Water.

7.1.6 As such the proposed development can be screened-out at the end of Stage 1 of Habitats Regulations Assessment and a Stage 2 of Habitats Regulations Assessment (Appropriate Assessment) is not required to be undertaken.

7.1.7 Evidence has been collected and an assessment has been undertaken to assist the competent authority, in conducting its Habitats Regulations Assessment as per the requirement placed upon it by Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended). The evidence provided it deemed sufficiently robust (being determined by use to the best scientific evidence available) to allow the authority to ascertain if it can be certain that there will be no adverse effect as a result of the proposed development on the integrity of any area which forms part of the National Sites Network.

7.1.8 Potential impacts on the Pevensey Levels SAC, the Pevensey Levels Ramsar, the Lewes Downs SAC, the Ashdown Forest SAC and the Ashdown Forest SPA have been detailed and considered. It has been displayed that it is highly unlikely that the proposed development will not result in a significant impact upon the: qualifying habitats and species; supporting habitats upon which qualifying species are reliant; or, delivery of the conservation objectives of the sites under consideration.

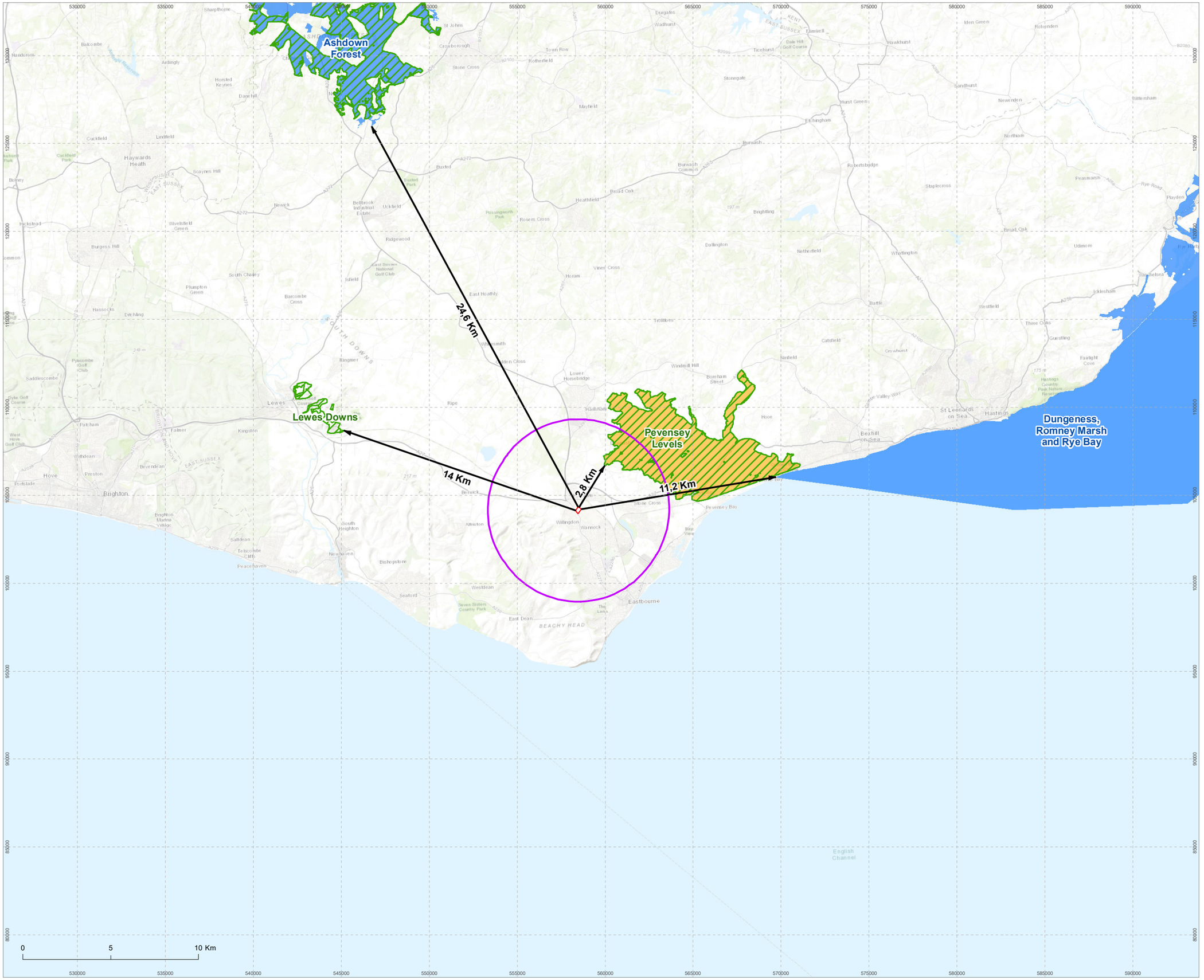
7.2 RECOMMENDATIONS

7.2.1 R1: Ensure Southern Water's Foul Water Capacity Can Accommodate the Proposed Development.

To ensure impacts upon the Pevensey Levels SAC and the Pevensey Levels Ramsar are fully avoided, full occupation for the proposed development will only take place once sufficient sewage capacity has been confirmed (i.e., after conformation is received that the planned 2022 sewer upgrade works providing improved capacity are fully completed). Until this confirmation can be provided, limited occupancy of the site shall occur, restricted up to an appropriate level in tandem with Southern Water's existing foul water capacity.

7.2.2 R2: Re-Assessment if Material Change

All future material revisions to the development scheme should be subject to an updated screening to determine if changes to the proposals could give rise to a likely significant effect on Pevensey Levels SAC, the Pevensey Levels Ramsar, the Lewes Downs SAC, the Ashdown Forest SAC or the Ashdown Forest Ramsar, whether alone or in-combination with other plans and projects.



C154291-01

Legend

- Development scheme boundary
- 5 km radius from site
- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)
- Ramsar areas

N

Project	Eastbourne Road, Willingdon, Eastbourne
Drawing	HRA Map
Client	Danescroft Land Limited
Drawing Number: C154291-01	Revision: 00
Scale @ A3: 1:200000	Date: February 2021
Approved By: CW	Drawn By: CD

MIDDLEMARCH ENVIRONMENTAL
Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
T:01676 525880 F:01676 521400
E:admin@middlemarch-environmental.com

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Pre-App

REV.	DATE	REVISIONS:	BY
A	16/02/21	Utility constraints updated.	RDB
B	25/02/21	Layout amendments to reflect consultation comments	RDB

REV.	DATE	REVISIONS:	BY

REV.	DATE	REVISIONS:	BY

STATUS:

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CLIENT:	Danescroft Land Ltd		PROJECT:	Hindsland, Eastbourne Road, Willingdon, East Sussex
SCALE:	1:500	(A0 ORIGINAL)	DRAWING:	Site Layout
DRAWN:	RDB	20089	P101	A
DATE:	10.02.21			

architecture planning masterplanning
Broadmede House, Farnham Business Park, Weydon Lane, Farnham, Surrey GU9 8QT.
info@osparchitecture.com www.osparchitecture.com
Tel: 01252 267878

9 APPENDICES

Appendix 1: Natural England, (2021), Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): REQUEST FOR SCOPING OPINION FOR MIXED-USE URBAN EXTENSION DEVELOPMENT COMPRISING UP TO 180 RESIDENTIAL PROPERTIES AND A MEDICAL CENTRE, ref: 338825

Appendix 2: Natural England, (2021), Planning Consultation Response to Wealden District Council, in Relation to Application WD/2021/0594/MEA, ref 347330

Appendix 3: Stuart Michael Associates Ltd., (2021), Flood Risk Assessment and Drainage Strategy, Eastbourne Road, Willingdon

Appendix 4: i-Transport, Land at Eastbourne Road, Willingdon, Transport Assessment, ref: NM/MD/AT/ITL15734-004, (2021)

Appendix 5: i-Transport, Land at Eastbourne Road, Willingdon, Framework Travel Plan, ref: NM/MD/ITL15734-005

Appendix 6: Further information from i-transport regarding modelled AADT growth on major roads within 200m of the boundaries of Lewes Downs SAC, Ashdown Forest SAC and Ashdown Forest SPA.

Appendix 7: Southern Water - Wastewater Position Statement Hailsham North and Hailsham South Wastewater Treatment Works – (September 2018)

Appendix 8: Southern Water - Wastewater Position Statement Hailsham North and Hailsham South Wastewater Treatment Works – (December 2018)

Appendix 1: Natural England, (2021), Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): REQUEST FOR SCOPING OPINION FOR MIXED-USE URBAN EXTENSION DEVELOPMENT COMPRISING UP TO 180 RESIDENTIAL PROPERTIES AND A MEDICAL CENTRE, ref: 338825

Date: 21 January 2021
Our ref: 338825
Your ref: WD/2020/6514/SCO

Louise Evans
Case Officer
Wealden District Council

planning@wealden.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Louise Evans,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): REQUEST FOR SCOPING OPINION FOR MIXED-USE URBAN EXTENSION DEVELOPMENT COMPRISING UP TO 180 RESIDENTIAL PROPERTIES AND A MEDICAL CENTRE

Location: FORMER HINDSLAND PLAYING FIELDS, EASTBOURNE ROAD, LOWER WILLINGDON

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 04 January 2021 which we received on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Ruby Musgrove-Ward at ruby.musgrove-ward@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely
Ruby Musgrove-Ward
Sustainable Development Adviser - Sussex and Kent

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In

addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is adjacent to the following designated nature conservation site:

- Pevensey Levels SSSI, Special Area of Conservation (SAC) and Ramsar site.

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within this site and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- European site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

Habitats Regulations Assessment

Natural England advises that as this proposal for up to 180 residential properties is within 3km of Pevensey Levels SSSI, SAC and Ramsar site, it has the potential to have a likely significant effect through increased surface water run-off. Natural England therefore advises that information on this potential impact should be provided in a report to inform a Habitats Regulations Assessment, which should be submitted with any planning application for the site:

- Pevensey Levels SSSI, SAC and Ramsar site is an internationally important wetland designated predominantly for wetland features such as: birds, invertebrates and vegetation. These interest features rely on a high quality of water and stable water levels. As such, development proposals must demonstrate how negative impacts to water quality and water levels are avoided and/or minimised. As this development will result in a net gain of hard standing surfaces, there is the risk of increased, potentially contaminated, surface water run-off into the designated site. To appropriately mitigate this impact, the development should implement an appropriate surface water drainage scheme such as a Sustainable Drainage System (SuDS). We advise any surface water drainage mitigation measures may need to be considered by the Council, as the competent authority, via an Appropriate Assessment to ensure there is no adverse effect on the integrity of the site(s) in accordance with the Conservation of Habitats & Species Regulations 2017.

If the above mitigation measures are secured, Natural England's view is that this will address the likely significant effect of increased surface water run-off to the Pevensey Levels.

2.3 Biodiversity Net Gain

Net gain through development is a key principle in the government's 25 Year Environment Plan. The Government consultation on mandating net gain closed in February 2019 and the Spring Statement confirmed that mandatory net gain would be taken forward. Further detail on the implementation of mandatory net gain is set out in the Government's response to the consultation issued in July 2019. Further information on the relationship between mandatory net gain and the planning system will be provided once a mandatory system is introduced.

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). The recent draft Environment Bill (2019-21) calls for at least a 10% biodiversity gain attributable to the development compared to pre-development. This is the minimum acceptable level. However, Natural England are advocating for Local Planning Authorities and developers to go beyond this mandatory minimum wherever possible. On a development of this size with the amount of proposed green/blue space, we believe this would certainly be possible and therefore advocate going beyond the 10% minimum. We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced and then what new features could be incorporated into the development proposal.

Whilst details on the mandatory approach are being finalised, it is indicated that use of the Biodiversity Metric will likely be mandated. Further information on the current realise of the metric can be found here. The biodiversity metric is a useful tool to help developers calculate net gain and we advise use of this metric to inform proposals for this development.

We refer to the Good Practice Guide jointly produced by CIEEM CIRIA and IEMA, which includes advice to support local authorities' with evidence gathering and provides further detail on good practice principles for securing measurable net gains. In particular we highlight the 10 good practice principles which are contained within this document. Industry standards are also being developed including biodiversity British Standards and a BREEAM approach to environmental credentials including use of the metric.

2.4 Regionally and Locally Important Sites
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.5 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.6 Habitats and Species of Principal Importance
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.7 Contacts for Local Records
Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes
As the development site is adjacent to the South Downs National park, consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for the South Downs National park.

Landscape and visual impacts
Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies

pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes
You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails
The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Appendix 2: Natural England, (2021), Planning Consultation Response to Wealden District Council, in Relation to Application WD/2021/0594/MEA, ref 347330

Date: 07 April 2021
Our ref: 347330
Your ref: WD/2021/0594/MEA

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Mrs C Turner
Case Officer
Wealden District Council

planning@wealden.gov.uk

BY EMAIL ONLY

Dear Mrs C Turner,

Planning consultation: Outline Application with Amr Except For Access (Excluding Internal Estate Roads Beyond the Access to Serve the Medical Centre Plot) For Demolition of Existing Vacant Dwelling. Erection of Up To 180 No. Dwellings & Medical Centre Together with All Parking, Servicing & On-Site Open Space.

Location: Hindsland, Eastbourne Road, Lower Willingdon, BN20 9NU

Thank you for your consultation on the above dated 19 March 2021 which was received by Natural England on 22 March 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application is likely to have a significant effect on Pevensey Levels Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and Ramsar site. Natural England requires further information in order to determine the scope for mitigation.

The following information is required:

- Demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. provide a Habitats Regulations Assessment (HRA).
- Confirmation of a hydrological connection (or lack thereof) between the development site and the Pevensey Levels site.
- Further detail on the Sustainable Drainage System (SuDS) design, it's suitability for the site and it's management and maintenance, for the lifetime of the development.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

HRA

Natural England notes that the HRA has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

Furthermore, Natural England notes that the applicant's 'Shadow Habitats Regulations Assessment: Stage 1 Screening' (March 2021) has screened the proposal to check for the likelihood of significant effects. The assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. This conclusion has been drawn having regard for the measures built into the proposal that seek to avoid all potential impacts.

On the basis of information provided, Natural England's advice is that this proposed development may contain (or require) measures intended to avoid or reduce the likely harmful effects on a European site(s) which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an Appropriate Assessment (following the *People Over Wind* ruling by the Court of Justice of the European Union).

For this reason, we advise that on the basis of the information supplied that the application may have a likely significant effect on the site(s). These measures therefore need to be formally checked and confirmed by your authority, as the competent authority, via an Appropriate Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). These measures, and any additional measures that can avoid or reduce any likely harmful effects, can be considered as part of the Appropriate Assessment, to determine whether a plan or project will have an adverse effect on the integrity of the European site.

SuDS

Natural England acknowledge and welcome that the applicant's 'Flood Risk Assessment and Drainage Strategy' (March 2021) includes at least two stages of treatment, that possible SuDS components have been considered following guidance in the CIRIA SuDS Manual, and that a drainage management and maintenance schedule has been proposed.

However, upon reviewing the information presented in this report, it is unclear as to whether there is an established hydrological connection between the development site and the Pevensey Levels designated sites. Although there is a brief mention of the development sites location being within the Impact Risk Zone of the Pevensey Levels, there is no further explanation as to whether this proximity has been taken into consideration during the SuDS design. For context, a recent application was submitted to Natural England (Ref: WD/2021/0174/MEA) for a development situated immediately adjacent to this development, where the associated Drainage Strategy (January 2021) suggests a possible hydrological connection with the Pevensey Levels and states that "*The proposed drainage would be designed… to safeguard the integrity of Pevensey Levels*" (p.27). Given the neighbouring proximity of the two developments, it can likely be assumed that this hydrological connection applies to both sites.

As you are aware, where there is a likelihood of significant effects (excluding any measures intended to avoid or reduce harmful effects on the European site), or there are uncertainties, a competent authority should fully assess (by way of an Appropriate Assessment) the implications of the proposal in view of the conservation objectives for the European site(s) in question. Appropriate Assessments cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned. Complete information is required to ensure that the proposal will not affect the integrity of the international sites.

In order to consider the associated SuDS strategy at Appropriate Assessment, the following information is required:

- Hydrological connection – Evidence that the development site is not hydrologically connected to the Pevensey Levels to justify screening out surface water impacts at HRA, or, if likely significant effects cannot be ruled out, consideration of this potential impact pathway and proposed mitigation at Appropriate Assessment.
- Design – Certainty of the specific SuDS components and how these will form a treatment train to ensure all surface water goes through at least two stages of treatment.
- Suitability – Certainty of how the specific design will work within the context of the development site, due to aspects such as topography and groundwater conditions.
- Management and Maintenance – A commitment to a maintenance schedule (as outlined in the 'Flood Risk Assessment and Drainage Strategy', Appendix K) with a named management body, who will retain overall responsibility for the SuDS and ensure its efficacy in perpetuity.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

In addition, Natural England would advise on the following issues.

Protected Landscapes

The proposed development is for a site close to a nationally designated landscape namely the South Downs National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the park's management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes. Relevant to this is the duty on public bodies to 'have regard' for those statutory purposes in carrying out their functions (section 11 A (2) of the National Parks and Access to the Countryside Act 1949 (as amended)). The Planning Practice Guidance confirms that this duty also

applies to proposals outside the designated area but impacting on its natural beauty.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter, please contact me at ruby.musgrove-ward@naturalengland.org.uk.

Please consult us again once the information requested above, has been provided.

Yours sincerely

Ruby Musgrove-Ward
Sustainable Development Adviser - Sussex and Kent

ANNEX A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.*

Protected Species

Natural England has produced standing advice[1] to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here[2]. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

[1] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals

[2] http://webarchive.nationalarchives.gov.uk/20140711133551/http:/www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx

Ancient woodland, ancient and veteran trees
You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement
Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wildflower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Biodiversity duty
Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Appendix 3: Stuart Michael Associates Ltd., (2021), Flood Risk Assessment and Drainage Strategy, Eastbourne Road, Willingdon

Flood Risk Assessment and Drainage Strategy

Eastbourne Road, Willingdon

Prepared for
Danescroft (FREOF V Willingdon) LLP

by

Stuart Michael Associates Limited

February 2021

Coombe House
Coombe Square
Thatcham
Berkshire
RG19 4JF

T: 01635 867711
F: 01635 861715
E: mail@stuartmichael.co.uk
W: www.stuartmichael.co.uk

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CONSULTING ENGINEERS

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Registered Office: Coombe House, Coombe Square, Thatcham, Berkshire RG19 4JF.
Telephone: 01635 867711 Facsimile: 01635 861715.

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ACRONYMS AND ABBREVIATIONS

AEP	Annual Exceedance Probability
AOD	Above Ordnance Datum
BGS	British Geological Society
CIRIA	Construction Industry Research and Information Association
DEFRA	Department for Environment, Food and Rural Affairs
DS	Drainage Strategy
EA	Environment Agency
ESCC	East Sussex County Council
FRA&DS	Flood Risk Assessment and Drainage Statement
ha	Hectares
ICP SUDS	Interim Code of Practice for Sustainable Drainage Systems
IDP	Pevensey and Cuckmere Water Level Management Board
IOH 124	Institute of Hydrology Report 124 'Flood Estimation for small catchments'
km	Kilometres
LLFA	Lead Local Flood Authority
LFRMS	Local Flood Risk Management Strategy
LPA	Local Planning Authority
m	Metres
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance to the National Planning Policy Framework
QBAR	Mean Annual Flood (Report No. 124 Flood Estimation for Small Catchments)
SAAR	Standard Annual Average Rainfall
SFRA	Strategic Flood Risk Assessment
SPZ	Source Protection Zone
SW	Southern Water
SUDS	Sustainable Drainage Systems
WDC	Wealden District Council

1.0 INTRODUCTION

1.1 Stuart Michael Associates Limited, consulting engineers, has prepared this Flood Risk Assessment and Drainage Strategy, hereafter referred to as the 'Report', on the instruction of Danescroft (FREOF V Willingdon) LLP, hereafter referred to as the 'Client'.

1.2 This Report supports an Outline Application, all matters reserved except for Access (excluding internal estate roads beyond the access to serve the Medical Centre Plot), for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and a medical centre together with all parking, servicing and onsite open space, hereafter referred to as the 'Site'.

1.3 The existing Site comprises 6.48 hectares and was previously used as university playing fields with associated ancillary services.

Scope of Report

1.4 The FRA section of the Report focuses on assessing the practical flood risk issues at the Site as follows:

- Identification of all the potential sources of flooding at the Site from all sources (i.e. fluvial, pluvial, groundwater, surface water, etc.);
- Assessment of the existing flood risk at the Site and the potential impact on the proposals;

1.5 Consideration of the flood risk implications, taking into account the potential allowance for climate change over the lifetime of the development, and the identification of the measures to mitigate flood risk.

1.6 The purposes of the Report are:

- To confirm that the proposed development will not be subject to unacceptable flood risk or to show that flood risk can be managed acceptably;
- To demonstrate that the proposed development will not increase risk of flooding elsewhere.

Policy Context

1.7 The requirements and policies of East Sussex County Council (ESCC), Wealden District Council (WDC), The Pevensey and Cuckmere Water Level Management Board (IDB), Southern Water (SW) and the Environment Agency (EA) have been taken into account when considering flood risk at the Site.

1.8 The Report presents an assessment of flood risk in accordance with the National Planning Policy Framework (NPPF), July 2018 and its supporting Planning Practice Guidance (PPG) 'Flood Risk and Costal Change', both published by the Department of Communities and Local Government, and the Flood Risk Assessment – Climate Change Allowances guidance, February 2016.

1.9 The NPPF and supporting PPG provide guidance on how flood risk should be considered during planning and development processes. The requirement to protect both new and established development from increased risk of flooding forms an essential part of the guidance. Moreover, implementation of Sustainable Drainage Systems (SUDS) for new development is encouraged.

1.10 WDC is the Local Planning Authority (LPA), controlling flood risk and water environment issues, through policies and guidance presented in the Level 1 Strategic Flood Risk Assessment (SFRA), 2017.

1.11 ESCC, in its role as Lead Local Flood Authority (LLFA), is a statutory consultee for all major applications and advises on the suitability of Sustainable Drainage proposals. Water People Place, A guide for master planning sustainable drainage into developments, AECOM, 2013 outlines the process for integrating SuDS into developments as part of the initial planning and design process for all types of residential, commercial and industrial development. It has been developed through a partnership of south east LLFA's Authorities with the intention of providing a consistent SuDS approach in the wider south eastern area.

1.12 ESCC sets out its vision for SUDS implementation within its administrative boundaries along with the drainage approval process and its requirements in relation to SuDS in the Guide to Sustainable Drainage Systems in East Sussex, 2015. This guidance is also accompanied by a Surface Water Drainage Checklist for both outline and detailed planning applications to follow.

1.13 The Flood and Water Management Act, 2010, requires the EA to develop, maintain and apply a National Flood and Costal Erosion Management Strategy. Similarly, the LLFA is required to develop a Local Flood Risk Management Strategy (LFRMS) for its area. East Sussex County Council's LFRMS for 2016-2026 identifies, at a strategic level, the priority flood risk areas.

1.14 Stuart Michael Associates Limited (SMA) submitted a SuDS pre app with ESCC and received a response on the 8th of October 2020. The pre application response outlined that the Site is included in a modelling project being currently undertaken in the Polegate Willingdon area to accurately assess the flood risk in this area. Alongside this, the pre app indicated the Site lies within the drainage district of the Pevensey and Cuckmere Water Level Management Board (IDB) and therefore the development needs to comply with the Byelaws set out by the Board.

1.15 After liaising with the IDB, the following where points where indicated as being crucial to the success of a Surface Water Management Strategy, alongside abiding by the IDP's byelaws:

- *The proposed impermeable area at the application site*
- *The proposed discharge rates for the drainage system and how they will be controlled*
- *How all forms of flood risk have been taken into account in the design of the drainage system – this includes how high groundwater will be managed, the consideration of offsite flows and how they have been taken into consideration. There appears to be highway drainage discharging into the watercourse/ditch bordering the site, this need to be taken into consideration and its path should not be obstructed*

1.16 The Eastbourne Area Surface Water Management Plan (2012) was produced as a strategic tool, to facilitate the local and coordinated management of surface water flood risk within the Eastbourne catchment area. This assists ESCC in helping to reduce the number of properties at risk of surface water flooding in Willingdon and the wider Eastbourne area.

1.17 Rainfall-runoff management for the Site will follow the procedures laid down by the Non-statutory Technical Standards (NTS) for sustainable drainage systems, which were published by the Department for Environment, Food and Rural Affairs (DEFRA) in March 2015. New climate change guidance published by the EA in February 2016 updates current guidance which supports the NPPF.

2.0 THE SITE

Location

2.1 The Site is located at Eastbourne Road, Willingdon, BN26 5BE (Grid ref: 558459E , 104149N), approximately 1.6km north of central Willingdon. The Site lies to the north east of the A2270 Eastbourne Road, between existing residential dwellings to the north and open agricultural land to the east. On the south west side of Eastbourne Road are existing residential dwellings. A plan showing the location of the Site is attached as **Appendix A**.

2.2 The total red line area of the Site is 6.48ha and is currently occupied by one vacant dwelling adjacent to the Site access and a derelict playing field.

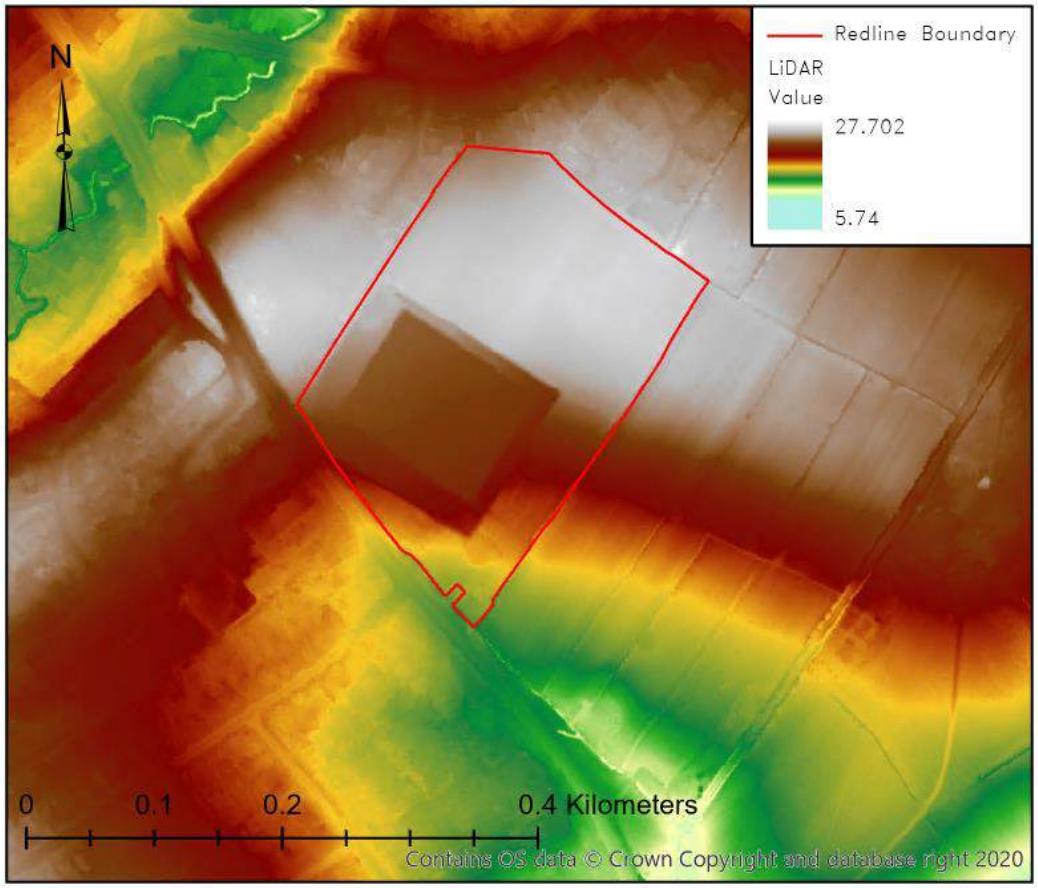
Topography

2.3 Topographical survey of the Site shows that the land falls in a south easterly direction with levels ranging from approximately 11.49mAOD and 21.20mAOD.

2.4 The topographical survey is included as **Appendix B.**

2.5 **Figure 1** below details the wider topographical area based on the Environment Agency's LiDAR Composite DTM 1m (2017) data.

Figure 1 - LiDAR Mapping Data



Geology and Hydrogeology

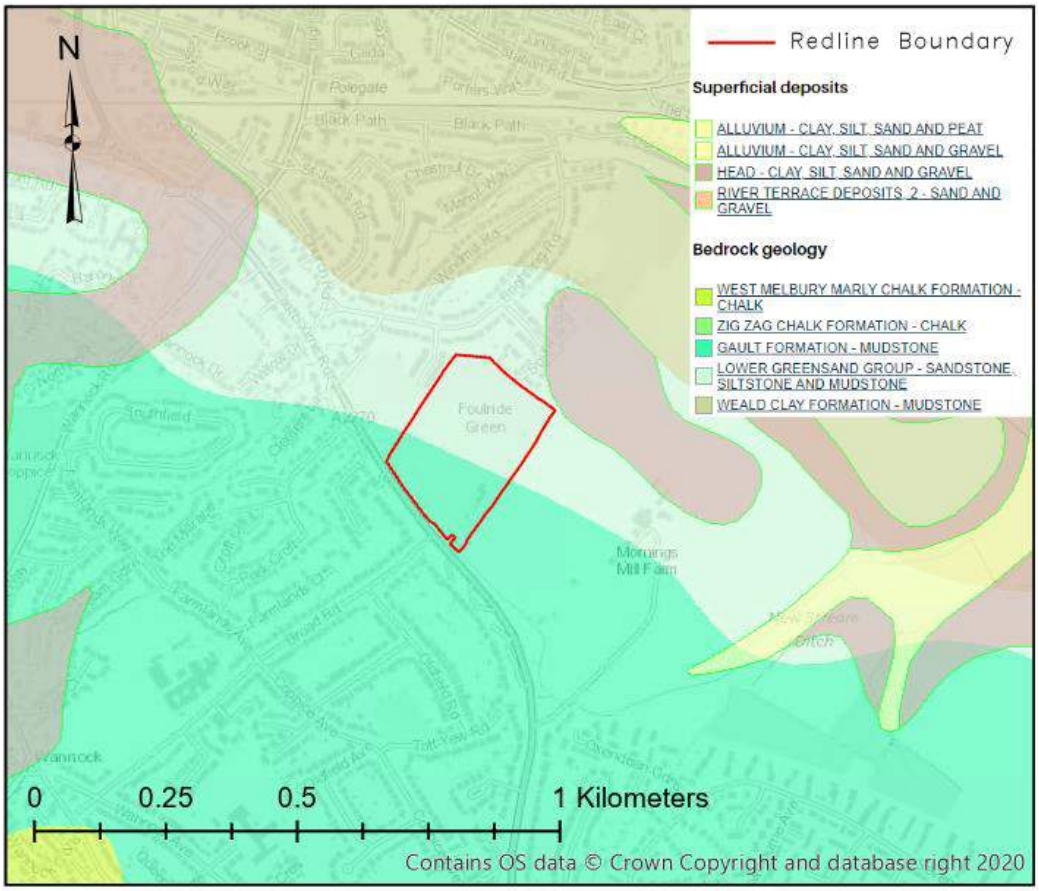
Geology and Soils

2.6 Information contained within 'Soilscapes' defines the site as "Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils" with impeded drainage. Surface water runoff is said to drain to the local stream network.

2.7 British Geological Survey (BGS) mapping indicates that the Site is underlain by a bedrock geology of Lower Greensand Group (Sandstone, Siltstone and Mudstone), and Gault Formation (Mudstone). BGS mapping indicates there are no superficial deposits present on Site.

2.8 Extracts from the BGS mapping tool are found below in **Figure 2.**

Figure 2 - BGS Mapping Data



Hydrogeology

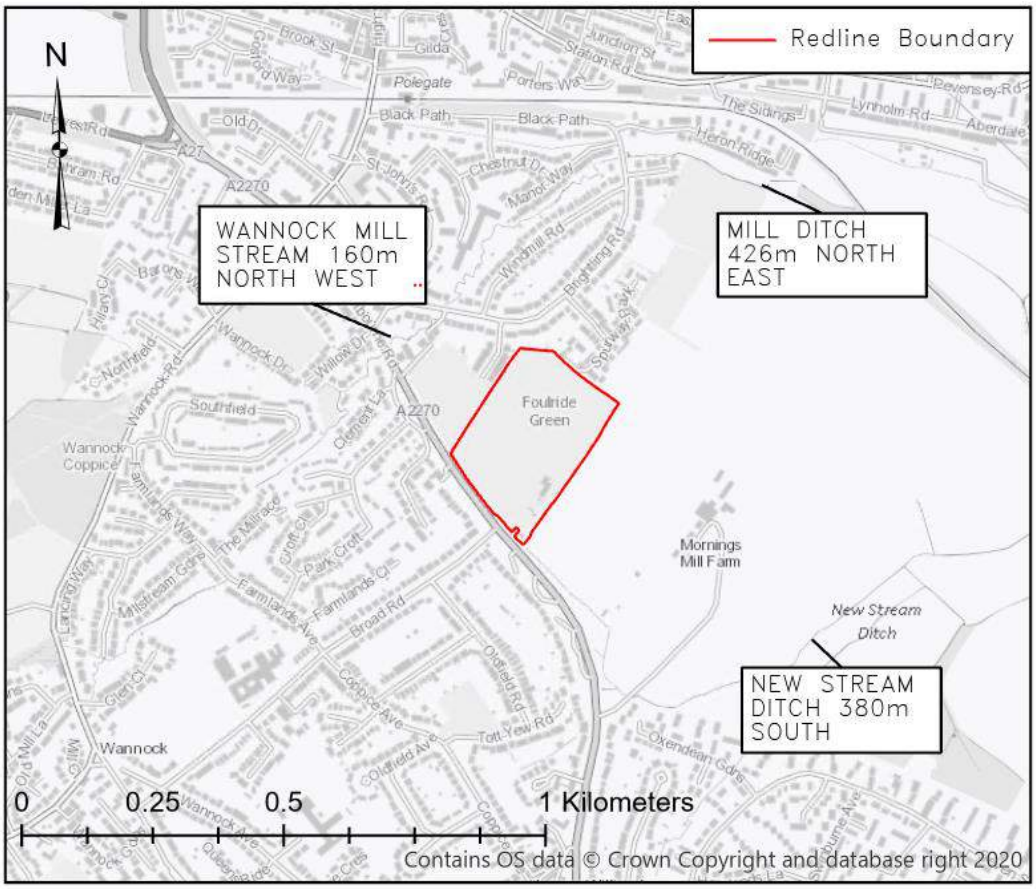
2.9 UK Government DEFRA mapping indicates that the Site is:

- Not located within a Nitrate Vulnerable Zone;
- Not within a Drinking Water Safeguard Zone for surface water;
- Not located within a Groundwater Source Protection Zone (SPZ);
- Underlain by a Principal bedrock aquifer of high permeability in the northern region of Site. The southern region of the Site is indicated to be underlain by an unproductive aquifer with unproductive permeability.

Watercourses

2.10 The Topographical survey indicates that there are ditches located within the Site boundary spanning the south eastern Site boundary and adjacent to the southern Site boundary, running along the A2270 Eastbourne Road in a southern direction. The watercourses on the eastern and southern boundaries of the site are classified by the EA as ordinary watercourses and eventually drain into the Mornings Mill Stream (Main River). The Wannock Mill Stream is located 160m north west of the Site, the New Stream Ditch is located approximately 380m south of Site, and Mill Ditch is located 426m north east of Site, as shown in **Figure 3 below.**

Figure 3 - Main Watercourses Within a 500m Radius



Drains and Sewers

Wastewater Sewers

2.11 Southern Water sewer records indicate the presence of foul water sewers adjacent to the northern and southern Site boundary.

Surface Water Sewers

2.12 Southern Water sewer records indicate the presence of a surface water sewer that runs adjacent to the northern Site boundary.

2.13 A copy of the Southern Water sewer records is presented as **Appendix C**.

Stuart Michael Associates Site Investigation

2.14 Stuart Michael Associates visited the Site on 18th of September 2020 to survey the drainage regime on Site. The ditch along the south eastern boundary, classified as an ordinary watercourse by the EA, enters a culverted section adjacent to the existing buildings on site via a headwall. The ditch is exceedingly overgrown and the invert level of the pipe could not be determined however by lifting the cover of the first manhole on the culvert a 300mm diameter pipe was observed heading towards the headwall. The culvert is circa 1.5m deep and outfalls via another headwall into a ditch adjacent to the gated access. The culverted section of the watercourse also drains the playing field and the roofs and hardstanding's of the existing buildings.

2.15 The ditch along the southern boundary starts within the land to the west of the substation and is culverted beneath the access to the substation and the driveway serving the playing fields.

2.16 A drawing showing the existing onsite drainage arrangements is presented within **Appendix D.**

Site Sensitivity

2.17 According to UK DEFRA mapping, the Site is located within four SSSI (Site of Special Scientific Interest) Impact Risk Zones (IRZ), designated to assess planning applications for likely impacts on the SSSIs/SACs/SPAs.

2.18 The IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to SSSIs, Special Areas of Conservation (SACs), and Special Protection Areas (SPAs).

2.19 The Site is located within the IRZ's of Willingdon Down (1.2km south of Site), Folkington Reservoir (1.8km west of Site), Wilmington Downs (2.6km west of Site) and the Pevensey Levels 2.8km north west of Site).

2.20 The Pevensey Levels is grazing marsh with internal ditches which covers 4300 hectares between Eastbourne and Bexhill-on-Sea and outfalls to the sea at Pevensey. The Site is key target of the Pevensey and Cuckmere Water Level Management Board's Biodiversity Action Plan, April 2018.

2.21 Measures to mitigate against the effects of runoff from the proposed development are discussed in further detail in later sections of the Report.

Local Plan

2.22 The Site is included within the WDC 2019 Strategic Land Availability Assessment (SLAA), a report that assesses all sites submitted to the Council for consideration for development.

2.23 The Site is included in the SLAA under reference number **180/1510,** listed as 'Deliverable' for the intended residential development.

3.0 DEVELOPMENT PROPOSALS

3.1 The development proposal is for an Outline Application, all matters reserved except for Access (excluding internal estate roads beyond the access to serve the Medical Centre Plot), for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing and onsite open space.

3.2 The proposed Site layout is included as **Appendix E**.

Vulnerability Classification

3.3 Table 2 of the PPG provides a detailed list of the types of development falling into the vulnerability classifications. This list provides guidance on the various uses and their subsequent flood risk vulnerability classification.

3.4 As per Table 2, the '*More Vulnerable'* classification applies to both the proposed residential development and medical centre.

Lifetime of development

3.5 In accordance with the PPG, the residential development should be considered for a minimum of 100 years.

4.0 FLOOD RISK ASSESSMENT

Coastal Flooding

4.1 The Site is located inland at an elevation in excess of 10mAOD and is within an area not shown to be at risk from coastal flooding.

Fluvial Flooding

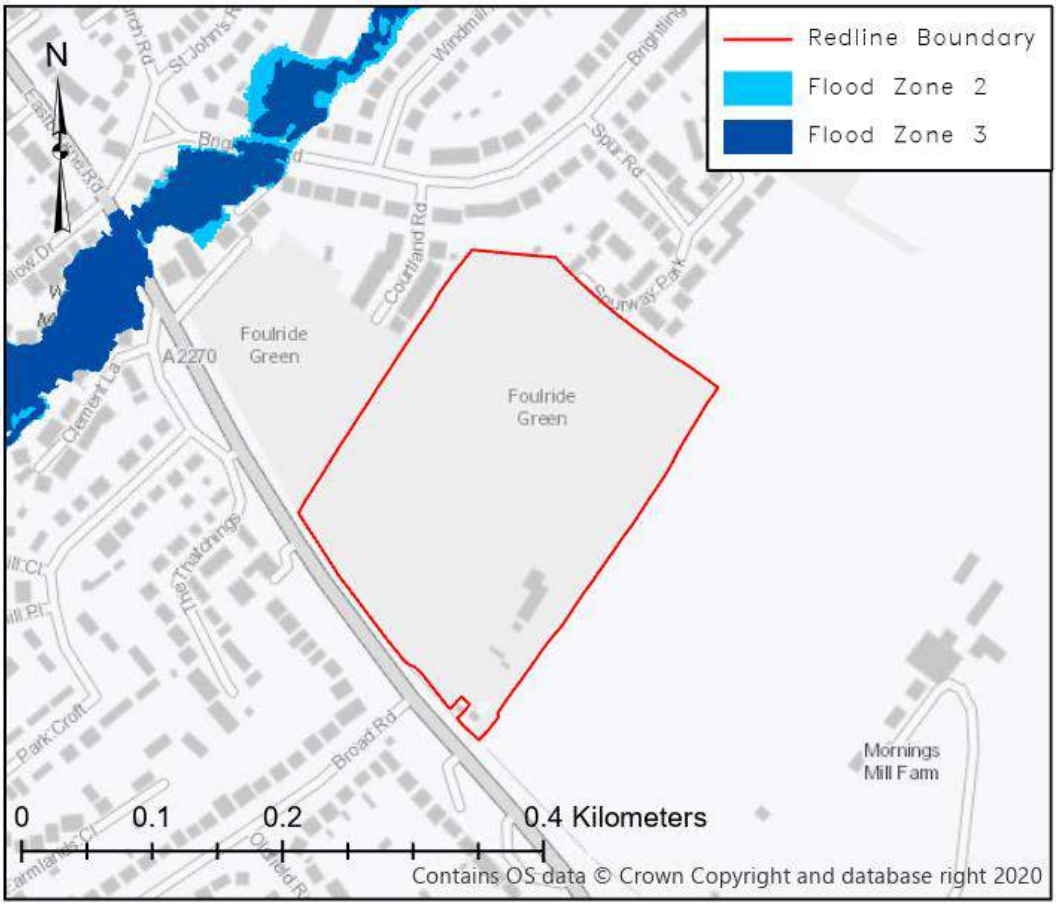
4.2 Maps of Flood Zones, published on the UK government website, are the main constraints used to inform the LPA when to consult the EA and the LLFA on flood risk in development control decisions.

4.3 The Zones refer to the probability of flooding and this varies depending on the source of flooding being fluvial or coastal. Flood Zones 1,2 and 3 refer to low, medium and high risk of flooding. These zones for fluvial risks of flooding correspond to the Annual Exceedance Probabilities (AEP) of less than 0.1%, in the range of 0.1-1% and greater than 1% in any given year, respectively.

4.4 An extract from the Government Flood Map is presented within **Figure 4**.

4.5 **Figure 4** indicates that the entirety of the Site is within Flood Zone 1.

Figure 4 - EA Flood Zones Mapping



Existing Flood Modelling

4.6 Wealden District Council has partnered with Eastbourne Borough Council to develop a fluvial flood model to accurately map flood risk in Polegate and Willingdon. This includes detailed modelling of the watercourse on the eastern boundary of the proposed development site.

4.7 At the point of writing this Report, this modelling work was still at collection of channel survey stage. This Report will be further updated as and when the results of this modelling work have been completed and released into the public domain.

Groundwater Flooding

4.8 Groundwater flooding occurs where groundwater levels rise sufficiently to intersect the ground surface and flow onto low-lying areas. Generally, groundwater flooding may be a problem where developments are situated over permeable soils or rocks.

4.9 The WDC SFRA Groundwater Flooding Map indicates that the Site lies within a wider area of groundwater concern. However, there is no records or anecdotal evidence to suggest that the Site has flooding historically as a result of groundwater flooding.

4.10 The SFRA mapping is included within **Appendix F**.

4.11 Figure 5: Groundwater Flood Risk within the ESCC Pre App obtained by SMA on the 8th of October 2020 shows that the northern section of the Site falls within an area shown to have 'Limited potential for groundwater flooding to occur'. The southern section of Site is not indicated to be at risk from groundwater flooding.

4.12 'Figure 6: Drainage Risk Areas' within the ESCC Pre App obtained by SMA on the 8th of October 2020 shows the Site falls within three drainage risk area classifications, which are spatial groupings intended to inform the preparation of drainage strategies with development proposals.

4.13 The northern section of Site lies within Risk Area 1 (Improvements upon greenfield runoff rates should be discussed with LLFA), whilst the central band and western section of Site lies within Risk Area 2 (Infiltration is unlikely, ensure an outfall can be secured) and the southern section falls within Risk Area 3 (Infiltration techniques are likely to be inappropriate) . The classifications indicate that due to a different degree of groundwater flood risk across the Site, infiltration techniques of surface water management are unlikely to be feasible across Site.

4.14 The ESCC Pre App is reproduced in **Appendix G.**

Surface Water Flooding

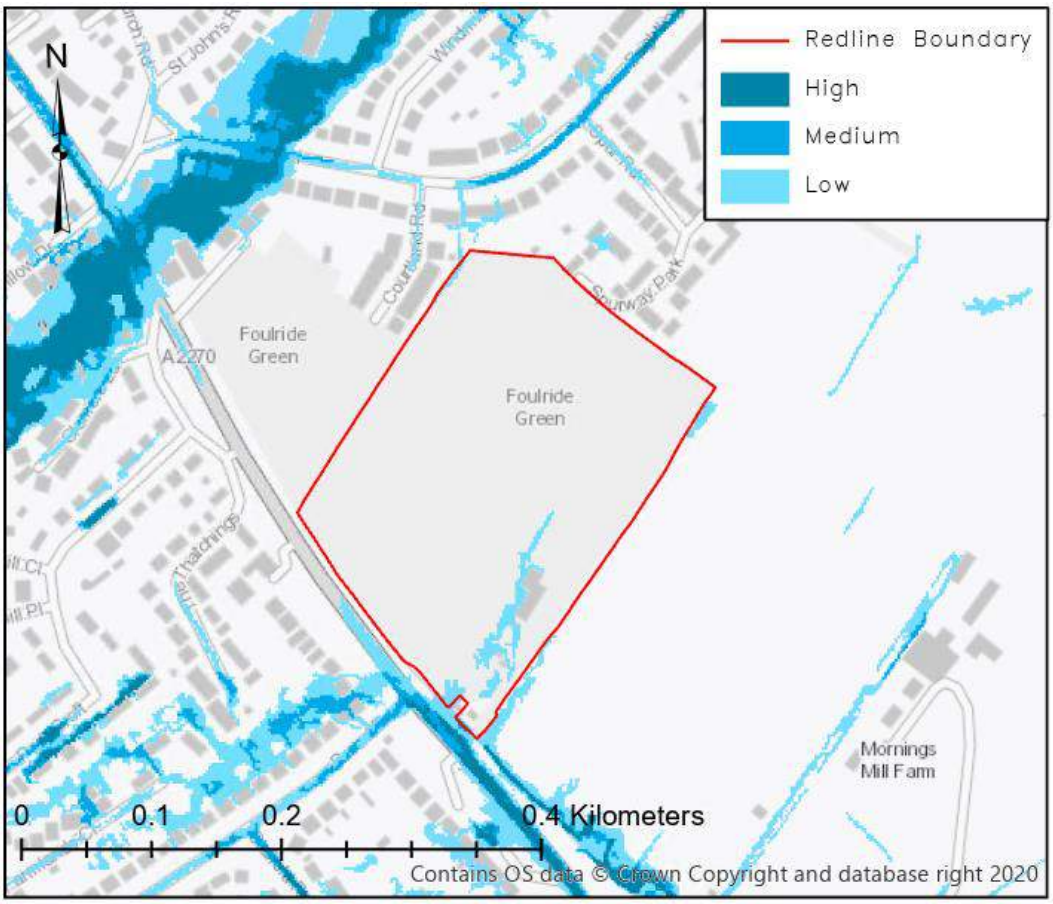
4.15 Surface Water Flooding occurs when the intensity of rainfall exceeds ground infiltration. Typically, this happens where the ground surface is impermeable, such as roads and paved areas within urban development and where there are impermeable soils, such as clay. The risk of flooding from surface water runoff is greater in locations that are situated adjacent to sloping land, within natural valleys and/or are within local depressions.

4.16 The EA map 'Risk of Flooding from Surface Water' (RoFSW) indicates that the majority of the Site lies within an area at a very low risk of surface water flooding. A small area within the southern region of Site is indicated to be at a low risk.

4.17 The overall risk from surface water flooding is therefore considered to be low.

4.18 The Risk of Flooding from Surface Water flood map is reproduced below in **Figure 5.**

Figure 5 - Risk of Surface Water Flood Map Data



Flooding from Reservoirs

4.19 The Government map 'Flood Risk from Reservoirs' shows that the Site is not within an area at risk of reservoir flooding.

Flooding from Infrastructure Failure

4.20 Where infrastructure retains, transmits or controls the flow of water, flooding may occur if there is a structural, hydraulic, geotechnical, mechanical or operational failure. There are three main categories of infrastructure associated with this mechanism of flooding:

- Failure of infrastructure designed to store or carry water (e.g. dam break, canal leak, burst water mains).

- Failure of infrastructure designed to protect an area from flooding (e.g. breached flood defences, flap valve or penstock failure, pumping station failure).

- Failure of a pipe, bridge or culvert due to blockage.

4.21 There is minimal existing drainage infrastructure on Site and the risk of flooding from infrastructure failure is considered to be low.

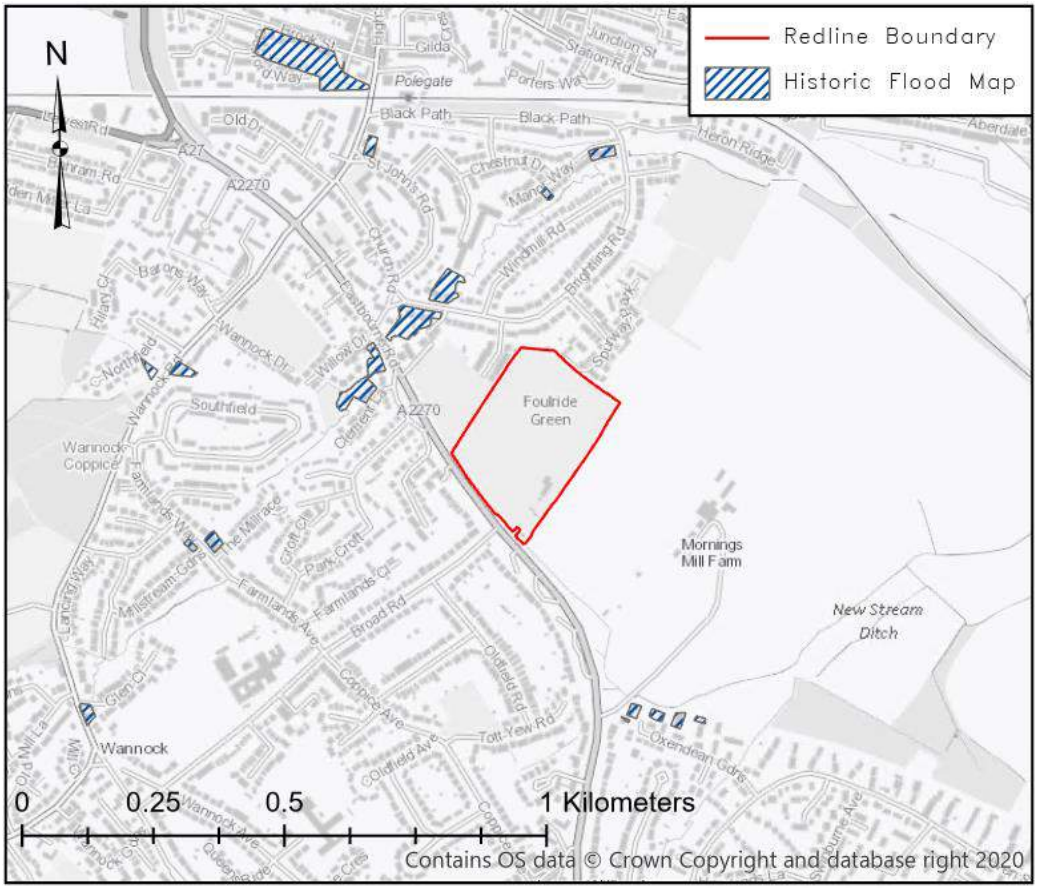
Historical Flooding

4.22 Table 6.1 of the WDC Level 1 SFRA, 2017 indicates that the Willingdon district has been subject to 34 historic flooding incidents from 1852 to 2016.

4.23 The EA 'Historic Flood Map' is a GIS layer showing individual recorded flood outlines since 1946 from river, sea and groundwater springs in England. The mapping shows no historical outlines within the Site boundary.

4.24 The historic flood map is reproduced below in **Figure 6**.

Figure 6 – Historic Flood Map



5.0 SURFACE WATER DRAINAGE STRATEGY

Discharge Destination

5.1 In order to ensure that surface water runoff from a developed site does not have a detrimental impact on the downstream catchment it is important to prioritise where surface water runoff is discharged, control how fast the runoff is discharged and also control how much runoff is discharged from the Site.

5.2 As the Site is predominantly greenfield, it is proposed to employ Sustainable Drainage Systems (SuDS) measures to ensure surface water is managed effectively.

5.3 Any development presents an opportunity to incorporate SuDS, which might include infiltration techniques or attenuation of flows to protect receiving sewers or watercourses. The choice of methods is dependent upon ground conditions and availability of suitable areas within the particular scheme layout.

5.4 The development proposals will incorporate SuDS to dispose of surface water runoff. The guidance given in the CIRIA report C753 'The SuDS Manual' will be followed during the design of the proposed sustainable drainage solution. Runoff will be managed both at source and across the Site as a whole.

5.5 Water is a valuable resource and opportunities should first be sought to reuse runoff on Site once it has been appropriately treated. Following this, the destination for surface water runoff that is not collected for reuse (rainwater harvesting) should be prioritised as set out in Requirement H3 Part 3 of the Building Regulations Approved Document H (2002 Edition), which states:

(3) Rainwater from a system provided pursuant to sub-paragraphs (1) and (2) should discharge to one of the following listed in order of priority:

(a) an adequate soakaway or some adequate infiltration system; or, where this is not reasonably practicable,

(b) a watercourse; or, where that is not reasonably practicable,

(c) a sewer

5.6 This guidance is replicated in the PPG which states:

"Generally, the aim should be to discharge surface water runoff as high up the following hierarchy of drainage options as reasonably practicable:

- Into the ground (infiltration);
- To a surface water body;
- To a surface water sewer, highway drain or another drainage system;
- To a combined sewer."

Water Quantity

5.7 A set of Non-statutory Technical Standards (NTS) for sustainable drainage systems was published by DEFRA in March 2015. These set out the recommended procedures for rainfall runoff management for developments in various terms including peak flow control, volume control and flood risk within the development.

Peak Flow Control

5.8 NTS states in Section (**S2**); for greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1-year rainfall rate and the 1 in 100-year rainfall event should never exceed the peak greenfield rate for the same return period.

Peak Volume Control

5.9 In Section (**S4**), the NTS states; where reasonably practicable, for Greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100-year, 6-hour rainfall event should never exceed the Greenfield runoff volume for the same event.

Existing Discharge Rates

5.10 The Site under its existing conditions is considered Greenfield.

5.11 Runoff rates for the existing of the Site have been calculated using the HR Wallingford UK SUDS FEH online tool, provided in **Table 1** below and at **Appendix H.**

Return Period 1 in X year	Greenfield Discharge Rate (l/s)
1	36.10
QBAR	42.47
30	97.68
100	135.47

Table 1: Existing Runoff Rates

Surface Water Drainage Strategy

5.12 In accordance with the discharge destination hierarchies of the Building Regulations H3 and the PPG an assessment of the suitability of the Site to utilise infiltration drainage techniques has been undertaken.

5.13 Geology beneath the proposed Site is underlain by a bedrock geology of Lower Greensand Group (Sandstone, Siltstone and Mudstone), and Gault Formation (Mudstone). Due to the underlying geology, the ESCC Drainage Risk Areas classifications across Site and the presence of local ditch and watercourse networks on Site, infiltration methods of surface water disposal is considered to be unfeasible.

5.14 In line with Part 3 of the Building Regulations, discharge of surface water runoff from the proposed development will follow existing arrangements. Runoff will be discharged into the ditch located within the south east corner of the Site.

5.15 The primary form of attenuation will be provided within a retention basin located adjacent to the outfall. Further attenuation will be provided throughout the Site in the form of porous paving and swales.

5.16 In compliance with the NTS, the drainage systems across the Site will be designed so that the surface water runoff from the proposed development is contained within the drainage network, with no flooding for all storms up to, and including, the 1 in 30-year event. Furthermore, the drainage system will be designed so that flooding to any new buildings does not occur during a 1 in 100-year rainfall event, including a +40% allowance for climate change.

5.17 Flows resulting from rainfall in excess of a 1 in 100-year rainfall event will be managed in exceedance routes along the roads and into the open space following the natural slope in the direction of the attenuation basin to minimise the risks to people and property.

5.18 The surface water drainage strategy for the Site is presented within **Appendix I**.

Development Runoff

5.19 In order to comply with both the peak flow and volume discharge requirements of the NTS and to ensure that flood risk is not increased further downstream, discharge for the Site will be restricted to the 1 in 1 year Greenfield runoff rate for all storms up to and including the 1 in 100year +40% climate change event.

5.20 A comparison of pre and post-development runoff rates is provided in **Table 2** below which demonstrates that the proposed drainage strategy complies with NTS requirements.

Return Period 1 in X year	Pre-development Runoff Rates (l/s)	Post-development Runoff Rates (l/s)
1	36.10	18.5
QBAR	42.47	18.5
30	97.68	18.5
100	135.47	18.5
100 + 40% cc	N/A	18.5

Table 2: Pre and Post-development Runoff Rates

5.21 The proposed peak runoff from the Site will be restricted to the 1 year greenfield event flow rate calculated as 5.57l/s/ha based on 36.10l/s over 6.48 ha.

5.22 Based on a proposed development impermeable area of 3.3ha (including a 10% allowance for urban creep) the peak runoff rate from Site has been calculated as 18.5l/s.

Preliminary Storage Volume Estimates

5.23 The proposed impermeable area of the Site has been calculated as 3.0ha.

5.24 Preliminary storage volumes have been calculated based on this impermeable area and an allowance of 10% increase for urban creep.

- Q30 1,000m^3
- Q100 1,800m^3
- Q100+40% 2,700m^3

Storage Volumes Provided

5.25 The required attenuation storage has been provided with the surface water network and SuDS systems across the Site, and a total of 2700m^3 of storage can be provided on Site:

- Attenuation Basin 800m^3
- Swales 950m^3
- Porous Paving 450m^3
- Adoptable Sewers 500m^3

Climate Change

5.26 New climate change guidance published by the EA in February 2016 updates current guidance which supports the NPPF. According to new guidance, for the period up to 2115, peak rainfall intensities could increase up to 40%.

5.27 A 40% allowance for climate change will be considered, to help minimise vulnerability and provide resilience to flooding in the future, for the 1 in 100-year rainfall event.

Interception Storage (Delivery and Compliance)

5.28 Interception is defined as the capture and retention on Site of the first 5mm of the majority of all rainfall events.

5.29 The benefits of designing for interception are:

- Runoff characteristics from the Site will more closely reflect Greenfield runoff behaviour (where runoff will not occur for the majority of small rainfall events) and this will help to protect the morphology and ecology of the receiving water body.

- The pollution load to any receiving surface water body that could potentially be associated with the total runoff volume from all such small events will be retained on Site where it will have more time to biodegrade and/or be acted on by natural treatment processes within the SuDS system.

5.30 CIRIA 753 'The SuDS Manual' outlines that Interception can be delivered using a combination of processes such as rainwater harvesting, infiltration and evapotranspiration. Furthermore, 'very high levels of compliance with Interception are achievable through the use of pervious pavements' because 'during small events, the water soaks into the pervious surface and is released back into the atmosphere through evaporation once the rainfall has stopped'.

5.31 As infiltration has already been excluded due to the underlying soils, interception storage for the development will be provided via evapotranspiration using temporary shallow ponding within the soil or upper aggregate layers of the proposed porous paving SuDS system.

Exceedance Design

5.32 Very high rainfall intensities can overwhelm pipe-based drainage systems for brief periods, whereas SuDS tend to have longer-duration critical storm events. In all cases, there will be events that cause flooding at points in the network if the storm event exceeds the design event.

5.33 To mitigate against the effects of exceedance flooding the final layout of the Site will provide exceedance flow management systems that will place residential buildings outside of exceedance flow pathways. SuDS should be incorporated at low spots within the development to convey flows away from people, property and critical infrastructure.

5.34 The exceedance flow routes drawing for the Site is presented within **Appendix I**.

Surface Water Management & Treatment Train

5.35 In accordance with CIRIA Report C753: The SuDS Manual, a "SuDS Management Train" process will be undertaken to assure that the proposed drainage strategy mimics the natural catchment of the Site as closely as possible.

5.36 The proposed Management Train (**Table 3**) will provide appropriate levels of risk management to protect the receiving water body.

SuDS Component	Interception	Primary Treatment	Secondary Treatment	Tertiary Treatment
Porous Pavements	Y	Y		
Swales	Y	Y	Y	
Retention Basin (Pond)		Y	Y	Y

Table 3: SuDS Management Train

5.37 Source control techniques will be incorporated into the drainage strategy to ensure that storm water runoff is managed as close to source as possible.

Source control (Porous Car-Parks/Permeable surfaces)

5.38 Porous pavements are structures that allow rainwater to infiltrate through the surface layer and into the underlying sub-structure, where it will be temporarily stored before discharging into the nearest sewer.

5.39 As runoff percolates through the sub-layers, pollutants and contaminates are filtered out by the surfacing layer and biological process in the sub-base.

5.40 Porous pavements are built as an alternative to impermeable surfaces and therefore require no extra development space for their construction.

5.41 It is proposed, where possible, to provide permeable pavements within communal parking areas.

5.42 The permeable pavements will be designed to accommodate the volume of runoff for all storms up to and including the 100 year event plus a 40% allowance for climate change.

Retention Basins (Pond)

5.43 Retention basins are permanently wet landscaped depressions that provide both attenuation and treatment of surface water runoff.

5.44 Attenuation storage is provided above the permanent pool of water at the base of the retention basin. Runoff from rainfall events are retained by a flow control device and treated within the pool of water.

5.45 The standing pool of water helps settle out particulate pollutants and residual fine silts. The larger the storm event, the more time is provided for treatment to occur.

Swales

5.46 Swales are shallow, flat bottomed, vegetated open channels designed to convey, treat and attenuate surface water runoff. In addition, runoff collected by the system ponds temporarily on the surface and then filters through the vegetation and underlying soils.

5.47 Swale channels are broad and shallow and covered by vegetation as a means to encourage low flow velocities to facilitate sedimentation and filtration through the root and soil matrix providing effective pollutant removal.

Water Quality

5.48 **Table 4** details the pollution hazard indices for the residential development on Site as stated by CIRIA C753. The indices range from 0 (no pollution hazard for this contaminant type) to 1 (high pollution hazard for this contaminant type).

Land Use	Pollution Hazard	Total Suspended solids (TSS)	Metals	Hydro-carbons
Individual property driveways, residential car parks, low traffic roads and non-residential car parking with infrequent change	Low	0.5	0.4	0.4

Table 4: Pollution Hazard indices for different land use classifications

5.49 To deliver adequate treatment, selected SuDS components must have a total pollution index (for each contaminant type) that equals or exceeds the pollution hazard index. The proposed SuDS components for the Site, and their mitigation indices, are produced in **Table 5.**

5.50 A factor of 0.5 is used to account for the reduced performance of secondary or tertiary components associated with already reduced inflow concentrations.

Land Use	Total Suspended solids (TSS)	Metals	Hydro-carbons
Permeable Pavement	0.7	0.6	0.7
Retention Basin (Pond)	0.25	0.25	0.3
Swales	0.25	0.3	0.3
Total	**1.2**	**1.15**	**1.3**

Table 5: Indicative SuDS mitigation indices for residential discharges to surface waters

5.51 It is considered that sufficient pollution treatment is provided within the proposed SuDS Management Train, minimising risk to water quality and to the receiving water bodies from the Site.

5.52 Management and maintenance schedules for the proposed SuDS features on-site are included within **Appendix J**.

6.0 WASTEWATER DRAINAGE STRATEGY

6.1 Southern Water sewer records indicate that there is an existing public foul sewer located adjacent to the southern Site boundary, within land south of the A2270 Eastbourne Road.

6.2 It is proposed to provide a gravity connection to the aforementioned Southern Water foul water sewer via a new connection into the sewer located downstream of manhole reference 3902.

6.3 The proposed drainage strategy drawing is included within **Appendix I**.

6.4 Southern Water has confirmed that there is currently insufficient capacity within this sewer to accept foul water flows from the proposed development, but If there is insufficient capacity within the network to accommodate the new flows either a new point of connection will be required or additional capacity within the existing system will be required. In either case this is considered to be network reinforcement and the cost will be absorbed by Southern Water and recovered through the Infrastructure Charges.

6.5 Southern Water correspondence is included as **Appendix K**.

6.6 Southern Water's Developer Services have previously advised that the site is located within their Regional Forecast growth area, and sewer upgrade works providing improved capacity for the area are due to be completed in 2022. The upgrade works will provide sufficient capacity for the proposed development.

6.7 Under the new Infrastructure Charges Scheme (April 2018) the cost of connecting a new sewer to the nearest practicable point on the network where the existing sewer is at least the same diameter as the new sewer is included within the new charges.

7.0 SUMMARY & CONCLUSIONS

Flooding

7.1 This Report presents an assessment of flood risk in accordance with the guidelines set out in National Planning Policy Framework (NPPF) and its National Planning Policy Guidance (PPG). It also refers to, and complies with, DEFRA standards, the policies of East Sussex County Council (ESCC), Wealden District Council (WDC) and the Environment Agency (EA).

7.2 The Report demonstrates that the proposed residential development would be at a low risk of flooding, lying in Flood Zone 1, with safe access maintained to the Site at all times. Additionally, the proposal would not create an unacceptable increase in flood risk elsewhere.

7.3 The Report confirms that the Site is suitable for the proposed development and complies with the WDC, ESCC, EA and NPPF policies.

Surface Water Drainage

7.4 The Report shows that the SuDS methods proposed will attenuate and filter flow in a manner that will mimic the existing drainage regime. Surface water runoff from the proposed development will employ the following proposed components:

7.5 Porous paving is proposed for communal parking areas.

- A retention basin located in the south western corner of the Site for primary attenuation storage and tertiary water treatment.
- Swales used throughout the development adjacent to access road for conveyance, treatment and storage of surface water.
- Porous paving located within communal parking areas where feasible.

Sewerage

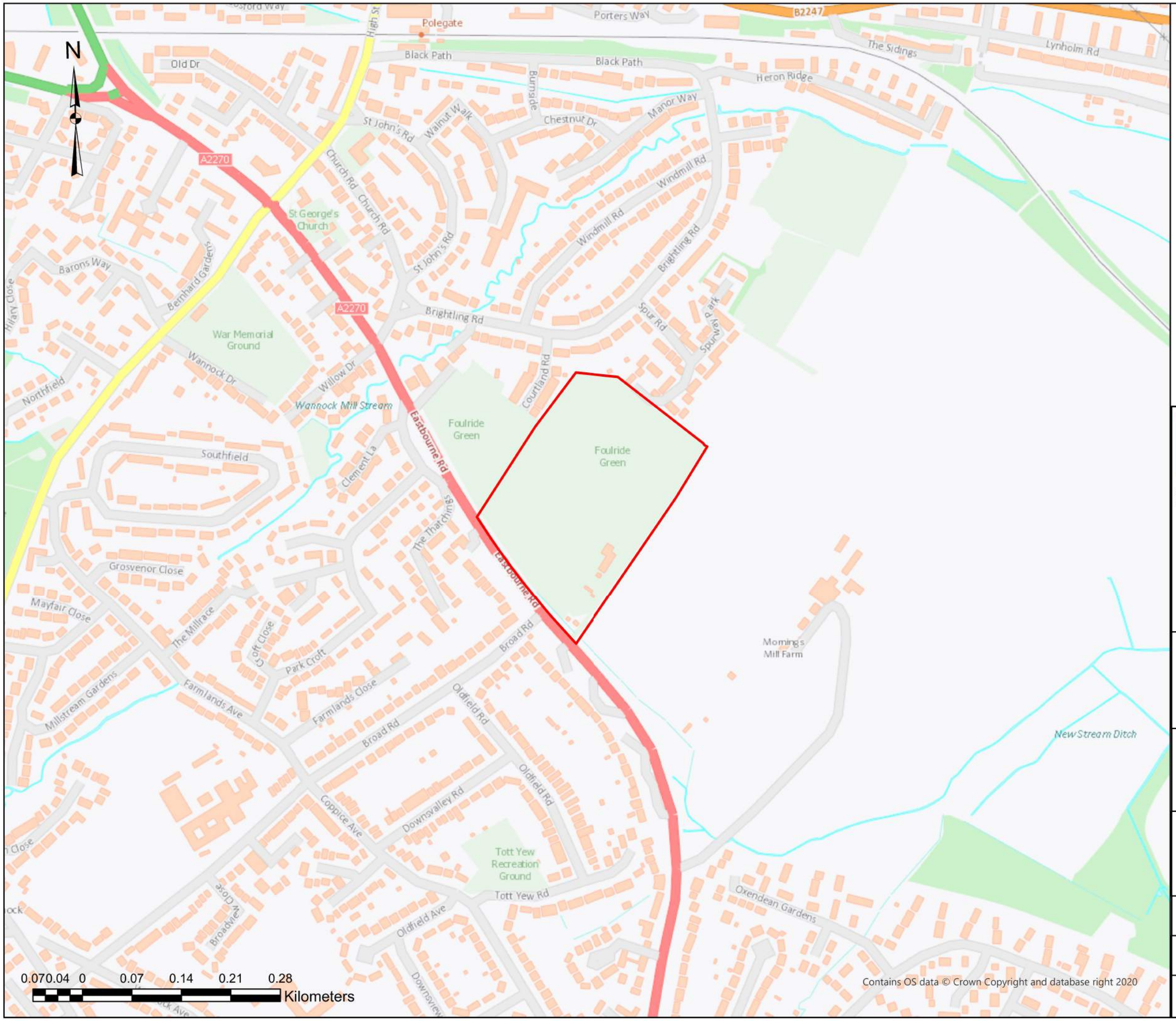
7.6 A Southern Water wastewater sewer is located within the A2270 Eastbourne Road to the south of the Site. A Gravity connection from the Site to the aforementioned sewer is proposed.

Conclusion

7.7 This report confirms that developing the Site would not increase the risk of flooding within the Site, or elsewhere, and that there is a satisfactory strategy, incorporating sustainable drainage techniques, for the disposal of surface water runoff, and wastewater, from the proposed development.

Site Location Plan

Appendix A



Legend

Site Boundary

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS

Stuart Michael Associates Ltd
Coombe House, Coombe Square, Thatcham, Berkshire, RG19 4JF

T: 01635867711 e: mail@stuartmichael.co.uk
F: 01635861715 w: www.stuartmichael.co.uk

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Client

Danescroft Land Limited

Job Title

6554 – Willingdon

Drawing Title

Site Layout

DRAWN	SCALE
LE	1:1500
CHECKED	DATE
JOK	SEPT' 2020

FIGURE 1

Topographical Survey

Appendix B

Possible boundary dispute - based on local knowledge

Legend

Air Valve	Av
Bellotha Beacon	BB
Borehole	BH
Bollard	Bo
Bus Stop	Bs
British Telecom box	Bt
Control Box	Cbox
Cable Covers	CTV
Down Pipe	Dp
Electric Post	Ep
Earth Rod	Er
Fire Hydrant	Fh
Flood light	Fl
Flag Staff	Fs
Gas Marker	Gmkr
Gate Post	Gp
Gas Valve	Gv
Gully	Gy
Illuminated Bollard	IB
Invert Level	IL
Floor Level	IFL
Letter Box	LB
Lamp post	Lp
Manholes	MH
Marker Post	Mkr
Parking Meter	Pmtr
Posts	Post
Rubbish Bin	Bin
Road Name Board	Rnb
Rodding Eye	Re
Soffit Level	So
Sign Post	Sp
Stile	Ste
Tree Stump	Stmp
Stop Tap	St
Stop Valve	Sv
Cable Stay	Sy
Trial Pit	Pit
Traffic Light	TL
Telegraph Post	Tp
Unable to Lift	UTL
Valve	Va
Vent Pipe	Vp
Video Camera	Vc
Water Level	WL
Water Meter	Wm
Wash Out	Wo
Window Sample	WS
Survey Station with Level	△ 10.000

90.50 — Terrain contours shown at 0.50m intervals

Hawthorn hedge row width drawn approximately

Survey notes:

1. Survey orientated to Ordnance Survey National Grid by the use of GPS coordinates transformed using 'UK/OSGB 1936/British National Grid OSTN15'. Scale factor of 0.999601271698 applied to all calculations.

2. Level datum taken GPS observations and transformed using 'The National Geoid Model OSGM02'

3. All feature shown were current at the time of the survey. There may be features missed during the survey due to obstructions or lack of access.

4. Drainage: invert levels, pipe sizes and pipe connections have been surveyed by visual inspection only, and therefore the complete accuracy of this information cannot be guaranteed.

5. Trees: sizes are indicative only, with the mean spread drawn to scale. Species TBC. Approximately 50% of trees to be added at a later date.

6. The contractor is to check and verify all building, survey coordinates and site dimensions, levels and sewer invert levels at connection points before work starts and to report any discrepancies to to Idom Merebrook immediately.

7. Ordnance survey digital data generally shown in GREY and is indicative only.

Survey Control

Station	Description	Easting	Northing	Height
M1	Road Nail	558432.615	103938.945	12.385
M2	Road Nail	558350.093	104033.896	14.579
M3	Road Nail	558274.744	104154.966	18.916
M4	Road Nail	558502.742	103858.679	11.373
M5	Road Nail	558539.954	103906.893	11.053
M6	Road Nail	558569.339	103745.540	10.259
M7	Road Nail	558583.113	103669.764	10.010

Grid Approx

Additional trees added.	10/02/17	B
	RM RM MB	
Height on Electricity poles added and additional trees updated.	03/02/17	A
	RM RM MB	
Based on a LSS output	13/01/17	-
	RM RM MB	
Issue Details	Dwn	Chd App'd

Client

JMT Planning

Project

Land at Polegate / Willingdon, Eastbourne

Dwg Title

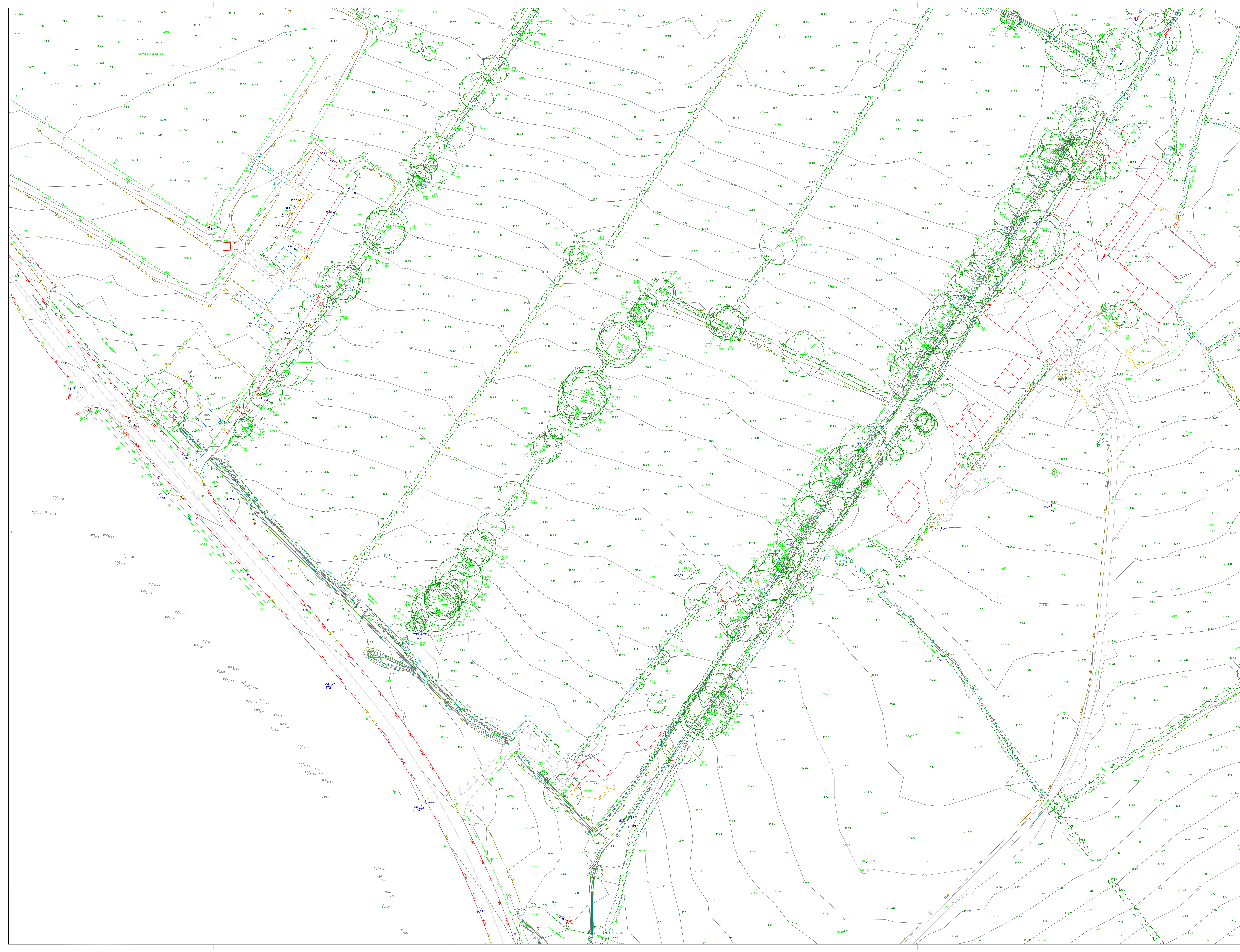
Topographic Survey
January 2017
Sheet 1

Job No.	Dwg No.	Revision
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Scale	Date	Frame Dimensions mm
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Drawn	Checked	Approved
RM	RM	MB

London
Kent
Derby
Cardiff
Manchester

idom merebrook

East Mill, Bridgefoot, Belper, Derbyshire. England. DE56 2UA
tel +44(0)1773 825660 fax +44(0)1773 820360 email info@merebrook.co.uk



Legend

Air Valve	Av
Belisha Beacon	BB
Borehole	BH
Bollard	Boll
Bus Stop	Bs
British Telecom box	Bt
Control Box	Cbox
Cable Covers	CTV
Down Pipe	Dp
Electric Post	Ep
Earth Rod	Er
Fire Hydrant	Fh
Flood light	Fl
Flag Staff	Fs
Gas Marker	Gmkr
Gate Post	Gp
Gas Valve	Gv
Gully	Gy
Illuminated Bollard	IB
Invert Level	IL
Floor Level	IFL
Letter Box	LB
Lamp post	Lp
Manholes	MH
Marker Post	Mkr
Parking Meter	Pmtr
Posts	Post
Rubbish Bin	Bin
Road Name Board	Rnb
Rodding Eye	Re
Soffit Level	So
Sign Post	Sp
Stile	Ste
Tree Stump	Stmp
Stop Tap	St
Stop Valve	Sv
Cable Stay	Sy
Trial Pit	Pit
Traffic Light	TL
Telegraph Post	Tp
Unable to Lift	UTL
Valve	Va
Vent Pipe	Vp
Video Camera	Vc
Water Level	WL
Water Meter	Wm
Wash Out	Wo
Window Sample	WS
Survey Station with Level	△ 10.000

90.50 — Terrain contours shown at 0.50m intervals

Hawthorn hedge row width drawn approximately

Survey notes:

1. Survey orientated to Ordnance Survey National Grid by the use of GPS coordinates transformed using 'UK/OSGB 1936/British National Grid OSTN15'. Scale factor of 0.999601271698 applied to all calculations.

2. Level datum taken GPS observations and transformed using 'The National Geoid Model OSGM02'

3. All feature shown were current at the time of the survey. There may be features missed during the survey due to obstructions or lack of access.

4. Drainage: invert levels, pipe sizes and pipe connections have been surveyed by visual inspection only, and therefore the complete accuracy of this information cannot be guaranteed.

5. Trees: sizes are indicative only, with the mean spread drawn to scale. Species TBC. Approximately 50% of trees to be added at a later date.

6. The contractor is to check and verify all building, survey coordinates and site dimensions, levels and sewer invert levels at connection points before work starts and to report any discrepancies to to Idom Merebrook immediately.

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Survey Control

Station	Description	Easting	Northing	Height
M1	Road Nail	558432.615	103938.945	12.385
M2	Road Nail	558350.093	104033.896	14.579
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M4	Road Nail	558502.742	103858.679	11.373
M5	Road Nail	558539.954	103806.893	11.053
M6	Road Nail	558569.339	103745.540	10.259
M7	Road Nail	558583.113	103669.764	10.010

N

Approx

Issue Details				
Additional trees added.	10/02/17			B
	RM	RM		MB
Height on Electricity poles added and additional trees updated.	03/02/17			A
	RM	RM		MB
Based on a LSS output	13/01/17			-
	RM	RM		MB
Issue Details	Dwn	Chd		App'd

Client

JMT Planning

Project

Land at Polegate / Willingdon, Eastbourne

Dwg Title

Topographic Survey
January 2017
Sheet 2

Job No.	Dwg No.	Revision
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Drawn	**Checked**	**Approved**
RM	RM	MB

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Kent
Derby
Cardiff
Manchester

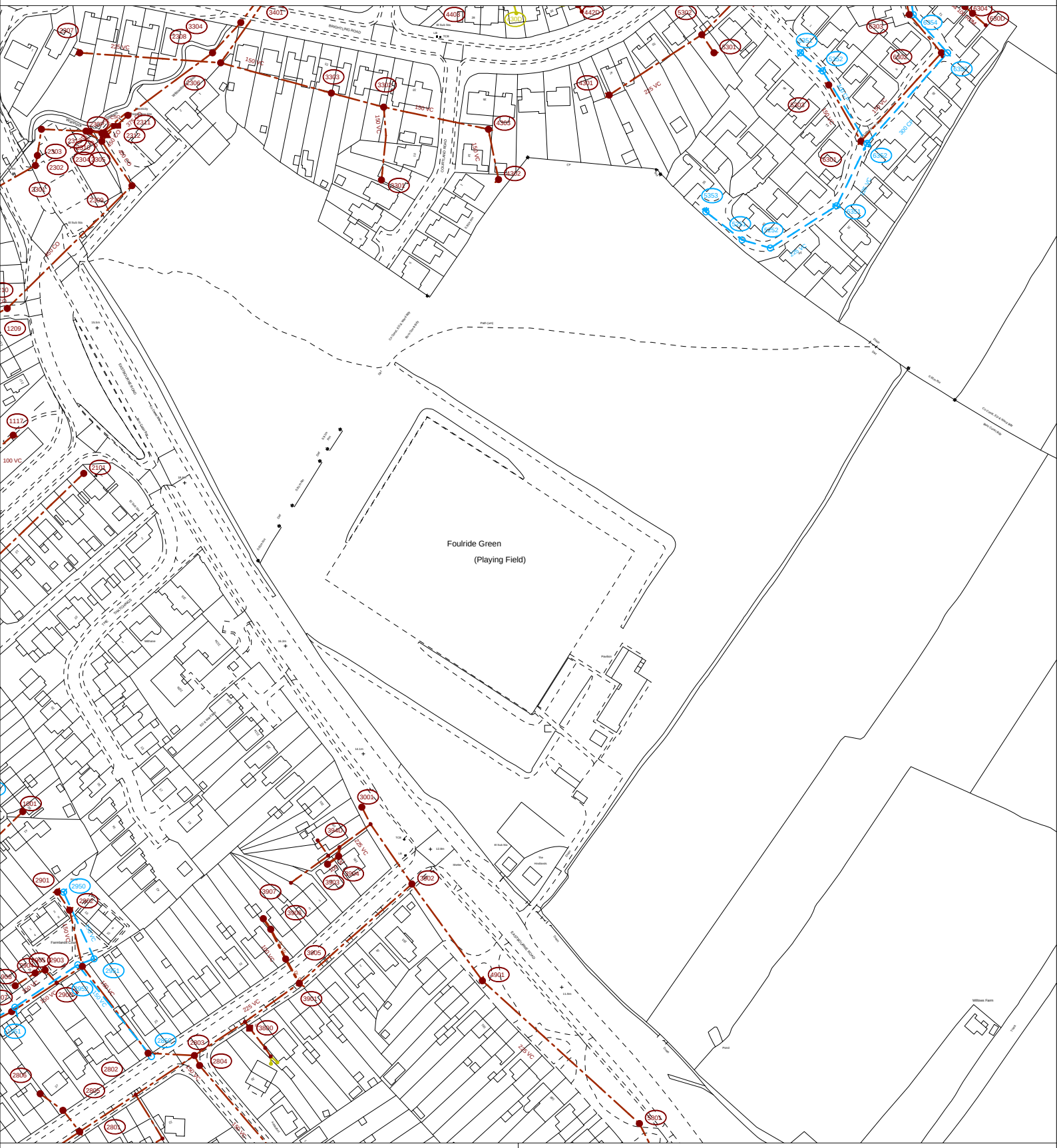
idom merebrook

East Mill, Bridgefoot, Belper, Derbyshire, England. DE56 2UA
tel +44(0)1773 829988 fax +44(0)1773 829393 email info@merebrook.co.uk

Southern Water Sewer Records

Appendix C

SOUTHERN WATER



The positions of pipes shown on this plan are believed to be correct, but Southern Water Services Ltd accept no responsibility in the event of inaccuracy. The actual positions should be determined on site.

Based upon Ordnance Survey Digital Data with the permission of the controller of H.M.S.O. Crown Copyright Reserved Licence No. WU 298530

Southern Water

O.S. REF: TQ5804SW	Scale: 1:2500	Printed By: Mercy	Date: 17-11-2020
Sewer Plot		Site Plan	
WARNING: BAC pipes are constructed of Bonded Asbestos Cement		Requested By:	
WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement			

Existing Drainage Regime

Appendix D

KEY

SITE BOUNDARY

EXISTING OVERLAND FLOW ROUTE

EXISTING SURFACE WATER DRAIN

DITCH

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS

Stuart Michael Associates Ltd
Coombe House, Coombe Square, Thatcham, Berkshire RG19 4JF
T: 01635 867 711
F: 01635 861 715
e: mail@stuartmichael.co.uk
w: www.stuartmichael.co.uk

DANESCROFT

JOB TITLE

EASTBOURNE ROAD
WILLINGDON

DRAWING TITLE

EXISTING DRAINAGE CATCHMENTS AND OVERLAND FLOW ROUTES

DATE	DRAWN	CHECKED	ISSUE CHECKBOX
FEB 21	JOK		

DRAWING No.	REV	SCALE	
6554.402		1:500	@ A1

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KEY

SITE BOUNDARY

EXISTING SURFACE WATER DRAIN

DITCH







Rev	Description	Drn	Chk	Date
A	MINOR UPDATES	JOK		24.02.21

REVISIONS

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS

Stuart Michael Associates Ltd
Coombe House, Coombe Square, Thatcham, Berkshire RG19 4JF

T: 01635 867 711 e: mail@stuartmichael.co.uk
F: 01635 861 715 w: www.stuartmichael.co.uk

DANESCROFT

JOB TITLE

EASTBOURNE ROAD
WILLINGDON

DRAWING TITLE

EXISTING DRAINAGE ARRANGEMENTS

DATE	DRAWN	CHECKED
SEPT 20	JOK	TSW

DRAWING No	REV	SCALE
6554.400	A	1:250 @ A1

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Constructionline

Development Proposals

Appendix E

Pre-App

REV.	DATE	REVISIONS:	BY
A	16/02/21	Utility constraints updated.	RDB
B	25/02/21	Layout amendments to reflect consultation comments	RDB

REV.	DATE	REVISIONS:	BY

REV.	DATE	REVISIONS:	BY

STATUS:

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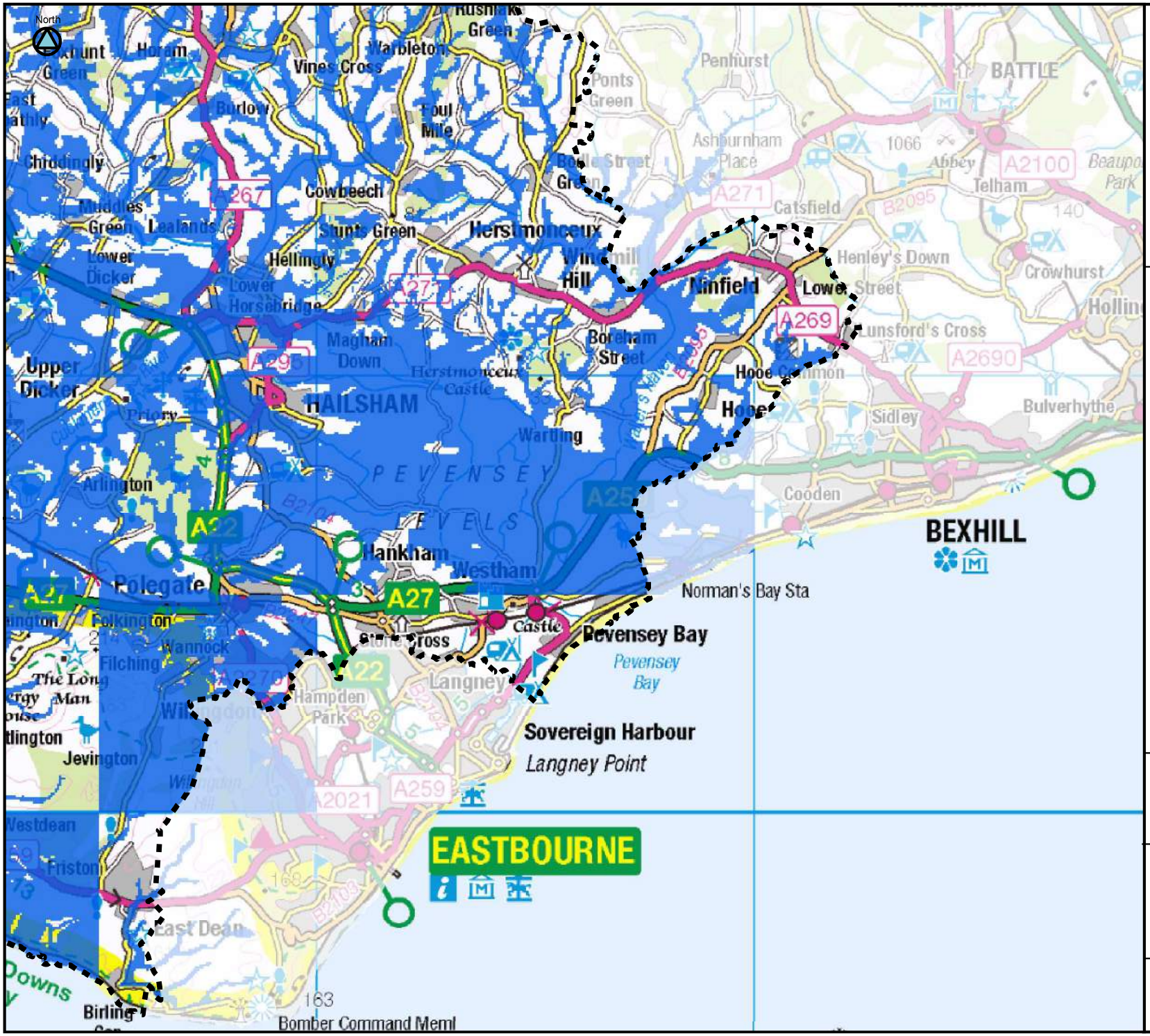
OS Licence No. 100057327

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DRAWN:	RDB			
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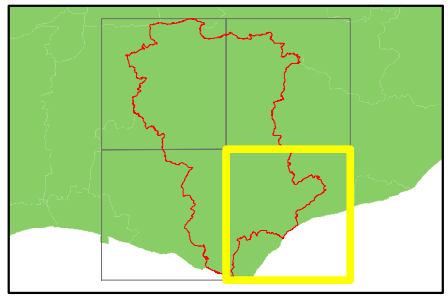
architecture planning masterplanning
Broadmede House, Farnham Business Park, Weydon Lane, Farnham, Surrey GU9 8QT.
info@ospharchitecture.com www.ospharchitecture.com
Tel: 01252 267878

SFRA Flood Maps

Appendix F



Key Plan



Legend

Wealden Boundary

Groundwater concern

0 1.25 2.5 5 km

WEALDEN DISTRICT COUNCIL

LEVEL 1 SFRA: APPENDIX F GROUNDWATER MAPPING

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Information regarding modelled and histprical flood risk is constantly changing. Users should consult the Environment Agency for the lastest flood risk information relating to specific planning applications.

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JBA consulting

Wealden District Council

East Sussex County Council Pre-Application Correspondence

Appendix G

08/10/2020

Drainage Report

Site name: Eastbourne Road, Willingdon, BN26 5DU

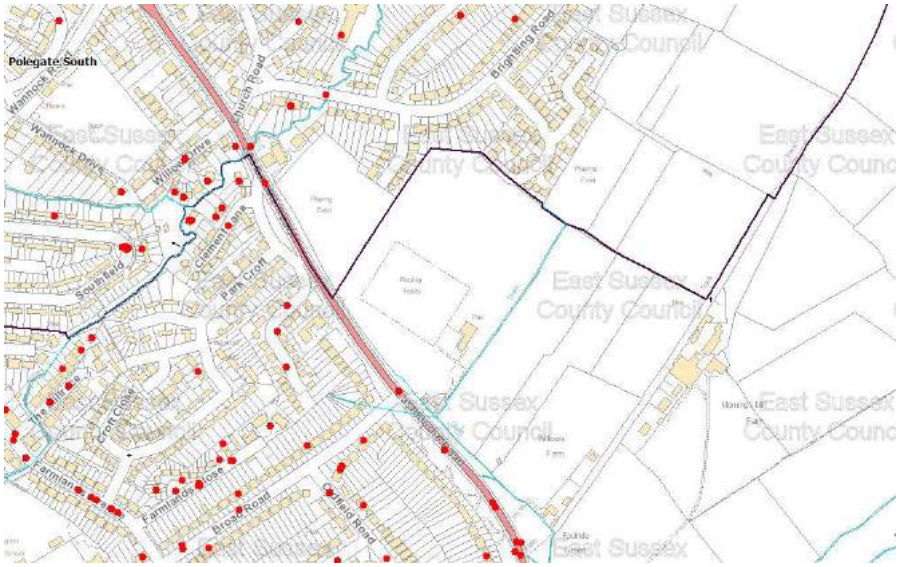
ESCC Reference: SUD/PRE/PC/WD/20/017

Flood Risk

Flood Risk	Is any part of the site at risk?	Where to obtain additional information
Fluvial/Coastal	No	Environment Agency
Surface water	Yes	Environment Agency
Groundwater	Yes	British Geological Survey

The site's location in Flood Zone 1 does not mean that there is no fluvial flood risk to it as there are some ordinary watercourses on the site, it just means that it has not been mapped. Wealden District Council has partnered with Eastbourne Borough Council to develop a fluvial flood model to accurately map flood risk in Polegate and Willingdon. This includes detailed modelling of the watercourse on the development site. This modelling work is still at collection of channel survey stage.

The map below shows the flood incidents recorded in our database in the vicinity of the development site.



Recorded flooding incident

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Figure 1: Recorded Flood Incidents

The table below provides details of the recorded flood incidents within the vicinity of the site.

Date	Source of flooding	Description
03/03/2010	Unknown	Unknown
23/02/2010	Unknown	Pavements outside property flooded & front garden of house
Unknown	FOUL/COMBINED, Curtilage and highway or open space flooded	Unknown
Unknown	FOUL/COMBINED, curtilage and highway or open space flooded	Unknown
Unknown	FOUL/COMBINED, curtilage flooding	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
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Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	SURFACE WATER	Unknown
Unknown	FOUL/COMBINED	Unknown
Unknown	FOUL/COMBINED	Unknown

Date	Source of flooding	Description
Unknown	FOUL/COMBINED	Unknown
Unknown	SURFACE WATER	Unknown
Unknown	FOUL/COMBINED	Unknown
02/03/2010	Unknown	Garden flooded
11/10/2010	Unknown	drains blocked
01/07/1993	Pluvial	Collapse of stream bank
01/11/1994	FOUL/COMBINED	Blocking of watercourse by rubbish.
01/01/1995	FOUL/COMBINED	Flooding. Fire Brigade
01/01/1995	FOUL/COMBINED	Flooding. Fire Brigade
01/01/1995	FOUL/COMBINED	Flooding Sandbags required
01/01/1995	FOUL/COMBINED	Sandbags req
01/03/1995	FOUL/COMBINED	Road flooded outside shops in Farmlands Way
01/03/1995	SURFACE WATER	Sandbags
01/03/1995	FOUL/COMBINED	Sandbags req
01/03/1995	SURFACE WATER	Flooding Sandbags req. Stream Flooding through garden.
01/11/1997	Pluvial according to SFRA 2008	Sandbags, surcharging from foul sewer
01/11/1997	Pluvial according to SFRA 2008	Surface flooding to garden run off from rec
01/01/1998	Pluvial according to SFRA 2008	Sandbags req
01/01/1998	Pluvial according to SFRA 2008	Sandbags req
01/06/1999	Pluvial according to SFRA 2008	Run off onto adjoining land
01/12/1999	Pluvial according to SFRA 2008	Sandbags req
01/02/2000	Pluvial according to SFRA 2008	Surface flooding of Garden
01/03/2000	Pluvial according to SFRA 2008	ditch blocked
01/06/2000	Pluvial according to SFRA 2008	Sandbags req
01/06/2000	Pluvial according to SFRA 2008	Sandbags req

Date	Source of flooding	Description
01/11/2000	Pluvial according to SFRA 2008	Sandbags req
01/01/2001	Pluvial according to SFRA 2008	Garage falling away into stream.
01/04/2002	Pluvial according to SFRA 2008	Complaint re rubbish/debris in main river
01/04/2002	Pluvial according to SFRA 2008	water ponds in rear garden
01/05/2002	Pluvial according to SFRA 2008	stream at rear blocked by doors debris and soil
01/04/2004	Pluvial according to SFRA 2008	manhole in footpath alongside library overflowing
01/06/2004	Pluvial according to SFRA 2008	channel blocked
01/08/2004	Pluvial according to SFRA 2008	Tree fallen across watercourse at into garden
01/12/2004	Pluvial according to SFRA 2008	Flooding in rear garden, suspected piped ditch when estate built
01/04/2005	Pluvial according to SFRA 2008	Youths putting debris in stream
01/05/2005	Pluvial according to SFRA 2008	Found land drain in rear garden
01/10/2005	Pluvial according to SFRA 2008	garden flooded again
01/10/2006	Pluvial according to SFRA 2008	Damp in property, possible underfloor
01/02/2007	Pluvial according to SFRA 2008	SW flooding to front garden- sandbags requested
01/01/2008	Pluvial according to SFRA 2008	Flooding in front and rear garden during heavy rain
01/01/2008	Tidal	Sandbags req
15/11/2010	Drainage: highway culvert	blocked drain outside property
01/09/1991	Fluvial	Watercourse fenced in and in need of maintenance
01/11/1991	Unknown	Flooding of gardens
01/06/1993	Pluvial	Flooding of garden. Broken water pipe
01/01/1994	Ground Water	Flooding of road on occasion. Broken pipes found by CCTV
01/02/1994	Pluvial	Groundwater in gardens
01/05/1994	Sewer	Unknown
01/12/1994	SURFACE WATER	Sandbags req

Date	Source of flooding	Description
01/12/1994	FOUL/COMBINED	Flooding from road and foul sewer.
01/01/1995	SURFACE WATER	Flooding Fire Brigade
01/01/1995	FOUL/COMBINED	Flooding under properties
01/01/1995	FOUL/COMBINED	Flooding to garden reoccurring problem
01/03/1995	FOUL/COMBINED	Sandbags req
01/03/1995	SURFACE WATER	Manhole covers lifting. Raw sewage into street
01/03/1995	FOUL/COMBINED	Foul surcharging across the garden.
01/01/1997	FOUL/COMBINED	Blocked culvert
01/11/1997	FOUL/COMBINED	Flooding to back garden
01/11/1997	FOUL/COMBINED	Sandbags - surface flooding to garden run off
01/11/1997	Pluvial according to SFRA 2008	Foul surcharging not above ground level
01/06/1998	Pluvial according to SFRA 2008	A22 flooded
01/01/1999	Pluvial according to SFRA 2008	Flooding off highway
01/11/2000	Pluvial according to SFRA 2008	Foul sewer surcharging due to water enter the manhole
01/02/2001	Pluvial according to SFRA 2008	Water ponding in rear garden after heavy rain
01/03/2001	Pluvial according to SFRA 2008	sw ponding reported in rear garden after heavy rain
01/10/2001	Pluvial according to SFRA 2008	Flooding from overflowing gutter
01/11/2002	Pluvial according to SFRA 2008	sw ponds in drive
01/11/2002	Pluvial according to SFRA 2008	rear garden lays wet most of time
01/01/2009	Pluvial according to SFRA 2008	watercourse surcharging in rear garden
01/01/2009	Pluvial according to SFRA 2008	Unknown
01/11/2009	Pluvial according to SFRA 2008	water off footway runs into front garden
11/02/2012	Unknown	Humanitarian or Assistance - Flooding
23/08/2012	Unknown	Humanitarian or Assistance - Flooding
09/11/1997	FOUL	curtilage flooding, unusable sanitation

Date	Source of flooding	Description
29/09/2005	FOUL	Curtilage flooding
30/11/2009	FOUL	Pollution, highway flooding
Unknown	Pluvial according to SFRA 2008	Unknown
Unknown	Pluvial according to SFRA 2008	Unknown
26/08/2011	Sewer- Foul	Unknown
04/11/2013	Sewer- Surface Water	Unknown
13/11/2013	Sewer- Foul	Unknown
15/10/2014	Unknown	Unknown
28/07/2014	Surface water- highway gully	Blocked gully is overflowing and flooding garden during heavy rainfall. It is currently 3ft away from the house.
08/08/2008	FOUL	Curtilage flooding
21/08/2008	FOUL	Curtilage, agricultural flooding
26/02/2010	FOUL	Curtilage flooding, unusable sanitation
Unknown	Unknown	Flooded gardens
Unknown	Pluvial	Damage to properties
Winter 2000	Pluvial	A2270 flooded, road closed
01/01/1995	Unknown	Sandbags required
01/01/1995	Unknown	Sandbags required
01/01/1995	Unknown	Flooding Sandbags required
01/03/1995	Unknown	Flooding
01/03/1995	Unknown	Sandbags req
01/11/1997	Unknown	Sandbags required
01/11/1997	Unknown	Sandbags required
01/11/1997	Surface Water	Surface flooding to garden run off from rec owned by Polegate T.C-Mr White485726
01/01/1998	Unknown	Sandbags required

Date	Source of flooding	Description
01/01/1998	Unknown	Sandbags required
01/06/1999	Surface Water	Run off onto adjoining land, Farmlands Court - Developer installs land drains
01/12/1999	Unknown	Sandbags required
01/02/2000	Surface Water	Surface flooding of Garden - former watercourse filled, historically
01/03/2000	Unknown	Work carried out by WDC to open up ditch
01/06/2000	Unknown	Sandbags required
01/06/2000	Unknown	Sandbags required
01/11/2000	Unknown	Sandbags required
01/04/2002	Unknown	water ponds in rear garden - advised installation of shallow land drain if problem is of sufficient concern
Unknown	Pluvial according to SFRA 2008	Unknown
Unknown	Pluvial according to SFRA 2008	Unknown
26/01/2010	Surface Water	When it rains the rain floods down and totally misses the gulley there. Apparently, it requires some sort of redirecting so that the falling rain goes into the gulley
01/02/2010	Unknown	Drain needs to be cleared.
26/08/2011	Sewer- Foul	Unknown
05/11/2012	Surface water- highway gully	The storm drain outside No. 71 is blocked, producing a large pool of water around the drain. This is bubbling up and running down the road into the front garden, causing severe flooding. Threatening the house.
Unknown	Groundwater	Groundwater in gardens, Owners advised to land drain gardens
31/08/2011	Surface water-highway gully	Gully/drain unable to cope with heavy rain water. Water running down the close.
11/11/2013	Unknown	Road flooded with standing water. Cars are having to use the opposite side of the road.
28/07/2014	Surface water- highway gully	Road is flooding due to heavy rain. Two road drains

Date	Source of flooding	Description
		blocked.
1997?	Pluvial	gardens flooded. Works carried out to prevent re-occurrence
01/01/1994	Surface Water - Drainage	Flooding of road on occasion.
01/02/1994	Groundwater	Groundwater in gardens, Owners advised to land drain gardens
01/12/1994	Unknown	Sandbags required
01/01/1995	Surface Water	Flooding to garden reoccurring problem
01/03/1995	Unknown	Sandbags req
01/03/1995	Foul	Manhole covers lifting. Raw sewage into street
01/11/1997	Foul	Foul surcharging not above ground level. SW alerted
01/11/1997	Surface Water	SW ponding in rear garden
01/11/1997	Surface Water	Sandbags - surface flooding to garden run off from Tott Yew Rec
01/06/1998	Surface Water	A22 flooded-ESCC advised although no problem reported to them
01/01/1999	Surface Water	Flooding off highway
01/11/2000	Foul	Foul sewer surcharging due to water enter the manhole. Southern Water have fitted a non-return valve. However, the problem appears to be persisting.
01/02/2001	Surface Water	Water ponding in rear garden after heavy rain. Agreed that the owner will pump water into surface water sewer when needed.
06/01/2015	Surface water - drainage ditch/highway gully	Road flooded and water overflowing onto cycle path. Grips and gullies cleared.
11/11/2013	Drainage	Drain is blocked with lots of bags filled with dog faeces. Small amount of water is collecting here and running down the road during heavy rainfall as a result
13/11/2013	Drainage	Road drainage issues
28/07/2014	Drainage	Gully requires clearance as overflowing and flooding

Date	Source of flooding	Description
		garden, during heavy rainfall. 3ft from house
28/07/2014	Surface Water	Customer reports a lot of water in road that could come into the house
28/07/2014	Drainage	Two drains blocked and the road is flooding due to the storm and heavy rain. Drains need clearing as weeds are growing out.
12/08/2014	Drainage	Gullies appear to be blocked as the rain water is not running away after rainfall.
26/01/2010	Surface Water	Problem outside 67 St John's Road Polegate. When it rains, floods and totally misses the gulley.
02/03/2010	Surface Water	There is fresh water going off route and it goes into his garden, causing flooding.
31/08/2011	Drainage	gully was missed recently as a car was parked over it and it caused flooding on Friday
08/09/2011	Drainage	When it rained last week the gully or drain could not cope with the water A few months ago all the others were cleared except this one
19/10/2012	Surface Water	Water running down the road and causing flooding in the general area
05/11/2012	Surface Water - Drainage	The storm drain outside number 71 is blocked. There is a big pool of water around the drain which is bubbling and then running down the road. Because of this my front garden is now severely flooded
12/02/2016	Drainage	drains are blocked here, causing a lot of flooding when it rains. Blocked with silt
13/01/2016	Surface Water - Drainage	blocked drains and water flowing down road
08/01/2016	Surface Water - Drainage	drains being blogged, as mud from the verge goes in the drains. Roads have major flooding problems
06/01/2016	Drainage	Reporting blocked gully. Surface water is flooding customers garden and says there is now rising damp in their front bedroom
26/08/2015	Surface Water	water flooding across the road. The culvert that runs underneath this road needs unblocking

Date	Source of flooding	Description
26/08/2015	Surface Water - Drainage	The road outside our home has just flooded again, right up over the grass verge. Drains are blocked with rubbish and debris in this area.
25/08/2015	Surface Water - Drainage	torrential downpour has caused drains to overflow flooding the interior through toilet and shower. Storm Drain blocked with rubbish. Combined water system.
14/08/2015	Surface Water	Drain regularly overwhelmed in heavy rain. Flooding threatening houses lower than road level.
28/07/2014	Drainage	Gully requires clearance as overflowing and flooding garden, during heavy rainfall. 3ft from house
28/07/2014	Surface Water - Drainage	Two drains blocked and the road is flooding due to the storm and heavy rain.
11/07/2014	Surface Water	3 curb stones need raising to stop rainwater over-flowing from road onto driveway and allow it to reach nearby drain.
Unknown	Unknown	Flooding of the grass verge and road outside 11 Farmlands Close after rain.
05/01/2018	Drainage	Customers report of a blocked drain.
15/03/2018	Drainage	This drain is blocked so when it rains carriageway around it floods, particularly difficult for cyclists to negotiate.
03/04/2018	Surface Water	A number of residents/drivers have reported to me that the bend outside 89 Southfield, Polegate are flooded during rain.
04/04/2018	Drainage	Please inspect drains on Foulride Green, for any which are blocked. Customer reporting 3 blocked.
19/01/2018	Surface Water	Customer called to report that there are areas of the pavement which flood causing difficulty in accessing their properties.
31/01/2018	Surface Water	Rain water is flooded the footway and verge which they have to walk on water.
23/05/2018	Surface Water	The water is gathering on large puddles and flooding a residents driveway.

Date	Source of flooding	Description
01/12/2018	Unknown	Flooding blocking one lane.

Please note that our records only provide a snapshot of the flood history in the area, as the majority of incidents were compiled after the County Council was established as the Lead Local Flood Authority in 2010. Therefore, other risk management authorities, such as the Environment Agency, the Local Planning Authority and Southern Water may hold additional records.

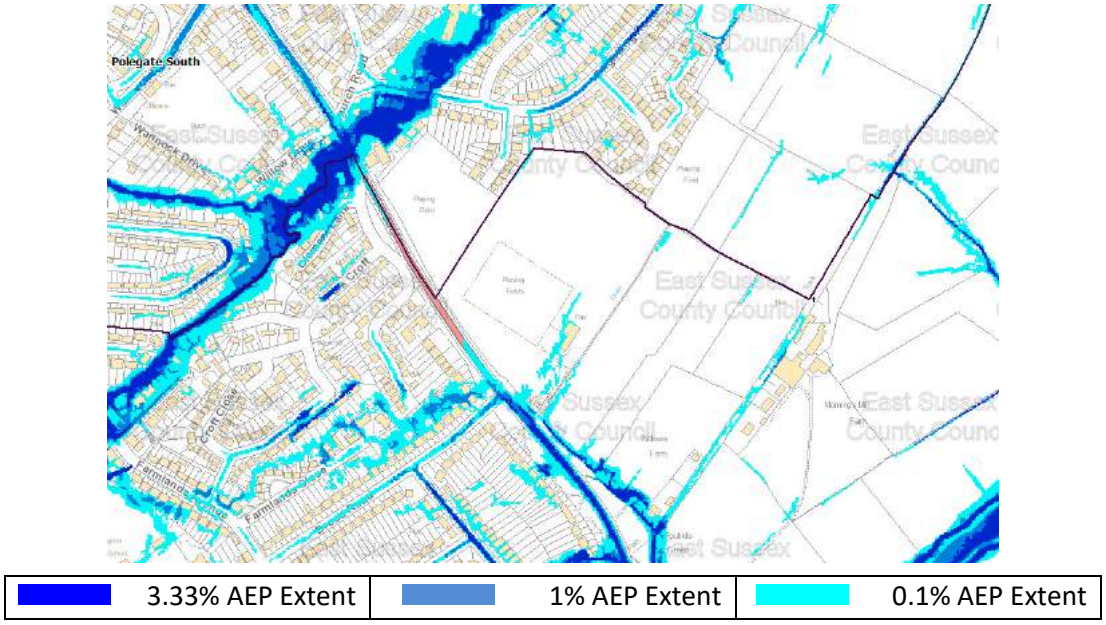
The surface water management strategy should include information on how the potential impacts of local flood risk sources on the proposed drainage arrangements have been considered and mitigated where necessary. Local flood risk sources include surface water, groundwater, sewer and ordinary watercourse flood risk.

Surface Water Flood Risk

The Environment Agency's surface water flood mapping shows the predicted surface water flood risk at the development site, and the table below gives the corresponding maximum flood depth:

Table 1: Surface Water Flood Depths

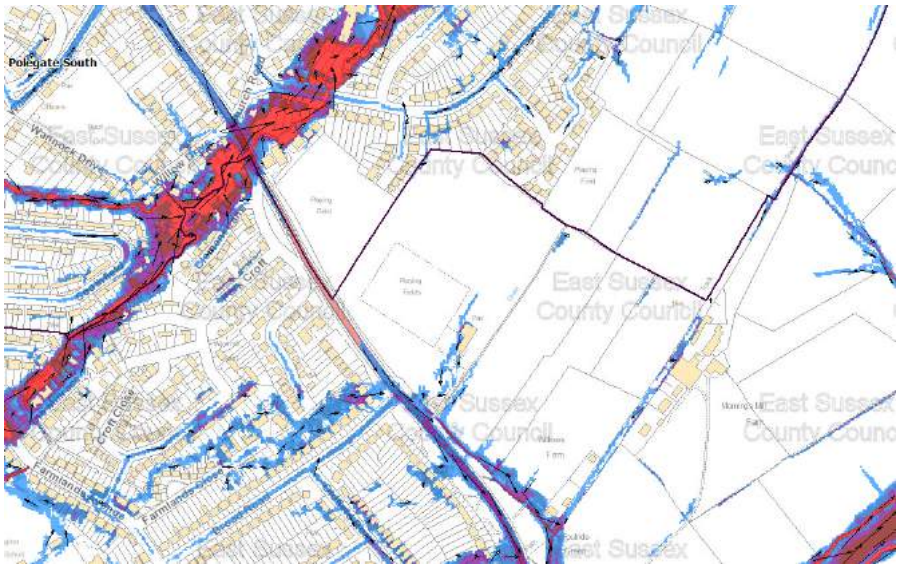
Flood Event	Maximum Depth
3.33% AEP (1 in 30 year)	N/A
1% AEP (1 in 100 year)	0.48
0.1% AEP (1 in 1000 year)	0.64



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Figure 2: Surface Water Flood Risk

The map below shows predicted depths and flow direction of surface water for the 0.1% AEP (1 in 1000) event:



	0.00 – 0.15m		0.15 – 0.30m		0.30 – 0.60m
	0.60 - 0.90m		> 0.90 m		

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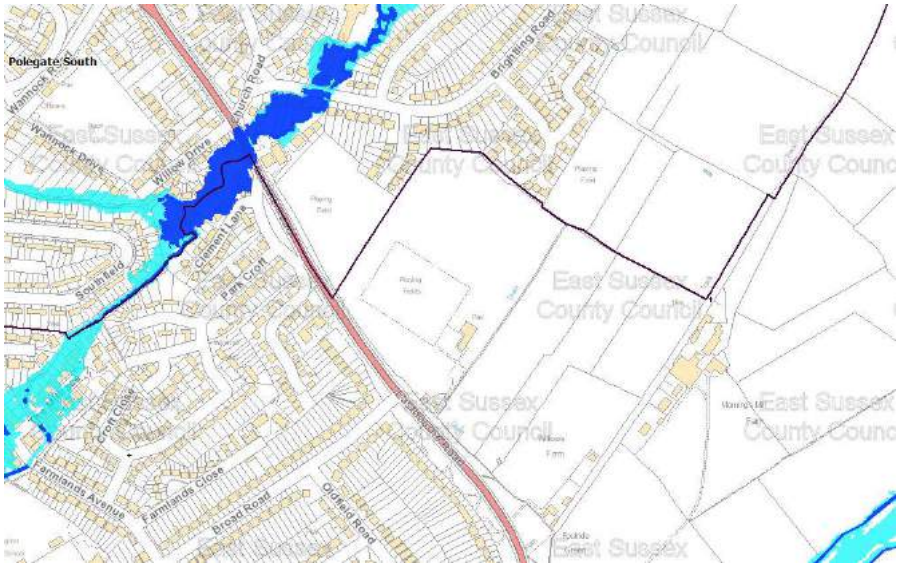
Figure 3: 0.1% AEP depth and flow direction

Further information can be viewed online on at the Environment Agency's pages on the GOV.UK website.

There is a small surface water flow path that runs partly through the site. This should be taken into account when designing the site layout and levels as to ensure the flood risk is not increased both on and off the site.

Fluvial and Coastal Flood Risk

The Environment Agency's mapping shows that the property is not in the vicinity of Flood Zone 2 and Flood Zone 3 and therefore probably at lower risk of flooding from fluvial and tidal sources.



	Flood Zone 3		Flood Zone 2

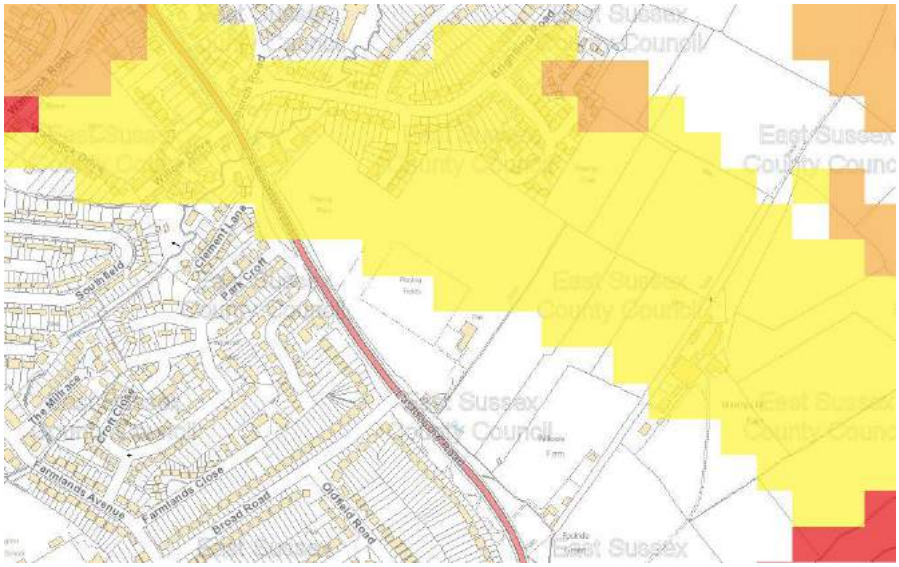
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Figure 4: Fluvial and Coastal Flood Risk

Further information can be viewed online at the Environment Agency's pages on the GOV.UK website.

<u>Groundwater Flood Risk</u>

Mapping from the British Geological Survey shows that there is limited potential for groundwater flooding to occur to the site.



Limited potential for groundwater flooding to	Potential for groundwater flooding of property situated below ground	Potential for groundwater flooding to occur at

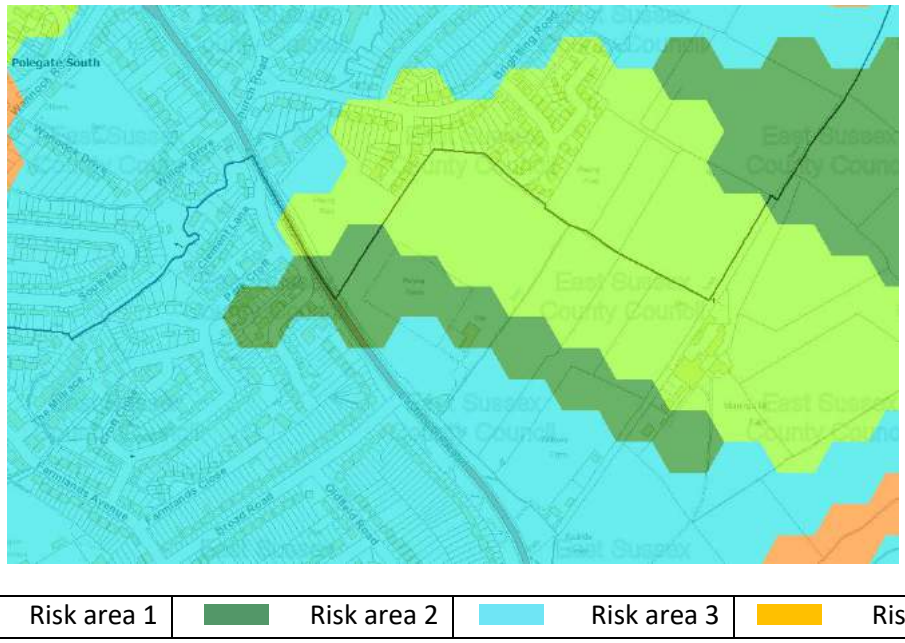
occur	level	surface

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Figure 5: Groundwater Flood Risk

Drainage Considerations

The council has carried out county wide analysis to classify East Sussex into four areas of broad drainage characteristics or Drainage Risk Areas (DRA). These spatial groupings are intended to inform the preparation of drainage strategies with development proposals, so that appropriate SuDS techniques are implemented in the county.



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Figure 6: Drainage Risk areas

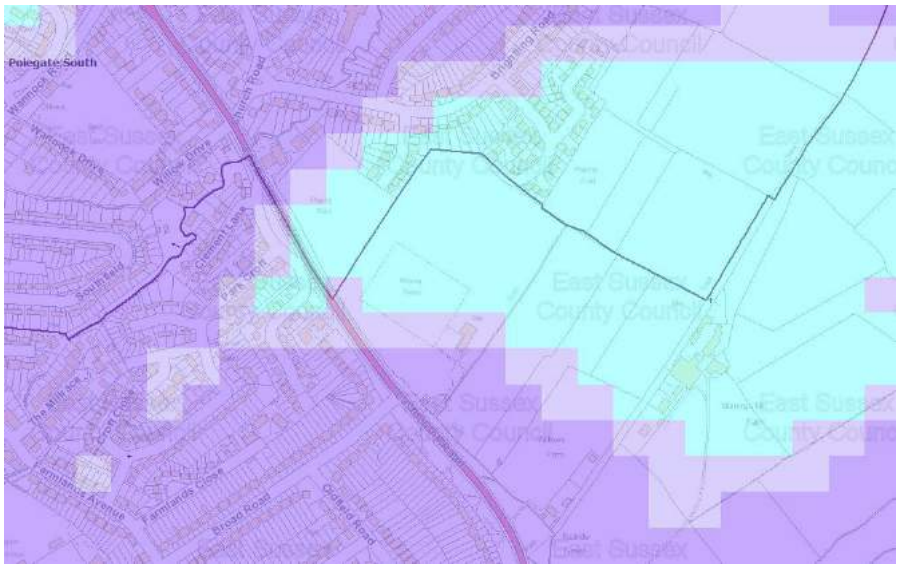
The site is shown to be within risk group 1, 2 and 3. The site may also the contain aspects of other DRA categories.

The LLFA requirements for each DRA are provided in Table 2 below.

Table 2: Drainage Risk Area Guidance

DRA Number	Colour	Guidance
1		Improvements upon greenfield runoff rates should be discussed with LLFA
2		Infiltration is unlikely, ensure an outfall can be secured
3		Infiltration techniques are likely to be inappropriate
4		Robust evidence is required to show the applicability of infiltration on site

Figure 7 below outlines the estimated water table depth for the site, based on data from the British Geological Survey. The legend contains the British Geological Survey advice for each groundwater depth band.



	>5m below surface	Observations of seasonal variations in groundwater level recommended
	3m – 5m below surface	Determine seasonal variations in groundwater level
	<3m below surface	Determine seasonal variations in groundwater level

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Figure 7: Depth to Groundwater

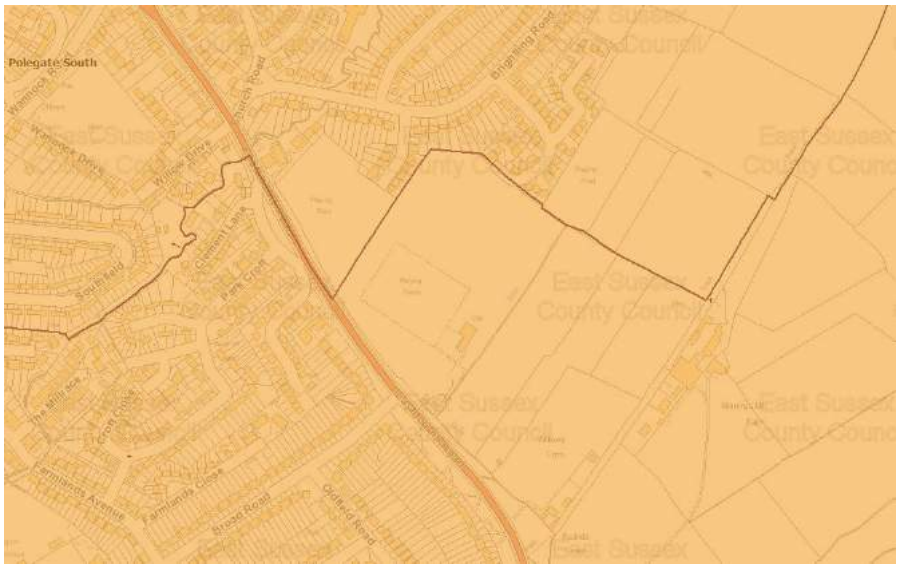
The map indicates that the water table varies across the site. Therefore, any proposals to use infiltration techniques within the drainage design will require infiltration testing to be completed in accordance with BRE365 at locations to and comparable depths of the proposed infiltration features.

Groundwater levels can vary throughout the year. These variations should be determined with groundwater monitoring to be completed between the autumn and spring when we would expect

groundwater levels to be at their highest. We would typically expect a 1m unsaturated zone between the base of the drainage structure and the highest recorded groundwater level.

Figure 8 below outlines the estimated ground stability for the site, based on data from the British Geological Survey. The legend contains the British Geological Survey advice for each ground stability band.

The BGS data indicates that {there is a significant potential for geohazard. Therefore, any proposals to use infiltration should consider the impacts that may have on ground stability.



	Potential for Geohazard	Before installing infiltration SuDS consider the potential for or consequences of infiltration or ground stability
	Significant potential for Geohazard	Only install infiltration SuDS if the potential for or consequences of infiltration are considered no to be considerate
	Very significant constraints are indicated	Only install infiltration SuDS if the potential for or consequences of infiltration are considered no to be considerate

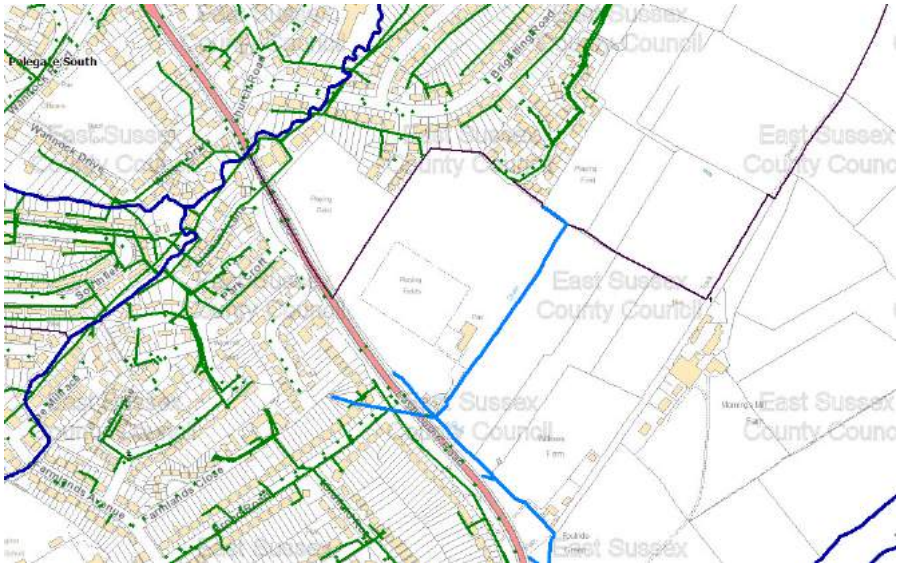
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Figure 8: Ground Stability

The information provided is guidance only. All development proposals must undertake the necessary site surveys to confirm the drainage constraints or opportunities. For further information on drainage strategy requirements, please refer to the ESCC Guide to Sustainable Drainage Systems in East Sussex and the Local Flood Risk Management Strategy. The 'surface water drainage checklist' available on our website lists the information we expect to be submitted in support of a planning application

Watercourses and Drainage Assets

Watercourses and drainage assets in the vicinity of the property are shown below.



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Figure 9: Watercourses

If any ordinary watercourses lie within the site boundary, any planned works to the watercourse map require a separate Ordinary Watercourse Consent from ESCC.

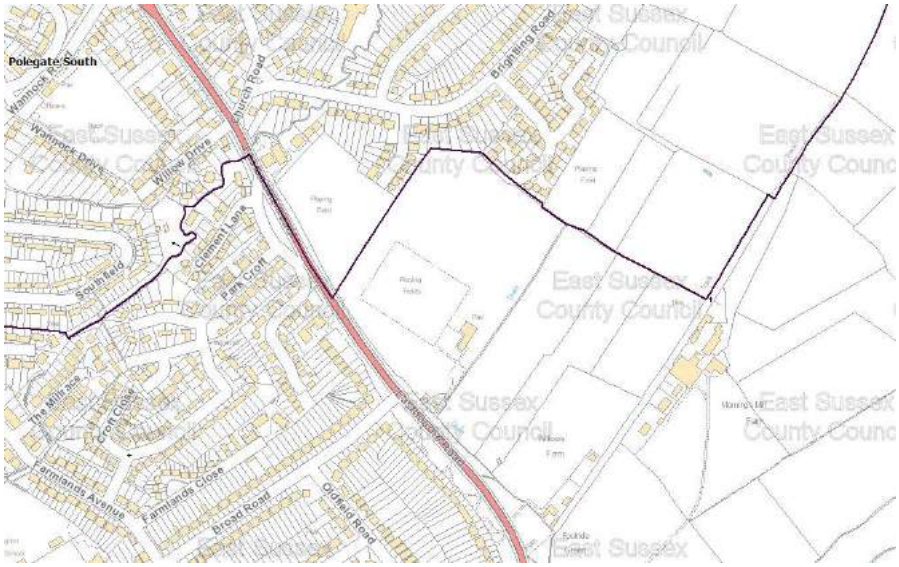
If a main river lies within the site boundary, any planned works to this watercourse may require an Environmental Permit (formerly Flood Defence Consent) from the Environment Agency. Contact the EA for enquiries at enquiries@environment-agency.co.uk

To connect into existing surface water and foul water systems, agreement must be obtained from Southern Water. Please refer to Southern Water for details on the capacity of the existing sewer system and applications for a new connection to the existing sewer system.

There is an ordinary watercourse that runs along the Eastern boundary of the site.

Water Quality and Landfill

Figure 10 below shows the ecological status of adjacent waterbodies, as defined by the Water Framework Directive and any historic landfill sites.



High Ecological Status	Good Ecological Status	Moderate Ecological Status
Poor Ecological Status	Bad Ecological Status	Historic Landfill Site

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Figure 10: Water Quality and Landfill

If the site is adjacent to a sensitive waterbody, as defined by the Water Framework Directive, the Quality of water discharged from the site is likely to be a key consideration. Contact the EA for enquiries at enquiries@environment-agency.co.uk for further information.

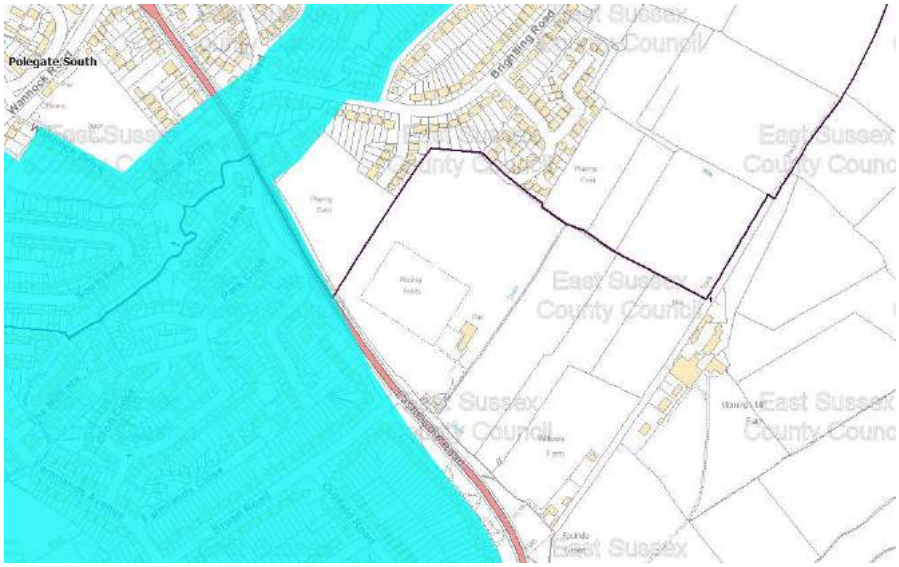
If the site is in the vicinity of a historic landfill the EA may have additional comments on the associated water quality risks.

Investigations

ESCC has undertaken a broad range of investigations into historic flooding and drainage issues including section 19 reports, Land Drainage Investigations and Surface Water Management Plans. Figure 11 below illustrates the location of these investigations.

Where a significant flood event has occurred and the responsibility for managing the risk is unclear; ESCC may undertake a formal investigation under Section 19 of the Flood and Water Management Act 2010. The published report aims to identify the responsible party and proposed response to the incident. To address less severe, localised flooding, ESCC may undertake a Land Drainage Investigation.

The Surface Water Management Plans (SWMP) in ESCC identified several risk 'hotspots'. If the site is adjacent to a hotspot, please refer to the full SWMP document for more information.



Land Drainage Investigation	SWMP Hotspot	Section 19 Investigation

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Figure 11: Previous investigations

If the site is adjacent to any Section 19 Reports, Land Drainage Investigations or SWMP hotspots, please contact the Flood Risk Management Team at watercourse.consenting@eastsussex.co.uk

The site is on the board of a surface water hot spot.

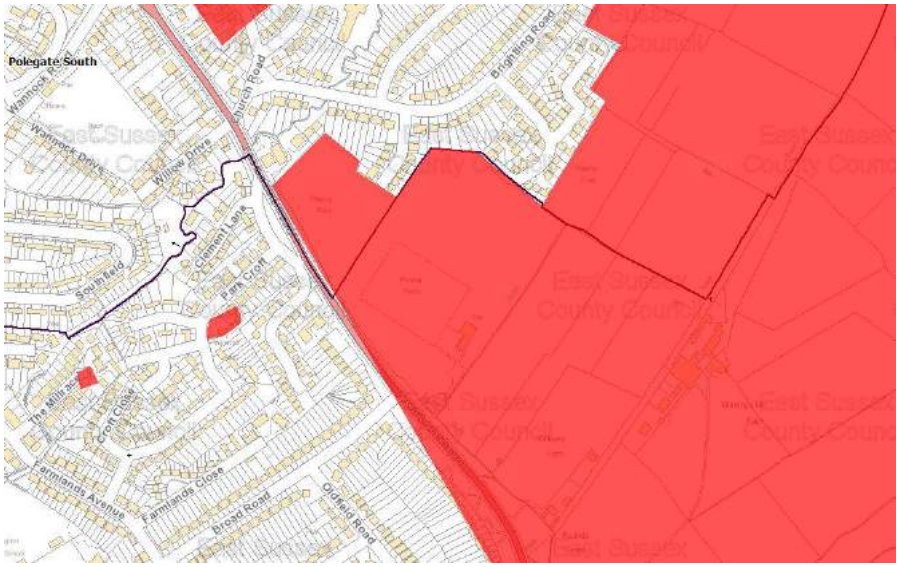
Other Information

The site lies with administrative area of the Pevensey and Cuckmere Water Level Management Board. Additional requirements may need to be taken into consideration. Please contact the below relevant authority for further information.

Upper Medway Internal Drainage Board	enquiries@medwayidb.co.uk
Romney Marshes Area Internal Drainage Board	info@rmaidb@co.uk
Cuckmere and Pevensey Water Level Management Board	planning@wlma.org.uk
East Sussex County Council LLFA	Watercourse.consenting@eastsussex.gov.uk

The site is located within the catchment of the Pevensey and Cuckmere Water Level Management Board and the western boundary of the site is located within its internal drainage district. Therefore the Byelaws of the Board apply to any development on this site which changes the impermeable areas. A surface water discharge consent in accordance with Byelaw 3 maybe be required further details and guidance are available on https://www.wlma.org.uk/pevensey-cuckmere/development/.

Figure 12 below shows any known archaeological sites adjacent to the site. If there is an adjacent site, it is highly likely that information on the location and extent of heritage assets will be required, as well as the archaeological potential of the area. It is recommended to investigate the level of information required by contacting East Sussex Historic Environment Record (HER) at country.HER@eastsussex.gov.uk

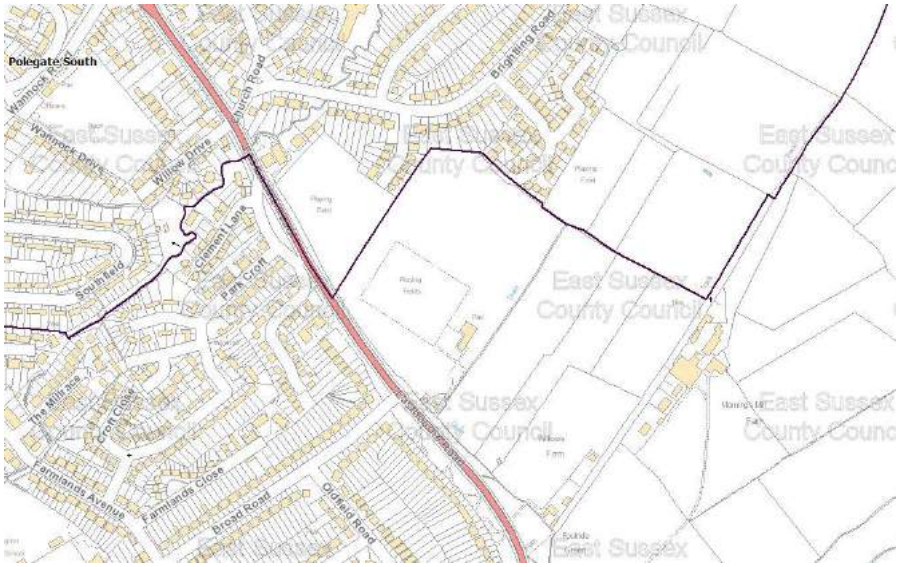


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Figure 12: Archaeology

The entire site is within the boundary of an archaeological site that extends beyond the development.

East Sussex contains area of international, national and local importance for biodiversity. The below Figure 13 illustrates the location of RAMSAR sites, Sites of Specific Scientific Interest (SSSI), Special Areas of Conservation (SAC) and Special Protection Areas (SPA).



RAMSAR	SSSI	SAC	SPA

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Figure 13: Biodiversity

ESCC policy states that the development should provide net gain in biodiversity where possible. Therefore Sustainable Drainage Systems (SuDS) should be designated as multifunctional features, which ensure that biodiversity can be compensated and/or enhanced.

Further information can be found in the Guide to Sustainable Drainage Systems in East Sussex.

Surface Water Calculations

Appendix H

Greenfield runoff rate estimation for sites

www.uksuds.com | Greenfield runoff tool

Calculated by:	James O'Kelly
Site name:	Eastbourne Road
Site location:	Willingdon

This is an estimation of the greenfield runoff rates that are used to meet normal best practice criteria in line with Environment Agency guidance "Rainfall runoff management for developments", SC030219 (2013) , the SuDS Manual C753 (Ciria, 2015) and the non-statutory standards for SuDS (Defra, 2015). This information on greenfield runoff rates may be the basis for setting consents for the drainage of surface water runoff from sites.

Site Details

Latitude:	50.81525° N
Longitude:	0.24790° E
Reference:	1954364488
Date:	Feb 25 2021 15:13

Runoff estimation approach

FEH Statistical

Site characteristics

Total site area (ha):	6.48

Methodology

Q_{MED} estimation method:	Calculate from BFI and SAAR
BFI and SPR method:	Specify BFI manually
HOST class:	N/A
BFI / BFIHOST:	0.405
Q_{MED} (l/s):	
Q_{BAR} / Q_{MED} factor:	1.14

Hydrological characteristics

	Default	Edited
SAAR (mm):	809	827
Hydrological region:	7	7
Growth curve factor 1 year:	0.85	0.85
Growth curve factor 30 years:	2.3	2.3
Growth curve factor 100 years:	3.19	3.19
Growth curve factor 200 years:	3.74	3.74

Notes

(1) Is Q_{BAR} < 2.0 l/s/ha?

When Q_{BAR} is < 2.0 l/s/ha then limiting discharge rates are set at 2.0 l/s/ha.

(2) Are flow rates < 5.0 l/s?

Where flow rates are less than 5.0 l/s consent for discharge is usually set at 5.0 l/s if blockage from vegetation and other materials is possible. Lower consent flow rates may be set where the blockage risk is addressed by using appropriate drainage elements.

(3) Is SPR/SPRHOST ≤ 0.3?

Where groundwater levels are low enough the use of soakaways to avoid discharge offsite would normally be preferred for disposal of surface water runoff.

Greenfield runoff rates

	Default	Edited
Q_{BAR} (l/s):		42.47
1 in 1 year (l/s):		36.1
1 in 30 years (l/s):		97.68
1 in 100 year (l/s):		135.47
1 in 200 years (l/s):		158.83

This report was produced using the greenfield runoff tool developed by HR Wallingford and available at www.uksuds.com. The use of this tool is subject to the UK SuDS terms and conditions and licence agreement , which can both be found at www.uksuds.com/terms-and-conditions.htm. The outputs from this tool are estimates of greenfield runoff rates. The use of these results is the responsibility of the users of this tool. No liability will be accepted by HR Wallingford, the Environment Agency, CEH, Hydrosolutions or any other organisation for the use of this data in the design or operational characteristics of any drainage scheme.

Greenfield Runoff Volume

FEH Data

Return Period (years)	100
Storm Duration (mins)	360
Site Location	GB 558650 103650 TQ 58650 03650
C(1km)	-0.024
D1(1km)	0.381
D2(1km)	0.319
D3(1km)	0.457
E(1km)	0.306
F(1km)	2.441
Areal Reduction Factor	1.00
Area (ha)	6.480
SAAR (mm)	827
CWI	118.648
SPR Host	40.190
URBEXT (1990)	0.2810

Results

Percentage Runoff (%)	48.62
Greenfield Runoff Volume (m^3)	2401.044

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Drainage Strategy Drawing
Exceedance Flow Routes Drawing

Appendix I



KEY

- SITE BOUNDARY
- FOUL WATER SEWER
- SURFACE WATER SEWER
- TANKED POROUS PAVING

SURFACE WATER STORAGE VOLUMES	
RETENTION BASIN	800m³
SWALES	950m³
TANKED POROUS PAVING	450m³
ADOPTABLE SEWERS	500m³
	2700m³

SURFACE WATER DRAINAGE STRATEGY

1. THE 1 YEAR GREENFIELD RUNOFF RATE HAS BEEN CALCULATED AS 5.57l/s/ha USING FEH RAINFALL DATA.
2. BASED ON A PROPOSED DEVELOPMENT IMPERMEABLE AREA OF 3.3ha (WHICH INCLUDES A 10% ALLOWANCE FOR URBAN CREEP) THE PEAK RUNOFF RATE FROM SITE HAS BEEN CALCULATED AS 18.5l/s.
3. SURFACE WATER RUNOFF IS TO FOLLOW EXISTING ARRANGEMENTS AND WILL DISCHARGE TO THE EXISTING DITCH LOCATED IN THE SOUTH EASTERN CORNER OF THE SITE.
4. STORAGE VOLUMES REQUIRED CALCULATED AS 2700m³ FOR THE 100 YEAR PLUS 40% ALLOWANCE FOR CLIMATE CHANGE STORM EVENT.
5. ATTENUATION STORAGE IS TO BE PROVIDED WITHIN A RETENTION BASIN, SWALES AND POROUS PAVING, ALONG WITH THE STORAGE AVAILABLE WITHIN THE ADOPTABLE SEWER NETWORK.

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS
Stuart Michael Associates Ltd
Coombe House, Coombe Square, Thatcham, Berkshire RG19 4JF
T: 01635 867 711 e: mail@stuartmichael.co.uk
F: 01635 861 715 w: www.stuartmichael.co.uk

DANESCROFT

JOB TITLE
EASTBOURNE ROAD
WILLINGDON

DRAWING TITLE
DRAINAGE STRATEGY

DATE	DRAWN	CHECKED
FEB 21	JOK	TSW
DRAWING NO.	REV.	SCALE
6554.401		1:500 @ A0

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Constructionline

KEY

- SITE BOUNDARY
- FOUL WATER SEWER
- SURFACE WATER SEWER
- EXCEEDANCE ROUTE

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS

Stuart Michael Associates Ltd
Coombe House, Coombe Square, Thatcham, Berkshire RG19 4JF
T: 01635 867 711 e: mail@stuartmichael.co.uk
F: 01635 861 715 w: www.stuartmichael.co.uk

DANESCROFT

JOB TITLE
EASTBOURNE ROAD
WILLINGDON

DRAWING TITLE
EXCEEDANCE ROUTES

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SUDS Maintenance Schedules

Appendix J

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS
Stuart Michael Associates Ltd
Coombe House, Coombe Square
Thatcham, Berkshire RG19 4JF
T: 01635 867 711 F: 01635 861 715
e: mail@stuartmichael.co.uk
w: www.stuartmichael.co.uk

Table 20.15 Operation and maintenance requirementsfor pervious pavements

Maintenance Schedule	Required action	Frequency
Regular maintenance	Brushing and vacuuming (standard cosmetic sweep over whole surface).	Once a year, after autumn leaf fall, or reduced frequency as required, based on site-specific observations of clogging or manufacturer's recommendations - pay particular attention to areas where water runs onto pervious surface from adjacent impermeable areas as this area is most likely to collect the most sediment.
Occasional maintenance	Stabilise and mow contributing and adjacent areas.	As required.
	Removal of weeds or management using glyphospate applied directly into the weeds by an applicator rather than spraying.	As required - once per year on less frequently used pavements
Remedial actions	Remediate any landscaping which, through vegetation maintenance or soil slip, has been raised to within 50mm of the level of the paving.	As required.
	Remedial work to any depressions, rutting and cracked or broken blocks considered detrimental to the structural performance or a hazard to users, and replace lost jointing material.	As required.
	Rehabilitation of surface and upper sub-structure by remedial sweeping.	Every 10 to 15 years or as required (if infiltration performance is reduced due to significant clogging).
Monitoring	Initial inspection.	Monthly for three months after installation.
	Inspect for evidence of poor operation and/or weed growth - if required, take remedial action.	Three-monthly, 48 h after large storms in first six months
	Inspect silt accumulation rates and establish appropriate brushing frequencies.	Anually.
	Monitor inspection chambers	Anually.

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS
Stuart Michael Associates Ltd
Coombe House, Coombe Square
Thatcham, Berkshire RG19 4JF
T: 01635 867 711 F: 01635 861 715
e: mail@stuartmichael.co.uk
w: www.stuartmichael.co.uk

Table 23.1 Operation and maintenance requirements for ponds and wetlands

Maintenance Schedule	Required action	Frequency
Regular maintenance	Remove litter and debris	Monthly (As required)
	Cut the grass - public areas.	Monthly (during growing season).
	Cut the meadow grass.	Half yearly (spring, before nesting season, and autumn).
	Inspect marginal and bankside vegetation and remove nuissance plants (for first 3 years).	Monthly (at start, then as required).
	Inspect inlets, outlets, banksides, structures, pipework etc fir evidence of blockage and/or physical damage.	Monthly
	Inspect water body for signs of poor water quality.	Monthly (May - October)
	Inspect silt accumulation rates in any forebay and in main body of the pond and establish appropriate removal frequencies; undertake contamination testing once some build-up has occurred, to inform management and disposal options.	Half yearly
	Check any mechanical devices eg penstock	Half yearly
	Hand cut submerged and emergent aquatic plants (at minimum of 0.1m above pond base; include max 25% of pond surface).	Annually
	Remove 25% of bank vegetation from waters edge to a minimum of 1m above water level.	Annually
	Tidy all dead growth (scrub clearance) before start of growing season (Note: tree maintenance is usually part of overall landscape management contract).	Annually
	Remove sediment from forebay.	1-5 years, or as required.
	Remove sediment and planting from one quadrant of the main body of ponds without sediment forebays.	Every 5 years (or as required)

STUART MICHAEL ASSOCIATES
CONSULTING ENGINEERS
Stuart Michael Associates Ltd
Coombe House, Coombe Square
Thatcham, Berkshire RG19 4JF
T: 01635 867 711 F: 01635 861 715
e: mail@stuartmichael.co.uk
w: www.stuartmichael.co.uk

Table 17.1 Operation and maintenance requirements for swales

Maintenance Schedule	Required action	Frequency
Regular maintenance	Remove litter and debris	Monthly (or as required).
	Cut grass - to retain grass height within specified design range.	Monthly (during growing season), or as required.
	Manage other vegetation and remove nuissance plants.	Monthly (at start, then as required).
	Inspect inlets, outlets and overflows for blockages, and clear if required.	Monthly
	Inspect infiltration surfaces for ponding, compaction, silt accumulation, record areas where water is ponding for > 48 hours	Monthly (or when required).
	Inspect vegetation coverage	Monthly (for 6 months, quarterly for 2 years, then half yearly)
	Inspects inlets and facility surface for silt accumulation, establish appropriate silt removal frequencies	Half yearly
Occasional maintenance	Re-seed areas of poor vegetation growth. Alter plant types to better suit conditions, if required.	As required or if bare soil is exposed over 10% or more of the swale treatment area
Remedial actions	Repair erosion or other damage by re-turfing or reseeding.	As required.
	Re-level uneven surfaces and reinstate design levels.	As required.
	Scarify and spike topsoil layer to improve infiltration performance, break up silt deposits and prevent compaction of the soil surface.	As required.
	Remove build-up of sediment on upstream gravel trench, flow spreader or at top of filter strip.	As required.
	Remove and dispose of oils or petrol residues using safe standard practices.	As required.

Occasional maintenance	Remove sediment from the main body of big ponds when pool volume is reduced by 20%.	With effective pre-treatment, this will only be required rarely, eg every 25-50 years.
Remedial actions	Repair of erosion or other damage.	As required.
	Replant where necessary.	As required.
	Aerate pond when signs of euthrophication are detected.	As required.
	Realignment of rip-rap or other damage.	As required.
	Repair / rehabilitation of inlets, outlets and overflows.	As required.

Southern Water Correspondence

Appendix K

from Southern Water

Scott Collis
Stuart Michael Associates
Coombe House
Coombe Square
Thatcham
Berkshire
RG19 4JF

Your ref

Our ref
DS_CC_PPE-121137

Date
30 November 2020

Contact
Tel 0330 303 0119

Dear Mr Collis,

Level 1 Capacity Check Enquiry: 6654 - Eastbourne Road, Willingdon, East Sussex, BN26 5DQ.

We have completed the capacity check for the above development site and the results are as follows:

Foul Water

There is currently inadequate capacity within the foul sewerage network to accommodate a foul flow of **4.25 l/s** for the above development at manhole reference TQ5803**3902**. The proposed development would increase flows to the public sewerage system which may increase the risk of flooding to existing properties and land. Additional off-site sewers or improvements to existing sewers will be required to provide sufficient capacity to service the development. Southern Water has a duty to provide Network capacity from the point of practical connection (point of equivalent or larger diameter pipe) funded by the New Infrastructure Charge.

Southern Water aim to provide this within 24 months following the date that planning has been granted for developments not identified as strategic sites in our current business plan. Strategic sites are larger developments and will often take longer than 24 months for a full solution to be provided.

The nearest point where capacity is currently available is at manhole reference TQ5904**5301** which is located approximately **1.1 km** North-East of the proposed development site.

New Infrastructure Charging

Please note as of 1st April 2018 we have moved to the “New Connections Services Charging Arrangements”. We understand that this may cause uncertainty for customers, particularly where they may have already committed to a development based on previous charging arrangements. We have worked with our stakeholders and Water UK to agree a set of principles by which we will base our charges. Please read through our new charging arrangement documents available at the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

Southern Water Services Ltd, Registered Office: Southern House, Yeoman Road, Worthing West Sussex BN13 3NX Registered in England No. 2366670

Alternatively, New Appointees and Variations (NAVs), also known as ‘inset’ companies, can provide new connection services or take ownership of the new water and wastewater connection infrastructure provided for a new development. NAVs are appointed by Ofwat and replace the regional water company. It is for the developer to choose whether to use a NAV or the regional water company to supply services for new sites, according to certain legal criteria.

Connecting to our network

It should be noted that this information is only a hydraulic assessment of the existing sewerage network and does not grant approval for a connection to the public sewerage system. A formal Sewer Connection (S106) application is required to be completed and approved by Southern Water Services. To make an application visit: developerservices.southernwater.co.uk/

Please note the information provided above does not grant approval for any designs/drawings submitted for the capacity analysis. The results quoted above are only valid for 12 months from the date of issue of this letter.

Should it be necessary to contact us please quote our above reference number relating to this application by email at southernwaterplanning@southernwater.co.uk

Yours sincerely,



Joff Edevane
Growth Planning Lead
Business Channels

Southern Water Services Ltd, Registered Office: Southern House, Yeoman Road, Worthing West Sussex BN13 3NX Registered in England No. 2366670

Appendix 4: i-Transport, Land at Eastbourne Road, Willingdon, Transport Assessment, ref: NM/MD/AT/ITL15734-004, (2021)

Land at Eastbourne Road, Willingdon

Transport Assessment

Client: Danescroft (FREOF V Willingdon) LLP

i-Transport Ref: NM/MD/AT/ITL15734-004

Date: 26 February 2021

Land at Eastbourne Road, Willingdon

Transport Assessment

Client: Danescroft (FREOF V Willingdon) LLP

i-Transport Ref: NM/MD/AT/ITL15734-004

Date: 26 February 2021

i-Transport LLP
85 Gresham Street
London
EC2V 7NQ

Tel: 020 3705 9215

www.i-transport.co.uk

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Quality Management

Report No.	Comments	Date	Author	Authorised
ITL15731-004	Draft	26/02/2021	MD/AT	NM

File Ref: L:\PROJECTS\15000 SERIES\15734 - Eastbourne Road, Willingdon\Admin\Report and Tech Notes\ITL15734-004 Transport Assessment.docx

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Drawings

ITL15734-GA-003 Proposed Site Access
ITL15734-GA-001 Proposed Site Acces with HPEMAC Improvements
ITL15734-GA-xx Proposed Site Access Vertical Visibility Splay
ITL15734-GA-xx Swept Path Analysis – Large Refuse at the Site Access
ITL15734-GA-xx Swept Path Analysis – Large Refuse
ITL15734-GA-xx Swept Path Analysis – 7.5t Box Van

Appendices

APPENDIX A. ESCC September 2020 Meeting Minutes
APPENDIX B. Personal Injury Accident Data
APPENDIX C. Road Safety Audits and Designer's Responses
APPENDIX D. ESCC Car Parking Calculator
APPENDIX E. Residential Trip Rates
APPENDIX F. Medical Centre Trip Rates
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APPENDIX H. Development Assignment
APPENDIX I. Operational Assessment Reports

SECTION 1 Introduction

1.1 Overview

1.1.1 Danescroft (FREOF V Willingdon) LLP has appointed i-Transport LLP to provide highways and transport advice for a forthcoming planning application for the development of up to 180 residential dwellings and a 2,170 sqm medical centre on land to the east of the A2270 Eastbourne Road, Willingdon.

1.1.2 The proposed development is for:

> ***"Outline Application All Matters Reserved except for Access (excluding internal estate roads beyond the access to serve the Medical Centre Plot) for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing and onsite open space".***

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

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

1.1.5 The site is within the planning jurisdiction of Wealden District Council (WDC), whilst East Sussex County Council (ESCC) is the local highway authority responsible for the operation and maintenance of the adjoining roads. Highways England (HE) is the strategic highway authority responsible for the operation and maintenance of the A27 (circa 1km to the northwest of the site).

1.1.6 A site location plan is provided at Figure 1.1 with an extract as Image 1.1.

Image 1.1: Site Location Plan Extract



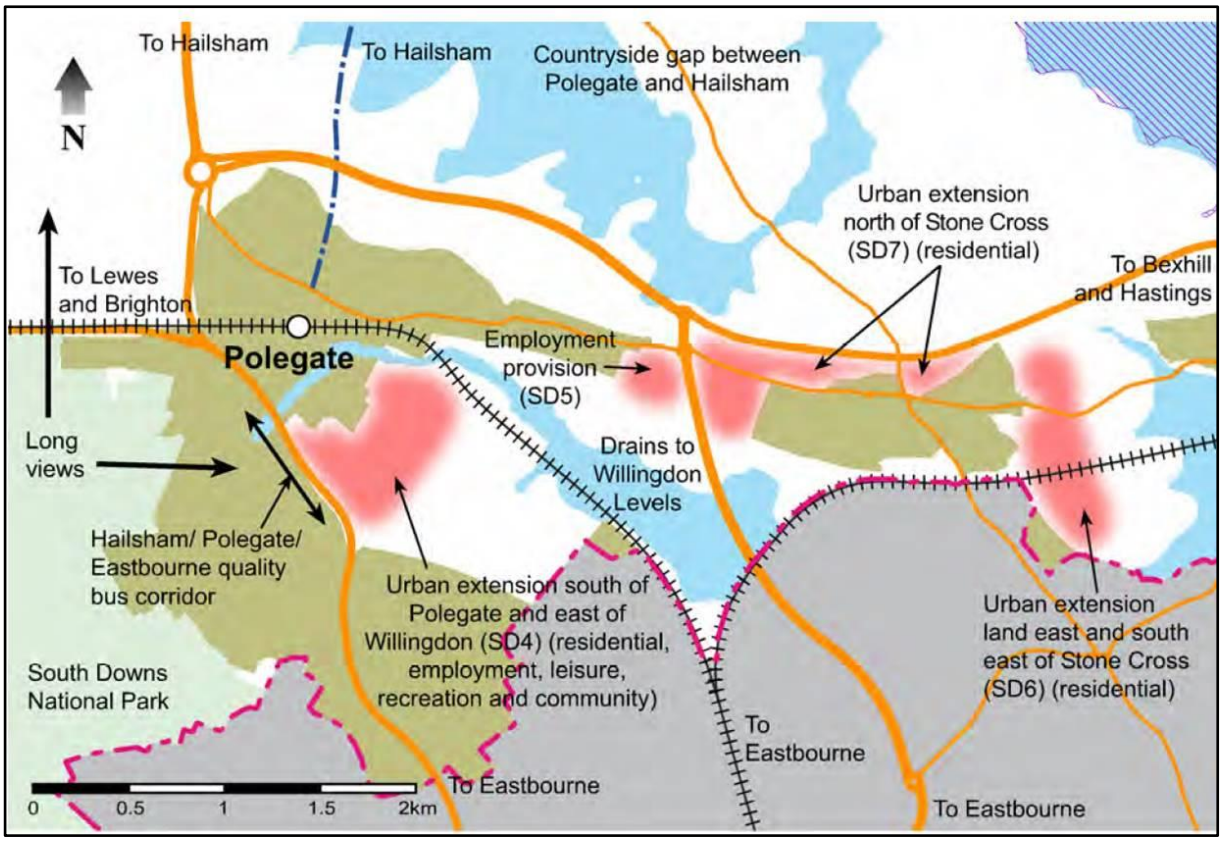
1.2 SD4 – Land at South Polegate and East Willingdon

1.2.1 The site is located within the Land at South Polegate and East Willingdon allocation which is set out in WDC's adopted Core Strategy. The site allocation is contained within Policy WCS4 – Strategic Development Areas – SD4. The allocation is for the provision of the following:

- Around 700 residential dwellings;
- 8,600 sqm net employment floor space;
- Leisure, recreation and community facilities.

1.2.2 The SD4 boundary is shown in Image 1.2.

Image 1.2: SD4 Allocation



1.2.3 The site has therefore been viewed positively by the Council over a considerable period of time for development purposes. Further, the most recent Strategic Housing and Economic Land Availability Assessment ("SHELAA") (January 2019) also considers the wider site favourably for housing.

1.3 Planning History

1.3.1 The proposed site formed part of a larger site, which also included the adjacent land at Mornings Mill Farm, for which an outline planning application (planning ref: WD/2017/1942) was submitted in 2017. The outline planning application sought consent for up to 700 dwellings, 8,600 sqm of employment floorspace, a medical centre, primary school and local community and retail land uses.

1.3.2 An appeal for non-determination (appeal ref: APP/C1435/W/19/3230484) was submitted on the site and an Inquiry was held in October 2019. The appeal was dismissed with the key concerns raised by the Inspector outlined below:

- The effect of the proposed access arrangements upon the safety of all road users;

- The effect of the proposed upon the operation of the strategy and local road networks, including impacts on the proposed Hailsham, Polegate and Eastbourne Movement and Access Corridor (HPEMAC) measures;
- Whether the proposed development would be premature to Wealden's emerging Local Plan; and
- Whether the proposed development would make an appropriate provision for affordable housing and infrastructure.

1.3.3 The two highways reasons outlined above are fully considered with regard to this proposed development.

1.3.4 Despite originally issuing a holding objection to the site due to a perceived impact on the strategic road network (SRN) (the A27 to the north and the A22 to the northeast), HE withdrew their holding objection to the scheme during the course of the Appeal. It had been adequately demonstrated that the impacts of the proposed development on the SRN had been adequately assessed and a package of mitigation works at Cophall Roundabout, located to the north-west of the appeal site, was agreed. Ultimately, HE advised the Inspector that the mitigation works could be secured via a Section 278 agreement, which the Inspected acknowledged at paragraph 20 of the Appeal Decision.

1.3.5 In addition, HE agreed that the proposed development would not have a direct impact on the operation of the two roundabouts on the A22 Golden Jubilee Way, located to the east of the appeal site. However, it was agreed that the proposed development should, to some extent, be contingent upon works to upgrade two roundabout junctions on Golden Jubilee Way because this route provides an alternative to the A2270 between Eastbourne and the SRN (A27 / A22). It was agreed that up to 150 new dwellings could be occupied prior to these improvement works being carried out by HE. This is confirmed at paragraph 23 of the Appeal Decision.

1.3.6 For the local road network, financial contributions were secured towards upgrades of the traffic signal controls at the junction of the A2270 Eastbourne Road / Huggetts Lane to the south of the site. It was also agreed that the proposed improvements at the A2270 / High Street / Wannock Road signal junction, included with the Phase 1 of the HPEMAC scheme would need to have been delivered prior to the occupation of dwellings at the site.

1.3.7 However, ultimately the Appeal scheme was refused due to it not being able to demonstrate that the proposed signal controlled accesses to the A2270 Eastbourne Road could safely

accommodate the needs of all highway users, whilst also not demonstrating that sufficient bus priority measures could be introduced so as to not have a material cumulative level of delay to the proposed HPEMAC scheme.

1.4 Pre-Application Discussions

1.4.1 A Transport Assessment Scoping Report (i-Transport report ref: ITL15734-001) was issued to ESCC in September 2020 as part of the pre-application process. In addition, a meeting was held with ESCC in November 2020. The November 2020 meeting minutes are provided at Appendix A.

1.4.2 A summary of the key points raised by ESCC during the pre-application discussions is provided below:

- Provision of a suitable access on the A2280 will need to take into account the committed HPEMAC scheme;
- Any access arrangements will need to be subject to a Stage 1 Road Safety Audit and junction modelling;
- A review of the pedestrian and cyclist impacts to be undertaken;
- Detailed capacity testing of the following junctions requested:
  - Site access/ Eastbourne Road;
  - Broad Road / Eastbourne Road;
  - Eastbourne Road / High Street / Wannock Road; and
  - Eastbourne Road / Huggetts Lane.
- A modal shift from car to bus/ walking/ cycling, as a result of the HPEMAC improvements, through a supporting Travel Plan would be supported; and
- Mornings Mill Farm development to be tested with an extra '700 dwellings' scenario;

1.4.3 Overall, it was agreed that the reasons for the previous refusal for the Mornings Mill Farm site were that it could not be demonstrated that a safe access for all users could be provided, without undue delay to future bus passengers on the HPEMAC corridor. These are very localised impacts, and it was agreed that the overall impact of the allocation could be accommodated on the local highway network, and by association, the SRN. It will therefore be up to this application to

demonstrate that any level of development that is over and above that previously assessed can be safely accessed and accommodated.

1.4.4 However, it was also acknowledged that both this Hindsland site and the adjacent Mornings Mill Farm site are part of the overall broad extent of the allocation, and that the Hindsland site is broadly more sustainably located, being closer to the centre of Polegate. Therefore, a reasonable assessment is that any application should consider its proportionate impact as part of the 700 dwelling allocation, as well as any cumulative additional housing delivery being brought forward by the two sites combined. It is for this reason that two scenarios are to be tested, one that assumes that the 180 dwellings are a fair proportion of the 700 dwelling allocation (and therefore Mornings Mill Farm would accommodate the remaining 520 dwellings), and a second scenario that considers both a 700 dwelling application on Mornings Mill Farm and 180 dwellings at Hindsland (i.e. a total of 880 dwellings on the allocation).

1.4.5 This Transport Assessment (TA) refers back to, and has regard of, the requests and discussion held with ESCC.

1.4.6 In addition, a scoping response from HE in relation to the Environmental Impact Assessment scoping stated that HE would not accept any assessments based on the ESCC South Wealden and Eastbourne Transport Study (SWETS) model.

1.5 HPEMAC Improvements

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

1.5.2 The proposals include improvements along the A2270 Eastbourne Road which commence to the south of this site's southern frontage. As such, during the pre-application process a meeting was held with ESCC's consultant to specifically discuss the impact of the proposed site on the improvements and to ensure that the proposed access arrangements do not prejudice the HPEMAC works. Further details are provided in Section 4.

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

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

1.5.4 Furthermore, significant capacity enhancements to the A2270 Eastbourne Road / High Street / Wannock Road junction to the north will be delivered. Emerging plans are to introduce an additional northbound ahead lane on the the A2270 Eastbourne Road southern arm, and a new left turn slip lane on the High Street arm, as well as a series of pedestrian and cycle enhancements.

1.6 Structure

1.6.1 The remainder of this TA is structured as follows:

- Section 2 – Policy Context;
- Section 3 – Existing Conditions;
- Section 4 – Proposed Development;
- Section 5 – Opportunities for Sustainable Travel;
- Section 6 – Impact Assessment Methodology;
- Section 7 – Impact Assessment;
- Section 8 – Framework Construction Logistics Plan; and
- Section 9 – Summary and Conclusions.

SECTION 2 Transport Policy Context

2.1 Introduction

2.1.1 This section of the Transport Assessment sets out the relevant transport policy at national and local level against which the site will be assessed.

2.2 National Policy

National Planning Policy Framework (NPPF) (February 2019)

2.2.1 The National Planning Policy Framework (NPPF) published in February 2019 sets out the Government's planning policies for England and how these are expected to be applied. It also constitutes guidance for local planning authorities and decision makers both in drawing up plans and as material consideration in determining applications.

2.2.2 The specific transport policies are contained within Section 9 of the NPPF. This sets out the importance of facilitating sustainable development by reducing the need to travel and offering a 'genuine' choice of transport in favour of sustainable modes.

2.2.3 The NPPF requires all developments that generate significant amounts of movement provide a travel plan, and to be supported by either a Transport Statement or Transport Assessment. The three key transport tests are set out in Paragraph 108:

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

- ***Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;***
- ***Safe and suitable access to the site can be achieved for all users; and***
- ***Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*** *(ref: NPPF, Paragraph 108)*

2.2.5 With regards to highways matters, it is clear that development "**should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe**." *(ref: NPPF, Paragraph 109)*

National Planning Practice Guidance (NPPG) (October 2019)

2.2.6 In March 2014 the Department for Communities and Local Government (DCLG) launched the Planning Policy Guidance (PPG) web-based resource, which is intended to underpin the guiding principles of the NPPF. Within the PPG matters related to highways and transportation are contained in ID: 42 under the heading of '*Travel plans, transport assessments and statements in decision-taking' (March 2014).*

2.2.7 The PPG discusses why Travel Plans, Transport Assessments and Statements are important:

> ***'Travel Plans, Transport Assessments and Statements can positively contribute to:***
>
> - ***encouraging sustainable travel;***
> - ***lessening traffic generation and its detrimental impacts;***
> - ***reducing carbon emissions and climate impacts;***
> - ***creating accessible, connected, inclusive communities;***
> - ***improving health outcomes and quality of life;***
> - ***improving road safety; and***
> - ***reducing the need for new development to increase existing road capacity or provide new roads.***
>
> ***They support national planning policy which sets out that planning should actively manage patterns of growth in order to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. […]'***

2.3 Local Policy

Wealden Core Strategy (February 2013)

2.3.1 This Core Strategy is the overarching planning policy document for the Wealden District Area, setting out our vision for the future development of the area over the period to 2027.

2.3.2 The key issue for Wealden is to accommodate the development needs within environmental and infrastructure limitations, whilst promoting more sustainable patterns of development through improved accessibility to key services and facilities, public transport and employment. Evidence confirms that if more sustainable patterns of living are to be promoted, the large majority of future planned growth in Wealden needs to be focused on the towns and larger villages in the hierarchy, where facilities, services and site opportunities exist.

2.3.3 The south Wealden settlements of Hailsham, Polegate, Willingdon, and Stone Cross all provide opportunities to encourage economic growth in order to help regenerate the south Wealden area, and to provide for significant local affordable housing needs as well as wider market requirements.

- **SPO7:** We will encourage reduction of the need to travel by car by concentrating development where it can most closely relate to public transport opportunities, improving the offer of our towns in terms of retail, leisure and recreation and by making it easier to travel by more sustainable modes of transport. We want to see noticeable improvements in journey quality for those people making trips on foot, bicycle or by public transport
- **WCS7 Effective Provision on Infrastructure:** The adequacy of infrastructure provision in Wealden will be the subject of regular review with infrastructure providers as part of the ongoing work on the Infrastructure Delivery Plan. This will include health, transport, utility services, and education providers and will be reported as part of the Local Plan monitoring arrangements in the Annual Monitoring Report.

2.3.4 The site is located within the identified SD4 allocation 'Land at South Polegate and East Willingdon' for the provision of some 700 dwellings, 8,600 sqm of employment floorspace and leisure, recreation and community facilities.

ESCC Local Transport Plan 3 2011-2026

2.3.5 ESCC's third Local Transport Plan sets out the vision, objectives, and the strategy for the next 15 years to 2026. The key objectives are to promote and encourage sustainable travel trips within the County. This includes promoting bus, rail and walking and cycling. The following policies set out the main objectives for these modes.

Bus

- To make bus travel an attractive and realistic alternative to the private car, provide sustainable access to services, local facilities and employment opportunities for all residents and deliver increased bus use by; maintaining and improving the quality of commercial services, enforcing parking restrictions and providing bus priority measures as funding becomes more available, improving the standard of provision at bus stop interchanges and providing high quality information both in advance of an intended journey and at the time of travel;

Rail

- Continue to lobby for improvements to connectivity to London including a new station at Polegate.

Active Transport – Walking and Cycling

- Make walking more attractive for short journeys to maximise the opportunities to walk to local facilities and services;
- Consider appropriate crossing facilities on key corridors of movements when needed;
- Undertake audits of all transport infrastructure improvement schemes to ensure accessibility for all;
- Consider potential new cycle routes and facilities; and
- Encourage recreational cycling and cycle tourism.

ESCC Car Parking Standards – Residential

2.3.6 ESCC sets out its residential car parking standards within their guidance 'Parking at New Residential Development' (October 2017). The document sets out a range of information on proposed parking provision at new residential developments, including the design and location of the parking, as well as information on disabled parking, cycle parking, electric vehicle charging and recommended design and sizes of garage. The document refers to the ESCC car parking calculator tool which determines the predicted parking demand at a new site by entering data such as location, dwelling type, size, and the way in which parking is allocated.

2.3.7 The guidance document notes that in some circumstances it may be appropriate to provide some flexibility in the application of parking requirements and that mitigation measures can be provided to help achieve lower levels of parking, such as:

- Areas located in high levels of accessibility. This is measured where the site is located within an appropriate walking distance to a bus and train services;
- Development's supported by a Travel Plan; and
- The provision of a car club vehicle.

ESCC Car Parking Standards – Non-Residential

2.3.8 ESCC also provides car parking guidance for non-residential developments. Similar to the residential development guidance, this document also sets out information regarding the design

and layout of spaces. Appendix A of the report contains the parking standards for non-residential development. A summary of the standards for health and medical centres is provided in Table 2.1.

Table 2.1: Summary of Non-Residential Parking Standards – Health Centres

	Car Parking Provision	Cycle Parking Provision	Disabled Parking Provision
D1 'Health centres, clinics, doctors, dentists, veterinary and other medical surgeries'	4 spaces per consulting room plus 1 space per 2 auxiliary staff on duty at any one time	1 short term spay per consulting room plus 1 long term space per 10 staff on duty at any one time	Up to 200 space car park = 3 spaces or 6%, whichever is greater

Source: ESCC Non-Residential Car Parking Guidance Appendix A

SECTION 3 Existing Conditions

3.1 Introduction

3.1.1 This section of the Transport Assessment provides a description of the existing transport conditions in the area, including opportunities for walking, cycling, and using public transport. The existing highway conditions are also reviewed.

3.2 Existing Site

3.2.1 The site is fully privately owned, with no public access rights over it. It contains the former University of Brighton playing fields, and a single dwelling at its southern end fronting the A2270 Eastbourne Road to the south of the junction with Broad Road. The playing fields were equipped with a pavilion (now demolished) and an area of hard standing able to accommodate in the region of 20 parked cars and/or minibuses / coaches.

3.2.2 The site's sole access to the wider area is via a simple vehicular crossover to the A2270 Eastbourne Road at its far southwest corner. This provided all access to the site's pavilion and single dwelling. This is shown in Image 3.1.

3.2.3 The site and dwelling are currently vacant and fenced.

Image 3.1: Existing Site Access



3.3 Walking and Cycling

Walking

A2270 Eastbourne Road

3.3.1 The A2270 Eastbourne Road provides the primary pedestrian route from the site north towards Polegate High Street and south through the centre of Willingdon. Routing north from the site, a single footway is provided on the western side of the carriageway, separated by a verge (see Image 3.2). At the Petrol Filling Station (PFS) and Tesco Express convenience store, a Puffin crossing is provided across Eastbourne Road which provides access to the PFS as well as a footway on the eastern side of the carriageway.

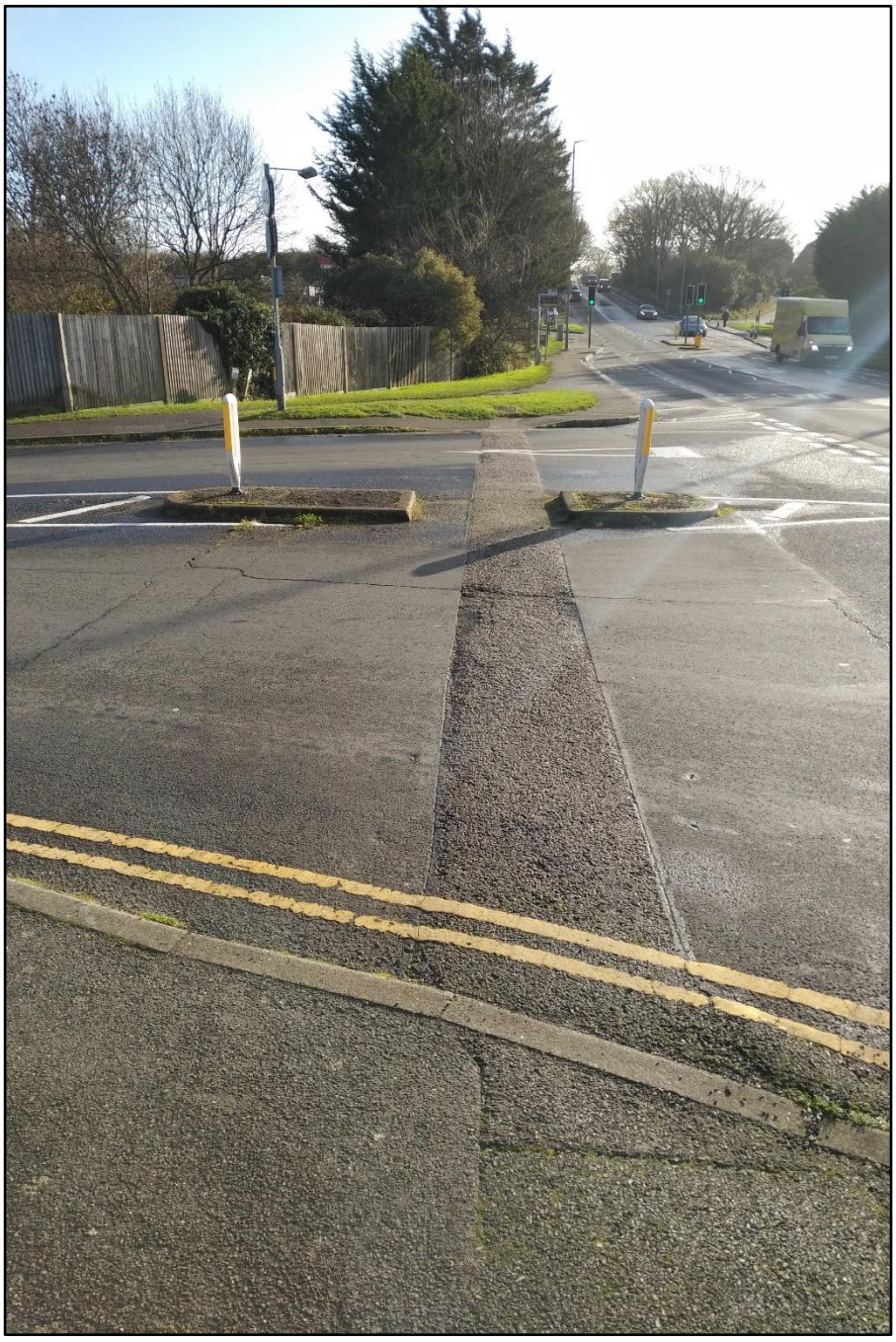
Image 3.2: Eastbourne Road Western Footway



3.3.2 An uncontrolled pedestrian crossing comprising dropped kerbs, tactile paving and a pedestrian refuge island is provided across the junction with Church Road (as shown in Image 3.3). The

footways on either side of Eastbourne Road continue north, both separated from the carriageway via a grass verge with access to private driveways provided along the route.

Image 3.3: Pedestrian Crossing of Church Road



3.3.3 At the traffic signalised crossroads with the High Street and Wannock Road, pedestrian phases and crossings are provided on all arms. The footways along the A2270 provide a direct connection to the footways on the High Street and Wannock Road.

3.3.4 To the south of the proposed site, the western footway continues south along Eastbourne Road. An uncontrolled pedestrian crossing comprising dropped kerbs and a pedestrian refuge island is provided just to the south of the junction with Broad Road. This provides access to the bus stop located on the eastern side of the carriageway. The footway to the south of the site is also separated by a grass verge. It should also be noted that street lighting is provided along Eastbourne Road within the vicinity of the site and north towards Polegate and south towards Willingdon.

Broad Road

3.3.5 Broad Road provides a connection between the Eastbourne Road and Willingdon Community School and other local community facilities (including a Church and Primary School). Footways are provided on both sides of the carriageway, tying into the footways provided on the A2270 Eastbourne Road. The footways are separated from the carriageway via grass verges.

3.3.6 Broad Road provides a connection to the north via Farmlands Avenue for access to additional local facilities. A raised table is provided at this junction serves to slow vehicles and increase the safety of pedestrians at this junction.

Church Road

3.3.7 Church Road is located to the north west of the site and connects with the A2270 Eastbourne Road just to the north of the PFS. Church Road serves primarily as a residential road with footways provided on both sides of the carriageway. At its northern extent, Church Road connects to High Street via a simple priority junction arrangement. The footways provided along Church Road remain continuous, routing north and south on High Street.

High Street

3.3.8 High Street provides access to a number of everyday facilities as well as Polegate rail station. Footways are provided on both sides of the carriageway. Just to the north of Black Path, pedestrians are able to cross the rail line and gain access to Polegate Rail Station.

Cycling

3.3.9 Advisory on-carriageway cycle lanes are provided within the carriageway on both sides of the A2270 Eastbourne Road between the PFS to the north and Meachants Lane to the south (a distance of some 1.4km). Throughout the remainder of the local highway network outlined

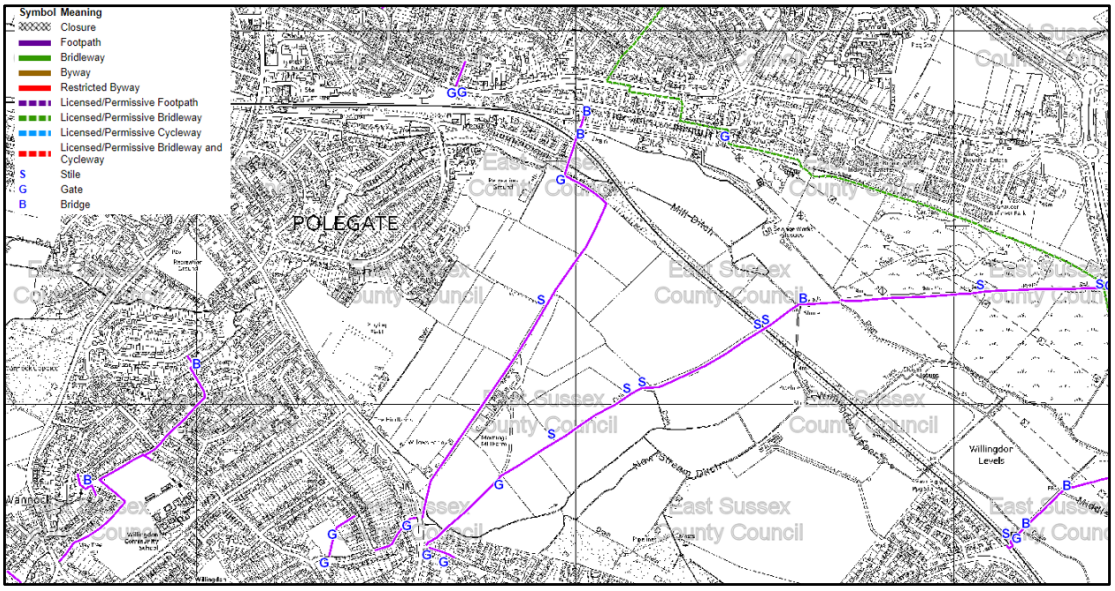
above, 30mph posted speed limits are enforced. As such, low vehicle speeds help to create an environment conducive to in-carriageway cycling without the requirement for designated cycle facilities.

3.3.10 The National Cycle Network Route 21 provides an identified route between Greenwich (Greater London) and Eastbourne. The cycle route is accessible from Polegate station.

Public Rights of Way

3.3.11 A number of public rights of way are accessible in the vicinity of the proposed site. Image 3.4, taken from ESCC's definitive map, illustrates the location of the closest routes in the context of the site.

Image 3.4: Local PRoW Network



Source: ESCC Public Rights of Way Map

3.3.12 As shown above, the closest rights of way are located to the east of the site and comprise the Willingdon and Jevington Footpath 5 and Polegate Footpath 5 which combine to provide a south-north route between the A2270 Eastbourne Road and Lynholm Road to the north of the railway line. There are no PRoWs within or adjacent to the site. There are no public links to Spurway Park to the northeast or the neighbouring land parcels.

3.4 Public Transport

Bus

3.4.1 The closest bus stops to the site are located on Eastbourne Road, on the site boundary. The bus stops provide access to a number of services which serve destinations such as Stone Cross, Uckfield, Lewes, and Eastbourne town centre. the stops consist of a simple flag and pole. In addition, additional bus stops are located along Brightling Road, to the north of the site. A summary of the typical frequencies of the bus services available from these stops is provided in Table 3.1 below.

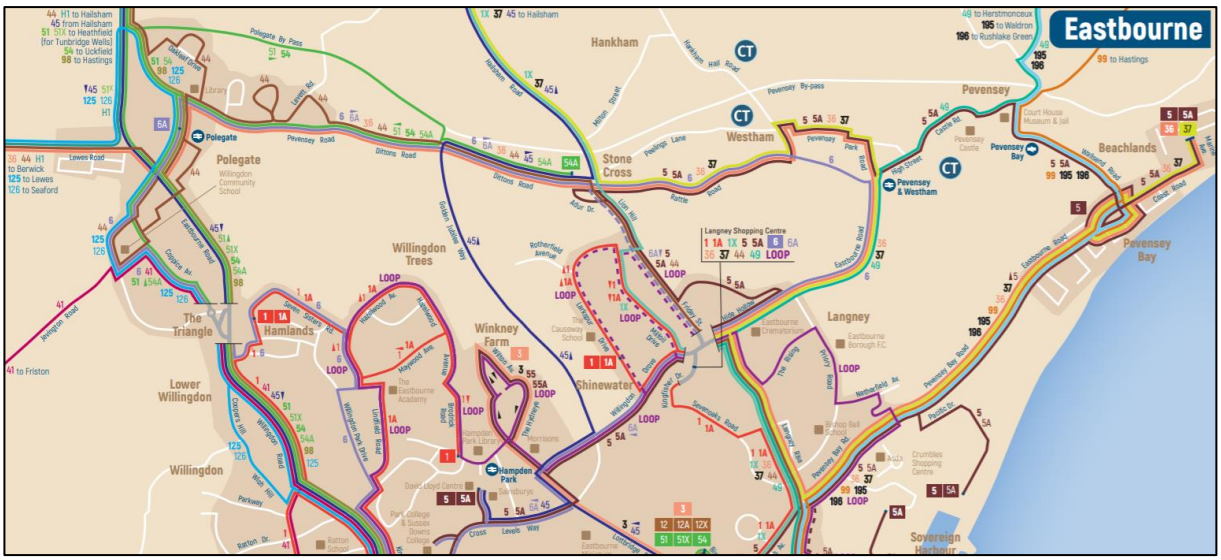
Table 3.1: Bus destinations and typical frequencies

Bus Route	Destinations	Typical Frequency		
		Mon - Fri	Sat	Sun
44	Berwick - Polegate - Langney - Eastbourne	1 per day on Thurs	No service	No service
45	Hailsham - Eastbourne	1 per day on Fri	No service	No service
51	Eastbourne - Heathfield	2 per hour	2 per hour	2 per hour
54	Eastbourne - Uckfield	1 per hour	1 per hour	1 per hour
54A	Eastbourne – Stone Cross	1 per hour	1 per hour	1 per hour
125	Lewes - Alfriston - Polegate - Eastbourne	1-2 per day	No service	No service

Source: Traveline, accessed February 2021. Note that services may be reduced at present due to Covid-19 travel restrictions.

3.4.2 The existing bus network within the wider Eastbourne area is illustrated in Image 3.5. This illustrates the wide range of bus routes available within the Eastbourne town centre area and ability for future passengers to interchange across the services.

Image 3.5: Public Transport Connectivity



Source: ESCC

Rail

3.4.3 Polegate railway station is located circa 850m walking distance (equivalent to a 11 minute walk) from the site's proposed site access on Eastbourne Road. The station is served by Southern Railway trains with direct services to Eastbourne, Hastings, Brighton, and London Victoria. The destinations, durations and typical frequencies are summarised in Table 3.2.

Table 3.2: Summary of Rail Frequencies – Polegate Station

Destination	Duration	Typical Frequency
Eastbourne	8 mins	4 per hour
Hastings	44 mins	4 per hour
Brighton	32 mins	4 per hour
London Victoria	1 hour 22 mins	4 per hour

Source: National Rail Enquiries, accessed February 2021. Note that services may be reduced at present due to Covid-19 travel restrictions.

3.5 Local Highway Network

A2270 Eastbourne Road

3.5.1 A2270 Eastbourne Road is a two-way single carriageway road subject to a 40mph speed limit. The road is street-lit and as set out previously there are footways along the western side of the carriageway in the vicinity of the site. It is a wide road, often with central lane spacing for ghost islands along its length, and has wide verges along most of its route. In the vicinity of the site

there are a large number of direct accesses to individual residential properties on the western side of the carriageway, and elsewhere such accesses are to both sides where frontage exists.

3.5.2 The road provides a route north towards the A27 and south towards Eastbourne town centre. Approximately 850m to the north of the site, Eastbourne Road diverges into the A27 via a signalised junction. The A27 is part of the strategic road network managed by Highways England. The A27 routes west towards Portsmouth, Southampton. To the east it routes to Pevensey where it terminates, although the A259 that it leads to remains part of the Highways England strategic highway network.

3.5.3 The majority of junctions along the A2270 Eastbourne Road (other than to very minor culs-de-sac) take the form of ghost island right turn priority junctions. The exceptions are the the four arm signal controlled junction with Wannock Road and High Street to the north and the three arm signal controlled junction to Huggetts Lane to the south.

3.5.4 Although it is singed as a 40mph road in the vicinity of the site, its footway provision, street lighting, and direct residential accesses give it an urbanised character. Without repeater signs indicating a 40mph speed limit, such features would lead it to being a "natural" 30mph road.

A2270 Eastbourne Road / Wannock Road / High Street

3.5.5 Eastbourne Road, Wannock Road and High Street forms a four arm signal controlled crossroads 600m to the north of the site. All of the arms provide a right turn lane and a left turn/straight ahead lane. The High Street provides the route into Polegate town centre via a level crossing at Polegate railway station, Wannock Road provides access to the residential estate to the west of the A2270 and Eastbourne Road (north) connects to the A27.

A2270 Eastbourne Road / Broad Road

3.5.6 Eastbourne Road forms a ghost island priority junction with Broad Road approximately 280m to the south of the proposed site access. Broad Road is residential in character and is subject to a 30mph speed limit. Broad Road routes between Eastbourne Road to the east and Wannock Lane to the west, providing access to a number of local community/education facilities.

A2270 Eastbourne Road / Huggetts Lane

3.5.7 Huggetts Lane forms a three arm signal controlled junction with Eastbourne Road approximately 1km to the south of the site. At the junction, the Eastbourne Road lanes are separated by a kerbed central reserve, allowing movements in and out of Huggetts Lane.

A27

3.5.8 The A2270 Eastbourne Road routes to the A27 to the north. The A27 provides a route west towards Lewes and Brighton and east via the Polegate bypass towards Pevensey. The road is a predominately single carriageway road subject to a 40mph speed limit. At the Cop Hall roundabout, the A27 provides a connection to the A22.

3.5.9 HE is currently working on the A27 East of Lewes improvement works. This is a suite of committed, and currently being built, improvement works between Lewes and Polegate on the A27. The works seek to improve journey time along the corridor as well as improving the safety of all road users and supporting sustainable modes of travel. The work includes dualling the carriageway between Polegate and Cop Hall roundabout (with the A22) and making alterations and improvement to the signal controlled junction between the A27 and the A2270.

A22

3.5.10 The A22 commences at the Cop Hall roundabout routing north towards Hailsham and Uckfield and connections towards the A26 and M25. The road is a dual carriageway and subject to the national speed limit. To the east, the A22 also provides a primary route between the A27 and the centre of Eastbourne east of Polegate, at the A22 Golden Jubilee Way.

3.6 Existing Highway Conditions

3.6.1 Due to travel restrictions relating to the Covid-19 pandemic, collection of new traffic data representative of normal conditions has not been possible. It has therefore been agreed that historic data sets held by ESCC can be purchased and used as a basis for understanding current local conditions. In addition, HE has stated that they will not accept any assessments based on the ESCC SWETS model.

3.6.2 A suite of traffic data of the local highway network has therefore been obtained from ESCC. The data includes a range of sources including Automatic Traffic Counters (ATCs) and turning counts. The data obtained is summarised below:

Automatic Traffic Counters (ATC)

- A2270 Eastbourne Road (in the vicinity of The Triangle) – September 2019; and
- A2270 Eastbourne Road (to the vicinity of Gorringe Valley Road) – September 2019;

Classified Turning Counts

- A2270 Eastbourne Road/ Broad Road – October 2015;
- A2270 Eastbourne Road/ High Street/ Wannock Road – May 2019; and
- A2270 Eastbourne Road/ Huggetts Lane – October 2011.

3.6.3 The traffic data above has been analysed and the network peak hours calculated. These flows have then been 'growthed' to a base year of 2021 using TEMPRO forecasts. The growth factors applied to the datasets is summarised in Table 3.3.

Table 3.3: Summary of TEMPRO Growth Factors to 2021

	2011-2021	2015-2021	2019-2021
Morning Peak Period	1.1028	1.0446	1.0143
Evening Peak Period	1.1142	1.0452	1.0136

Source: TEMPRO, Wealden District

3.6.4 The 2021 baseline flows on the local network, for the morning and evening peak hours, are presented in Figures 3.1 and 3.2 respectively.

3.6.5 A summary of the predicted "historic normal" 2021 total junction flows during the peak hours is provided in Table 3.4.

Table 3.4: Summary of Total Junction Flows - 2021

Junction	Morning Peak Hour	Evening Peak Hour
A2270 Eastbourne Road/ High Street/ Wannock Road	2,362	2,651
A2270 Eastbourne Road/ Broad Road	1,916	2,161
A2270 Eastbourne Road/ Huggetts Lane	2,707	2,995

Source: Consultant's Estimates

3.6.6 A summary of the total vehicle flows, in 15 minute periods, along Eastbourne Road, from the Eastbourne Road/ High Street/ Wannock Road junction, is provided in Table 3.5. The table summarises the vehicles flows across the morning and evening peak periods.

Table 3.5: Summary of Total Vehicle Flows – Eastbourne Road (Through Flow)

	Northbound	Southbound	Two-Way
Morning Peak Period			
0700-0715	211	140	351
0715-0730	204	183	387
0730-0745	190	228	418
0745-0800	181	245	426
0800-0815	189	214	403
0815-0830	115	234	349
0830-0845	205	189	394
0845-0900	206	166	372
Evening Peak Period			
1600-1615	167	253	420
1615-1630	144	254	398
1630-1645	198	277	475
1700-1715	197	292	489
1715-1730	196	300	496
1730-1745	203	313	516
1745-1800	198	308	506

Source: ESCC: average of ATCs 049 and 0100.

3.6.7 Table 3.5 demonstrates that traffic flows across the morning and evening peak periods are fairly consistent across the peak periods; this is, they exhibit a "flat profile".

Vehicle Speeds

3.6.8 A summary of the free flows 85%tile traffic speeds recorded along Eastbourne Road, taken from an average of the two ATCs (both located in 40mph locations) is summarised in Table 3.6.

Table 3.6: Summary of Traffic Speeds – Eastbourne Road

	85% Design Speeds (mph)
Northbound	36.4 mph
Southbound	35.9 mph

Source: ESCC ATCs 049 and 0100.

Note: 85% design speed based on 85% speeds recorded Monday to Friday between 1000-1200 and 1400-1600.

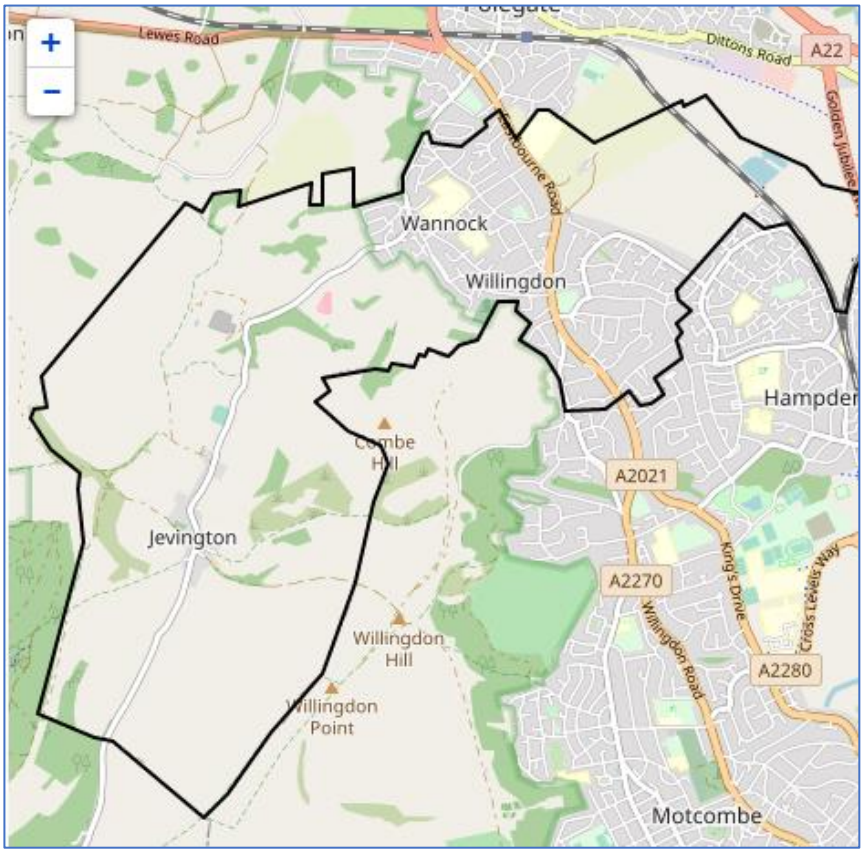
3.6.9 The 85%tile design speeds have been calculated in accordance with DMRB methodology with the 85th%tile speeds based on the speeds recorded Monday to Friday between 1000-1200 and 1400-1600. The 85th%tile speeds are circa 36 mph in both directions. This demonstrates that the majority of vehicles are therefore travelling at below the posted 40mph speed limit.

3.7 Local Travel Characteristics

Modal Split

3.7.1 A review of the 2011 Census Method of Travel to Work database has been undertaken for the area surrounding the site in which it is wholly contained and linked to. The data has been extracted for the Middle Layer Super Output Area (MSOA) Wealden 021 in which the site is located. Image 3.6 illustrates the MSOA used within this assessment.

Image 3.6: MSOA Wealden 021



Source: NOMIS

3.7.2 A summary of the method of travel to work modal split data for the MSOA is provided in Table 3.7.

Table 3.7: Method of Travel to Work Summary

Mode	Wealden MSOA 021	
	Count	%
Car or Van Driver	2,241	75%
Train	189	6%
On Foot	178	6%
Passenger in a Car or Van	163	5%
Bus, Minibus, Coach	107	4%
Bicycle	49	2%
Motorcycle, Scooter, Moped	20	1%
Other	18	1%
Taxi	14	0%
Underground, Metro, Light Rail	6	0%
Total	2,985	100%

Source: 2011 Census, Nomis QS701EW – Method of Travel to Work for Wealden MSOA 021.

Note: Numbers may not sum due to rounding.

Data does not take into account those not in employment and those who work from home.

3.7.3 Table 3.7 reveals car driver trips account for some 75% of the mode share, with a further 10% traveling by public transport and 8% by active modes (i.e. walking and cycling).

Car Ownership

3.7.4 The level of local car ownership rates for the Wealden MSOA 021 has also been obtained from the 2011 census data. A summary of the car ownership data is outlined in Table 3.8.

Table 3.8: Local Car Ownership Data – MSOA Wealden 021

Car or Van Availability	MSOA Wealden 021	
	Households	Cars
No cars or vans in household	593	0
1 car or van in household	1,645	1,648
2 cars or vans in household	977	1,954
3 cars or vans in household	216	648
4 or more cars or vans in household	75	333
All households	3,506	-
All cars or vans in area	-	4,580
Car Ownership	1.3	

Source: 2011 Census and Consultant's Estimates

3.7.5 The data demonstrates that the average car ownership level across the MSOA is 1.3 cars/vans per household. Table 3.8 also demonstrates that on average circa 17% of the total households in these areas live car free whilst on average 47% have access to one car.

3.8 Road Safety

3.8.1 Personal Injury Accident (PIA) data has been obtained from Sussex Police for the latest five years available, at the time of the request. The data covers the five year period up to the 30/11/2020. The study area includes an over 1km length of Eastbourne Road from the High Street/ Wannock Road junction in the north to the Tott Yew Road junction in the south.

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

3.8.3 A summary of the location, severity and type of casualties is presented in Table 3.9. The full data, including a map of the recorded PIAs, is provided at Appendix B.

Table 3.9: Summary of PIAs

	Slight			Serious			Total
	Car	Cycle /MC	Pedestrian	Car	Cycle /MC	Pedestrian	
Eastbourne Road	5	2	0	0	0	0	**7**
Junction of Eastbourne Road/ Broad Road	1	0	2	0	0	0	**3**
Junction of Eastbourne Road /The Thatchings	1	2	0	0	0	0	**3**
Junction of Eastbourne Road/ Church Road/ Willow Drive	2	1	0	0	0	0	**3**
Junction of Eastbourne Road /Wannock Road /High Street	10	0	0	0	1	0	**11**
Total	**19**	**5**	**2**	**0**	**1**	**0**	**27**

Source: East Sussex Police

Eastbourne Road

3.8.4 A total of seven slight PIAs were recorded along Eastbourne Road (away from junctions) which were as a result of the following:

- Three rear end shunts;
- Two accidents occurred whereby the driver lost control of their vehicles and collided with street furniture;
- A vehicle turning right collided with a cyclist in the cycle lane; and
- A motorcyclist came off their bike following a vehicle undertaking a u-turn within the carriageway. No contact was made.

3.8.5 Considering the high traffic flow on the A2270 Eastbourne Road and its primary nature, seven slight PIAs over a five year period is considered to represent a very safe highway network. None appear related to the highway layout, and there is therefore is no consistent cause.

Eastbourne Road/Broad Road

3.8.6 Three slight PIAs were recorded at the junction of Eastbourne Road and Broad Road, all of which resulted in slight injuries. These accidents were caused by the following:

- A pedestrian walking into the carriageway collided with a vehicle wing mirror;
- A driver lost control of their vehicle after feeling tired; and

- A motorcyclist struck a pedestrian as they were crossing the road in slow moving traffic.

3.8.7 Three recorded PIAs at this junction over five years is considered low for the type of road. It is noted that the data appears to suggest that all recorded PIAs relate to incidents in the vicinity of the junction, as opposed to being directly relating to turning movements at this ghost island priority junction.

Eastbourne Road /The Thatchings

3.8.8 Three slight PIAs were recorded at the junction of Eastbourne Road and the southern access to The Thatchings which resulted in slight injuries. A summary of the causation factors is provided below:

- Two rear end shunts; and
- A driver turning right into The Thatchings failed to see an oncoming cyclist.

Eastbourne Road/Church Road/Willow Drive

3.8.9 Three slight PIAs were recorded at the junction of Eastbourne Road, Church Road and Willow Drive which were as a result of the following:

- Two accidents as a result of the driver of a vehicle pulling across the path of an oncoming cyclist and motorcyclist; and
- One rear end shunt.

Eastbourne Road/Wannock Road /High Street

3.8.10 A total of 11 PIAs were recorded at the Eastbourne Road/ High Street/ Wannock Road junction four arm traffic signal controlled junction. Of these, one resulted in serious injuries whilst the remain 10 resulted in slight injuries. A summary of the causation factors is provided below:

- The serious injury was as a result of a motorcyclist losing control of their bike and falling off as they turned right at the junction;
- Four rear end shunts, including one driver impaired by alcohol;
- Three accidents as a result of a driver travelling into the path of an oncoming vehicle;
- A vehicle turning into the path of an oncoming vehicle attempted to avoid a collision but collided with the street furniture;
- A passenger on a bus fell off their seat as the bus stopped at the junction; and

- A driver lost control of their vehicle and mounted the kerb.

Summary

3.8.11 Whilst any accident is regrettable, the locations and causes of these accidents do not indicate any highway safety concerns or issues with the local highway geometry. The majority of these accidents were as a result of driver error.

3.9 Summary

3.9.1 The site is located to the east of Eastbourne Road and forms part of the wider allocated 'Land at South Polegate and East Willingdon' site. There is a footway along the western side of Eastbourne Road which provide access north towards Polegate and south through Willingdon. An on-carriageway advisory cycle lane is provided along both sides of Eastbourne Road.

3.9.2 There are a range of committed highway improvements in the area as part of the HPEMAC scheme (as detailed in Section 1 of this report). This work includes improvements to the local walking and cycling infrastructure, as well as improvements to bus priority services.

3.9.3 There are local bus stops on Eastbourne Road, directly outside of the site, which provide access to routes which serve Eastbourne town centre, Uckfield and Lewes. The site is within an 850m (equivalent to a 11 minute walk) of Polegate railway station which is served by Southern services.

3.9.4 A suite of traffic data, of the local highway network, has been obtained from ESCC and growthed, using TEMPRO, to a base year of 2021.

3.9.5 A review of the 2011 Census data for the local area reveals the majority of residents travel to work by car (75% of the mode share), with a further 10% traveling by public transport and 8% by active modes (i.e. walking and cycling). A review of the car ownership data reveals an average car ownership of 1.3 cars per household with up to 47% living car free.

3.9.6 A review of the latest road safety data does not reveal any patterns with regard to the time, spread or nature of the recorded accidents.

SECTION 4 Proposed Development

4.1 Overview

4.1.1 The proposed development is for the construction of up to 180 residential units and a 2,170 sqm medical centre on land to the east of Eastbourne Road, with access provided via Eastbourne Road. The application is in outline form with all matters reserved except for access.

4.1.2 The following section sets out the details of the development proposal.

4.2 Proposed Access Arrangements

4.2.1 The development will be accessed via a ghost island right turn priority junction to the A2270 Eastbourne Road. The proposed access will be located circa 90m north of the junction with Broad Road. The design is shown in Drawing No. ITL15734-GA-003 Rev B with an extract at Image 4.1.

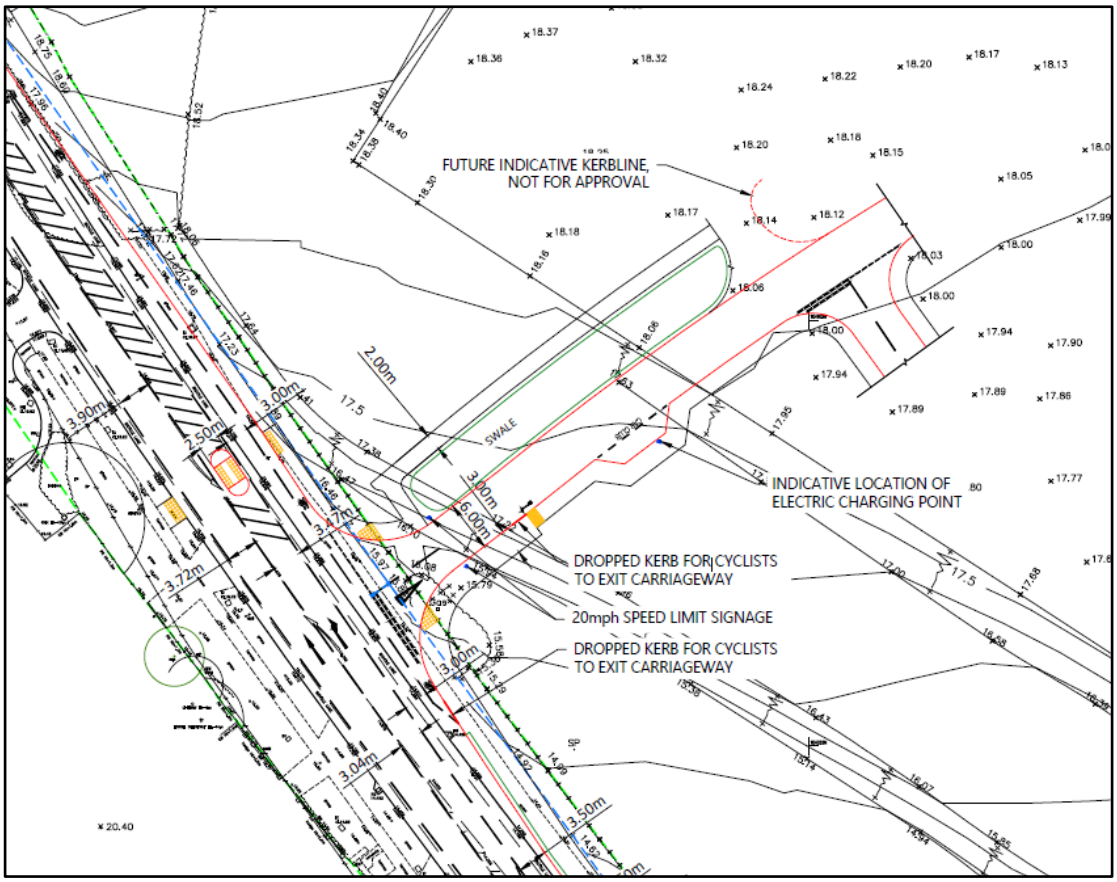
4.2.2 The proposed access arrangement has been designed with the following:

- A2270 Eastbourne Road;
  - Eastern kerbline realigned to enable a 3.47m wide ghost island right turn lane to be constructed;
  - Southbound running lane retained at 3.0m width, plus 1.25m wide advisory cycle lane to north of access;
  - Northbound running lane at 3.72m to 3.90m wide, plus 1.25m wide advisory cycle lane;
  - No alterations to western kerbline;
  - A formal, uncontrolled pedestrian crossing, incorporating 2.50m wide refuge island across the A2270 Eastbourne Road to the north of the site access to provide pedestrians with the ability to cross Eastbourne Road to the western footway – including footway connections and tactile paving and dropped kerbs;
  - A 3.0m wide shared foot / cycleway along the eastern side of the carriageway, between the site access and a point just south of the junction with Broad Road, to tie in with existing footway provision – shared foot/cycle way to be separated from carriageway by 0.5m wide verge;

- Dropped kerbs and signage to enable southbound cyclists to join the shared provision from the main carriageway;
- Introduction of tactile paving at the existing pedestrian crossing point south of Broad Road; and
- No alterations to the Broad Road junction alignment.

- Site Access
  - A carriageway of 6.0m into the site access, narrowing to 5.50m within the site;
  - Visibility splays at the access of 2.4m by 120m in accordance with the existing 40mph speed limit on Eastbourne Road (although stopping sight distance at 40mph is actually 65m);
  - 2.0m footways into the site, along both sides of the access, the northern one separated by a drainage swale;
  - Continuation of the 3.0m shared footway/cycleway from Eastbourne Road into the first part of the site access;
  - Access road deigned to provide access to the proposed medical centre, to ensure a fully serviced land parcel is delivered;
  - Road signed as 20mph limit;
  - Dropped kerbs and tactile paving provision across the access; and
  - Introduction of on-street electric car club parking bay.

Image 4.1: Proposed Site Access Extract



4.2.3 The vertical visibility splay drawing for the proposed site access is illustrated in drawing ITL15734-GA-[tbc].

HPE MAC Improvements

4.2.4 As set out previously, the HPEMAC improvements are located along the site frontage and begin towards the southern frontage of the site. Discussions have been held with ESCC during the pre-application process to discuss and understand the impact of the HPEMAC improvements on the proposed site access. Crucially, it was agreed that the proposal should not introduce any measures or infrastructure that would hinder implementation of the HPEMAC, or increase its costs. Both the access and the HPEMAC plans should be able to be constructed in isolation of each other.

4.2.5 The HPEMAC drawings were obtained directly from ESCC's design team in December 2020 and the site access was designed around the proposal to ensure the site would not prejudice the HPEMAC. A drawing has been prepared which illustrates the proposed site access alongside the HPEMAC improvements. This is shown in drawing ITL15734-GA-001 Rev F.

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

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

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

4.3 Road Safety Audit

4.3.1 A Stage 1 Road Safety Audit (RSA) has been undertaken of the proposed site layout. The RSA included two audits of the site access junction; one with and one without the proposed HPEMAC improvements. The proposed site access arrangements (illustrated on drawings ITL15734-GA-003 Rev B and ITL15734-GA-001 Rev F) reflect comments made within the RSA.

4.3.2 The RSAs raised the following comments:

Without HPEMAC

- The 40mph restriction to be reduced to 30mph;
- Vertical visibility at the site access to be provided;
- A 'buffer zone' to be designed between the shared use footway/cycleway and the carriageway; and
- Further details to how the shared footway/cycleway to the south ties into the existing infrastructure.

With HPEMAC

- Same comments as above;
- Traffic speed data to be provided on the approach to the crossing; and
- Vehicle maintenance bay to be provided at the proposed crossing.

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

4.3.4 The full RSA reports, including the Designer's Responses, are provided at Appendix C.

4.4 Parking

4.4.1 Whilst the form and layout of car and cycle parking within the site is not a matter for determination within this outline planning application, car and cycle parking provision as part of a future reserved matters application will have regard to the standards contained in the ESCC car parking calculator (or any subsequent guidance at the time reserved matters applications are determined).

4.4.2 It is envisaged that parking provision will accord with the following broad principles:

- To be provided having regard to local car parking standards at the time for all land uses on the site;
- Any residential non-curtilage allocated car parking ideally to be located within 25m of individual dwellings;
- Within discrete residential parking courts, a proportion of parking should be unallocated to provide for efficient use;
- On-street parking to be accommodated but to be provided within discrete parking bays on the residential streets (so as not to obstruct refuse vehicle access); and
- Cycle parking spaces will be provided for the proposed houses in garages/ covered cycle stands within gardens, and suitable secure communal cycle parking facilities will be provided for the flatted units.

4.4.3 Notwithstanding this, a review of the parking provision presented within the illustrative masterplan for the site is provided below. All car parking spaces are a minimum of 2.5 x 5m in dimension.

Residential

4.4.4 Using the illustrative masterplan and ESCC's parking demand calculator, the residential units will generate the following parking demands:

- XXX allocated spaces;
- XXX unallocated spaces; and
- XXX visitor spaces.

4.4.5 The masterplan demonstrates a total of XXXX spaces for the residential units. This level of parking is in accordance with the anticipated demand estimated using ESCC's car parking calculator. A copy of the ESCC car parking calculator is provided at Appendix D.

Medical Centre

4.4.6 The parking standards for medical centres are set out within Table 2.1. At this stage of the development, the future occupier and exact requirements are unknow. The Applicant has approached a local medical centre operator who has confirmed the site has the potential to provide:

- 19 consulting rooms, six treatment rooms, five multi-purpose rooms, one phlebotomy room = 31 clinical rooms in total; and
- Up to 60 members of staff (including GPs, nurses and admin staff). It is noted that not all staff will be present on site at any one time.

4.4.7 The parking standards therefore suggest anywhere between 97-154[1] parking spaces to be provided.

4.4.8 The illustrative masterplan demonstrates some 113 car parking spaces will be provided. This equates to a parking ratio of 5.2 spaces per 100sqm. A review of the medical centre approved at Victoria Drive in Eastbourne (planning ref: 18/0450), which is of a similar scale and within a comparable local environment to the proposed centre, was permitted with a parking ratio of 2.5 spaces per 100sqm.

[1] This is based on how one classifies the consulting rooms and number of staff. Various options have been assessed against the parking standards, including assessing all clinical rooms, assessing just the consulting rooms, assessing all staff present at any one time and assessing up to 70% of staff onsite at any one time.

Electric Vehicle Charging Provision

4.4.9 Whilst there are no required standards for electric vehicle charging, the illustrative masterplan demonstrates that some XX% of spaces will be equipped with such provision. This includes:

- XXX private driveway/ garage spaces with access to an electrical socket for charging;
- XXX spaces equipped with an electric vehicle charging point including:
  - XX spaces within the residential parcels; and
  - XXX spaces within the medical centre.

4.5 Car Club

4.5.1 Car clubs offer an alternative model to private car ownership, whereby members can rent vehicles on a short-term service that allows them to pay by the minute, hour or day.

4.5.2 The development includes the provision of one electric car club parking space to be allocated for a car club close to the site access, and therefore in a highly visible location for all future residential occupiers, users of the medical centre, and the surrounding existing residential areas. The spaces would be located on the site but in a publicly accessible location so it could be used by existing local residents and visitors/ staff of the medical centre. Discussions have been held with Enterprise Car Club who have confirmed support of providing a car club(s) within the site.

4.5.3 The space will be equipped with an electric vehicle charging point and would be supplied with an electric car club.

4.5.4 As a result of car club membership resulting in members selling/not replacing private vehicles, CoMo (a charity supporting the introduction of sustainable transport modes) have calculated that for every car club vehicle, it leads to a removal of 10.5 private cars from the road network. Accordingly, the provision of a car club vehicle is equivalent to providing 10 - 11 additional car parking spaces.

4.6 Refuse and Servicing Arrangements

4.6.1 A vehicle swept path analysis of a large refuse vehicle (11.2m) at the proposed site access has been undertaken and is shown in Drawing No. ITL15734-GA-[tbc]. In addition, this drawing includes swept path analysis of various vehicles at the junction, including large vehicles passing

along Eastbourne Road with a vehicle in the right turn lane. This drawing demonstrates the ability for a large reuse to enter and exit the site access.

4.6.2 Whilst the internal layout is not for determination in this outline application, the swept path analysis of a large refuse vehicle has also been undertaken within the site. The Drawing No. ITL15734-GA- tbc demonstrates the ability of the vehicle to manoeuvre around the site as well as load within close proximity to bin stores.

4.6.3 In addition to the larger refuse within the site, the Drawing No. ITL15734-GA- tbc demonstrates the ability for a 7.5t box van to enter and exit the site.

SECTION 5 Promoting Sustainable Transport

5.1 Overview

5.1.1 This section sets out the sustainable transport strategy for the proposed development, including a review of the opportunities for future residents of the site to travel by sustainable travel modes.

5.2 Key Destinations

Journey Purpose

5.2.1 In promoting sustainable transport, it is important to consider the reasons why future residents of the proposed development will make journeys. The Department of Transport's National Travel Survey (NTS) identifies the proportion of all trips by purpose as set out in Table 5.1 below.

Table 5.1: Proportion of Trips per Year by Journey Purpose

Journey Purpose	Proportion of Trips
Leisure	26%
Shopping	19%
Commuting / Business	18%
Education/Escort Education	13%
Personal Business	9%
Other Escort	9%
Other (Including Just Walk)	6%

Source: Table NTS0409 Average number of trips (trip rates) by purpose and main mode: England, 2019, National Travel Survey 2019

5.2.2 The main reasons for travelling are therefore for leisure, shopping, commuting/ business, and education.

5.3 Local Facilities

5.3.1 The NTS data also identifies the mode share of journeys of different lengths. The data identifies that the vast majority (81%) of trips up to one mile (1.6km) are undertaken on foot. The data also shows that 30% of journeys between one and two miles will be on foot, i.e. a significant proportion of people are prepared to walk for journeys of up to 2 miles (3.2km). With regards to cycling, 8km is considered an acceptable cycling distance.

5.3.2 On this basis, the following walking and cycling distances have been used in this assessment:

- 1.6km – a comfortable walking distance where most people (circa 81%) will walk;
- 3.2km – an acceptable walking distance where walking is a realistic alternative to car use and where some people (circa 31%) are still prepared to walk; and
- 8km – an acceptable cycling distance.

5.3.3 A review of the existing local facilities in the vicinity of the site has been undertaken and is summarised in Table 5.2, including the walking and cycling journey times. A plan highlighting the location of these facilities to the site is provided at Figure 5.1 with an extract at Image 5.1. All distances are from the site access. No allowance for new facilities within the remainder of the allocation is made.

Table 5.2: Summary of Local Facilities

Destination	Approx. Distance from Site (m)	Walking Time (mins)	Cycling Time (mins)
Retail			
Tesco Express	350	4	1
ATM Machine	350	4	1
Co-op & Post Office, Willingdon	850	10	3
One Stop Convenience, Polegate	950	11	3
Co-op & Post Office, Polegate	1,000	12	4
Polegate High Street	1,000	12	4
Tesco Express, Freshwater Square	1,200	14	5
Education			
Willlingdon Community School	600	7	2
Willingdon Primary School	1,200	14	5
Step by Step Children's Nursery Polegate	1,300	15	5
Polegate School	1,400	17	5
Leisure			
Polegate Town FC	550	7	2
Willingdon Community Library	1,000	12	4
Brightling Road Leisure Ground	1,100	13	4
Health			
Proposed Medical Centre	0	1	1

Destination	Approx. Distance from Site (m)	Walking Time (mins)	Cycling Time (mins)
Manor Park Surgery	650	8	2
Polegate Dental Surgery	650	8	2
Kamsons Pharmacy	850	10	3
Employment			
Polegate High Street	1000	9	3
Chaucer Industrial Estate	2,800	33	11
Chaucer Business Park	3,000	36	11
Other			
Saint George's Catholic Church	550	7	2
St John's Church of England Church	650	8	2

Key:

Within a 'Walkable Neighbourhood' (800m)

Within a distance where most people (circa 81%) will walk (1,600m)

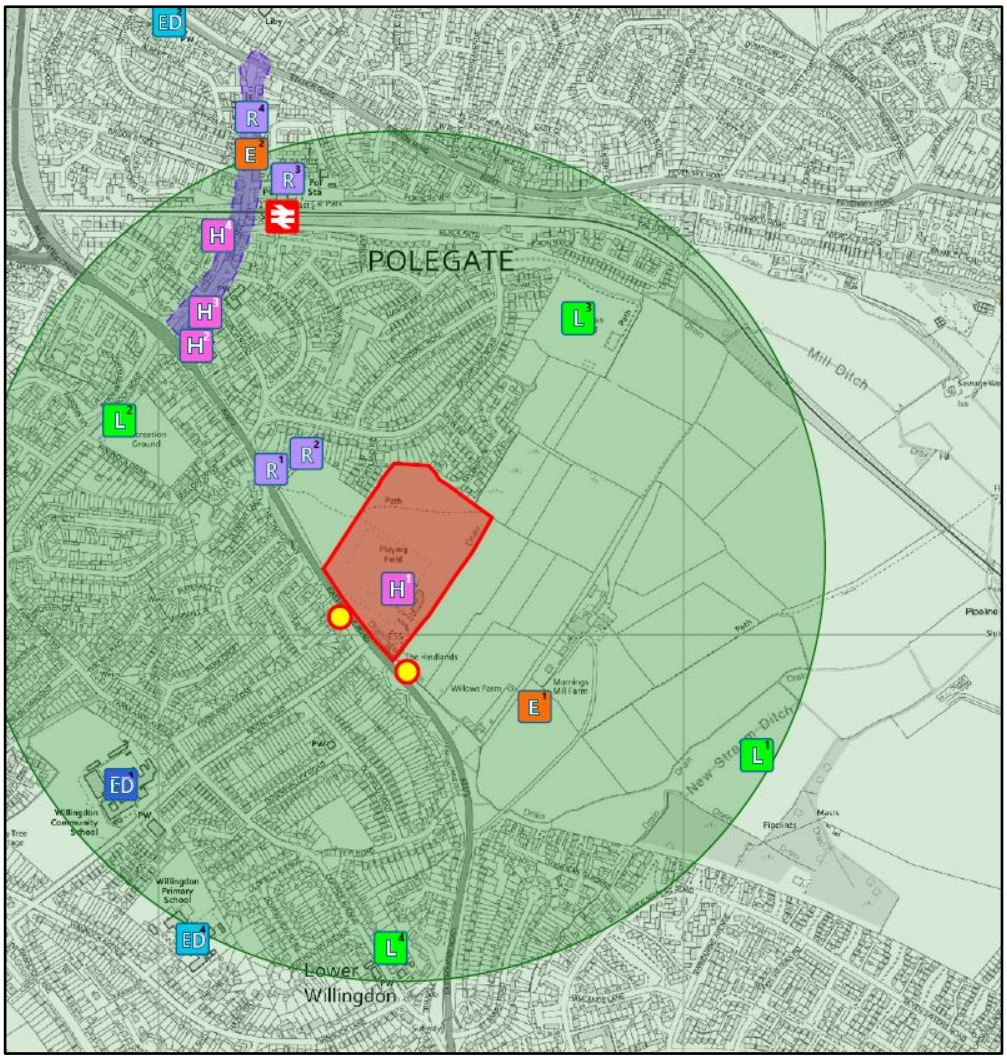
Within a distance where walking is a realistic alternative to car use and where some people (circa 31%) are still prepared to walk (3,200m)

Source: Consultant's Estimates

Walking speed – 1.33m/s

Cycling speed – 15km per hour

Image 5.1: Local Facilities Plan Extract



5.3.4 Table 5.2 demonstrates that the majority of everyday services and facilities are within a comfortable 1.6km walking distance from the site. In addition, bus services along Eastbourne Road provide access to Eastbourne town centre which provide a wider range of services and facilities. These bus services are to be further enhanced as part of the HPEMAC plans, for which the development will be providing a proportionate financial contribution towards.

5.3.5 Furthermore, the remainder of the site allocation includes potential provision of employment, retail and community spaces which will be accessible via proposed walking and cycling links through the site.

5.4 Framework Travel Plan

5.4.1 A Framework Travel Plan (FTP) has been produced (report ref: ITL15734-006) and should be read in conjunction with this TA. The FTP is produced in line with ESCC's Travel Plan Guidance and sets out a number of measures that will be implemented at the site to encourage sustainable travel, such as:

- A resident's travel information pack, including:
  - Information leaflet of local bus and rail services;
  - Information regarding local facilities, including a map and walking and cycling times; and
  - Details of local walking and cycling routes;
  - Information and details to residents on the car club, including membership options and its benefits; and
  - Details of local cycle training information.

5.5 Summary

5.5.1 Polegate is one of five main towns in Wealden District, i.e. one of the most sustainable locations for new development in the District. The site is well located to a range of everyday services and facilities, the majority within a reasonable walking and cycling distance. These are accessible by the existing foot and cycle facilities and will be further enhanced by the HPEMAC improvements.

5.5.2 Future residents will be informed of these sustainable travel options, which will be actively advertised to them, by way of the Travel Plan measures to be secured as part of the development.

SECTION 6 Impact Assessment Methodology

6.1 Overview

6.1.1 This section of the report sets out the method for calculating the impact of the development proposal on the local highway network.

6.2 Committed Development

6.2.1 As agreed as part of the scoping of the TA, and subsequent correspondence regarding scoping of the Environmental Impact Assessment, the following developments are assessed as committed developments:

- Mornings Mill Farm – 520 dwellings with two accesses off Eastbourne Road to the south of the proposed development and 8,600 sqm of employment space;
- Mornings Mill Farm – 700 dwellings with two accesses off Eastbourne Road to the south of the proposed development and 8,600 sqm of employment space;
- Brodricksland and Hamlands Farm – 440 dwellings with two accesses onto Hazelwood Avenue. The outline application (planning ref: WD/2016/0986/MAO) was granted permission in October 2016. A recent application (planning ref: WD/2020/2379) has been submitted to provide an uplift of 50 units to that permitted in the outline application. The 440 unit scheme reflects this uplift;
- Land at Little Shepham – 108 units (planning ref: WD/2016/3047); and
- Land at Greenleaf Gardens – 40 units (planning ref: WD/2016/0644/MAO).

6.2.2 Since the scoping response, an application for the Mornings Mill Farm development was submitted in February 2021 (planning ref: WD/2021/0174/MEA). The application is in outline form (except for access) and includes all proposed land uses set out within the SD4 allocation, including the proposed provision of 700 dwellings. As set out previously, the proposed site, as well as Mornings Mill Farm, are located within the SD4 allocation. As such it is considered that a proportional review of the allocation of residential dwellings across the two sites is a "fair" assessment criteria. Therefore, a quantum of 520[2] residential units has been assessed in the

[2] A figure of 520 has been assessed based on the SD4 allocation, in which both sites are located within, which subtracts the proposed 180 units from the 700 unit allocation.

design year. In addition, as requested by ESCC during the pre-application discussions a 700 dwelling scheme has also been assessed. It is noted that the Mornings Mill Farm application has not assessed the additional dwellings proposed at Brodricksland. It has also made no assessment of what level of development could be delivered on the (more sustainably located) Hindsland site, and has merely assumed a higher density of development on its own land. Clearly such an assessment is short sighted in terms of undertaking a realistic future assessment of delivery of housing on the remainder of the allocation[3].

6.2.3 In addition, the assessment considers the proposed HPEMAC improvements along the Eastbourne Road and the impact on mode shift changes. This is detailed further later in this Section.

Distribution and Assignment

6.2.4 It is noted that both the Mornings Mill Farm and Brodricksland Farm applications are supported by the South Wealden and Eastbourne Transport Study (SWETS) model. The SWETS model has been used in both applications to assess future traffic impacts, including trip generation, distribution and assignment. Within the reports the full distribution and assignment of the development traffic can therefore not be determined. For the purposes of this assessment, the trip generation and distribution of traffic associated with these developments has been based on the parameters outlined in this section below.

6.2.5 A summary of the assumptions used with regard to the committed developments in this assessment is provided below:

Mornings Mill Farm

- Trip rates based on the agreed rates for the Hindsland site at Table 6.1;
- Assumed 50% of development traffic would use the proposed northern access junction into the site and the remaining 50% would use the southern access junction;
- Distribution and assignments assumptions as per those set out below.

[3] Whilst the applicant of the Mornings Mill Farm did not know the full details of the forthcoming application on the Hindsland site, they were aware that the Danescoft (FREOF V Willingdon) LLP had acquired the site and had development aspirations as a result of an attempt to engage in relation to sharing of traffic data.

Brodricksland and Hamlands Farm

- Trip rates based on the agreed rates for the Hindsland site at Table 6.1;
- Assume 20% of development traffic heading south (based on distribution set out in Tables 6.8 and 6.9) would route via Huggetts Lane and then south on the A2270 Eastbourne Road.

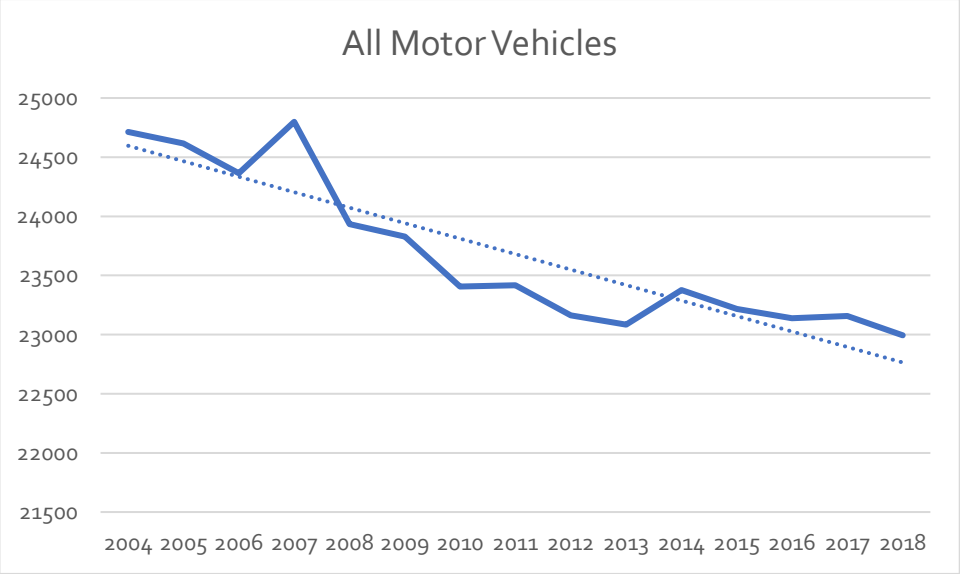
6.2.6 The committed development flows for the Mornings Mill Farm, both the 520 and 700 dwelling scenarios, are shown illustratively in Figures 6.1-6.4 for the morning and evening peak hours. The Brodricksland and Hamlands Farm committed development flows are provided in Figures 6.5 and 6.6 for the morning and evening peak hour respectively.

6.3 Future Design Year

6.3.1 The applicant considers that it is appropriate to test development impacts at the initial year of opening of the development, which is the year when the first part of the development is open for occupation. In this case, the year of opening would be 2024.

6.3.2 A review of the Annual Average Daily Traffic (AADT) flows along the A2270 Eastbourne Road (to the north of Broad Road) from the Department for Transport (DfT) demonstrates that there has been a steady decline in traffic flows at this location over the last 15 year period, as summarised in Image 6.1.

Image 6.1: A2270 Eastbourne Road (North of Broad Road) AADF 2004-2018



Source: DfT Traffic Count 16249

6.3.3 In addition, the HPMEAC improvements will not only seek to improve, encourage, and increase sustainable journeys but also support a corresponding reduction in vehicular traffic through this corridor and mode shift. The HPEMAC Business Case Report (dated November 2016) sets out that the proposals will support a mode shift and reduce traffic congestion along this corridor

6.3.4 As such, for the reasons set out above, it is considered robust not to add any background growth the to 2021 base traffic flows. It is noted that the traffic counts obtained from ESCC were from 2011, 2015, 2019, and these had growth rates of circa 10%, 4%, and 1% applied to represent at 2021 year of assessment. In reality, it is likely that traffic would have fallen along the corridor during this time (by as much as 5% from 2011 to 2021), and therefore the growth already applied to the data to obtain a base year is likely an overestimate.

6.3.5 It is considered that the correct assessment year is the year of opening (i.e. 2024), plus committed development as it is not for the development proposal to assess and mitigate for future background growth. However, on the basis that it is considered that there is no background growth in traffic along the A2270 Eastbourne Road corridor (and actually a reduction), there is no purpose in assessing both a 2024 year and a sensitivity test of 2030 as requested by ESCC, as the flows will be identical. Therefore, a 2030 year of assessment is presented as a future base.

6.3.6 The committed development flows (as shown in Figures 6.1-6.6) have been added to the base flows to create a 2030 without development baseline traffic flow scenario. These are presented in Figures 6.7 to 6.10 for the 520 and 700 dwelling scenarios (both morning and evening peak hours). These are considered to be the base flows for assessment.

6.4 Proposed Development Trip Rates and Trip Generation

Residential

6.4.1 The TRICS database has been used to extract residential trip rates for private houses. The sites have been filtered based on the following parameters:

- Residential/A – Houses Privately Owned;
- Sites in England only, excluding Greater London;
- Sites with a range of 50 – 363 units;
- Weekday surveys only (Monday to Friday); and

- Edge of Town Centre and Suburban Area locations.

6.4.2 The full residential TRICS outputs are provided at Appendix E. These trips rates were set out during the pre-application discussions and agreed with ESCC.

6.4.3 A summary of the residential vehicular trip rates and resultant trip generation of the proposed development (based on 180 dwellings) is provided in Table 6.1.

Table 6.1: Residential Trip Rates and Trip Generation

	Trip Rates (per dwelling)			Trip Generation (180 dwellings)		
	In	Out	Two-Way	In	Out	Two-Way
Vehicles						
AM Peak Hour	0.135	0.382	0.517	24	69	93
PM Peak Hour	0.364	0.158	0.522	66	28	94
Daily (12 Hour)	2.383	2.444	4.827	429	440	869

Source: TRICS v.7.5.1 and Consultant's Estimates

Note: Numbers may not sum due to rounding

6.4.4 Table 6.1 reveals the residential units have the potential to generate circa 95 (two-way) traffic flows during the network peaks. This is equivalent to less than two vehicles per minute in the peak hours

Multi-Modal Trip Generation

6.4.5 The proposed multi-modal trip generation of the site has been estimated using the TRICS data and the local modal split data (see Table 3.7). The vehicular trip generation has been applied to the local mode split data. The resultant multi-modal trip generation of the proposed development is summarised in Table 6.2.

Table 6.2: Residential Multi-Modal Trip Generation

Mode and Modal Split		Trips Generation					
		AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)		
		In	Out	Two-Way	In	Out	Two-Way
Car or Van Driver	75%	24	69	93	66	28	94
Train	6%	2	6	7	5	2	8
On Foot	6%	2	6	7	5	2	8
Passenger in a Car or Van	5%	2	5	6	4	2	6
Bus, Minibus, Coach	4%	1	4	5	3	2	5
Bicycle	2%	1	2	2	2	1	3
Motorcycle, Scooter, Moped	1%	0	1	1	1	0	1
Other	1%	0	1	1	1	0	1
Taxi	0%	0	0	0	0	0	0
Underground, Metro, Light Rail	0%	0	0	0	0	0	0
Total	100%	32	92	124	87	38	125

Source: Consultant's Estimates Note: Numbers may not sum due to rounding.

6.4.6 The HPEMAC improvements will be accessible directly outside of the proposed site access and will allow future residents to benefit from both improved walking and cycling infrastructure as well as enhanced bus services to the Hailsham to the north and Eastbourne to the south. As such it is considered that the implementation of these improvements (to which the application site will provide a proportionate financial contribution towards as well as delivering direct links to) alongside the implementation of the site's Travel Plan, will result in a modal shift to walking, cycling, and public transport, from private car use.

6.4.7 A revised mode share has been estimated based on the following assumptions:

- 10% reduction in car driver trips;
- 5% increase in walking and cycling trips; and
- 5% increase in bus trips.

6.4.8 The revised mode shares, and resultant trip generation, is set out in Table 6.3.

Table 6.3: Residential Multi-Modal Trip Generation – Revised with HPEMAC Improvements

Mode and Modal Split		Trips Generation					
		AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)		
		In	Out	Two-Way	In	Out	Two-Way
Car or Van Driver	65%	21	60	81	57	25	81
Train	6%	2	6	7	5	2	8
On Foot	8%	3	7	10	7	3	10
Passenger in a Car or Van	5%	2	5	6	4	2	6
Bus, Minibus, Coach	9%	3	8	11	8	3	11
Bicycle	5%	2	5	6	4	2	6
Motorcycle, Scooter, Moped	1%	0	1	1	1	0	1
Other	1%	0	1	1	1	0	1
Taxi	0%	0	0	0	0	0	0
Underground, Metro, Light Rail	0%	0	0	0	0	0	0
Total	100%	32	92	124	87	38	125

Source: Consultant's Estimates Note: Numbers may not sum due to rounding.

6.4.9 Table 6.3 reveals the revised mode share, taking into account the HPEMAC improvements and the implementation of the Travel Plan has the potential to lead to a modest increase in bus passengers from five to 11 in the peak hour, an increase in those walking from five to seven, and for those cycling from circa two to six. There would be a corresponding reduction in vehicle trips by some 13 two-way trips during the peak hours.

6.4.10 The mode share set out in Table 6.3 will be used in the remainder of this assessment.

Medical Centre

6.4.11 The proposal also includes a 2,170 sqm medical centre. The site will include a GP surgery and an ancillary pharmacy within the building. The TRICS database has also been reviewed for comparable GP surgery sites. A summary of the resultant trips rates, and trip attraction, is presented in Table 6.4. The full trip rates are provided at Appendix F.

Table 6.4: Medical Centre Trip Rates and Trip Attraction

	Trip Rates (per 100sqm)			Trip Attraction (2,170 sqm)		
	In	Out	Two-Way	In	Out	Two-Way
Vehicles						
AM Peak Hour	3.683	1.739	5.422	80	38	118
PM Peak Hour	1.846	2.479	4.325	40	54	94
Daily (12 Hour)	30.916	30.588	61.504	671	664	1,335
Total Persons						
AM Peak Hour	6.403	3.255	9.658	139	71	210
PM Peak Hour	3.228	4.477	7.705	70	97	167
Daily (12 Hour)	57.860	57.519	115.379	1,256	1,248	2,504

Source: TRICS v.7.5.1 and Consultant's Estimates

Note: Numbers may not sum due to rounding

6.4.12 Table 6.4 reveals the medical centre has the potential to attract up to 118 two-way vehicle trips during the network peak hour and some 210 two-way total person trips.

6.4.13 It is noted that the vehicular trip attraction of the medical centre, across the peak hour, is the equivalent of, on average, some 210 additional residential units.

6.4.14 Discussions have been held with the future potential occupier regarding future appointments and the potential for virtual consultations at the sites. The occupier has confirmed that three, of the total 19 consulting rooms, will be 'virtual consulting rooms' for virtual/ online appointments. As such this will reduce the need for future patients to physically travel to and from the site. This is further supported by anecdotal evidence from local health providers that is anticipated that post Covid up to 30% of medical appointments may be undertaken virtually. As such, it is considered that as a result of future travel patterns there is the potential for the number of trips to reduce. For this assessment a reduction in trips to the medical centre by 20% has been assessed for a robust case.

6.4.15 The trip generation set out within Table 6.4 has been reduced by 20% to take into account the propensity for future virtual appointments, with the resultant trip generation set out within Table 6.5.

Table 6.5: Proposed Medical Centre Trip Attraction with Virtual Appointment Discount

	Trip Attraction (2,170 sqm)		
	In	Out	Two-Way
Vehicles			
AM Peak Hour	64	30	94
PM Peak Hour	32	43	75
Daily (12 Hour)	537	531	1,068
Total Persons			
AM Peak Hour	111	57	168
PM Peak Hour	56	78	134
Daily (12 Hour)	1,005	998	2,003

Source: Sanderson Associates Transport Assessment and Consultant's Estimates
Note: Numbers may not sum due to rounding

6.4.16 As a result of future online and remote appointments, it is anticipated that the medical centre will attract the following:

- Up to 94 (two-way) vehicle movements during the morning peak hour;
- Some 75 (two-way) vehicle trips during the evening pear hour; and
- Circa 168 (two-way) total person trips in the morning peak hour and 134 (two-way) total person trips in the evening.

Total Development Traffic

6.4.17 The total development traffic generated by the development proposal (including the residential units and the medical centre) is presented in Table 6.6.

Table 6.6: Total Development Trip Generation

	Trip Generation		
	In	Out	Two-Way
Vehicles			
AM Peak Hour	85	90	175
PM Peak Hour	89	68	156
Total Persons			
AM Peak Hour	143	149	292
PM Peak Hour	143	116	259

Source: TRICS v.7.5.1 and Consultant's Estimates
Note: Numbers may not sum due to rounding

6.4.18 The total development, including the residential units and the medical centre, is therefore anticipated to generate up to 175 (two-way) vehicle trips during the network peak hours and some 292 (two-way) total person trips during the peak hours.

6.5 Trip Distribution

Residential

6.5.1 The trip distribution of future residential trips has been derived from the NTS table 'Proportion of Peak Hour Trips by Journey Purpose (Car Driver only'). This table sets out the proportion of peak hour trips by journey purpose and is summarised in Table 6.7.

Table 6.7: Proportion of Peak Hour Trips by Journey Purpose (Car Driver Only)

Trip Purpose	AM Peak (0800-0900)	PM Peak (1700-1800)
Commuting/Business	37.6%	43.9%
All Other Journey Purposes	62.4%	56.1%
Total	**100%**	**100%**

Source: Car driver trip start time by trip purpose (Monday to Friday only): Great Britain, 2014/18, National Travel Survey, DfT, 2019

6.5.2 Table 6.7 demonstrates that some 38% of the total vehicular trips generated by the residential development will be for employment journeys in the morning peak hour period. The remaining 62% of the vehicle trips will be all other purposes, including education, shopping, leisure, and personal business trips. In the evening peak hour, 44% of journeys are employment related with other journeys comprising 56% of the total vehicular trips.

6.5.3 In the morning peak hour, up to 30% of trips are associated with educational trips. The site is located within easy walking distance to both primary and secondary education facilities in Willingdon (as set out in Section 5). In addition, the site's allocation includes a primary school (for which the recent Mornings Mill Farm application seeks permission for land for). It is therefore likely that nearly all educational trips from the site will be by foot. However, as a robust assessment, no discount in vehicle numbers to reflect this is made.

6.5.4 To provide an accurate assessment of the likely distribution of traffic from the site, separate methodologies have been applied to consider the destinations of commuting and business trips to other trip purposes:

- For commuting and business trips, the 2011 National Census Journey to Work statistics (for car drivers) has been used based on the existing local residents. This dataset identifies existing resident's employment locations and so existing commuting patterns; and
- For other journey purpose trips, a P/T^2 gravity model has been undertaken using the population of key urban areas (from the 2011 Census) within a 30-minute drive time of the site (estimated from Google Maps Directions facility).

6.5.5 The 2011 Census Journey to Work data is provided at Appendix G alongside the gravity model. The combined distributions of commuting and business trips and all other trips, based on the data above, is presented in Tables 6.8 and 6.9 for the morning and evening peak hours respectively.

Table 6.8: Combined Distribution – Morning Peak Hour

Destination	Commuting/ Business	All Other	Combined
Eastbourne	18%	35%	53%
Wealden	10%	7%	16%
Lewes	3%	3%	5%
Brighton and Hove	1%	13%	14%
Hastings	1%	4%	5%
Rother	1%	1%	2%
All other destinations	5%	-	5%
Total	**38%**	**62%**	**100%**

Source: Census and Consultant's Estimates
Note: Numbers may not sum due to rounding

Table 6.9: Combined Distribution – Evening Peak Hour

Destination	Commuting/ Business	All Other	Combined
Eastbourne	21%	31%	52%
Wealden	11%	6%	17%
Lewes	3%	2%	5%
Brighton and Hove	1%	12%	13%
Hastings	1%	3%	4%
Rother	1%	1%	2%
All other destinations	5%	-	5%
Total	**44%**	**56%**	**100%**

Source: Census and Consultant's Estimates
Note: Numbers may not sum due to rounding

Medical Centre

6.5.6 The distribution of the proposed medical centre trips has been based on the population gravity model only, noting that the centre is anticipated to serve local residents and thus the majority of trips (both future patients and staff) are likely to be local and well within a 30 minute drive. The medical centre distribution, based on the gravity model, is reproduced in Table 6.10.

Table 6.10: Gravity Model Distribution – Medical Centre

Destination	Distribution
Eastbourne	56%
Hailsham	8%
Bexhill	2%
Hastings	6%
Crowborough	1%
Uckfield	1%
Lewes	2%
Brighton	21%
Seaford	2%
Total	**100%**

Source: Consultant's Estimates. Note: numbers may not sum due to rounding.

6.6 Trip Assignment

6.6.1 The proposed development traffic has been assigned to the local highway network using the Google Maps journey planner for a weekday morning peak hour. The assignment of the main destinations by route is provided in the tables at Appendix H.

6.6.2 The resultant development assignment of the residential dwellings is provided in Figures 6.11 and 6.12 for the morning and evening peak hour, and Figures 6.13 and 6.14 illustrates the medical centre development assignment. The combined proposed development assignment is illustrated in Figures 6.15 and 6.16 for the morning and evening peak hours respectively.

6.6.3 The 2030 with proposed development traffic flows during the morning and evening peak hours are provided in Figures 6.17 to 6.20, for the two Mornings Mill Farm scenarios.

6.7 A2270 Eastbourne Road Traffic Flows Review

6.7.1 Both the Mornings Mill Farm and Brodricksland applications utilise the SWETS model. This is a strategic level traffic model that distributes traffic flows over a wide network. By its nature, it will assign traffic away from highway links and junctions that are approaching capacity. This cannot be replicated in a simple spreadsheet based model. A review of the A2270 Eastbourne Road flows using growthed traffic survey data and the flows presented in the SWETS model (from the outputs in the Mornings Mill Farm application) are presented in Table 6.11.

6.7.2 The table below summarises the 'through flow' of traffic along Eastbourne Road to the north of the site access.

Table 6.11: A2270 Eastbourne Road Total Vehicles Review

	Proposed Site 2030 With Development[1]	Mornings Mill Farm 2027 With Development	Difference
Morning Peak Hour			
Northbound	1,012	952	+60 (6%)
Southbound	1,000	847	+153 (18%)
Two-Way	2,012	1,799	+213 (12%)
Evening Peak Hour			
Northbound	978	883	+95 (11%)
Southbound	1,313	1,057	+256 (24%)
Two-Way	2,291	1,940	+351 (18%)

Source: Consultant's Estimates

1: With Mornings Mill Farm at 700 dwellings

6.7.3 Table 6.11 reveals that the future year flows along Eastbourne Road using the growthed traffic survey data, and within this assessment, provides an overly robust case for which to assess this application. All other sites, many of which are much larger than this proposal, assume a much lower volume of traffic utilising the Eastbourne Road corridor north of the site access.

6.7.4 For example, the assessments presented within this application are using traffic flows 12% higher in the AM peak hour and 18% higher in the PM peak hour than that utilised in the Mornings Mill Farm application, due to the difference in methodology. Such a large increase cannot be simply put down to the additional traffic from the 180 units and medical centre or any background growth (which in any event is considered to be non-existent along this corridor). In reality, the

additional development traffic to the north of the site will be around 80 two-way movements in the peak hours. Therefore, the SWETS model mush be reassigning over 100 two-way movement in the AM peak hour and 250 two-way movements in the PM peak hour away from the Eastbourne Road.

6.8 Assessment Scenarios

6.8.1 The following assessment scenarios to be tested are as follows:

- 2021 base traffic flows – taken from the ESCC traffic data (see Figures 3.1 and 3.2);
- 2030 future year without development with committed development with MMF at 520 dwellings (see Figures 6.7 and 6.8);
- 2030 future year without development with committed development with MMF at 700 dwellings (see Figures 6.9 and 6.10);
- 2030 future year with development and with committed development with MMF at 520 dwellings (see Figures 6.17 and 6.18); and
- 2030 future year with development and with committed development with MMF at 700 dwellings (see Figures 6.19 and 6.20).

SECTION 7 Impact Assessment

7.1 Proportional Impact

7.1.1 The proportional increase in traffic flows as a result of the development in the 2030 future year compared to traffic flows without development is summarised in Table 7.1.

Table 7.1: Proportional Increase in Total Junction Traffic Flows

Junction	Total Peak Hour Traffic Flows					
	2030 Base (MMF 520 dwellings)	2030 With Dev't (MMF 520 dwellings	% Increase	2030 Base (MMF 700 dwellings)	2030 With Dev't (MMF 700 dwellings	% Increase
Morning Peak Hour						
A2270 Eastbourne Road/ High Street/ Wannock Road	2,677	2,753	*+2.8%*	2,718	2,794	*+2.8%*
A2270 Eastbourne Road/ Broad Road	2,289	2,382	*+4.1%*	2,335	2,428	*+4.0%*
A2270 Eastbourne Road/ Huggetts Lane	3,103	3,196	*+3.0%*	3,149	3,242	*+3.0%*
Evening Peak Hour						
A2270 Eastbourne Road/ High Street/ Wannock Road	2,943	3,011	*+2.3%*	2,985	3,053	*+2.3%*
A2270 Eastbourne Road/ Broad Road	2,506	2,588	*+3.3%*	2,553	2,634	*+3.2%*
A2270 Eastbourne Road/ Huggetts Lane	3,362	3,444	*+2.4%*	3,408	3,490	*+2.4%*

Source: Consultant's Estimates

7.1.2 Table 7.1 demonstrates that the proportional impact of the development proposal will result in a significantly less than 5% increase in total flows at the local junctions during the peak hours. This level of increase is well within daily variations of traffic and below that which the impact of the proposal would usually be considered necessary to test its impact across a wide highway network. If a standard growth rate hand been applied, then the proportional impact would have been even less.

7.1.3 As set out in earlier sections of the report, it has been demonstrated and agreed by the Planning Inspectorate, that full development of the allocation of up to 700 dwellings can be

accommodated on the wider highway network, with an agreed set of mitigation measures (that can be proportionally funded by various applicants). The most important point is to demonstrate that an access can be delivered that is safe for all users and will not cause undue delay to buses on the future HPEMAC corridor. With the Mornings Mills Farm site recently applying for the full 700 dwelling allocation on its land, it is for this Hindsland application to demonstrate that the additional demand over and above the allocation can be safely accommodated on the network. However, as also set out previously, it is considered that 180 dwellings on the Hindsland site is a fair and proportionate delivery of new housing on this element of the allocation, and the impact from the development traffic from the additional 180 dwellings now to be delivered across the allocation land is more to do with the higher density being applied for on the Mornings Mill Farm site. Any such impact and mitigation that may be necessary of the combined 880 units on the allocation site should be considered across all application sites.

7.1.4 In reality, the additional 180 dwellings only results in an additional 41 two-way vehicular movements at the junction with High Street, and an additional 46 two-way trips at the junctions with Broad Road and Huggetts Lane during the morning peak hour. The increases are 42 and 46 in the evening peak hour respectively. Therefore, the additional level of traffic is equivalent to a 1% increase in traffic flows at the Broad Road junction and less than 2% increase at the High Street and Huggetts Lane junctions.

7.1.5 However, despite the small increase in vehicular flow anticipated as a result of the development, the impact of the proposal on the operation of the next significant junctions on the Eastbourne Road north and south of the development (at High Street and at Huggetts Lane) has been undertaken, as well as at the neighbouring Broad Road junction.

7.2 Operational Assessments

7.2.1 The assessment scenarios have been tested using LinSIG (signalised junctions) and Junctions 9 (priority junctions) software. These are industry standard software packages that model capacity, queuing, and delay at junctions.

7.2.2 The proposed site access and the A2270 Eastbourne Road / Broad Road junction have been modelled with a FLAT profile. This is justified through a review of the observed traffic flows along Eastbourne Road during the network peak periods which demonstrates a constant flow of traffic with no evidence of 'peaking' through these periods. This is summarised in Table 3.5.

7.2.3 The junctions that have subject to detailed operational testing are:

- Proposed site access/ A2270 Eastbourne Road;
- A2270 Eastbourne Road/ High Street/ Wannock Road;
- A2270 Eastbourne Road/ Broad Road; and
- A2270 Eastbourne Road/ Huggetts Lane.

7.2.4 A summary of the operational assessments for these junctions is provided in the following tables. The full results are provided at Appendix I.

Proposed Site Access/ A2270 Eastbourne Road

Table 7.2: Operational Assessments – Site Access

	Morning Peak Hour			Evening Peak Hour		
	RFC	Delay (s/PCU)	Queue (PCU)	RFC	Delay (s/PCU)	Queue (PCU)
2030 With Development (Mornings Mill Farm 520 dwellings)						
Site Access	0.43	30	1	0.66	91	2
Eastbourne Road South	0.10	8	<1	0.11	10	<1
2030 With Development (Mornings Mill Farm 700 dwellings)						
Site Access	0.45	33	1	0.79	164	3
Eastbourne Road South	0.10	8	<1	0.11	10	<1

Source: Junctions 9

7.2.5 The results of the site access operational assessments demonstrate the site access will operate well within capacity with minimal delays and queues during both the morning and evening peak hours. The additional test of Mornings Mill Farm with 700 dwellings demonstrates the junction will continue to operate well below theoretical capacity.

7.2.6 Crucially, the development will not result in any significant queues on the right turn in lane within the ghost island junction. The queue will be fully contained with the ghost island lane, with no queue more than one vehicle, when the lane can safely accommodate up to five vehicles before blocking back. This is important, as this demonstrates that the introduction of this access junction in this form and location will have no impact on the through flow of traffic on the Eastbourne Road. This is contrast to a traffic signal controlled junction which will by its nature, introduce some delays to through movements. Therefore, the site access will also not have any

impact on the operation of the future bus priority measures to be introduced as part of the HPEMAC plans.

A2270 Eastbourne Road/ High Street/ Wannock Road

Table 7.3: Operational Assessments – Eastbourne Road/ High Street/ Wannock Road

	Morning Peak Hour			Evening Peak Hour		
	Deg. Saturation	Delay (s/PCU)	Queue	Deg. Saturation	Delay (s/PCU)	Queue
2021 Base						
Eastbourne Road (North)	84.5%	42	24	108.7%	68	95
High Street	84.7%	69	9	92.4%	4	7
Eastbourne Road (South)	82.7%	39	24	78.2%	7	20
Wannock Road	72.2%	51	12	84.0%	6	12
2030 Without Development (Mornings Mill Farm 520 dwellings)						
Eastbourne Road (North)	96.2%	63	39	110.6%	225	118
High Street	90.1%	86	11	115.2%	146	14
Eastbourne Road (South)	97.8%	72	42	81.4%	28	23
Wannock Road	74.5%	53	12	103.6%	180	23
2030 Without Development (Mornings Mill Farm 700 dwellings)						
Eastbourne Road (North)	96.0%	61	39	113.0%	262	135
High Street	99.1%	134	15	115.2%	146	14
Eastbourne Road (South)	99.5%	84	47	82.5%	29	24
Wannock Road	77.0%	56	13	109.8%	263	32
2030 With Development (Mornings Mill Farm 520 dwellings)						
Eastbourne Road (North)	99.0%	79	47	113.7%	272	139
High Street	100.00%	142	16	115.2%	146	14
Eastbourne Road (South)	100.9%	98	52	84.1%	30	25
Wannock Road	77.4%	56	13	109.8%	263	32
2030 With Development (Mornings Mill Farm 700 dwellings)						
Eastbourne Road (North)	100.0%	73	45	114.5%	282	146
High Street	98.7%	130	15	115.2%	154	15
Eastbourne Road (South)	101.3%	102	56	83.7%	29	25
Wannock Road	76.7%	56	13	115.9%	349	40

Source: LinSIG

7.2.7 The results in Table 7.3 demonstrate a very similar pattern to that established in the assessment that were agreed as part of the original planning submission and subsequent appeal for the overall Mornings Mill Farm site that also included the Hindsland site. The models supporting that application demonstrated that the network was effectively already operating at capacity, and ultimately it was agreed by ESCC and the Inspector that the further increase in traffic flows at the junction could not be considered as severe. That was based on the site accommodating 700 dwellings. This is ultimately the same as the "2030 with Development (Mornings Mill Farm 520 dwellings)" assessment presented in Table 7.3, and it has therefore been agreed that the reduction in performance at the junction between that scenario and that presented in the "2021 base" is acceptable.

7.2.8 This proposal is introducing a further 180 dwellings to the network. This is effectively the "2030 with development (Mornings Mill Farm 700 dwellings)" assessment. It is clear that the during the morning peak hour, the overall performance of the junction is not altered by the introduction of the additional units, with the performance of some arms improving by the same amount as those worsening on other arms. In the PM peak the pattern is slightly different, with the RFC increasing slightly (by 1%) on the northern arm, remaining the same and slightly improving on the High Street and southern arms respectively, whilst worsening by 5% on the Wannock Road arm. However, such small increases cannot be considered severe, and in any event that are plans as part of the HPEMAC scheme to significantly increase capacity at the junction. Overall, the development is only adding 80 two-way vehicle trips in the peak hours across all the arms of the junction.

A2270 Eastbourne Road/ Broad Road

Table 7.4: Operational Assessments – Eastbourne Road/ Broad Road

	Morning Peak Hour			Evening Peak Hour		
	RFC	Delay (s/PCU)	Queue (PCU)	RFC	Delay (s/PCU)	Queue (PCU)
2021 Base						
Broad Road (left turn)	0.11	7	<1	0.04	7	<1
Broad Road (right turn)	0.21	22	<1	0.13	28	<1
Eastbourne Road North	0.16	8	<1	0.12	8	<1
2030 Without Development (Mornings Mill Farm 520 dwellings)						
Broad Road (left turn)	0.14	10	<1	0.05	9	<1
Broad Road (right turn)	0.40	54	1	0.30	78	<1
Eastbourne Road North	0.18	9	<1	0.13	9	<1
2030 Without Development (Mornings Mill Farm 700 dwellings)						
Broad Road (left turn)	0.14	10	<1	0.05	9	<1
Broad Road (right turn)	0.41	56	1	0.38	108	1
Eastbourne Road North	0.18	9	<1	0.14	9	<1
2030 With Development (Mornings Mill Farm 520 dwellings)						
Broad Road (left turn)	0.16	12	<1	0.06	10	<1
Broad Road (right turn)	0.51	82	1	0.45	143	1
Eastbourne Road North	0.18	10	<1	0.14	9	<1
2030 With Development (Mornings Mill Farm 700 dwellings)						
Broad Road (left turn)	0.19	14	<1	0.11	20	<1
Broad Road (right turn)	0.57	107	1	0.62	273	1
Eastbourne Road North	0.18	10	<1	0.14	10	<1

Source: Junctions 9

7.2.9 The Broad Road / Eastbourne Road junction has also been subject to detailed operational assessments for the future with and without development scenarios. The junction has the same layout as the proposed access junction, and have very similar peak hour turning movements (i.e. the flow of traffic turning in and out of Broad Road at present is of a similar magnitude to that to be experienced at the proposed access junction to the site.

7.2.10 The results demonstrate the junction is anticipated to operate within capacity during both 'without development' scenarios. The addition of the development traffic will result in the

junction continuing to operate within capacity during both the morning and evening peak hours, with limited queuing and delays on all arms.

7.2.11 The results demonstrate the junction is, and will operate, within capacity in the with development scenarios. The model suggests there will be an increase in delay to vehicles, particularly along Broad Road in the evening peak hour. This is as a result of the flows along Eastbourne Road and vehicles seeking to exit the Broad Road arm. It is noted that this modelling assesses the Eastbourne Road to have 18% higher traffic flows than that set out in the Mornings Mill Farm application. In reality, the increase of some 80 (two-way) vehicle trips (including residential and medical centre trips) traveling through this junction will have an immaterial impact on queues.

A2270 Eastbourne Road/ Huggetts Lane

Table 7.5: Operational Assessments – Eastbourne Road/ Huggetts Lane

	Morning Peak Hour			Evening Peak Hour		
	Deg. Saturation	Delay (s/PCU)	Queue	Deg. Saturation	Delay (s/PCU)	Queue
2021 Base						
Eastbourne Road (north)	97.3%	45	44	101.3%	80	68
Huggetts Lane	88.1%	70	13	55.1%	48	5
Eastbourne Road South (ahead)	34.8%	6	4	45.9%	8	6
Eastbourne Road South (right)	36.1%	9	4	50.6%	13	5
2030 Without Development (Mornings Mill Farm 520 dwellings)						
Eastbourne Road (north)	114.3%	281	157	115.1%	289	174
Huggetts Lane	115.5%	337	58	102.5%	172	15
Eastbourne Road South (ahead)	42.3%	8	5	49.9%	9	7
Eastbourne Road South (right)	43.7%	11	5	56.3%	14	6
2030 Without Development (Mornings Mill Farm 700 dwellings)						
Eastbourne Road (north)	116.7%	315	176	116.0%	302	182
Huggetts Lane	117.0%	358	61	108.5%	344	22
Eastbourne Road South (ahead)	42.7%	8	5	50.7%	9	7

	Morning Peak Hour			Evening Peak Hour		
	Deg. Saturation	Delay (s/PCU)	Queue	Deg. Saturation	Delay (s/PCU)	Queue
Eastbourne Road South (right)	44.1%	11	5	56.5%	14	6
2030 With Development (Mornings Mill Farm 520 dwellings)						
Eastbourne Road (north)	118.9%	347	191	117.5%	323	194
Huggetts Lane	117.1%	359	62	111.0%	277	25
Eastbourne Road South (ahead)	44.4%	9	6	50.9%	9	7
Eastbourne Road South (right)	45.8%	12	5	56.6%	14	7
2030 With Development (Mornings Mill Farm 700 dwellings)						
Eastbourne Road (north)	121.1%	378	209	118.4%	336	202
Huggetts Lane	118.5%	378	65	116.1%	342	31
Eastbourne Road South (ahead)	44.7%	9	6	51.7%	9	7
Eastbourne Road South (right)	46.3%	12	5	57.1%	14	7

Source: LinSIG

7.2.12 Similar to the High Street junction, this assessment of the Huggetts lane junction presents a very similar pattern to that established in the assessment that were agreed as part of the original planning submission and subsequent appeal for the overall Mornings Mill Farm. Again, the models supporting that application demonstrated that the network was effectively already operating at capacity, and ultimately it was agreed by ESCC and the Inspector that the further increase in traffic flows at the junction could not be considered as severe. That was based on the site accommodating 700 dwellings. This is ultimately the same as the "2030 with Development (Mornings Mill Farm 520 dwellings)" assessment presented in Table 7.5, and it has therefore been agreed that the reduction in performance at the junction between that scenario and that presented in the "2021 base" is acceptable.

7.2.13 This proposal is introducing a further 180 dwellings to the network. This is effectively the "2030 with development (Mornings Mill Farm 700 dwellings)" assessment. It is clear that the during the morning peak hour, the overall performance of the junction is not materially altered by the introduction of the additional units. Whilst increases occur in the PM peak assessment, these are

at a significantly lower magnitude than those agreed for the whole Mornings Mill Farm site. Overall, the development is only adding 80 two-way vehicle trips in the peak hours across all the arms of the junction, and such small increases cannot be considered severe. Future improvements, as well as a modal shift, will also be provided by the HPEMAC scheme at this junction.

7.3 Impact on the A27 and A22

7.3.1 The anticipated distribution and assignment of proposed development trips onto the A27 and A22 is set out within the assignment tables in Appendix H. The estimated distribution, and resultant assignment, of the residential development traffic routing along these roads is presented in Table 7.6. The vehicular trips associated with the medical centre is not included within the table below as it considered that these trips, and the local catchment, will predominately result in additional vehicles on the local highway network, rather than the strategic network.

Table 7.6: Distribution and Assignment – A27 and A22

	A22 North of Polegate	A27 West (Lewes Road)	A27 East (Polegate Bypass)	Total
Morning Peak Hour				
Distribution	20%	23%	1%	44%
In	4	5	0	9
Out	12	14	1	26
Two-Way	16	19	1	36
Evening Peak Hour				
Distribution	21%	22%	1%	44%
In	12	13	1	25
Out	5	6	0	11
Two-Way	17	18	1	36

Source: Consultant's Estimates

7.3.2 Table 7.6 demonstrates that less than 40 two-way trips are anticipated to be generated by the development traveling on the A27 and A22 during the network peak hours. This equates to less than one vehicle per minute in the peak hours and such an increase will not result in a 'severe' impact on the operation or capacity of these key junctions.

7.4 Summary

7.4.1 This assessment takes into account a number of local developments that are considered as committed developments. This includes the Mornings Mill Farm development and the Brodricklands Farm development. The estimated vehicular traffic impacts of these developments have been assessed and considered within the future year assessments. For a robust assessment it is assumed that the full occupation of these sites in the future year.

7.4.2 A review of the traffic flows on the Eastbourne Road, taken from the DfT, over the last 14 years demonstrates a consistent reduction in traffic. As such, the 2021 base traffic flows have not had any background traffic growth applied, although traffic has been growthed up to a 2021 base year (despite it likely have reduced by up to 5%). This is also supported through the new HPEMAC improvements which seek a modal shift from private vehicle to more sustainable modes and thus will reduce future vehicular growth along this corridor.

7.4.3 The traffic impact of the proposed development has been assessed for a future year of 2030 with the full occupation of the committed developments also assessed. A review of the assessed traffic flows along the Eastbourne Road demonstrates this assessment provides a robust and 'worst case' assessment of such traffic flows compared to the Mornings Mill Farm application with this assessment considering 12-18% higher flows in the peak hours.

7.4.4 The likely trip generation of the proposal has been estimated based on similar private house schemes within the TRICS database and the local 2011 Census mode share data. In addition, the medical centre trip rates are comparable TRICS sites.

7.4.5 The vehicular trip distribution of the proposed site has been based on the local Census journey to work data and a gravity model. The vehicle trips have been assigned onto the local highway network using Google Maps.

7.4.6 The proportional impact of the proposed development on the local junctions has been assessed and reveals a less than 5% increase as a result of the development. This level of increase is well within daily variations of traffic. Notwithstanding this, these junctions have been subject to additional capacity testing.

7.4.7 The capacity of the local junctions, including the proposed site access, have been tested using junction capacity software. The results reveal the proposed site access will operate in the future with development year within capacity. In particularly, no delays will be introduced to through

movements on the Eastbourne Road, including to bus passengers. In addition, the Broad Road/ Eastbourne Road junction will also continue to operate within theoretical capacity with and without the development.

7.4.8 Whilst the signal controlled junction to High Street to the north and Huggetts Lane to the south are demonstrating a network at capacity, the level of increase pressure on these junctions created by the 180 dwellings and medical centre is significantly less than the level of impact considered to be acceptable as part of the previous application and appeal. It is therefore considered that the further slight worsening of performance cannot be seen as "severe" in NPPF terms. In any event, the traffic flows used for the assessment are significantly higher than those presented as part of the previous application and appeal, due to the spreadsheet modelling technique used (which does not reassign traffic away from junction like the strategic SWETS model does), and also provides for a growth in traffic on the network over recent year, when the evidence points towards a slight reduction in traffic flows along the Eastbourne Road corridor.

SECTION 8 Framework Construction Traffic Management Plan

8.1 Overview

8.1.1 This section of the TA sets out the framework Construction Traffic Management Plan (CTMP) that will form the basis / foundation for the CTMP, once any consent is granted.

8.1.2 A CTMP will be Conditioned as part of any future consent. This report will identify the construction programme, vehicle routing and management measures. Construction vehicles will be routed to use the strategic road network and will be discouraged from routing along residential streets and estates.

8.1.3 This section sets out a high level review of the likely management measures that will be implemented within the CTMP.

8.2 Vehicle Routing and Construction Traffic Movements

8.2.1 The site is well located to the primary and strategic road networks, including access from the A2270 Eastbourne Road and the A22 and A27 to the north. As such, it is unlikely that construction vehicles will need to route along residential roads in the vicinity of the site and will be limited from doing so unless strictly necessary.

8.2.2 All construction vehicles will enter and exit the site via the site access onto the A2270 Eastbourne Road. The proposed access is designed of sufficient width to accommodate timed and managed construction activity. As part of the final CTMP, the appointed contractor will be required to provide a vehicle routing strategy which shall set out the primary construction routes to and from the site.

8.2.3 All construction vehicle drivers will be informed that they must not wait/park on the surrounding highway network; any drivers who ignore this directive will face disciplinary action.

8.3 Mitigation Measures

8.3.1 A detailed list of measures and site protocols will be agreed with WDC/ESCC through the submission of a full CTMP. This should include and make reference to at least the following:

- All contractors to be members of the Considerate Contractors Scheme and Fleet Operators Recognition Scheme (FORS);
- HGVs will be brought to and from site outside of the network peak hours of 0800-0900 and 1700-1800 hours;
- Temporary construction vehicle routing signage on the local highway network;
- Site hoarding to enclose the site on all sides and suitable signage to be installed to warn pedestrians and highways users of the presence of HGVs;
- The regular inspection of the local highway network for any deposits of soil/debris deposited by construction traffic and if necessary, the road to be swept using a mechanical sweeper or similar;
- Wheel washing facilities;
- Dust, noise and vibration and its management; and
- Given that the site is located off the A2270 Eastbourne Road, it is anticipated that at least one banksman will always be present at the site access when construction vehicles are expected.

8.4 Management, Monitoring and Review

8.4.1 The Applicant, or future developer, will work with the appointed Principal Contractor to implement the measures identified above. The continuing management of the CTMP will be the responsibility of the Principal Contractor and will cover the lifetime of the planned construction works.

8.4.2 The Principal Contractor will nominate a member of staff to be responsible for the day-to-day organisation and monitoring of construction logistics for the Site, which given the complexity of the project will be a full time role. The responsibilities of this Logistics Manager role will include the implementation and management of the CTMP for the lifetime of the construction project.

8.4.3 The final CTMP will be implemented from commencement of construction activities on the Site.

8.4.4 The Logistics Manager will monitor vehicle movements on a daily basis and will carry out surveys of vehicle movements and routing at regular intervals throughout the construction project.

8.4.5 The final CTMP shall be a 'live' document and will be regularly reviewed with key stakeholders and updated throughout the project's construction. The CTMP will be reviewed no less than annually. Should updates be required, these will be undertaken, and an updated version issued to WDC/ESCC and other key stakeholders for review and information.

SECTION 9 Summary and Conclusions

9.1.1 Summary

9.1.2 Danescroft (FREOF V Willingdon) LLP has appointed i-Transport LLP to provide highways and transport advice for a forthcoming planning application for the development of up to 180 residential dwellings and a 2,170 sqm medical centre on land to the east of the A2270 Eastbourne Road, Willingdon.

9.1.3 The proposed development is for:

> ***"Outline Application All Matters Reserved except for Access (excluding internal estate roads beyond the access to serve the Medical Centre Plot) for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing and onsite open space".***

9.1.4 The site is located to the south of Polegate and comprises of the disused Hindsland Playing Fields. The site is within the planning jurisdiction of Wealden District Council (WDC), with East Sussex County Council (ESCC) the local highway authority.

9.1.5 The site is located within the Land at South Polegate and East Willingdon allocation which is set out in WDC's adopted Core Strategy. The site allocation is contained within Policy WCS4 – Strategic Development Areas – SD4, an allocation for some 700 residential dwellings, employment land uses and community facilities.

9.1.6 The proposed site formed part of a larger site, which also included the adjacent land at Mornings Mill Farm, for which an outline planning application (planning ref: WD/2017/1942) was submitted in 2017. An appeal for non-determination (appeal ref: APP/C1435/W/19/3230484) was submitted on the site and an Inquiry was held in October 2019. The appeal was dismissed.

9.1.7 The Hailsham, Polegate and Eastbourne Movement and Access Corridor (HPEMAC) is a committed and secure package of integrated transport improvements along the A22/A2270/A2021 corridor between Hailsham, Polegate and Eastbourne. The proposals include improvements along the A2270 Eastbourne Road which begin outside of the proposed site's southern frontage. It was due to the impacts of the previous site's signal controlled access on users of the HPEMAC buses that the Appeal was dismissed. Overall highway impact was considered acceptable.

9.1.8 Pre-application discussions have been held with ESCC, including the submission of a scoping report and a meeting in November 2020. In addition, a meeting was held with ESCC to specifically discuss the HPEMAC improvements.

9.1.9 The site is well located to existing, and future, walking and cycling infrastructure in the area. There is a footway along the western side of Eastbourne Road which provide access north towards Polegate and south through Willingdon. An on-carriageway advisory cycle lane is provided along both sides of Eastbourne Road. The proposed HPEMAC improvements propose a shared footway/ cycleway along the Eastbourne Road as well as new crossings.

9.1.10 There are local bus stops on Eastbourne Road, directly outside of the site, which provide access to routes which serve Eastbourne town centre, Uckfield and Lewes. The site is within a 850m (equivalent to a 11 minute walk) of Polegate railway station which is served by Southern services.

9.1.11 A review of the 2011 Census data for the local area reveals the majority of residents travel to work by car (75% of the mode share), with a further 10% traveling by public transport and 8% by active modes (i.e. walking and cycling). A review of the car ownership data reveals an average car ownership of 1.3 cars per household with up to 47% living car free.

9.1.12 The proposed development is for the construction of up to 180 residential units and a 2,170 sqm medical centre. The development will be accessed via a ghost island right turn priority junction via Eastbourne Road. The proposed access will be located circa 90m north of the junction with Broad Road. The proposed access arrangements take account of the HPEMAC scheme and do not prejudice the delivery of the works.

9.1.13 Whilst the form and layout of car and cycle parking within the site is not a matter for determination within this planning application, a review of the parking provision presented within the illustrative masterplan has been undertaken. The review demonstrates the illustrative layout can provide the sufficient number of spaces required to meet ESCC's car parking demand calculator, with ample visitor and unallocated spaces.

9.1.14 A suite of swept path analysis has been undertaken at the site access, and within the illustrative internal layout, to demonstrate the ability of all vehicles, including refuse and servicing vehicles, to manoeuvre around the site.

9.1.15 Two Stage 1 Road Safety Audits were undertaken on the proposed access arrangements, including one with and the other without the HPEMAC improvements. The audits raised minor

comments, of which the majority can be picked up within the detailed design stage or have been updated within the proposed arrangements. The audit did not raise any issues with the overall arrangement of the site access junction with the HPEMAC improvements.

9.1.16 The proposed access arrangements have been updated in line with the comments and proposed recommendations.

9.1.17 A review of the everyday services and facilities within a comfortable (1.6km) walking distance from the site has been undertaken and demonstrates a vast array of destinations are located within this distance.

9.1.18 A Framework Travel Plan has been prepared and is submitted alongside this Transport Assessment. The report has been prepared in line with ESCC's guidance and includes a number of measures that will be implemented at the site to encourage sustainable travel to and from the site for all future users.

9.1.19 This assessment takes into account a number of local developments that are considered as committed developments. This includes the Mornings Mill Farm development and the Brodricklands Farm development. The estimated vehicular traffic impacts of these developments have been assessed and considered within the future year assessments.

9.1.20 A review of the traffic flows on the Eastbourne Road, taken from the DfT, over the last 14 years demonstrates a consistent reduction in traffic. As such, the 2021 base traffic flows have not had any background traffic growth applied.

9.1.21 The traffic impact of the proposed development has been estimated using the TRICS database for the residential dwellings and medical centre. The vehicular trip distribution of the proposed site has been based on the local Census journey to work data and a gravity model. The vehicle trips have been assigned onto the local highway network using Google Maps.

9.1.22 A future year of 2030 with the full occupation of the committed developments also assessed. The proportional impact of the proposed development on the local junctions reveals a less than 5% increase as a result of the development. This level of increase is well within daily variations of traffic. Notwithstanding this, these junctions have been subject to additional capacity testing.

9.1.23 The capacity of the local junctions, including the proposed site access, have been tested using junction capacity software. The results reveal the proposed site access will operate in the future

with development year within capacity. In addition, the Broad Road/ Eastbourne Road junction will also continue to operate within theoretical capacity with and without the development.

9.1.24 The Eastbourne Road/ High Street/ Wannock Road and Eastbourne Road/ Huggetts Lane models demonstrate both junctions are operating at capacity in the base year. As a result of the committed developments and proposed development traffic, the junctions will operate above capacity with increased queuing and delay, particularly in the evening peak hour. The increase in development traffic at these junctions (up to 80 two-way trips across both junctions) will have a minor impact in the overall operation of such and the increases, and such changes are small compared to those considered as acceptable for the whole 700 units assessment on the allocation land.

9.2 Conclusions

9.2.1 Overall, the site is in in general accordance with the previous planning application on the wider sited. The impact of that site was agreed to be acceptable on the local and wider highway networks (following mitigation), with only the localised impacts of the introduction of signal controlled accesses considered to a material concern warranting a refusal at Appeal.

9.2.2 This assessment has demonstrated that, following mitigation, it is in a sustainable location, that can accommodate the increase in all mode trips generated by its proposed 180 dwellings and medical centre. Whilst it is considered that it should really be assessment as a proportionate part of the wider 700 dwelling allocation, it has been demonstrated that even if considered in addition to the allocation housing numbers, the overall highways impact is acceptable.

9.2.3 Importantly, it has been demonstrated that the site's access to the A2270 Eastbourne Road can not only safely be accommodated within ESCC HPEMAC bus corridor proposals, without creating any additional delays to future bus users, but it can actually benefit the scheme, by increasing the available length of northbound bus lane and southbound cycle lane.

9.2.4 It is therefore considered that the proposed development fully satisfies and addresses the transport and highways concerns relating to the previous application and appeal site in which it is contained, and can be brought forward without delay, without significant infrastructure requirements.

FIGURES

DRAWINGS

APPENDIX A. ESCC September 2020 Meeting Minutes

APPENDIX B. Personal Injury Accident Data

APPENDIX C. Road Safety Audits and Designer's Responses

APPENDIX D. ESCC Car Parking Calculator

APPENDIX E. Residential Trip Rates

APPENDIX F. Medical Centre Trip Rates

APPENDIX G. 2011 Census Journey to Work Data and Gravity Model

APPENDIX H. Development Assignment

APPENDIX I. Operational Assessment Reports

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Appendix 5: i-Transport, Land at Eastbourne Road, Willingdon, Framework Travel Plan, ref: NM/MD/ITL15734-005

Land at Eastbourne Road, Willingdon

Framework Travel Plan

Client: Danescroft (FREOF V Willingdon) LLP

i-Transport Ref: NM/MD/ITL15734-005

Date: 26 February 2021

i-Transport – Basingstoke | Manchester | London | Leeds
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Land at Eastbourne Road, Willingdon

Framework Travel Plan

Client: Danescroft (FREOF V Willingdon) LLP

i-Transport Ref: NM/MD/ITL15734-005

Date: 26 February 2021

i-Transport LLP
85 Gresham Street
London
EC2V 7NQ

Tel: 020 3705 9215

www.i-transport.co.uk

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Quality Management

Report No.	Comments	Date	Author	Authorised
ITL15734-005	Draft	26/02/2021	MD	NM

File Ref: L:\PROJECTS\15000 SERIES\15734 - Eastbourne Road, Willingdon\Admin\Report and Tech Notes\ITL15734-005 Framework Travel Plan.docx

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FIGURE 1.1	Site Location Plan

SECTION 1 Introduction

1.1 Overview

1.1.1 Danescroft (FREOF V Willingdon) LLP has appointed i-Transport LLP to provide to provide transport and highways advice to support the proposed development up of to 180 dwellings and a 2,170 sqm medical centre on land to the east of Eastbourne Road, Willingdon. This Framework Travel Plan (FTP) has been prepared to support the planning submission.

1.1.2 This FTP is submitted alongside, and should be read in conjunction with, the Transport Assessment (TA) for the development proposal (report reference: ITL15734-004).

1.1.3 The primary purpose of this FTP is to identify opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling and public transport to reduce the demand for travel by less sustainable modes, most specifically single occupancy vehicle trips.

1.2 Site Location

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

1.2.2 The site is within the planning jurisdiction of Wealden District Council (WDC), whilst East Sussex County Council (ESCC) is the local highway authority responsible for the operation and maintenance of the adjoining roads. Highways England (HE) is the strategic highway authority responsible for the operation and maintenance of the A27 (circa 1km to the northwest of the site).

1.2.3 A site location plan is provided at Figure 1.1 with an extract as Image 1.1.

Image 1.1: Site Location Plan Extract



1.3 Relevant Transport Policy

National Policy

1.3.1 The National Planning Policy Framework (February 2019) sets the policy background for the development of Travel Plans (TP). It states, with regard to applications for new developments, they should:

> ***"a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;***
>
> ***b) address the needs of people with disabilities and reduced mobility in relation to***
>
> ***all modes of transport; c) create places that are safe, secure and attractive – which minimise the scope or conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;***
>
> ***d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and***
>
> ***e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.***

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed".

1.3.2 The web-based National Planning Practice Guidance (NPPG) brings together planning guidance for England across all disciplines in an accessible way as well as to provide a clear link between guidance and the aims and objectives of the NPPF. The NPPG sets out the importance and requirements for Travel Plans and states:

"The primary purpose of a Travel Plan is to identify opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling, public transport and tele-commuting, in connection with both proposed and existing developments and through this to thereby reduce the demand for travel by less sustainable modes."

ESCC Local Transport Plan 3 2011-2026

1.3.3 ESCC's third Local Transport Plan sets out the vision, objectives, and the strategy for the next 15 years to 2026. The key objectives are to promote and encourage sustainable travel trips within the County. This includes promoting bus, rail and walking and cycling. The following policies set out the main objectives for these modes.

Bus

1.3.4 To make bus travel an attractive and realistic alternative to the private car, provide sustainable access to services, local facilities and employment opportunities for all residents and deliver increased bus use by; maintaining and improving the quality of commercial services, enforcing parking restrictions and providing bus priority measures as funding becomes more available, improving the standard of provision at bus stop interchanges and providing high quality information both in advance of an intended journey and at the time of travel;

Rail

1.3.5 Continue to lobby for improvements to connectivity to London including a new station at Polegate.

- Active Transport – Walking and Cycling
- Make walking more attractive for short journeys to maximise the opportunities to walk to local facilities and services;
- Consider appropriate crossing facilities on key corridors of movements when needed;

- Undertake audits of all transport infrastructure improvement schemes to ensure accessibility for all;
- Consider potential new cycle routes and facilities; and
- Encourage recreational cycling and cycle tourism.

ESCC Travel Plans for Development (February 2020)

1.3.6 This guidance document establishes ESCC's reasons for requiring Travel Plans and the contents of Travel Plans. It confirms that Travel Plans can assist in achieving a "decide and provide" transport strategy, as opposed to a more traditional "predict and provide".

1.3.7 This FTP meets the requirements of the guidance.

1.4 Scope of Travel Plan

1.4.1 This Travel Plan has been prepared as a FTP. This FTP will be used by the eventual developer of the site as a basis to develop a full and detailed Travel Plan (TP) in discussion with ESCC.

1.5 Structure of Travel Plan

1.5.1 The remainder of this FTP is structured as follows:

- Section 2 – Objectives and Benefits;
- Section 3 – Existing Conditions and Travel Patterns;
- Section 4 – Site Layout and Infrastructure Measures;
- Section 5 –Travel Plan Management;
- Section 6 – Measures;
- Section 7 – Targets;
- Section 8 – Monitoring; and
- Section 9 – Enforcement.

SECTION 2 Objectives and Benefits

2.1 Objectives

2.1.1 This FTP sets out a sustainable transport strategy for the proposed development. In line with national and local government guidance, the headline aims for the plan will be as follows:

- To reduce the number of single occupancy car journeys to the site; and
- To improve accessibility to the site by non-car modes of transport.

2.1.2 The plan will have the following additional objectives:

a To support a range of sustainable transport alternatives to provide future residents and medical centre visitors with options for travel to/from the site;

b To develop an awareness of the options for sustainable travel to and from the site amongst residents and visitors;

c To promote walking, cycling and public transport as safe, efficient, affordable alternatives to private cars and highlight the health and environmental benefits of using sustainable travel modes;

d To minimise the impacts of car based travel to the site on the local and strategic highway network and environment; and

e To manage car parking demand across the development.

2.2 Benefits

2.2.1 The benefits of a TP can include:

- Increased travel choice: a wider range of travel options; savings and benefits for residents can be achieved. A TP can lead to greater social inclusion enabling those who do not have access to a car to travel to and from the site more easily;
- A more accessible site - encouraging travel by the most sustainable modes can help the site to become more accessible and safer for all residents and visitors. This can also help the surrounding area become a more attractive place to work and live;

- Health benefits: many alternative forms of travel include an element of exercise that can lead to an improved level of fitness amongst residents. Improved levels of fitness can help businesses that employ residents by improving morale and reducing health related absences;
- Less congestion on local roads: encouraging future residents to travel by non-car modes and increase the uptake of more trips made by active modes and public transport can help reduce the number of private vehicle trips and thus reduce the number of vehicles on the road and in turn reducing congestion on the local highway network;
- Local environment improvements: benefits of improved air and noise quality from the reduced congestion, pollution, and noise, also creating a more attractive and healthier place to work in live; and
- Positive publicity: producing a TP can improve links with the local community.

2.2.2 Overall, it is anticipated that the TP, combined with the package of infrastructure measures designed to promote sustainable transport, will result in benefits for residents of the site and the wider community in the vicinity of the development.

SECTION 3 Existing Conditions and Travel Patterns

3.1 Introduction

3.1.1 This section of the FTP summarises the site location, existing pedestrian and cycle provision, and public transport services.

3.2 Walking and Cycling Provision

A2270 Eastbourne Road

3.2.1 The A2270 Eastbourne Road provides the primary pedestrian route from the site north towards Polegate High Street and south through the centre of Willingdon. Routing north from the site, a single footway is provided on the western side of the carriageway, separated by a verge. At the Petrol Filling Station (PFS) a Puffin crossing is provided across Eastbourne Road which provides access to the PFS and the Tesco Express as well as a footway on the eastern side of the carriageway.

3.2.2 An uncontrolled pedestrian crossing comprising dropped kerbs, tactile paving and a pedestrian refuge island is provided across the junction with Church Road. The footways on either side of Eastbourne Road continue north, both separated from the carriageway via a grass verge with access to private driveways provided along the route.

3.2.3 At the traffic signalised crossroads with the High Street and Wannock Road, pedestrian phases and crossings are provided on all arms. The footways along the A2270 provide a direct connection to the footways on the High Street and Wannock Road.

3.2.4 To the south of the proposed site, the western footway continues south along Eastbourne Road. An uncontrolled pedestrian crossing comprising dropped kerbs and a pedestrian refuge island is provided just to the south of the junction with Broad Road. This provides access to the bus stop located on the eastern side of the carriageway. The footway to the south of the site is also separated by a grass verge. It should also be noted that street lighting is provided along Eastbourne Road within the vicinity of the site and north towards Polegate and south towards Willingdon.

Broad Road

3.2.5 Broad Road provides a connection between the Eastbourne Road and Willingdon Community School and other local community facilities (including a Church and Primary School). Footways are provided on both sides of the carriageway, tying into the footways provided on the A2270 Eastbourne Road. The footways are separated from the carriageway via grass verges.

3.2.6 Broad Road provides a connection to the north via Farmlands Avenue for access to additional local facilities. A raised table is provided at this junction serves to slow vehicles and increase the safety of pedestrians at this junction.

Church Road

3.2.7 Church Road is located to the north west of the site and connects with the A2270 Eastbourne Road just to the north of the PFS. Church Road serves primarily as a residential road with footways provided on both sides of the carriageway. At its northern extent, Church Road connects to High Street via a simple priority junction arrangement. The footways provided along Church Road remain continuous, routing north and south on High Street.

High Street

3.2.8 High Street provides access to a number of everyday facilities as well as Polegate rail station. Footways are provided on both sides of the carriageway. Just to the north of Black Path, pedestrians are able to cross the rail line and gain access to Polegate Rail Station.

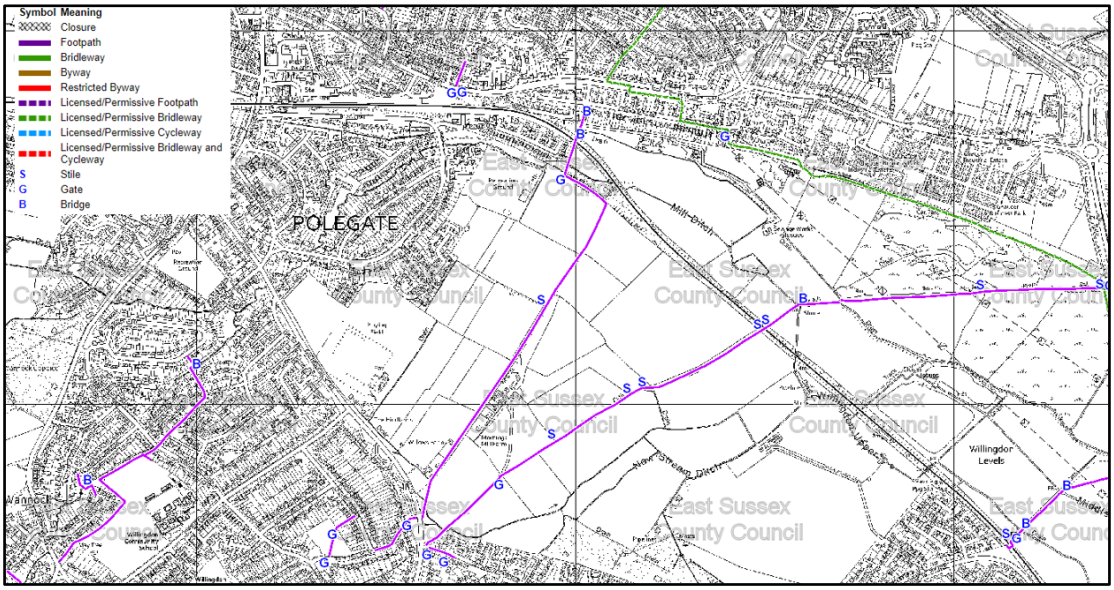
3.2.9 Advisory on carriageway cycle lanes are provided within the carriageway on both sides of the A2270 Eastbourne Road between the PFS to the north and Meachants Lane to the south. Throughout the remainder of the local highway network outlined above, 30mph posted speed limits are enforced. As such, low vehicle speeds help to create an environment conducive to in-carriageway cycling without the requirement for designated cycle facilities.

3.2.10 The National Cycle Network Route 21 provides an identified route between Greenwich (Greater London) and Eastbourne. The cycle route is accessible from Polegate station.

Public Rights of Way

3.2.11 A number of public rights of way are accessible in the vicinity of the proposed site. Image 3.1, taken from ESCC's definitive map, illustrates the location of the closest routes in the context of the site.

Image 3.1: Local PRoW Network



Source: ESCC Public Rights of Way Map

3.2.12 As shown above, the closest rights of way are located to the east of the site and comprise the Willingdon and Jevington Footpath 5 and Polegate Footpath 5 which combine to provide a south-north route between the A2270 Eastbourne Road and Lynholm Road to the north of the railway line. There are no PRoWs within or adjacent to the site. There are no public links to Spurway Park to the northeast or the neighbouring land parcels.

3.3 Public Transport

Bus

3.3.1 The closest bus stops to the site are located on Eastbourne Road, on the site boundary. The bus stops provide access to a number of services which serve destinations such as Stone Cross, Uckfield, Lewes, and Eastbourne town centre. The stops consist of a simple flag and pole. In addition, additional bus stops are located along Brightling Road, to the north of the site. A summary of the typical frequencies of the bus services available from these stops is provided in Table 3.1 below.

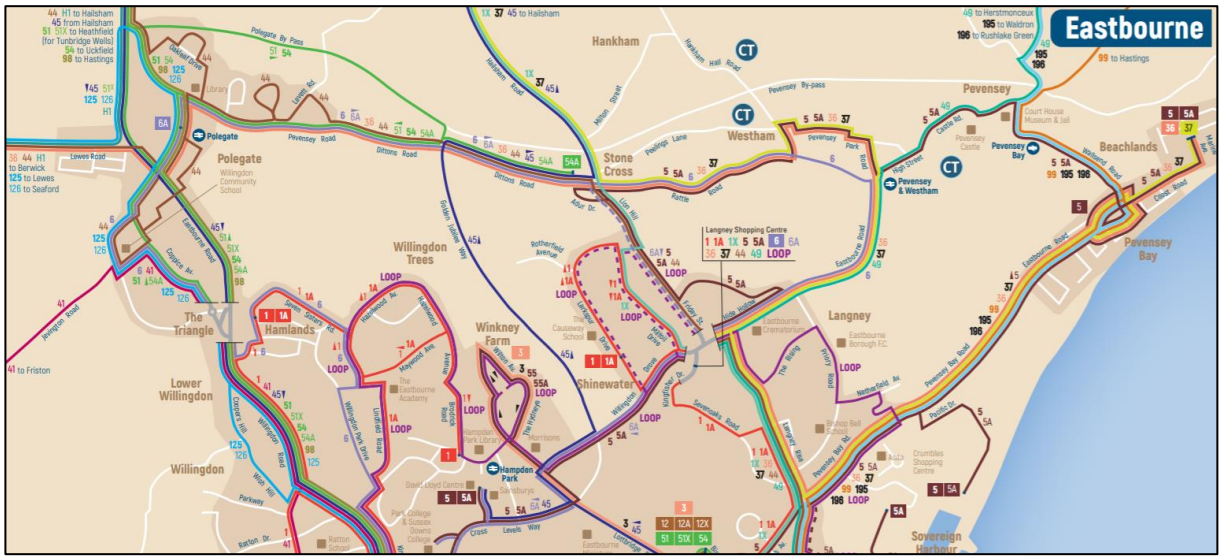
Table 3.1: Bus destinations and typical frequencies

Bus Route	Destinations	Typical Frequency		
		Mon - Fri	Sat	Sun
44	Berwick - Polegate - Langney - Eastbourne	1 per day on Thurs	No service	No service
45	Hailsham - Eastbourne	1 per day on Fri	No service	No service
51	Eastbourne - Heathfield	2 per hour	2 per hour	2 per hour
54	Eastbourne - Uckfield	1 per hour	1 per hour	1 per hour
54A	Eastbourne – Stone Cross	1 per hour	1 per hour	1 per hour
125	Lewes - Alfriston - Polegate - Eastbourne	1-2 per day	No service	No service

Source: Traveline, accessed February 2021. Note that services may be reduced at present due to Covid-19 travel restrictions.

3.3.2 The existing bus network within the wider Eastbourne area is illustrated in Image 3.2. This illustrates the wide range of bus routes available within the Eastbourne town centre area and ability for future passengers to interchange across the services.

Image 3.2: Public Transport Connectivity



Source: ESCC

Rail

3.3.3 Polegate railway station is located circa 850m walking distance (equivalent to a 11 minute walk) from the site's proposed site access on Eastbourne Road. The station is served by Southern Railway trains with direct services to Eastbourne, Hastings, Brighton, and London Victoria. The destinations, durations and typical frequencies are summarised in Table 3.2.

Table 3.2: Summary of Rail Frequencies – Polegate Station

Destination	Duration	Typical Frequency
Eastbourne	8 mins	4 per hour
Hastings	44 mins	4 per hour
Brighton	32 mins	4 per hour
London Victoria	1 hour 22 mins	4 per hour

Source: National Rail Enquiries, accessed February 2021. Note that services may be reduced at present due to Covid-19 travel restrictions.

3.4 Existing Travel Characteristics

Journey Purpose

3.4.1 When promoting sustainable transport, it is important to consider the reasons why future residents of the proposed development will make journeys. The Department of Transport's National Travel Survey identifies the proportion of all trips by purpose as set out in Table 3.3.

Table 3.3: Proportions of Trips per Year by Journey Purpose

Journey Purpose	Proportion of Trips
Leisure	26%
Shopping	19%
Commuting / Business	18%
Education / Escort Education	13%
Personal Business	9%
Other Escort	9%
Other (Including Just Walk)	6%

Source: Table NTS0409 Average number of trips (trip rates) by purpose and main mode: England, 2018, National Travel Survey 2019

3.4.2 Table 3.3 shows the main reasons for travelling are for leisure, shopping, commuting/business and education. Journeys for these trips are considered within this Travel Plan.

Local Travel Patterns

3.4.3 Data from the 2011 Census has been analysed to assist in establishing wider commuting patterns for people living in the local area. The Middle Super Output Area (MSOA) Walden 021, which is likely to be most representative of the site in terms of resident's future travel, has been examined and the modal split data of existing residents is summarised in Table 3.4.

Table 3.4: Method of Travel to Work Summary

Mode	Wealden MSOA 021	
	Count	%
Car or Van Driver	2,241	75%
Train	189	6%
On Foot	178	6%
Passenger in a Car or Van	163	5%
Bus, Minibus, Coach	107	4%
Bicycle	49	2%
Motorcycle, Scooter, Moped	20	1%
Other	18	1%
Taxi	14	0%
Underground, Metro, Light Rail	6	0%
Total	2,985	100%

Source: 2011 Census, Nomis QS701EW – Method of Travel to Work for Wealden MSOA 021.

Note: Numbers may not sum due to rounding.

Data does not take into account those not in employment and those who work from home.

3.4.4 Table 3.7 reveals car driver trips account for some 75% of the mode share, with a further 10% traveling by public transport and 8% by active modes (i.e. walking and cycling).

3.5 Trip Rates and Generation

3.5.1 The likely trip generation of the development is set out in further detail in Section 6 of the TA. A summary of the residential multi-modal trip generation (based on 180 dwellings) is provided in Table 3.5.

Table 3.5: Proposed Multi-Modal Trip Generation – Residential

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Two-Way	In	Out	Two-Way
Car or Van Driver	21	60	81	57	25	81
Train	2	6	7	5	2	8
On Foot	3	7	10	7	3	10
Passenger in a Car or Van	2	5	6	4	2	6
Bus, Minibus, Coach	3	8	11	8	3	11
Bicycle	2	5	6	4	2	6
Motorcycle, Scooter, Moped	0	1	1	1	0	1
Other	0	1	1	1	0	1
Taxi	0	0	0	0	0	0
Underground, Metro, Light Rail	0	0	0	0	0	0
Total	32	92	124	87	38	125

Source: Consultant's Estimates
Note: Numbers my not sum due to rounding

3.5.2 The anticipated multi-modal trip attraction of the proposed medical centre is also set out in further detail in Section 6 of the TA and the estimated total person and vehicle trips is presented in Table 3.6.

Table 3.6: Proposed Multi-Modal Trip Generation – Medical Centre

	Trip Attraction (2,170 sqm)		
	In	Out	Two-Way
Vehicles			
AM Peak Hour	85	90	175
PM Peak Hour	89	68	156
Total Persons			
AM Peak Hour	143	149	292
PM Peak Hour	143	116	259

Source: Consultant's Estimates

Note: Numbers my not sum due to rounding

3.5.3 The total development, including the residential units and the medical centre, is therefore anticipated to generate up to 175 (two-way) vehicle trips during the network peak hours and some 292 (two-way) total person trips during the peak hours.

3.6 Proposed HPE MAC Improvements

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

3.6.2 The proposals include improvements along the A2270 Eastbourne Road which begin outside of the proposed site's southern frontage. The improvements along the A2270 Eastbourne Road, outside of the site, include:

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

SECTION 4 Site Layout and Infrastructure Measures

4.1 Overview

4.1.1 This section describes the on and off-site infrastructure measures which will encourage residents to travel via sustainable modes.

4.2 Proposed Site Access Arrangements

4.2.1 The development will be accessed via a ghost island right turn priority junction via Eastbourne Road. It includes footways on both sides of the access road, and a shared foot/cycleway on the eastern side of Eastbourne Road to the south of the access. This links to the existing bus stop to the south. In addition, a new uncontrolled pedestrian crossing of Eastbourne Road to the north of the access is provided, and an improvement to the existing crossing south of Broad Road.

4.2.2 In addition, the access is designed to enable a full integration with ESCC's HPEMAC bus and cycle improvements along the Eastbourne Road, which will further enhance sustainable access to the site.

4.3 Parking

4.3.1 The application is in outline. However, future reserved matters application will ensure that car parking is provided in accordance with the ESCC car parking calculator, and accord with the following broad principles:

- To be provided having regard to local car parking standards at the time for all land uses on the site;
- Any residential non-curtilage allocated car parking ideally to be located within 25m of individual dwellings;
- Within discrete residential parking courts, a proportion of parking should be unallocated to provide for efficient use;
- On-street parking to be accommodated but to be provided within discrete parking bays on the residential streets (so as not to obstruct bus or refuse vehicle access);

- Cycle parking spaces will be provided for the proposed houses in garages/ covered cycle stands within gardens, and suitable secure communal cycle parking facilities will be provided for the flatted units; and
- Electric vehicle (EV) charging infrastructure within the development will also be provided.

4.4 Car Club

4.4.1 Car clubs offer an alternative model to private car ownership, whereby members can rent vehicles on a short-term service that allows them to pay by the minute, hour or day.

4.4.2 The development includes the provision of one electric car club parking space to be allocated for a car club close to the site access, therefore in a highly visible location for all future residential occupiers, users of the medical centre, and the surrounding existing residential areas . The spaces would be located on the site but in a publicly accessible location so it could be used by existing local residents and visitors/ staff of the medical centre. Discussions have been held with Enterprise Car Club who have confirmed support of providing a car club(s) within the site.

4.4.3 The space will be equipped with an electric vehicle charging point and would be supplied with an electric car club.

4.4.4 As a result of car club membership resulting in members selling/not replacing private vehicles, CoMo (a charity supporting the introduction of sustainable transport modes) have calculated that for every car club vehicle, it leads to a removal of 10.5 private cars from the road network. Accordingly, the provision of a car club vehicle is equivalent to providing 10 - 11 additional car parking spaces.

SECTION 5 Travel Plan Management

5.1 Overview

5.1.1 This section of the document sets out the proposed regime for the travel plan management.

5.2 Funding

5.2.1 The owner / developer will fund the following items:

- The transport infrastructure outlined in Section 4 of the FTP;
- The Travel Plan Co-Ordinator (TPC) role for a period from at least 3 months prior to first occupation of the development until 5 years after 50% occupation; and
- The site wide monitoring surveys outlined in Section 8.

5.3 Travel Plan Co-Ordinator

5.3.1 The owner / developer will fund a TPC for a period from at least three months prior to first occupation of the residential development until five years after 50% occupation.

5.3.2 The TPC will be appointed three months before the first occupation of any residential dwellings, in order to commence development of the initial Travel Plan measures and to ensure that the Travel Plan is implemented in time for the first occupations.

5.3.3 The role of the TPC will be as follows:

- Ensure the final Residential Travel Plan is or has been submitted to ESCC for approval in accordance with the requirements of any planning obligation;
- Ensure that monitoring is undertaken in accordance with the requirements of the TP and provided to ESCC;
- To market the TP to encourage interest and involvement of residents;
- To maintain a good level of knowledge of sustainable travel opportunities in the vicinity of the site, so as to provide a basic personal journey planning service for residents, i.e. how to access schools, workplaces and local facilities by non-car modes; and
- To provide monitoring feedback to residents as necessary.

SECTION 6 Measures

6.1.1 This section of the FTP describes the non-infrastructure or 'soft' TP measures that will be developed and promoted for the residents of the new development. It covers:

- Measures to encourage new residents to walk and cycle;
- Measures to encourage the use of public transport;
- Information provision;
- A new resident's travel pack; and
- Membership of the car club.

6.2 Promotion of Walking and Cycling

6.2.1 The development will be designed to facilitate walking and cycling, in particular for local journeys to key destinations and that all dwellings will be provided with cycle parking in line with local parking standards at the time. Information on the local walking and cycling routes as well as cycle journey planning resources will be made available to new residents through the resident's travel information pack.

6.2.2 The TPC will promote 'Bikeability' cycle training courses to residents. In addition, the TPC will publicise national and local initiatives, such as 'Bike Week', to encourage residents to participate in such events and the uptake of cycling.

6.3 Promotion of Public Transport

6.3.1 Information on the public transport routes and facilities in the vicinity of the site will be made available to new residents through the residents' travel information pack and during the sales process.

6.3.2 The frequent and direct bus and rail services to key destinations will be emphasised, and any literature, including the travel information pack, will emphasise the good walking, cycling and bus links.

6.3.3 The residents travel information pack will advertise ESCC's travel website which includes local bus route timetables and maps.

6.4 Information Provision

6.4.1 New residents will be provided with the travel information set out above during the purchase of their property. The initial sales pack will include a leaflet about the sustainability credentials of the development and sales staff will be trained in personal journey planning in order that this service can be offered to new residents shortly after completion of their purchase.

6.5 Resident's Travel Information Pack

6.5.1 The first occupier of each household will be provided with a residents' travel information pack. The pack will pull together information on the above listed measures and contain information about the objectives of the TP, non-car mode travel options and provide a range of incentives to encourage use of non-car modes of transport. It is proposed that the following items will be included in the resident's travel information pack:

- Details regarding the provision of broadband access to enable easy access to local home delivery services and home working;
- An information leaflet about the TP, its aims and objectives, how to get involved and how travel will be monitored;
- Information about the Facebook (or other social networking site) Travel Plan group;
- A plan of the new development, highlighting local facilities and the nearby key destinations, the walking and cycling routes to these, locations of public cycle parking within the development, and the location of nearby bus stops;
- Information about opportunities to travel to local schools in the vicinity of the site by sustainable modes, including details of any local school Travel Plans and Safer Routes to School schemes run by ESCC;
- Travel Plan mapping leaflets showing location of key services and facilities and walking / cycling time isochrones and "number of steps" to demonstrate to residents how long it will take to walk or cycle to these destinations;
- Details of cycle training schemes;
- Bus and rail maps and timetable information, including information about journey planning services, e.g. www.nationalrail.co.uk;
- Details of local multi-modal bus and rail ticketing;

- Information and details to residents on the on-site and local car clubs and the benefits;
- Information about the home delivery services offered by local supermarkets and potentially a voucher for free home delivery on first use; and
- The offer of personalised travel planning for all new residents.

6.5.2 A Facebook (or other social networking site) group will also be set up to enable the dissemination of the information above. It will provide an interactive travel planning resource; for example, residents will be able to discuss TP matters in an open forum. It could also be used to enable residents to post their own helpful information, advice and tips and it is envisaged that this will continue as a functioning page indefinitely.

SECTION 7 Targets

7.1 Overview

7.1.1 Targets are the measurable goals against which the progress of the TP can be assessed. Best practice guidance places an emphasis on targets being 'SMART', that is: Specific, Measurable, Achievable, Realistic and Time Bound. Targets should be linked to TP objectives. Indicators are linked to the targets for the purpose of monitoring.

7.1.2 The overall objectives of the TP will be developed from this FTP. The objectives seek to encourage residents, and visitors to the proposed development to use the most sustainable modes of travel. In doing so the TP should achieve the following:

- Minimise the impact and frequency of car travel, particularly single occupancy vehicle trips;
- Improve awareness of the site's accessibility to residents, and visitors;
- Improve the health and well-being of residents and visitors of the site;
- Reduce any transport impacts of the development on the local community and environment; and
- Ensure that all residents, and visitors are aware of the TP.

7.2 Interim Target 1 – Reducing Single Occupancy Vehicle Trips

7.2.1 As set out previously, and in the supporting TA, the development is supported by, and will proportionally fund, the HPEMAC scheme which will provide an attractive bus, cycle, and walking corridor along the Eastbourne Road. The TA assesses a 2030 assessment year (i.e. nine years from submission), by which time it is calculated that there will be a ten percentage points reduction in car driver trips from residential occupiers. This would be a reduction from a 75% car driver mode share to a 65% mode share as a result of a shift to the committing enhancements. This is real terms reduction in circa 13 two-way vehicular movements at the site access.

7.3 Interim Target 2 – Increasing the Proportion of Sustainable Mode Trips

7.3.1 To reflect the reduction in car trips, there would be a five percentage points increase in bus patronage numbers, and a combined five percentage points increase in walking and cycling trips.

7.4 Action Targets

7.4.1 In addition to the traffic generation and mode share targets, it is important to identify a number of action targets which will ensure that the commitments made by the developer, through the TP are delivered. The action targets are as follows:

- Appoint the TPC three months prior to first occupation;
- The TPC to become familiarised with the agreed monitoring process;
- The TPC to create and distribute Travel Plan Information Pack for new residents;
- Undertake travel plan monitoring and reporting to ESCC;
- Review measures to ensure that they remain appropriate; and
- Once agreed with ESCC and WDC, updates to the Travel Plan with any necessary revisions to measures.

SECTION 8 Monitoring

8.1 Travel Surveys

8.1.1 The total monitoring programme of the development will be five years from 50% occupation, as set out in ESCC's Travel Plan Guidance. After this period, it is expected that the targets of the TP should have been achieved. Monitoring of the TP will be important in understanding the changing nature of residents' travel habits and the effectiveness of the TP's measures in working towards the targets identified.

8.1.2 The first questionnaire surveys will be carried out once the development makes its 50% occupation. This will allow a sufficient number of residents to be surveyed whilst ensuring that travel habits are yet to be established. Questionnaire surveys will then be undertaken annually.

8.1.3 It is proposed that formal monitoring will be undertaken in line with the TRICS Standard Assessment Methodology (SAM). The TPC will supply ESCC with observed statistical data showing how the residents travel to the development and details of the measures employed to encourage sustainable travel. Questionnaire surveys will also be used to determine the effectiveness of the Travel Plan measures, and enable residents to remain involved in the TP process.

8.1.4 The first TRICS SAM survey will be carried out one year after the 50% occupation. This will ensure that the survey captures information about an established critical mass of residents, and will allow time for the measures contained within the Travel Plan to take effect. Subsequent TRICS SAM surveys will be undertaken again at Years 3 and 5.

8.1.5 The results of the traffic surveys and the analysis will be included in an updated TP, with the TP targets revised or updated accordingly. The results of these surveys and statistical analysis will form the basis of discussions with the local planning and highway authority to examine how the TP is continuing to influence travel behaviour and to discuss alternative measures that could be incorporated within the plan to achieve further success.

8.1.6 The TPC will monitor and review the progress and success of the TP and make all users aware of the progress made and the effectiveness of the sustainable travel solutions. The review will involve the local planning authority as well as the TPC. The use of newsletters distributed to all

users will assist in informing users of any new measures and give them an understanding of how the Travel Plan is operating.

8.2 Remedial Measures

8.2.1 Following each monitoring event, a review of the measures contained within the TP and their contribution towards achieving the targets will be undertaken. The targets themselves will also be reviewed having regard to changing travel patterns and characteristics.

8.2.2 Where it is agreed the targets are not being achieved or are no longer appropriate, revised measures will be identified to focus towards achieving revised or amended targets. The Applicant will use reasonable endeavours to work with ESCC to identify a strategy and to agree further reasonable actions to achieve success.

SECTION 9 Enforcement

9.1.1 Should the TP targets not be met by the end of the monitoring period outlined above, the developer will use reasonable endeavours to work with ESCC to identify a strategy and to agree further reasonable actions to get the TP back on track. The Final TP will include details of potential remedial measures should the targets not be met.

9.1.2 The proposed sustainable transport strategy and all of the associated measures will provide a genuine opportunity for the 10% traffic reduction / mode shift to be achieved.

FIGURE

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Appendix 6: Further information from i-transport regarding modelled AADT growth on major roads within 200m of the boundaries of Lewes Downs SAC, Ashdown Forest SAC and Ashdown Forest SPA.

Chris Walsh

From: Melanie Dobson <[redacted]>
Sent: 29 January 2021 16:23
To: Chris Walsh <[redacted]>
Cc: Parker, Harry <[redacted]>; Alston, Ben <[redacted]>; Neil Marshall <[redacted]>
Subject: Eastbourne Road, Willngdon - Proposed Development AADT

Hi Chris

Hope you are well and having a good week.

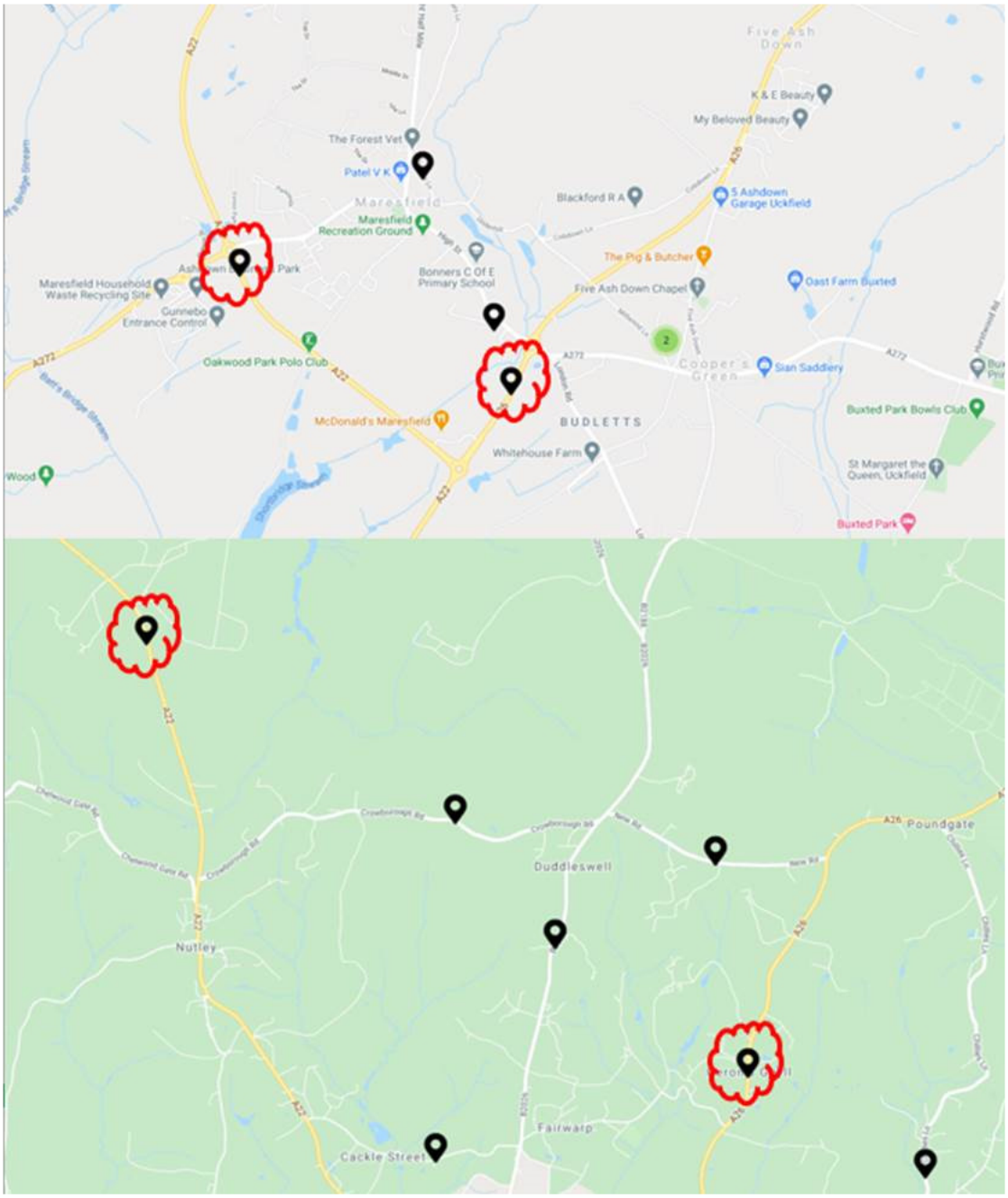
Further to our meeting last week, we have calculated our proposed development AADT and undertaken our distribution and assignment assessment. We estimate that the proposal will generate the following:

- 5% of traffic routing north on the A22 (north of Maresfield); and
- 6% of traffic routing north on the A22 then then A26 (north of Maresfield).

Based on our proposed AADT of 2,169, this equates to:

- 109 vehicles on the A22; and
- 130 vehicles on the A22 and then the A26.

In terms of baseline traffic data on these links, our traffic data from ESCC did not include these links, but the DfT have some AADT counters on the A22 and A26, both within the vicinity of Maresfield and to the north of Maresfield – see extract below:



https://roadtraffic.dft.gov.uk/#14/51.0351/0.0401/basemap-countpoints

Our assumptions in this assessment are set out below:

- A distribution assessment based on a combination of local Census journey to work data and a 30 minute gravity model
- Proposed residential units = 180 units;
- Proposed medical centre = 1,900 sqm
- The peak hour trip generation for the residential units has been factored using a factor derived from the DtT's "Motor vehicle traffic distribution by time of day and day of the week on all roads" 2019 table
- It is assumed for the medical centre that:
    - It is open 6 days a week
    - Daily opening time are 0700-1900.

I hope this helps and is what your require at this stage, however please let me know if you have any queries or need anything else.

Hope you have a nice weekend also.

Kind regards
Mel

Melanie Dobson
Principal Consultant
for i-Transport LLP

T: [redacted]
M: [redacted]
E: [redacted]
W: www.i-transport.co.uk

London Office: 85 Gresham Street, London, EC2V 7NQ

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Please note my new mobile number.

Coronavirus will not stop us working. Please continue to email or call us if you need assistance.

Chris Walsh

From: Melanie Dobson <[redacted]>
Sent: 03 February 2021 14:18
To: Chris Walsh <[redacted]>
Cc: Hannah Train <[redacted]>; Neil Marshall <[redacted]>
Subject: RE: Eastbourne Road, Willngdon - Proposed Development AADT

Hi Chris

Thanks for your email and apologies for the delay in getting back to you.

In terms of our distribution assessment we do not anticipate that any vehicles will route along the A275 or B2026, with our distribution assumptions assuming trips will be distributed along the primary strategic network. Please note we are not using a strategic model but undertaking a manual distribution assessment based on Census data, a gravity model and the Google Maps journey planner tool, which has been agreed with ESCC Highways.

In reality, and probably likely if we were using a strategic model, some trips would route along these roads but the number would be well within the daily variations of traffic and not of a magnitude we would consider testing.

In terms of the future growth, this is something we are still working on. For our growth assumptions we will be using TEMPRO as well as adding on the Mornings Mill Farm development traffic. We can aim to get you the future with, and without development, AADT flows for the DfT counts highlighted in my email on Friday next week.

I hope this makes sense, however please let me know if you have any queries or wish to discuss.

Kind regards
Mel

Melanie Dobson
Principal Consultant
for i-Transport LLP

T: [redacted]
M: [redacted]
E: [redacted] **W:** www.i-transport.co.uk

London Office: 85 Gresham Street, London, EC2V 7NQ

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Please note my new mobile number.

Coronavirus will not stop us working. Please continue to email or call us if you need assistance.

Chris Walsh

From: Melanie Dobson <[redacted]>
Sent: 02 March 2021 09:54
To: Chris Walsh <[redacted]>
Cc: Hannah Train <[redacted]>; Neil Marshall <[redacted]>
Subject: RE: Eastbourne Road, Willngdon - Proposed Development AADT

Hi Chris

Thanks for your time on the phone yesterday.

We have calculated the anticipated number of AADT development trips, and those generated by the committed developments, estimated to route along the A22/ A26 in the future year which is set out below:

- A22 (north of Maresfield) = 572 AADT
- A26 (north of Maresfield) = 687 AADT

The figures above are based on the following:

- Our proposed development;
- Mornings Mill Farm development (assuming the full 700 units); and
- Brodericklands Farm development (440 units).

As previously noted, we do not anticipate any AADT from the development distributing along the A275 or B2026. Further, with regard to the Lewes Down SAC, our distribution model does not distribute any vehicles along the A26 or the B2192 within the Lewes Down SAC vicinity.

I hope this helps and please let me know if you need anything else or have any queries.

Kind regards
Mel

Melanie Dobson
Principal Consultant
for i-Transport LLP

T: [redacted]
M: [redacted]
E: [redacted] **W:** www.i-transport.co.uk

London Office: 85 Gresham Street, London, EC2V 7NQ

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Please note my new mobile number.

Coronavirus will not stop us working. Please continue to email or call us if you need assistance.

Appendix 7: Southern Water - Wastewater Position Statement Hailsham North and Hailsham South Wastewater Treatment Works – (September 2018)

Southern Water - Wastewater Position Statement Hailsham North and Hailsham South Wastewater Treatment Works - September 2018

Summary

1.1 Hailsham North and Hailsham South WTWs discharge treated effluent into the Pevensey Levels, a sensitive natural environment afforded protection by European and National legislation. During the preparation of Wealden's Core Strategy (adopted February 2013) it became apparent that additional discharges into the Pevensey Levels might be constrained and so a commitment was made to limit growth until an acceptable solution for treating wastewater had been identified. Southern Water has considered various options and based on current information has concluded that the preferred solution is the provision of a high rate secondary treatment process at both WTWs in order to overcome this environmental constraint.

Introduction

2.1 Southern Water owns and operates Hailsham North and Hailsham South Wastewater Treatment Works (WTWs). Both WTWs discharge treated effluent to the Pevensey Levels, a sensitive natural environment protected by National and European Legislation. The WTWs operate in accordance with Environmental Permits set by the Environment Agency so that water quality objectives are protected.

2.2. During the preparation of Wealden's Core Strategy (adopted February 2013), it was identified that there was capacity available at both WTWs but their ability to accommodate future growth beyond the existing headroom would be limited due to the environmental impact of additional treated effluent on the Pevensey Levels. The evidence was considered by the Planning Inspector who concluded in his report '…there is sufficient uncertainty over the deliverability of development beyond the headroom level for the CS not to commit at this stage to further housing in south Wealden….'. He recommended a main modification to review the Core Strategy by 2015.

2.3. Accordingly, policy WCS1 (Provision of Homes and Jobs 2006-2027) of the adopted Core Strategy requires that the strategy for homes and jobs 'shall be reviewed in 2015 or when a preferred solution to the capacity issues associated with Hailsham North and Hailsham South Wastewater Treatment Works has been identified, whichever is the earlier, in order to ensure that there is an adequate supply of development land in the longer term. The review shall include an assessment of current and future levels of need and demand for housing to provide an appropriate basis for longer term housing provision'.

2.4. Southern Water has investigated possible solutions to deliver additional wastewater treatment capacity in south Wealden to accommodate growth beyond the existing combined headroom at Hailsham North and South WTWs. This position statement sets out background information, summarises

the possible options and identifies the preferred solution based on the best information currently available.

Pevensey Levels

3.1 Hailsham South and Hailsham North Wastewater Treatment Works (WTWs) discharge treated effluent into the Pevensey Levels. The Pevensey Levels are located between Eastbourne and Bexhill and comprise one of the largest and least fragmented lowland wet grassland in the UK. They are designated as a Ramsar site as well as a Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI) and part of it is a National Nature Reserve.

3.2 Paragraph 118 of the National Planning Policy Framework (NPPF) requires that Ramsar sites should be given the same protection as European sites. Therefore, in town & country planning terms, the Pevensey Levels Ramsar Site has an equivalent status to Natura 2000 sites and so afforded a high level of protection.

Wastewater treatment capacity currently available

4.1 Hailsham North WTW serves the northern part of Hailsham, Horsebridge and several outlying villages. Hailsham South WTW serves the majority of Hailsham itself as well as Polegate and Willingdon. Both these WTWs discharge treated waste water into the Pevensey Levels, in line with Environmental Permits granted by the Environment Agency.

4.2 There is sufficient capacity at the two WTWs to serve the development set out in the adopted Wealden Core Strategy. Paragraph 6.16 of the Core Strategy states that ‘Development in Hailsham and Hellingly is constrained by the capacity of the waste water treatment works to discharge treated waste water. Of particular concern is the impact of the treated effluent on the conservation objectives of the Pevensey levels, and as a result the Environment Agency has capped the amount of effluent that can be discharged. The growth strategy reflects this constraint and therefore development will only be allowed if it can be accommodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented’. As a result, the Core Strategy limits the number of new homes in Hailsham, Polegate, Willingdon and Stone Cross to match the capacity available at the two WTWs.

Provision of additional wastewater treatment capacity

5.1 Further review and trialling of current wastewater treatment technology identified a high rate biological treatment process that is capable of meeting the requirement to achieve a high quality effluent.

5.2 Southern Water is currently undertaking the engineering design with a view to construction, commissioning and operation of the process by 2022.

5.3 Whilst continuing with the design Southern Water is working with the Environment Agency and Natural England to develop an ‘operating agreement’ to achieve the required high quality effluent from the works. The permit will recognise the achievement of a phosphorous level in the treated effluent from the sites of 0.1 mg/l. The development of an operating agreement with the Environment Agency and Natural England is well progressed and nearing completion.

5.4 In addition, to further reduce the level of phosphorous, Southern Water has undertaken investigations on the surface water sewer network serving Hailsham. This has identified a number of misconnections, where foul discharges have been mistakenly connected to the surface water system. The details of these connections have been shared with the Environmental Health team within Wealden District Council for them to pursue their removal.

Odour Control Infrastructure

6.1 Broad locations identified in the Wealden Local Plan, including land east of Hailsham as well as the consented land west of Uckfield are potentially affected by odour nuisance arising from nearby WwTW. The Wealden Local Plan seeks to allocate land outside of the areas potentially subject to odour nuisance. Any planning application associated with development within the proximity of the WwTW will need to show that it will not be subject to odour nuisance. If it is deemed that odour nuisance is relevant to any proposed development then, in order for development to proceed, schemes are required to be implemented at the works to reduce the odour to acceptable levels. It is expected that the relevant developer(s) contribute to such schemes and is implemented prior to occupation.

Appendix 8: Southern Water - Wastewater Position Statement Hailsham North and Hailsham South Wastewater Treatment Works – (December 2018)

Southern Water - Wastewater Position Statement Hailsham North and Hailsham South Wastewater Treatment Works - December 2018

Summary

1.1 The following Wastewater Position Statement has been subject to meetings and discussions with relevant stakeholders in order to assist in formulating the basis for a Statement of Common Ground on Wastewater Infrastructure issues in Hailsham, for the purposes of the Wealden Local Plan. The following organisations have signed up to this Position Statement as an accurate factual account of the position at the Hailsham North and Hailsham South Wastewater Treatment Works (WTWs):

- Wealden District Council;
- Southern Water;
- Environment Agency; and
- Natural England.

1.2 Hailsham North and Hailsham South WTWs discharge treated effluent into the Pevensey Levels, a sensitive natural environment afforded protection by European and National legislation. During the preparation of Wealden's Core Strategy (adopted February 2013) it became apparent that additional discharges into the Pevensey Levels might be constrained and so a commitment was made to limit growth until an acceptable solution for treating wastewater had been identified. Southern Water has considered various options and based on current information has concluded that the preferred solution is the provision of a high rate secondary treatment process at both WTWs in order to overcome this environmental constraint.

Introduction

2.1 Southern Water owns and operates Hailsham North and Hailsham South WTWs. Both WTWs discharge treated effluent to the Pevensey Levels, a sensitive natural environment protected by National and European Legislation. The WTWs operate in accordance with Environmental Permits set by the Environment Agency so that water quality objectives are protected.

2.2. During the preparation of Wealden's Core Strategy (adopted February 2013), it was identified that there was capacity available at both WTWs but their ability to accommodate future growth beyond the existing headroom would be limited due to the environmental impact of additional treated effluent on the Pevensey Levels. The evidence was considered by the Planning Inspector who concluded in his report '…there is sufficient uncertainty over the deliverability of development beyond the headroom level for the CS not to commit at this stage to further housing in south Wealden….'. He recommended a main modification to review the Core Strategy by 2015.

2.3. Accordingly, policy WCS1 (Provision of Homes and Jobs 2006-2027) of the adopted Core Strategy requires that the strategy for homes and jobs 'shall be reviewed in 2015 or when a preferred solution to the capacity issues associated with Hailsham North and Hailsham South Wastewater Treatment

Works has been identified, whichever is the earlier, in order to ensure that there is an adequate supply of development land in the longer term. The review shall include an assessment of current and future levels of need and demand for housing to provide an appropriate basis for longer term housing provision'.

2.4. Southern Water has investigated possible solutions to deliver additional wastewater treatment capacity in south Wealden to accommodate growth beyond the existing combined headroom at Hailsham North and South WTWs. This position statement sets out background information, summarises the possible options and identifies the preferred solution based on the best information currently available.

Pevensey Levels

3.1 Hailsham South and Hailsham North Wastewater Treatment Works (WTWs) discharge treated effluent into the Pevensey Levels. The Pevensey Levels are located between Eastbourne and Bexhill and comprise one of the largest and least fragmented lowland wet grassland in the UK. They are designated as a Ramsar site as well as a Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI) and part of it is a National Nature Reserve.

3.2 As a designated SAC the Pevensey Levels is afforded a high level of protection in town and country planning terms.

Wastewater treatment capacity currently available

4.1 Hailsham North WTW serves the northern part of Hailsham, Horsebridge and several outlying villages. Hailsham South WTW serves the majority of Hailsham itself as well as Polegate and Willingdon. Both these WTWs discharge treated waste water into the Pevensey Levels, in line with Environmental Permits granted by the Environment Agency.

4.2 There is sufficient capacity at the two WTWs to serve the development set out in the adopted Wealden Core Strategy. Paragraph 6.16 of the Core Strategy states that 'Development in Hailsham and Hellingly is constrained by the capacity of the waste water treatment works to discharge treated waste water. Of particular concern is the impact of the treated effluent on the conservation objectives of the Pevensey levels, and as a result the Environment Agency has capped the amount of effluent that can be discharged. The growth strategy reflects this constraint and therefore development will only be allowed if it can be accommodated by the existing works, unless an alternative location for the treatment and discharge of waste water is implemented'. As a result, the Core Strategy limits the number of new homes in Hailsham, Polegate, Willingdon and Stone Cross to match the capacity available at the two WTWs.

Provision of additional wastewater treatment capacity

5.1 Further review and trialling of current wastewater treatment technology identified a high rate biological treatment process that is capable of meeting the requirement to achieve a high quality effluent.

5.2 Southern Water is currently undertaking the engineering design with a deadline for the construction, commissioning and operation of the process by 22nd December 2021.

5.3 Whilst continuing with the design Southern Water is working with the Environment Agency and Natural England to develop an 'Operating Agreement' to achieve the required high quality effluent from the works.

5.4 The permit itself will include a numeric standard of 0.25mg/l phosphorous level as an annual average. This standard is considered as the "Technically Achievable Limit" for phosphorous with current technology, however Southern Water have committed to treat beyond this at the two Hailsham WTWs to support the protection of the Pevensey Levels. The Operating Agreement will set out the way in which Southern Water will run the works to reduce the annual average of phosphorous to 0.1mg/l at Hailsham South WTW and 0.08mg/l at Hailsham North WTW.

5.5 The development of an operating agreement with the Environment Agency and Natural England is well progressed and nearing completion. Once the permit is in place we will monitor Southern Water's progress in meeting the requirements of the Operating Agreement.

5.6 In addition, to further reduce the level of phosphorous, Southern Water has undertaken investigations on the surface water sewer network serving Hailsham. This has identified a number of misconnections, where foul discharges have been mistakenly connected to the surface water system. The details of these connections have been shared with the Environmental Health team within Wealden District Council for them to pursue their removal.

Odour Control Infrastructure

6.1 Broad locations identified in the Wealden Local Plan, including land east of Hailsham as well as the consented land west of Uckfield are potentially affected by odour nuisance arising from nearby WTWs. The Wealden Local Plan seeks to allocate land outside of the areas potentially subject to odour nuisance. Any planning application associated with development within the proximity of the WTWs will need to show that it will not be subject to odour nuisance. If it is deemed that odour nuisance is relevant to any proposed development then, in order for development to proceed, schemes are required to be implemented at the works to reduce the odour to acceptable levels. It is expected that the relevant developer(s) fund such schemes and is implemented prior to occupation.