TRANSPORT TECHNICAL NOTE

Site: Mockbeggars Farm, Uckfield

Client: Obsidian Strategic Asset Management

Prepared by: DHA, Eclipse House, Eclipse Park, Sittingbourne Road, Maidstone, ME14 3EN

Date: November 2022

1.1 Introduction

1.1.1 This Transport Technical Note has been produced to provide a response to the latest email comments made by East Sussex County Council (ESCC) on 4th November 2022 to Planning Application Reference: WD/2022/0648/MAO. The application relates to the development of 60 residential dwellings at Mockbeggars Farm, Uckfield. Please see attached the relevant email correspondence at **Appendix A** for reference.

1.2 Review of Comments

1.2.1 In their email ESCC has stated that:

> "the proposals given to widen the footway and narrow the carriageway has been flagged up by the auditor and the Road Safety Team".

1.2.2 It is then further noted that:

> *"the scheme to narrow the carriageway and widen the footways creates other significant highway safety problems"*

1.2.3 DHA would strongly disagree with the above points. With regard to the location in question the only recommendation raised within the independent Stage 1 Road Safety Audit (RSA), as attached at **Appendix B,** reads *"the carriageway should not be narrowed to less than 6.4m when bordered by a narrow footway".*

1.2.4 As can be seen by the proposed highway improvements plan attached at **Appendix C**, at no point does the carriageway width in the location in question narrow below 6.4m. This point was confirmed within the Designers Response to the RSA, which is also attached at **Appendix C** for reference.

1.2.5 In addition to the above the proposals to widen the footway in this location allow for a footway which does not reduce below 1.8m in width, a width which is considered to be acceptable with respect to Manual for Streets.

1.2.6 DHA acknowledges the point raised in the telephone call with ESCC which followed the delivery of the email at **Appendix A**, regarding the overgrown hedge within the area in question. However, as noted on the telephone call the hedge could be trimmed back to prevent it from oversailing the highway, as per that set out in the Designers Response.

1.2.7 ESCC has also stated in their email at **Appendix A** that:

> *"The lack of enforcement is also an issue (DYLs), in terms of keeping the footway clear- due to the restricted width. Physical measures (such as bollards to prevent parking) would only lead to obstruction of the footway"*

1.2.7 and

> *"Imposing DYLs would require a TRO which is likely to receive objection from local residents".*

1.2.8 To be clear *"DYLs"* are read as double yellow lines. Again, DHA disagrees with the above comments. As shown in the plan at **Appendix C**, and as noted above, the minimum footway width following the proposed improvements is 1.8m. This is a sufficient width to provide bollards if this is felt to be a necessary measure, albeit this point was not raised within the RSA.

1.2.9 The Traffic Regulation Order (TRO) would go through the standard process of consultation. However, from earlier site visits DHA can confirm that only a limited number of individuals currently park in this location, meaning that objections are likely to be minimal. Indeed, the removal of inappropriate parking on an existing footway should be seen as a betterment in any regard.

1.2.10 ESCC has also noted the following in the email at **Appendix A**:

> *"The Passenger Transport team would support the lay-by having a bus cage to secure the provision of a bus being able to access the kerbside."*

1.2.11 This point is noted and accepted.

1.3 Conclusion

1.3.1 Given the above, and contrary to that set out in the email correspondence attached at **Appendix A**, DHA asserts that the site does provide the opportunity to promote alternative modes of transport as per that set out with in the NPPF. The site would be accessible both on foot and by bus, along with other modes as well. There would be the opportunity to promote sustainable modes of travel through a Travel Plan.

1.3.2 Therefore, there is no sound transport grounds on which an objection should be raised against the proposed scheme.

APPENDIX
A



planning transport design environment infrastructure land

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From: Kal Kamboh <Kal.Kamboh@eastsussex.gov.uk>
Sent: 04 November 2022 15:34
To: Paul Lulham <paul.lulham@dhatransport.co.uk>; Simon Moon <simon.moon@dhatransport.co.uk>
Subject: FW: WD220648 - MOCKBEGGAR

[External email - This message originated from outside DHA – prior to opening any attachments or opening links, please ensure their authenticity with the sender]
I understand that James has left and asked for correspondence to be directed to you. Please see below.

Regards

Ms Kal Kamboh
Strategic Sites Transport Advisor
Transport Development Control
Communities, Economy and Transport

01273 482287|07701394 524
eastsussex.gov.uk

From: Kal Kamboh
Sent: 04 November 2022 15:32
To: James Lehane <james.lehane@dhatransport.co.uk>
Cc: 'Matthew Taylor' <Matthew.Taylor@wealden.gov.uk>
Subject: RE: WD220648 - MOCKBEGGAR

Dear James,
I have now heard back from the Road Safety Team and there remains concerns at the pinch point at Ringles Cross. The proposals given to widen the footway and narrow the carriageway has been flagged up by the auditor and the Road Safety Team comments are in agreement.

"The footways on both sides of the road here are well below absolute minimum widths. The RSA raises a valid point. The lack of enforcement is also an issue (DYLs), in terms of keeping the footway clear- due to the restricted width. Physical measures (such as bollards to prevent parking) would only lead to obstruction of the footway, resulting in pedestrians stepping out into the carriageway."

From these comments, the scheme to narrow the carriageway and widen the footways creates other significant highway safety problems. Imposing DYLs would require a TRO which is likely to receive objection from local residents, which I have already indicated during our discussions.

The Passenger Transport team would support the lay-by having a bus cage to secure the provision of a bus being able to access the kerbside.

I have now carried out the required consultations for this site and the responses are quite clear now that with the arrangement proposed, the development cannot be supported by highways as sustainable travel modes are not supportable.

As such, I intend to formalise my highway objection and issue to the LPA. Paragraphs 110-113 of the NPPF are key considerations and accessibility for all users cannot be met, nor could targets within travel plan be deemed to be achievable with poor connections. However, I will wait until close of Monday next week to hear from you before I close this case. Please note that any further revisions to this application would need to be through the planning process, by consultation by the LPA.

You may wish to discuss with the planning case officer next steps.

Regards

Ms Kal Kamboh
Strategic Sites Transport Advisor
Transport Development Control
Communities, Economy and Transport

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From: James Lehane <james.lehane@dhatransport.co.uk>
Sent: 18 October 2022 08:59
To: Kal Kamboh <kal.kamboh@eastsussex.gov.uk>
Subject: RE: WD220648 - MOCKBEGGAR

Hi Kal,

Please see the attached RSA1. We are currently completing the Designer's Response, however we are happy to agree to the recommendations provided.

APPENDIX
B



Road Safety Audit Stage 1

Mockbeggars Farm, Uckfield Highway Works

Client: DHA Transport

Road Safety Answers reference no: RSA591

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Control Sheet

	Name	Date	Signature
Author	Paul Martin	13/10/2022	
Checker	David Dodd	13/10/2022	
Authoriser	Paul Martin	13/10/2022	

Report Version

RSA Report Ref.	Version	Date of Issue
RSA591	Final	13/10/2022

1. Introduction

1.1 This report describes a Stage 1 Road Safety Audit carried out on the preliminary design for highway works in association with the Mockbeggars Farm development, for DHA Transport at the request of the overseeing organisation, East Sussex County Council. The audit was carried out in the office of Road Safety Answers Ltd during October 2022.

1.2 The audit team members were as follows:

Team Leader
Paul Martin - BSc (Hons), CEng, FCIHT, FSoRSA, IEng, MICE
HE Approved RSA Certificate of Competency (2013)
Director, Road Safety Answers Ltd

Team Member
David Dodd – BSc(Hons), DipNEBOSH, FIHE, IEng. MCIHT, MSoRSA
Independent Highway and Road Safety Consultant

1.3 The audit comprised an examination of the documents listed in **Appendix A,** and included the drawings supplied by James Marsh of DHA Transport. The site was visited by the Audit Team, together, on 13th October 2022 between 10.45 and 11.25 hours. The weather was occasional light rain and the road surface was wet. Traffic flows were light to moderate on London Road. Cycle and pedestrian flows were very light.

1.4 The terms of reference of the audit are as described in the UK's national standard for road safety audit, GG 119 (revision 2). The team has examined and reported only on the road safety implications of the scheme as presented and has not examined or verified the compliance of the design to any other criteria.

1.5 All the problems described in this report are considered by the audit team to require action to improve the safety of the scheme and minimise accident occurrence. A plan showing the scheme and the locations of any problems found during the audit is shown in **Appendix B**.

1.6 The purpose of the scheme is to provide an uncontrolled pedestrian crossing and bus stops on London Road, Uckfield to assist the general public and pedestrians travelling to and from the Mockbeggars Farm development.

1.7 The proposed works consist of the following elements:

- A priority junction onto the eastern side of London Road, within the national speed limit, approximately 150m north of the 40mph zone;
- The priority junction to have visibility splays of 171m south x 2.4m x 215m north although, in reality, the visibility southwards will be far greater to oncoming vehicles;
- The priority junction to have 8m shoulder radii and serving a 5.5m wide access road with a footway on its southern side;
- The footway leaving the development to continue around the southern shoulder of the junction to a point 55m south of the tangent point with London Road;
- An uncontrolled pedestrian crossing point, with a 1.8m wide pedestrian refuge, dropped kerbs and tactile paving on either side of London Road, 12m south of the southern shoulder of the development junction;
- A southbound bus stop on the east side of London Road at the southern end of the new footway;
- A northbound bus stop in the existing lay-by approximately 120m north of the northern shoulder of the development junction;
- Lengthening of the 40mph speed limit northwards to include the development junction;
- Widening of the footway on the western side of London Road outside the houses to the north of The Ringles Cross public house, leaving a carriageway width of between 6m and 6.7m;
- A short length (circa 6.5m) of 'No waiting at any time' double yellow line restrictions alongside the widened footway, outside the most northerly property on the west side of London Road

1.8 No details of street lighting, surface water drainage or advanced signing have been provided. These issues are not, therefore, considered further in this report, unless these existing facilities, or a lack of them, are likely to engender a safety problem with the new proposals.

2. Items resulting from previous road safety audits

2.1 A previous stage 1 road safety audit was carried out by Road Safety Answers Ltd (report ref. RSA499) in December 2021 on part of these proposals, the development access (same width, shoulder radii and visibility splays), a shorter length of footway, and an uncontrolled pedestrian crossing without a central refuge. It found three safety related problems:

Problem 1: a risk of high severity side impact collisions due to the existing national speed limit to the north. This risk has been mitigated by extending the 40mph speed limit to include the development junction and, therefore, no longer appears in this audit report.

Problem 2: a risk of vehicle/pedestrian collisions on the proposed uncontrolled crossing as it was located too close the development junction. This risk has been mitigated by locating the crossing further away from the development junction and, therefore, no longer appears in this audit report.

Problem 3: a risk of side impact collisions if side road vehicles unintentionally roll onto London Road due to the steep downhill gradient of the existing land. There is nothing on the current drawing to say this will be mitigated so this problem is repeated in this audit report (see problem 3.1).

3. Items resulting from this Stage 1 Audit

3.1 PROBLEM

Location: A – The access road approach to London Road.

Summary: Risk of side impact collisions if side road vehicles unintentionally roll onto London Road.

The development land is some 2m higher than London Road. If the gradient of the access road is too steep approaching the give way lines, an exiting vehicle may unintentionally roll onto London Road whilst waiting to manoeuvre, increasing the risk of side impact collisions.

RECOMMENDATION

A relatively flat dwell area should be designed into the access road near the give way lines.

Design Team Response:

Client Officer Response:

3.2 PROBLEM

Location: B – The lay-by for the northbound bus stop on London Road.

Summary: Risk of pedestrian trips and falls if passengers cannot alight onto the footway due to parked vehicles in the lay-by.

The existing lay-by appears to be well used by people from local residences and businesses, or their visitors (photo 1). This increases the likelihood of the bus not being able to alight passengers onto the footway, increasing their risk of trips and falls due to the greater step down from the bus.



Photo 1: Well used lay-by to be used as the northbound bus stop

RECOMMENDATION

A bus stop clearway should be installed in the lay-by for the bus stop.

Design Team Response:

Client Officer Response:

3.3 PROBLEM

Location: C – The narrowed carriageway at the footway widening.

Summary: Risk of wing mirrors of opposing lorries colliding, and risk of pedestrians being struck by van wing mirrors.

London Road is a main distributor road linking Uckfield High Street to the A26 leading to Crowborough and Tunbridge Wells to the north. It will, therefore, experience a relatively high level of two-way heavy goods vehicle flow. With a proposed carriageway width of only 6m the risk of collisions between the wing mirrors of opposing lorries increases. Furthermore, as the eastern footway is very narrow, circa 1m at its widest, and significantly narrower where the hedge has been allowed to grow over the footway (photo 2), the risk of a pedestrian exiting the pedestrian gap from the properties on the corner of London Road and Coopers Green Road (photo 3) and being hit by the wing mirror of a southbound van trying to avoid an oncoming wide lorry becomes significant.



Photo 2: Looking south on London Road opposite the private lane junction



Photo 3: Gap from the properties opposite Ringles Cross cottages

RECOMMENDATION

The carriageway should not be narrowed to less than 6.4m[1] when bordered by a narrow footway.

Design Team Response:

Client Officer Response:

[1] Pedestrians have been struck by wing mirrors of vans (avoiding opposing lorries) on the A25 in Borough Green, Kent where the carriageway is 6.25m in width

4. Audit Team Statement

We certify that this road safety audit has been carried out in accordance with GG 119 (revision 2), with the exception that Designer and Highway Authority response sections have been added to each problem, and a signing off chapter added for the convenience of both parties.

Audit Team Leader

Paul Martin - BSc (Hons), CEng, FCIHT, FSoRSA, IEng, MICE
HE Approved RSA Certificate of Competency
Director, Road Safety Answers Ltd

Signed

Date 13/10/2022

Audit Team Member

David Dodd – BSc(Hons), DipNEBOSH, FIHE, IEng. MCIHT, MSoRSA
Independent Highway and Road Safety Consultant

Signed

Date 13/10/2022

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5. Design Team and Overseeing Organisation Statements

Design Team Leader

I certify that I have reviewed the items raised in this Stage 1 Safety Audit report. I have given due consideration to each issue raised and have stated my proposed course of action for each in this report. I seek the Overseeing Organisation's endorsement of my proposals.

Name:

Organisation:

Signed:

Date:

Overseeing Organisation (Highway Authority) Project Manager

I certify that I have reviewed the comments and actions proposed by the Design Team Leader and, in this report, I have stated my agreement, or alternative proposal, or acceptance of the risk associated with the problem.

Name:

Organisation:

Signed:

Date:

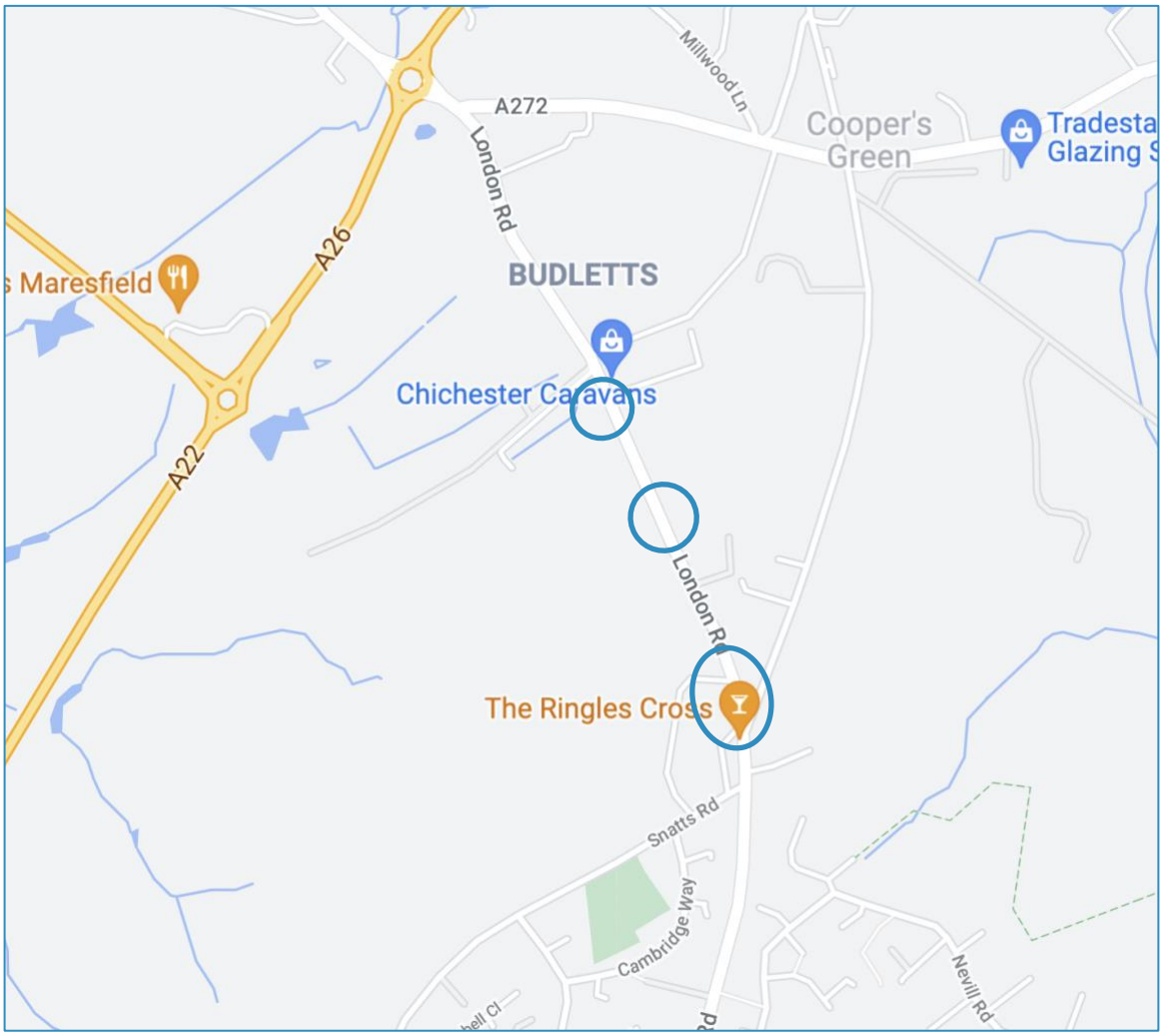
Appendix A

Drawings and Documents Examined:

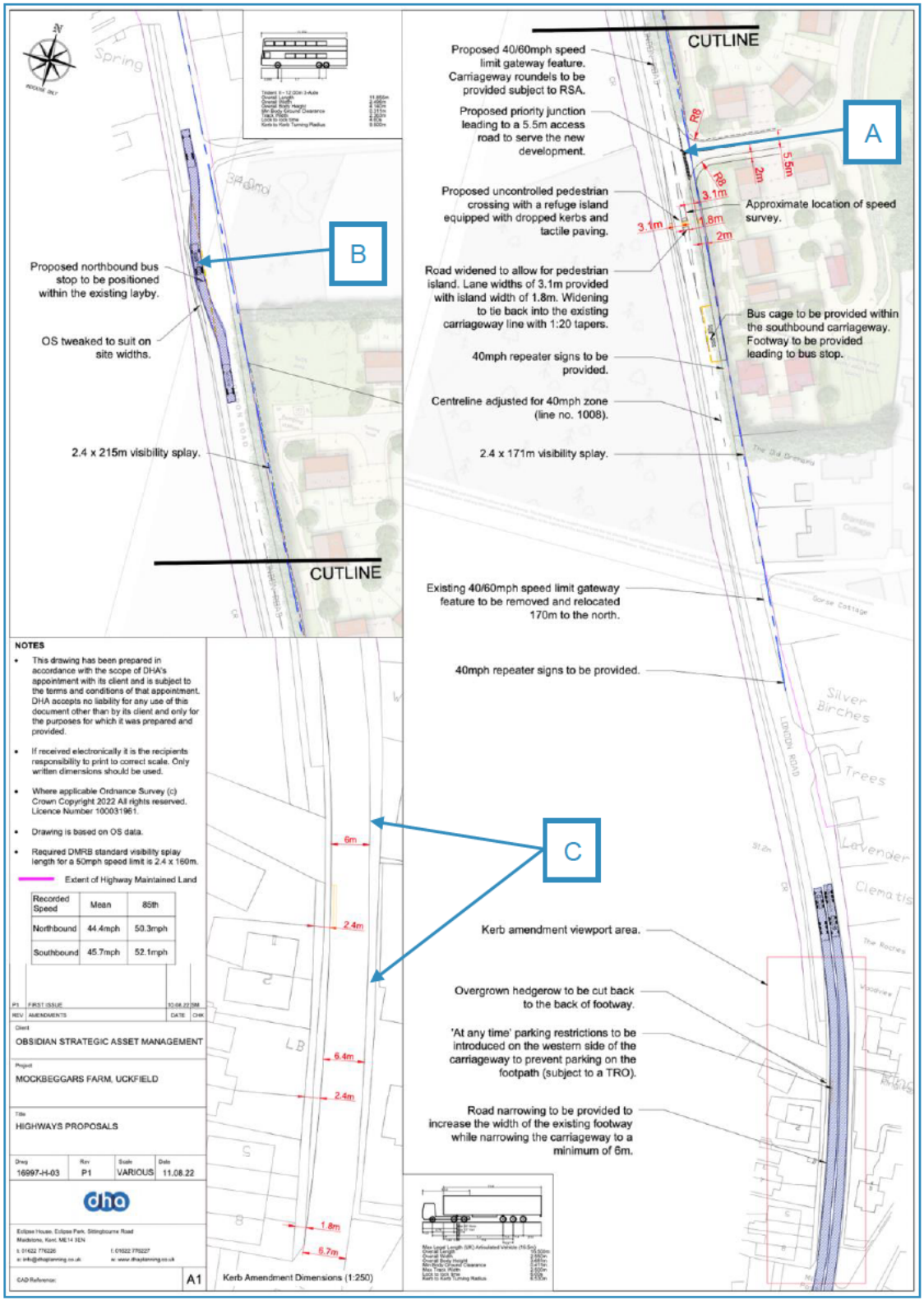
- 16997-H-03 Rev. P1 Mockbeggars Farm, Uckfield Highway Proposals

Appendix B

The following plan shows the location of the scheme



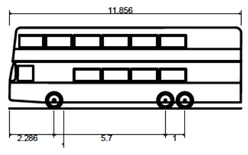
Problems Location Plan



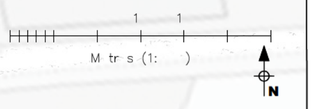
APPENDIX
C







Trident II - 12.00m 3-Axle	
Overall Length	11.856m
Overall Width	2.496m
Overall Body Height	4.140m
Min Body Ground Clearance	0.311m
Track Width	2.363m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	9.500m



Proposed northbound bus stop to be positioned within the existing layby. Bus stop markings and clearway to be provided along widht

OS tweaked to suit on site widths.

2.4 x 215m visibility splay.

CUTLINE

Proposed 40/60mph speed limit gateway feature. Carriageway roundels to be provided subject to RSA.

Proposed priority junction leading to a 5.5m access road to serve the new development.

Proposed uncontrolled pedestrian crossing with a refuge island equipped with dropped kerbs and tactile paving.

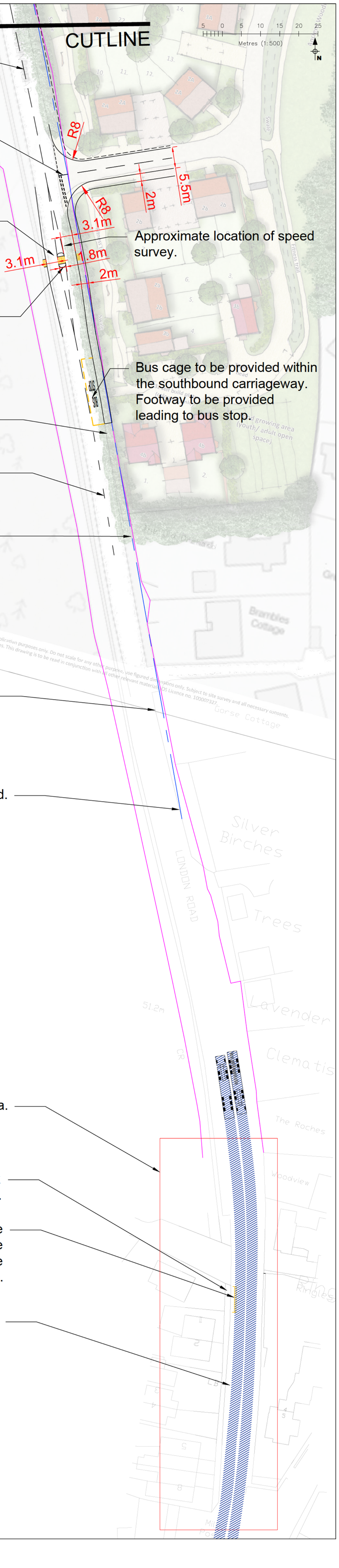
Road widened to allow for pedestrian island. Lane widths of 3.1m provided with island width of 1.8m. Widening to tie back into the existing carriageway line with 1:20 tapers.

40mph repeater signs to be provided.

Centreline adjusted for 40mph zone (line no. 1008).

2.4 x 171m visibility splay.

Existing 40/60mph speed limit gateway feature to be removed and relocated 170m to the north.



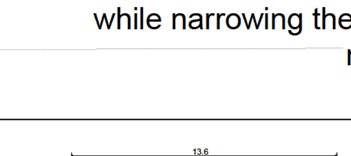
40mph repeater signs to be provided.

Kerb amendment viewport area.

Overgrown hedgerow to be cut back to the back of footway.

'At any time' parking restrictions to be introduced on the western side of the carriageway to prevent parking on the footpath (subject to a TRO).

Road narrowing to be provided to increase the width of the existing footway while narrowing the carriageway to a minimum of 6.4m.



Max Legal Length (UK) Articulated Vehicle (16.5m)	
Overall Length	16.500m
Overall Width	2.550m
Overall Body Height	3.681m
Min Body Ground Clearance	0.411m
Max Track Width	2.500m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	6.530m

NOTES

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- Drawing is based on OS data.
- Required DMRB standard visibility splay length for a 50mph speed limit is 2.4 x 160m.

Extent of Highway Maintained Land

Recorded Speed	Mean	85th
Northbound	44.4mph	50.3mph
Southbound	45.7mph	52.1mph

REV	AMENDMENTS	DATE	CHK
P2	ROAD SAFETY AUDIT	19.10.22	SM
P1	FIRST ISSUE	10.08.22	SM

Client: OBSIDIAN STRATEGIC ASSET MANAGEMENT

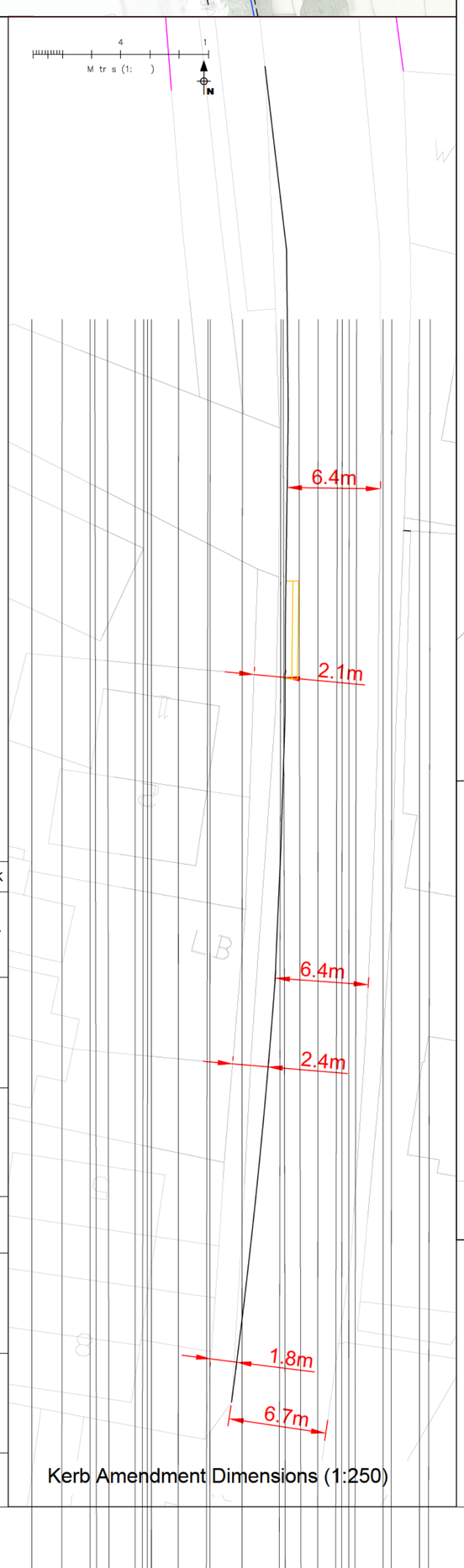
Project: MOCKBEGGARS FARM, UCKFIELD

Title: HIGHWAYS PROPOSALS

Drwg	Rev	Scale	Date
16997-H-03	P1	VARIOUS	19.10.22

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CAD Reference: A1



Kerb Amendment Dimensions (1:250)

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Project Details Mockbeggars Farm, Uckfield

Date – 18/10/22

Consultant/Design Engineer – DHA

Contact – James Marsh 01622 776226

Road Safety Audit Stage 1
This response is to the issues raised in the Stage 1 RSA report, prepared by Road Safety Answers and dated 13th October 2022. The RSA references is RSA591

Authorisation sheet

Prepared by:	
Name:	**James Marsh**
Position	**Senior Transport Technician**
Signed:	
Organisation	**DHA**
Date:	**18/10/2022**
Approved by:	
Name:	**Simon Moon**
Position	**Director**
Signed:	
Organisation:	**DHA**
Date:	**18/10/2022**

Introduction

The scheme at Mockbeggars Farm, Uckfield comprises the development of up to 60 dwellings. This Stage 1 Road Safety Audit was prepared by Road Safety Answers Ltd on 8th December 2021 and was updated on 5th April 2022 to assess the proposed site access. This Designer's Response was produced by James Marsh of DHA, approved by Chris Smoker of DHA and reviewed by the overseeing organisation of East Sussex County Council.

Item Number	RSA Issue	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
3.1	**Location**: A – The access road approach to London Road. **Summary**: Risk of side impact collisions if side road vehicles unintentionally roll onto London Road. The development land is some 2m higher than London Road. If the gradient of the access road is too steep approaching the give way lines, an exiting vehicle may unintentionally roll onto London Road whilst waiting to manoeuvre, increasing the risk of side impact collisions.	A relatively flat dwell area should be designed into the access road near the give way lines.	**Agreed.** Gradients will be reviewed at the detailed design phase, where an ideal gradient of 1:25 will be provided for the first stretch into the development, providing a dwell area.		
3.2	**Location**: B – The lay-by for the northbound bus stop on London Road. **Summary**: Risk of pedestrian trips and falls if passengers cannot alight onto the footway due to parked vehicles in the lay-by.	A bus stop clearway should be installed in the lay-by for the bus stop.	**Agreed.** The bus layby will be provided with a clearway as shown on the revised drawing 16997-H-01 Rev P2. Appropriate signage will be provided to enforce the parking restriction.		

Item Number	RSA Issue	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
	The existing lay-by appears to be well used by people from local residences and businesses, or their visitors (photo 1). This increases the likelihood of the bus not being able to alight passengers onto the footway, increasing their risk of trips and falls due to the greater step down from the bus.				
3.3	**Location**: C – The narrowed carriageway at the footway widening. **Summary**: Risk of wing mirrors of opposing lorries colliding, and risk of pedestrians being struck by van wing mirrors. London Road is a main distributor road linking Uckfield High Street to the A26 leading to Crowborough and Tunbridge Wells to the north. It will there, experience a relatively high level of two-way heavy good vehicle flow. With a proposed carriageway width of only	The carriageway should not be narrowed to less than 6.4m when bordered by a narrow footway.	**Agreed.** The narrowing has been adjusted on the revised drawing 16997-H-01 Rev P2 in order to maintain a carriageway width of 6.4m. This does provide a widening of approximately 0.5m to the footway, and the hedge referred to will be trimmed back and a maintenance scheme will be put in place.		

Item Number	RSA Issue	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
	6m, the risk of collisions between wind mirrors of opposing lorries increases. Furthermore, as the eastern footway is very narrow, circa 1m at its widest, and significantly narrower where the hedge has allowed to grow over the footway (photo 2), the risk of a pedestrian exiting the pedestrian gap from properties on the corner of London Road and Coopers Green Road (photo 3) and being hit by the wing mirror of a southbound van trying to avoid an oncoming HGV becomes significant.				

Design Organisation and Overseeing Organisation Statements

On behalf of the design organisation I certify that: **1) The RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the Overseeing organisation.**	
Name:	**James Marsh**
Signed:	
Position:	**Senior Transport Technician**
Organisation:	**DHA**
Date:	

On behalf of the overseeing organisation I certify that: **1) The RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the design organisation; and** **2) The agreed RSA actions will be progressed.**	
Name:	
Signed:	
Position:	
Organisation:	
Date:	