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Copy to: Traffic and Safety, Highway Implementation, Passenger Transport
Date: 17.02.23
Our Ref: WD/2022/0648/MAO
District/Borough Ref: WD/2022/0648/MAO

Applicant: Obsidian Strategic Asset Management Ltd

Location: LAND AT MOCKBEGGARS FARM, LONDON ROAD, UCKFIELD TN22 2EA

Development: OUTLINE APPLICATION FOR THE DEVELOPMENT OF 60 NO. DWELLINGS, ACCESS AND INTERNAL ROADS, PARKING, ANCILLARY STRUCTURES, LANDSCAPING AND OPEN SPACE, DRAINAGE AND OTHER ASSOCIATED WORKS. ALL MATTERS RESERVED APART FROM ACCESS.

Road Name or Number	C33 London Road	**Consultation Date**	6 May 2022
National Grid Reference	547481122914	**Contact Officer Details:**	Kal Kamboh 01273 482287 kal.kamboh@eastsussex.gov.uk

Recommendation:

No objection		**Objection**	
No objection subject to the imposition of conditions and s106 agreement	x	**Objection due to insufficient information**	

Executive Summary

This application seeks outline consent for 60 dwellings. Extensive discussions have taken place between the transport consultant and this authority regarding accessibility, due to the location of the site. This response cannot be completed

until the Travel Plan has been submitted. The appropriate guidance has been forwarded to the transport consultant.

Preamble

This application was received as a formal consultation in May 2022 and attracted a number of highway objections. Please note that the highway representation remained as a draft response which was shared with the applicant and planning case officer and was not submitted as a formal objection. The summary of the objections originally made are:

i) Access suitability – gradient
ii) Lack of measures to support active travel accessibility
iii) Site within a 60mph limit not conducive to reaching footway on west side of London Road or for cyclists.
iv) Lack of suitable footway between Ringles Cross/Ringles Place and Snatts Road
v) Lack of information to support the application – non motorised user audit
vi) Location reliant on private car due to active travel constraints on the network

Response

This application seeks outline consent for a residential development of 60 dwellings, with all matters reserved except for access. The applicant did not engage in pre-application discussions with the Highway Authority.

The matters that concern this authority are:

- Existing conditions
- Access provision for vehicles and non-motorised users and suitability of the access for service/emergency vehicles
- Accessibility to local amenities, public transport and public rights of way
- Traffic impact on the highway network
- Mitigation measures required to support a development of this scale
- Walking distance to existing bus service infrastructure

<u>Existing Conditions</u>
London Road (C33) is subject to derestricted speeds along the site frontage. The speed limit changes to 40mph at Ringles Cross to the immediate south and then 30mph approaching Uckfield Town. The site is currently agricultural and has an access from a single point adjacent to Chichester Caravans commercial site. For its length, London Road is unlit from Budletts roundabout to Ringles Cross PH/junction Coopers Green Road.

London Road accommodates 6220 vehicles per day (AADT 2021) and has a narrow footway on the western side. The footway surface is approximately 1m in width and has

a wider verge strip separating this from the carriageway. On the eastern side is highway verge between 1.6m and 3.6m in width along the whole site frontage.

The bus stop to the north of the site would be 400-500m from the centre of the site, for a northbound service (stop is opposite property Fairhazel), this provision is a layby arrangement with a simple flag and timetable and lacks a shelter, seating, kerbing and real time passenger information. Southbound stop is opposite the junction with Snatts Road, 500-600m from the centre of the site. This stop has a shelter and seating but lacks kerbing and real time passenger information.

The applicant has provided a 7-day speed survey at a location close to the proposed access point. The outcome of the survey indicates that the 85th percentile speeds are 52.1mph (SB) and 50.3mph (NB). Noted from the data, is that outside the hours 0700-1800, speeds are reaching 60-70mph.

Police crash records have been interrogated for the past 36 months and there have been 3 injury related crashes south of the site at the junctions London Rd/Coopers Green Road and London Road/Snatts Road. These were driver error and not related to the technical attributes of the highway. To the north, there have been 4 injury related crashes at the junction London Road/A272 and Budletts Roundabout. Again, these were not contributed to by driver error.

The site location is north of Uckfield, with Ringles Cross being the closest sub-settlement, where there is a local pub/restaurant. Coopers Green is a small settlement to the east and to the north is Five Ash Down. Uckfield town centre is located to the south and is approximately 2km from the site access and 2.25km from the centre of the site.

The closest amenities are the PH which is 0.5km distant; Tesco Express on Browns Lane, 1.4km; Uckfield College 1.7km; Manor Primary School 1.9km; leisure centre 2km; Bonners Primary school 1.2km; Buxted Primary School 1.9km; Ashdown Business Park 2.6km. Access to these locations will be discussed later in this response.

<u>The Proposal and Access Provision</u>
The proposal is for 60 dwellings and approval is sought for access only. Matters for consideration are vehicular access into the site and non-motorised user access to the network, public transport and local amenities/destinations.

The vehicle access is shown onto London Road, central to the site frontage and is a simple priority junction with 5.5m wide width, 2m wide footway on south side, 8m radii and 0.5m verge to the north side. The footway connecting the site to London Road is a short section which terminates approximately 10m south of the access where a dropped kerb and tactile paving is indicated to enable connection to the existing footway network on the west side of London Road, where corresponding dropped kerb and paving is proposed. The gradient of the access has not been provided and there is a levels difference between the site and carriageway.

Driver visibility is indicated as exceeding the requirement for a derestricted speeds when looking north (215m from a setback of 2.4m) and looking south 171m can be accommodated within the highway, though there may be a requirement to reduce the level of frontage vegetation. These sightlines are in accordance with Design Manual for Roads and Bridges stopping sight distances, based on the observed speeds provided in the speed survey.

A swept path plan is provided showing a refuse truck 11.97m long. This indicates that the proposed arrangement could accommodate this vehicle which would require regular access.

A road safety audit was been provided for the initial access proposal and it is noted the 3 problems raised:

Location: A – The proposed priority junction serving the development.
Summary: Risk of side impact collisions of high severity.
Although adequate visibility can be provided at the junction, in accordance with both Manual for Streets and Design Manual for Roads and Bridges, some drivers waiting to exit a side road experience difficulties judging the speed of an approaching vehicle, and the gaps between approaching vehicles, especially when the speeds are high, such as in a national speed limit area, and where drivers on the main road are anticipating being able to make faster progress when leaving a lower speed limit in an urban area. This will lead to an unnecessarily high risk of side impact collisions at the development junction.
Auditor Recommendation: The existing 40mph speed limit starting point should be extended northwards to a point an appropriate distance north of the proposed development junction.

Designers Response: While we note the points raised in relation to the relocation of the speed limit, it is unlikely that the character of the road is to substantially change as part of the proposed application besides the construction of the access and crossing point. Due to the limited change in nature, we would view that there may not be sufficient justification to relocate the speed limit as vehicles are still likely to travel at the same speed as the existing situation. If the Highways Authority are of the view that the speed limit should be relocated, then a condition could be applied for delivery as part of the reserved matters phase.

HA Response: The evidence from the surveys suggests that 85th percentile speeds exceed 50mph, which would require physical measures in the highway to assist to reduce speeds of vehicles both northbound and southbound for purposes of reducing the speed limit to 40 mph. A highway related scheme to include traffic calming features would need to be considered not just for this problem, but to provide a more suited environment for pedestrians to cross the London Road, preferably in two parts with a pedestrian refuge, and for cyclists emerging and exiting the site access. An audited highway scheme is required for purposes of 'access', which is the detail sought by this application, and should be demonstrated as deliverable at this stage, not at reserved matters stage. Please note that this will need to be consulted with the Traffic and Safety Team and Sussex Police, as well as having a further road safety audit.

Location: B – The proposed uncontrolled pedestrian crossing point on London Road.
Summary: Risk of left turning vehicles from the development colliding with pedestrians on the crossing.

Some drivers turn left from a side road without adequately looking to the left, only concerned about drivers from their right to whom they will have to give way. If this occurs when a pedestrian is using the crossing point, there will be a risk of a collision between the pedestrian and the left turning vehicle.
Auditor recommendation: The uncontrolled pedestrian crossing should either be located further away from the junction or should be located on the north side of the development junction. If the latter is the case, the footway within the development should, therefore, be on the north side of the access road.

Designer's Response: The pedestrian crossing has been relocated a further 10m south from the access point in order to reduce any chance of vehicle to pedestrian collisions.

HA Response: The sole route for pedestrians is to join the footway network on the opposite side of London Road, and to promote sustainable travel choices, a crossing point should provide a level of safety and provide confidence to its users. A simple dropped kerb arrangement where speeds are exhibited to exceed 50mph in an unlit road is insufficient for this level of development A highway related scheme to include traffic calming features would need to be considered for the earlier problem and to provide a more suited environment for pedestrians to cross the London Road, preferably in two parts with a pedestrian refuge.

Location: C – 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.
Auditor's recommendation: A relatively flat dwell area should be designed into the access road near the give way lines.

Designer's response: not provided

HA Response: Access details have not been submitted to indicate the cross section of the access or verge grading. A maximum gradient of 1:25 is recommended for the first 10 metres and 1:9 thereafter.

Summary of proposed access problems:
a) access gradient
b) no cycle provision
c) RSA problems – pedestrian access, vehicle speeds, speed limit

Further information has been submitted during the course of the planning application period and this entails a series of work including:

- *Extension of the 40mph speed limit to include the site up to a point 90 south of Budletts Roundabout.*

  Following discussions with Sussex Police and the Road Safety Team, for any reduction to the speed limit, there needs to be a consistent message along the section of London Road affected that has similar in character. The reduction in the national speed limit to 40mph is required to commence from the Budletts

Roundabout to include the junction with the A272. Historic speed data has been made available at Blue Asia location and at Carmel/Carmel Cottage where mean speeds have been recorded as 43 and 45 mph. Provided there is sufficient signage by way of repeaters, this would be the requirement and the speed limit proposal is supported in principle subject to the infrastructure proposed [crossing point refuge, bus stops, new access with dominant visual frontage and related boundary vegetation that appears as a residential landscape feature] with the objective to look and feel less rural. There has been a request by Sussex Police that the 30mph extent to the south of Ringles Cross is extended, ideally further north to encompass Ringles Cottages and section with widened footway (which has the character of a 30mph limit), so that the 40mph can commence thereafter (further speed survey is likely to be required to ascertain the position). A TRO will be required for speed limit proposals to accommodate the proposed housing and associated accessibility infrastructure.

- *Pedestrian crossing to include a refuge to reach footway on west side of London Road.*

The footway on the west side of London Road would require some minor widening down to Ringles Cross so that the site can accommodate wheelchair users and adults accompanying young children. The crossing is accepted, and footway works are requested and would form part of a s278 package of highway works secured in a s106 agreement.

- *New bus stop with carriageway bus cage markings, shelter and seating along site frontage south of the proposed access for southbound services.*

This is accepted and would be part of a s278 package of highway works secured in a s106 agreement.

- *Bus stop with bus cage markings within existing layby on west side of London Road (just south of Chichester Caravans site).*

This is accepted and would be part of a s278 package of highway works secured in a s106 agreement, though this layby should be reviewed so that parking provision, currently enjoyed by local residents is not compromised and that the bus can ingress and egress appropriately. This may require a minor extension to the layby.

- *Ringles Cross – minor carriageway narrowing to 6.4m to allow footway on west side of London Road between Paygate/1 Ringles Cottage and Snatts Road junction to be improved to meet standards of between 1.9m and 2.4m in width. Parking restrictions (double yellow lines) are required to support this to ensure that the footway is unobstructed, and the carriageway can support unhindered flows of traffic. To ensure that alternative parking provision can be met within a short distance of the cottages that currently park on the existing narrow footway, a layby is proposed opposite properties Woodview and The Roches, sufficient for 4 vehicles (as per overnight parking surveys carried out on 5 separate days).*

This is accepted and would be part of a s278 package of highway works secured in a s106 agreement, with a TRO for the parking restrictions.

- *Snatts Road junction improvements to alignment and footway provision to provide pedestrian visibility when crossing the junction.*

Swept path analysis has been produced to confirm suitable access for refuse trucks and pedestrian visibility. This is accepted and would be part of a s278 package of highway works secured in a s106 agreement

Accessibility

The proposal for 60 dwellings will contribute to expansion of the existing built environment and there is a requirement that all development should accord with the requirements of the NPPF to prioritise provision for pedestrians and cyclists. This site is located where local amenities are within walking and cycling distance and being less than 2km they are short journeys and are not necessarily dependent on the use of a private car. However, every non-motorised journey from this site would need to traverse London Road to reach local schools, local employment, public transport, possibly more than once. The applicant proposes an uncontrolled crossing point with a refuge to split the crossing manoeuvre in two parts, where vehicle speeds are proposed to benefit from a reduced speed limit as recommended in the safety audit.

It is noted the footway on the opposite side is narrow and does not exhibit ideal width of 2m and would be the only route for users of this site. Some minor widening to 1.5m would benefit the route between the site and Ringles Cross whilst maintaining the benefit of there being a good level of separation between pedestrians and vehicles on this section footway and the applicant has proposed widening the footway surface between the site and opposite Ringles Cross Cottage. The footway enhancements would be essential to be able to accommodate pedestrians with accompanied children as well as persons with mobility impairments.

Comments received from the County Passenger Transport Team on the original submission are in blue, with highway authority comments in black:

All of the existing bus stops are some distance away, i.e. more than about 500 metres from parts of the development. There is also no southbound bus stop to match the northbound stop near the Blue Asia restaurant. We would expect a new pair of bus stops (northbound and southbound) to be provided as close to the development as possible. These are now provided in the submitted drawings.

There would seem to be scope to create a northbound bus stop in the car layby almost opposite the development. This would require a raised kerb, bus stop clearway markings, bus stop pole (sourced from 'Externiture') and an accessible/safe road crossing point. Given the length of the layby, there may be scope to retain some parking, but this will need to be so that it doesn't interfere with the ability of buses to enter/exit the layby safely and deploy their wheelchair ramp adjacent to the raised kerb. The applicant has proposed a bus stop in this layby, but there have been concerns raised locally that the provision for accommodating parked vehicles

clear of the highway should not be compromised. The proposed plan indicating the bus stop in this layby should accommodate some parking for cars which may require the extension of the layby, or a separate provision. It should be noted that the bus needs to essentially stop at the raised kerb and not distanced from it.

The southbound bus stop should be provided adjacent to the development. We would envisage this being on the main carriageway, subject to a safety assessment. An accessible paved walking route will need to be provided between this stop and the development. There would also need to be a raised kerb, bus stop clearway markings, Externiture bus stop pole, real time display and bus shelter with seating. Therefore, it will be necessary to provide sufficient pedestrian space adjacent to this bus stop so as to accommodate the bus shelter too. These are now provided in the proposed drawings.

In terms of bus service provision, this section of London Road is served by an hourly Monday to Saturday daytime bus service (route 31), supplemented by a Monday to Friday 2 hourly bus service (route 261). In line with the Government's 'Bus Back Better' National Bus Strategy, we would also seek funding of £1,100 per dwelling (ie. £66,000 for the proposed 60 dwellings) to secure evening and Sunday bus service provision. This may be in the form of a conventional timetabled bus route, or by way of Digital Demand Responsive Transport (DDRT) whereby service users pre-book their journey requirements by way of phone or app. This service enhancement would be sought as a contribution within a s106 agreement.

Access to public rights of way would not be easily accessible from this site and would involve crossing the London Road to reach Buxted 57a from Coopers Green Road.

It had been raised earlier to the LPA and applicants that the demands towards Uckfield town are constrained by the context of the highway on the approach to Ringles Cross/Coopers Green Road where there is little highway availability to enhance footways and noting that several properties bounding London Road use the footway for parking and have overhanging vegetation which reduces the narrow footways even further. See below:



Footway widening in this section and enhancements to Snatts Road junction have been submitted.

Traffic impact on the highway network

TA development of 60 dwellings are predicted to generate approximately 276 trips daily based on 39 market dwellings and 21 affordable dwellings are stated in the TA. A sensitivity test has been applied. The peak hour generation would be approximately 30 vehicles 08-9000 and 17-1800hrs.
AM – 22 departures (17 right out, 5 left out), 8 arrivals (1 right in, 7 left in)
PM – 11 departures (8 right out, 3 left out), 20 arrivals (3 right in, 17 left in)

Over each peak hour, the level of traffic is not considered to have a discernible impact on the highway network in isolation, representing very little impact on the junctions assessed. However, this application has not included proposals in the Coopers Green/Five Ash Down area that have been recently approved/allowed at appeal or wider modelling that has been required for major sites in Uckfield. There is some concern that the modelling provide by the applicant does not consider the cumulative impact on the network of sites which may come forward. However, based on the committed development in Five Ash Down and Coopers Green Road, the impact of this development is not likely to represent a severe impact on the highway network in traffic terms.

Travel Plan
For developments larger than 35 dwellings and less than 80 dwellings, a Travel Plan statement is required. Such a document is a standard requirement, and the guidance is available on the County website. On the basis that the applicant's transport consultant has discussed measures to increase travel options for this site, and the detached position of the site from the built-up area of Uckfield, a Travel Plan would be critical to supporting this development.

Summary
This proposal is located outside the built-up area of Uckfield and as such the infrastructural requirement to successfully connect the site for active travel purposes is extensive, which demonstrates what is required to support an extension to the town, which should be supported by a Travel Plan. A Travel Plan Statement has been provided (by email on 17.02.23) which is regarded as draft currently.

Highway related works (off-site) which are required to support development in this location are:

1) Reduction in the speed limit to include an extension of the 30mph and 40mph extents – subject of a TRO which should be reliant on the visual frontage appearance of the site.
2) Highway works:

i) site access and grading;
ii) crossing point with refuge;
iii) footway on east side of London Road;
iv) southbound bus stop and infrastructure (cage, shelter, seating, RTPI, raised kerb);
v) footway widening to minimum of 1.5m between proposed crossing and Paygate/1 Ringles Cottage;
vi) footway enhancement Ringles Cross to Snatts Road and double yellow lines (TRO);
vii) Snatts Road junction realignment
viii) Layby to accommodate current on-street parking for 4 spaces
ix) Northbound bus stop with infrastructure layby/parking (cage, shelter, seating, RTPI, raised kerb)

3) Bus service contribution of £1,100 per dwelling to provide enhanced services.

Recommended conditions:

1) The development shall not commence until technical details of the layout of the access and all associated off-site highway works which shall include details of new and enhanced footways, uncontrolled crossing point, bus stops, new layby and layby enhancements, Snatts Road junction improvements, and associated Traffic Regulation Orders (speed limits and parking restrictions) have been submitted to and approved in writing by the Highway Authority and the development shall not be occupied until the technical highway scheme and Traffic Regulation Orders have been authorised and completed.

   Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway

2) The access shall not be used until visibility splays of 2.4m by 215m are provided in both directions and maintained thereafter. Once provided the splays shall thereafter be maintained and kept free of all obstructions over a height of 600mm.

   Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway

3) Prior to the commencement of development details of the proposed surface water drainage to prevent the discharge of surface water from the proposed site onto the public highway and, similarly, to prevent the discharge of surface water from the highway onto the site shall be submitted to the Local Planning Authority for approval in consultation with the Highway Authority.

   Reason: To ensure the appropriate management of surface water on and adjacent to the highway and prevent an increased risk of flooding

4) The new estate roads shall be designed and constructed to a standard approved by the Planning Authority in accordance with Highway Authority's standards with a view to subsequent adoption as publicly maintained highway

   Reason: In the interest of highway safety and for this benefit and convenience of the public at large

5) Prior to the commencement of development on site, detailed drawings, including levels, sections and constructional details of the proposed road(s), surface water drainage, outfall disposal and street lighting to be provided, shall be submitted to the Planning Authority and be subject to its approval, in consultation with the Highway Authority

   Reason: In the interests of highway safety and for the benefit and convenience of the public at large

6) No development shall take place, including any ground works or works of demolition, until a Construction Management Plan (CMP) has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved CMP shall be implemented and adhered to in full throughout the entire construction period. The CMP shall provide details as appropriate but not be restricted to the following matters:
   - Temporary access provision
   - the anticipated number, frequency and types of vehicles used during construction,
   - the method of access, turning, egress and routeing of vehicles during construction,
   - the parking of vehicles by site operatives and visitors,
   - the loading and unloading of plant, materials and waste,
   - the storage of plant and materials used in construction of the development,
   - the erection and maintenance of security hoarding,
   - the provision and utilisation of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
   - details of public engagement both prior to and during construction works.

   Reason: In the interests of highway safety and the amenities of the area.

7) The Travel Plan Statement, once approved, shall be in operation from first occupation of development. The appointed Travel Plan Coordinator shall provide a monitoring report to the Local Planning Authority after 1 year of full occupation to be audited by the Highway Authority.

Reason: In order that the development site/use hereby permitted maximises its accessibility by non-car modes and to meet the objectives of sustainable development.

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