
Technical Note

Project No: ITL15734
Project Title: Land at Hindsland, Eastbourne Road, Willingdon
Title: Highways England 2nd Response
Ref: NM/MD/ITL15734-007a
Date: 15 July 2021

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 proposed development of up to 180 residential dwellings and a 2,170 sqm medical centre on land at Hindsland, to the east of the A2270 Eastbourne Road, Willingdon.

1.1.2 An outline application was submitted in March 2021 (*planning ref: WD/2021/0594/MEA*) for the following:

“Outline application 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 medical centre together with all parking, servicing and on-site open space”.

1.1.3 The application was supported by a Transport Assessment (i-Transport ref: ITL15734-004) and a Framework Travel Plan (i-Transport ref: ITL15734-005), both dated March 2021 and produced by i-Transport LLP.

1.1.4 Highways England (HE) has been consulted and a suite of comments from HE were received on 28th April 2021. These were responded to by way of the following documents, on 14th May 2021:

- Letter from Neame Sutton to Wealden District Council, establishing the planning policy context/history of the site, and
- Technical Note from i-Transport LLP (ref: ITL15734-006A) responding to each point raised by HE.

1.1.5 In summary, the position of the applicant and their consultant team is that the application site is within the land on Eastbourne Road that has an historic allocation for new residential development, as well

as wholly within the land that has previously been considered by the Planning Inspectorate for new housing for 700 dwellings (plus other land uses), for which no objection was made in relation to impacts on the Strategic Road Network (SRN) subject to an agreed set of mitigation measures.

- 1.1.6 Subsequently, HE provided a further response, by way of an email dated 16th June 2021. Unfortunately, it has not been possible to arrange a time convenient to all to discuss the main points of the response. Therefore, this Technical Note seeks to provide further clarity to HE as to how the development proposal will not have a detrimental impact on the SRN following the implementation of an agreed set of off-site highway mitigation measures. The following section sets out the comments and queries raised by HE on the application and the applicant's response.
- 1.1.7 To reiterate, East Sussex County Council (ESCC) as the local highway authority recommends no objection to the development, subject to Conditions and a legal agreement.

SECTION 2 Committed Development

HE response:

"Irrespective of how many dwellings this site can reasonably apportion to the SD4 allocation, it should be acknowledged that the site was allocated in 2013 adopted Local Plan and any transport modelling undertaken to support the plan is now severely out of date. Whilst the SD4 allocation is still current, the weight given to this has over time diminished markedly, firstly as the Plan was adopted prior the East of Lewes scheme announcement in 2014 and substantial changes have occurred in the period since. Secondly, we are mindful of the fact that the site was withdrawn from the emerging LP regardless of whether or not the plan was withdrawn. It was clearly the councils intent to remove the allocation and as far as we are currently aware that position has not changed.

There were several conditions associated with the A27 which were attached to the Highways England response to the Mornings Mill Farm planning application including :

Prior to 151 occupancies within the development hereby permitted, the Highways England East of Lewes scheme for improvement of the A27/A2270 Polegate Junction and widening of the stretch of A27 between A27 / A2270 Polegate Junction and Cophall Roundabout shall be completed and opened to all traffic.

Separately, this and any other site will need to demonstrate its impact and undertake an assessment cumulatively to see if the East of Lewes scheme needs to be implemented prior to the occupancy of the 151 dwellings. Whilst acknowledging that the 180 houses proposed sits within the SD4 allocation (noting that the boundary of the site is loosely defined in the adopted Local Plan) it still needs to manage its own impacts on the highways network or will be required to contribute a proportionate element of the scheme costs for an overall mitigation (to be defined) for the combined total development. Any additional development would be required to manage its own impacts. We note that some of the SD4 land to the north appears to be undeveloped and not covered by either application. Accordingly, any application coming forward on the land would need to be able to demonstrate that its impacts are mitigated. It is suggested that the agreed mitigations for the Mornings Mill appeal site are robustly costed and presented to Highways England for assessment. It should be noted that the East of Lewes scheme will deliver the traffic signals link between the Polegate signals and the A2270/High Street signal cross roads on the local road network to the south of the A27.

- 2.1.1 Whilst it is helpful to note that the site sits within the SD4 allocation (and the position taken by HE in relation to WDC's future intentions or otherwise in relation to the site has no bearing or weight as the emerging Local Plan has been fully withdrawn), the fundamental basis for the acceptability of the site's SRN impact relates back to the Appeal decision rather than the policy status of the site.
- 2.1.2 Whilst this site is known as Hindsland, it is wholly within the extent of the land previously considered at Appeal which was known as Mornings Mill Farm. Despite its name, the Appeal site was effectively a combined Hindsland and Morning Mill Farm site. This is clearly shown in the attached Figure 1, with its extract at Image 1 overleaf. This shows the application site, on the western side of the image, as being wholly contained within the red line of the historic appeal site. The site is therefore considered

2.1.3 It has therefore been agreed as part of the appeal that the development of 700 dwellings within the red line of the Appeal scheme can be effectively mitigated to an acceptable degree.

2.1.5 Notwithstanding this point, the Transport Assessment (TA) supporting the application has considered the impact of delivery of the fair and proportionate quantum of development on this parcel, alongside that being delivered by the neighbouring Mornings Mill Farm application for land within and beyond the extent of the Appeal. However, any need for mitigation of impacts resulting from development of more than 700 dwellings falls solely within the requirements of the Mornings Mill Farm application as

that application is delivering additional land to increase dwelling numbers above that considered at Appeal.

SECTION 3 Future Design Year

HE Response:

Whilst it is accepted that the Mornings Mill application was found to be acceptable subject to necessary conditions for highway works as this was previously agreed for the appeal, we are now in a situation where this further application for 180 dwellings has increased the total level of development and there is no evidence provided to demonstrate that the agreed mitigations would be acceptable for a cumulative impact of 880 (180 + 700) dwellings. Therefore an assessment will be needed in this instance

- 3.1.1 As noted in the previous section, this is not a “further application for 180 dwellings”, but an application for 180 dwellings wholly within the land considered acceptable as part of the historic 700 dwelling Appeal scheme. It is therefore for any application (in this context, that being put forward by Mornings Mill Farm) to demonstrate that the agreed mitigations would be acceptable for a cumulative impact of 880 dwellings. Without prejudice to this position, later parts of this note do consider the impact of a further 180 dwellings.

SECTION 4 Proposed Development Trip Rates and Trip Generation

HE Response

We have reviewed the medical centre TRICS rates using the latest version of TRICS (now 7.8.1) and obtain similar trip rates. Accordingly we are content with the Medical Centre trip rates outlined in the TA Table 6.4. The TA para 6.5.6 and Table 6.10 describes the Medical Centre trip distribution. A high level assessment using the google journey time tool suggest that most, other than Eastbourne (56%) would utilise the SRN i.e. almost half of Medical Centre trips. As stated in the TA there is the potential for trips to reduce due to virtual appointments however this is not and cannot be guaranteed in perpetuity by the applicant [this would be around 12 AM peak hour trips] ACTION - Accordingly the assessment should be of the worst case, with a sensitivity test to demonstrate the potential 20% reduction associated with virtual appointments. In addition the original SD4 allocation only required one Medical Centre the combined applications now provide two and therefore it is questioned whether both will serve the local community as advised

- 4.1.1 The previous Appeal scheme at the site also included a medical centre. Therefore, the impacts on the highway network resulting from delivery of a medical centre have already been demonstrated to be acceptable subject to delivery of the agreed off-site mitigation measures. As a result, the separate assessment of such trips is actually double counting on the wider network, and only presented to enable ESCC to determine the site’s access performance. This point is acknowledged in the ESCC consultation response, that states ***“It is important to mention that the medical centre trips onto***

the network are already accepted to be part of the development as accepted for the original Mornings Mill application. So, although, this is a proposal on both sites, medical centre traffic will be double counted in terms of impact on the A2270, and consequently the impact from this site proposal would only be from the housing”.

- 4.1.2 Without prejudice to the position that the impact of the medical centre traffic has already been assessed on the local highway network, since the production of the TA, a medical centre provider/operator has agreed terms on the medical centre and therefore certainty of delivery on this site has been provided. They would combine the two existing medical facilities located in Polegate (the Downlands Medical Centre and the Manor Park Medical Centre, both located on High Street). Appendix A to this Technical Note provides maps of the current catchments of these medical centres. It is clear that, other than a small handful of dwellings located north of the A27 (west of Polegate) that all those on the registry would access the site via local roads, and not travel on the SRN. Again, this point is agreed with ESCC, who state in their consultation response ***“It is also important to add that any proposed medical centre will be transferred patients from other nearby surgeries who are already potentially on the network but dispersed.”***
- 4.1.3 Therefore, a further impact assessment of the medical centre on the SRN is unnecessary, with ESCC as the local highway authority confirming acceptability of the trip rates, discounts for virtual appointments, and distribution/assignment of medical centre traffic.
- 4.1.4 Again, without prejudice to the position that the impact of the medical centre has already been tested and agreed at the Appeal, should the 20% reduction not be applied to account for virtual appointments, and should the distribution pattern be based on that set out in the TA, there would be an additional 24 vehicle trips associated with the medical centre in the AM peak hour. Of these, 13 would come from the Eastbourne area, so would not impact on the SRN. Of the remainder, 7 (Lewes, Brighton, and Seaford) would approach from the west on the A27, 2 (Hailsham) would approach from the north on the A22, and 2 (Bexhill and Hastings) would approach from the east on the A27. These are all very small numbers, and well within the realms of daily variation and therefore make no bearing on the impact assessments presented in the TA.

HE Response

The TA section 1.5 refers to the HPEMAC proposals as being, "The Hailsham, Polegate and Eastbourne Movement and Access Corridor" – a committed and secured package of integrated transport improvements along the A22/A22070/A2021 corridor between Hailsham, Polegate and Eastbourne. Para 6.3.3 states that the HPEMAC Business Case report (Nov 2016) sets out that the proposals will support a mode shift and reduce traffic congestion along this corridor." Para. 6.4.7 of the TA states that, in combination with the implementation of the sites Travel Plan a 10% reduction in car driver trips has been factored in. This reduction is applied to Table 6.3. Para 6.4.10 of the TA states that the mode share set out in Table 6.3 is used in the remainder of the assessment. The Mornington (sic) Farm Transport Assessment did not refer to a potential mode shift associated with these proposals. No additional analysis has been provided supporting a 10% reduction in car driver trips. ACTION – the HPEMAC scheme has not been implemented and may or may not have a reduction in car driver trips and may take considerable time to embed. Accordingly, the assessment should be of the worst case, with a sensitivity test to demonstrate the potential 10% reduction associated with the HPEMAC scheme and Travel Plan. The potential HPEMAC benefits cannot be assumed in the assessment

- 4.1.5 As stated, the historic Appeal at the site did not make any allowance for a 10% reduction in vehicle trips associated with either the HPEMAC or Travel Plan measures. Despite this, the impact of the development of 700 dwellings was found to be acceptable subject to the implementation of off-site highways mitigation.
- 4.1.6 The 10% reduction in trips has been agreed in conjunction with ESCC as the local highway authority now there is greater certainty of delivery of the HPEMAC, and for whom the reduction in flows will have the greatest impact, as all vehicular trips to the site will utilise the local network for access. Their consultation responses states **"Given that this is what the HPEMAC is expected to deliver, not just for this site but on a much wider scale, this is a reasonable assumption for car borne trips that originate in the locality"**.
- 4.1.7 The HPEMAC is a fully funded and committed proposal, for completion in late 2022/23 (in advance of occupation at this application site) and has a total project cost of £3.53m¹. The whole business case is predicated on a modal shift from private car to, predominantly, bus, but also cycles, along the corridor. Any inference that such a capital injection would not result in a modal shift would put the whole scheme in jeopardy. The corresponding 10% modal shift from private car as a result of the HPEMAC has been agreed as an accurate assessment by ESCC, as the lead authority for the scheme.
- 4.1.8 In addition, the site is to deliver £108,000 of bus service contributions, as well as £36,000 in flexible travel vouchers, alongside a targeted Travel Plan with measures to promote sustainable travel options (including a bond for a further £36,000 for additional travel vouchers should targets not be met), and

¹ <https://www.southeastlepp.com/project/hailsham-polegate-eastbourne-movement-and-access-transport-scheme/>

a car club provision. These are all significant mitigation measures to be delivered by the site, to ensure that the first travel mode of choice for future occupiers is by active modes and public transport. This is part of the key tests of the NPPF, which states that:

- ***“...appropriate opportunities to promote sustainable transport modes can be- or have been – taken up, given the type of development and its location...”*** (paragraph 108);
- ***“...Any significant impacts from the development on the transport network (in terms of capacity and congestions, or on highway safety, can be cost effectively mitigated to an acceptable degree...”*** (paragraph 108); and
- ***“...applications for development 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...”*** (paragraph 110)

4.1.9 Therefore, taking into account the significant public finance inputs to the HPEMAC, alongside £144,000 of developer funding for public transport enhancements, and a Travel Plan (which will be monitored and enforced by ESCC), the 10% reduction in vehicular trip rates is a highly appropriate mitigation being delivered by the development to reduce impacts on the highway network, in accordance with national planning policy.

4.2 Assessment Scenarios

HE Response

As the position currently stands there is no assessment to demonstrate that a combined total of 880 dwellings will not have a severe impact on the A27. Highways England have already responded on the Morning Mill application which relied upon the previously agreed mitigations. Accordingly if reliance is being placed upon those mitigations for this application then assessment is required to demonstrate that the agreed mitigations will still be acceptable. The assessment period should be 10 years following opening of development i.e. 2034

4.2.1 The TA supporting the application provided, at Table 7.6, a summary of the traffic from 180 dwellings on the A22 and A27 in the vicinity of the site; therefore it does consider the impact of the development's 180 dwellings on the strategic road network, irrespective of the position put forward that the site's impact has already been assessed and agreed as part of the previous Appeal scheme.

4.2.2 The traffic flows presented in Table 7.6 of the TA demonstrates very low additional flows on the network, with a two way flow of 16 vehicles in the morning peak hour on the A22 north of Polegate, 19 vehicles on the A27 west of Polegate, and 1 vehicle on the A27 east of Polegate.

4.2.3 Table 4.1 of this note further summarises the proportional impact of these additional traffic flows on each direction of the strategic highway network during the network peak hours, based on the most recent manual counts available on the Department for Transport's Road Traffic Statistics database. At all locations, the increase in flows is between 0-1% and therefore would be imperceptible on the network, and well within the daily variations of traffic flows. As such, no assessment is justified to determine the impact of the proposal on the strategic road network.

Table 4.1: Proportionate Impact on Strategic Road Network

	A27 (S of Cophall)			A22 N of Polegate			A27 W of Polegate			A27 E of Polegate		
	Dev't Traffic	Existing	Impact	Dev't Traffic	Existing	Impact	Dev't Traffic	Existing	Impact	Dev't Traffic	Existing	Impact
AM Peak Hour												
In	4	1082	0.4%	4	1484	0.3%	5	893	0.6%	0	1289	0.0%
Out	13	1167	1.1%	12	1620	0.7%	14	1141	1.2%	1	1325	0.1%
PM Peak Hour												
In	13	1227	1.1%	12	2126	0.6%	13	999	1.3%	1	1109	0.1%
Out	5	1195	0.4%	5	1228	0.6%	6	737	0.8%	0	1810	0.0%

Note: A27 S of Cophall and A22 N of Polegate from 2019, A27 E and W of Polegate from 2015.

4.2.4 In addition, the evidence base² presented to the Inquiry for the Mornings Mill Farm Appeal site (which this application site is wholly contained within), demonstrated that the improvements being delivered at the Cophall Roundabout would improve performance at the junction to a better degree than the "do minimum" situation (i.e. the highway network, allowing for the proposed improvements and 700 units at Mornings Mill Farm, would perform more efficiently than would be the case without development and associated infrastructure improvements). There is therefore sufficient spare capacity released to ensure that such minor flows resulting from the 180 units will be accommodated with nil detriment to network performance.

² Mornings Mill Farm Development Assessment, VISSIM Model Evaluation, Atkins (16th August 2019)

4.3 Impact Assessment

HE Response

As acknowledged in the TA and the i-transport response, the Eastbourne Road/ High Street/ Wannock Road junction is already operating close to capacity without the proposed scheme. The 2030 Without Development (Mornings Mill Farm 700 dwellings) scenario is operating with a degree of saturation of 96.0% compared to 100.5% with development and mean max queue increasing from 39 to 45. The PM situation increases from 110.6% to 114.5% with queues increasing from 135 to 146. Accordingly, the 2030 junction performance and impact on vehicle delay could be described as severe without the development. While the additional level of queueing may be short, it is clearly adding to an already severe level of congestion. As a matter of general policy and practice, we do not accept the argument that it's only a small addition and won't make any difference, since all applicants could say the same and the queue could therefore extend for miles. Whilst ESCC may maintain the junction, the impacts of any additional queueing on the Eastbourne Road (north) arm will impact upon the A27. ACTION – a nil detriment to delay and queue lengths is required. No reliance can be placed upon the HPEMAC scheme to increase junction capacity

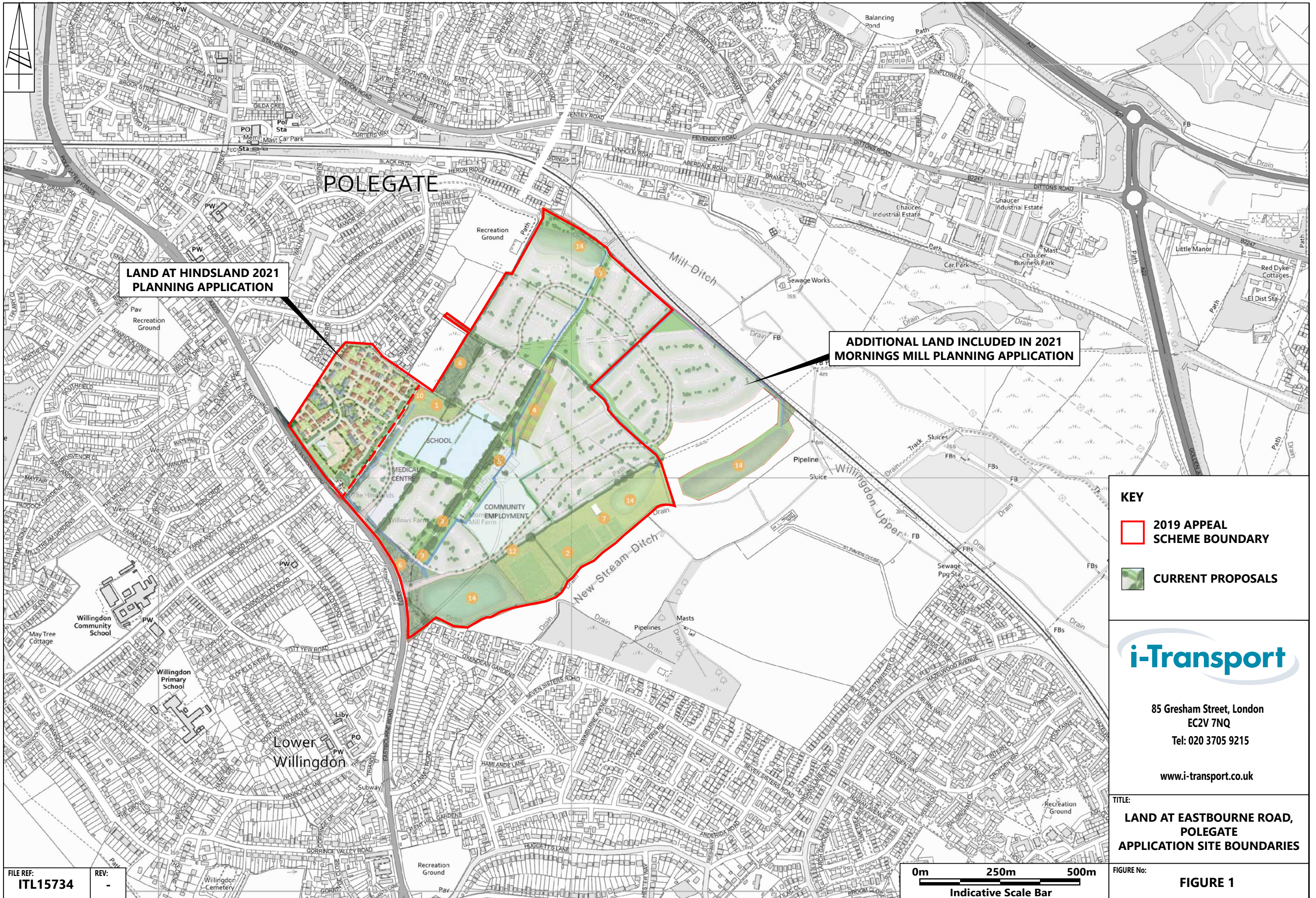
- 4.3.1 The Phase 1 of the HPEMAC, including the ESCC improvement at the A2270/High Street junction is a committed scheme, scheduled in the next 12 months (as set out in the ESCC consultation response). Therefore, the applicant site will benefit from the improvements being delivered, and in any event, is conditioned to not be occupied until it is completed. Therefore, full reliance can be placed on the HPEMAC scheme to increase junction capacity. This is the same position as taken by the Inspector at the appeal. This is confirmed in the ESCC consultation response which states ***“The development shall not be occupied until the necessary strategic highway mitigation works for East Sussex Highway networks have been fully completed: A2270 and Polegate High Street signalised junction (ESCC scheme); HPEMAC (stage 1)”***.
- 4.3.2 The modelling of this junction includes traffic flows from the medical centre and therefore, as set out previously in this note, is at least double counting the traffic flows associated with it because, 1). The impact of the medical centre is already contained within the Mornings Mill Farm appeal decision traffic flows; and 2). the medical centre trips will largely already be apparent on the local highway network.
- 4.3.3 ESCC, as the highway authority responsible for the junction, has confirmed that the modelling for this application site (i.e. this junction has been modelled for 700 dwellings on Mornings Mill Farm, plus other committed development, and 180 dwellings/medical centre on Hindsland in 2030) would result in an additional queue of 7 vehicles on the northern arm (again, double counting for the medical centre). This is far below the level of impact considered at the Appeal, for which the Inspector considered that the impact could not be considered to be “severe” (in NPPF terms).

HE Response

Please refer to our earlier comments to 6.2 Committed Developments above. This and any other site will need to demonstrate its impact and undertake an assessment cumulatively to see if the East of Lewes scheme needs to be implemented prior to the occupancy of the 151 dwellings. Whilst acknowledging that the 180 houses proposed sits within the SD4 allocation (noting that the boundary of the site is loosely defined in the adopted Local Plan) it still needs to manage its own impacts on the highways network or will be required to contribute a proportionate element of the scheme costs for an overall mitigation (to be defined) for the combined total development. Any additional development would be required to manage its own impacts. We note that some of the SD4 land to the north appears to be undeveloped and not covered by either application. Accordingly, any application coming forward on the land would need to be able to demonstrate that its impacts are mitigated. It is suggested that the agreed mitigations for the Mornings Mill appeal site are robustly costed and presented to Highways England for assessment. It should be noted that the East of Lewes scheme will deliver the traffic signals link between the Polegate signals and the A2270/High Street signal cross roads on the local road network to the south of the A27

- 4.3.4 As set out in previously in this note, as well as within the previous response to HE, and within the TA supporting the application, as part of the Appeal scheme the impacts of the delivery of up to 700 dwellings on the SRN were assessed and considered acceptable subject to an agreed set of mitigations to be delivered by obligation. The Hindsland application site is not delivering additional housing within the appeal site, and therefore its impacts on the SRN are already considered acceptable as part of the Appeal decision.
- 4.3.5 Notwithstanding this position, the TA has assessed the impact of a further 180 units (and a double counted medical centre) being delivered on the Hindsland site, in addition to 700 dwellings on the Mornings Mill Farm site, as well as other committed developments, in locations where a material impact is considered. This is on the A2270 corridor from the signal controlled junction with High Street to the north, to the signal controlled junction with Huggetts Lane to the south. This impact assessment has been considered and agreed as acceptable (subject to agreed mitigation) with ESCC as the local highway authority.
- 4.3.6 The assessment has not considered the impact of the development of 180 dwellings in addition to the 700 dwellings considered at Appeal at locations where the impact will be imperceptible. In this case, those locations coincide with the strategic road network of the A27 and A22 where increases in traffic flows are no greater than 14 vehicles on any one arm of the junction across a peak hour, equating to an increase in flows of 1% or less. As such, no impact assessment or mitigation on the SRN is necessary for 180 dwellings, as the flows are well within the realms of standard daily variation.

FIGURE



LAND AT HINDSLAND 2021
PLANNING APPLICATION

ADDITIONAL LAND INCLUDED IN 2021
MORNINGS MILL PLANNING APPLICATION

KEY

2019 APPEAL
SCHEME BOUNDARY

CURRENT PROPOSALS



85 Gresham Street, London
EC2V 7NQ
Tel: 020 3705 9215

www.i-transport.co.uk

TITLE:
**LAND AT EASTBOURNE ROAD,
POLEGATE
APPLICATION SITE BOUNDARIES**

FIGURE No:
FIGURE 1

FILE REF:
ITL15734

REV:
-

0m 250m 500m
Indicative Scale Bar

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APPENDIX A. MEDICAL CENTRE CATCHMENTS



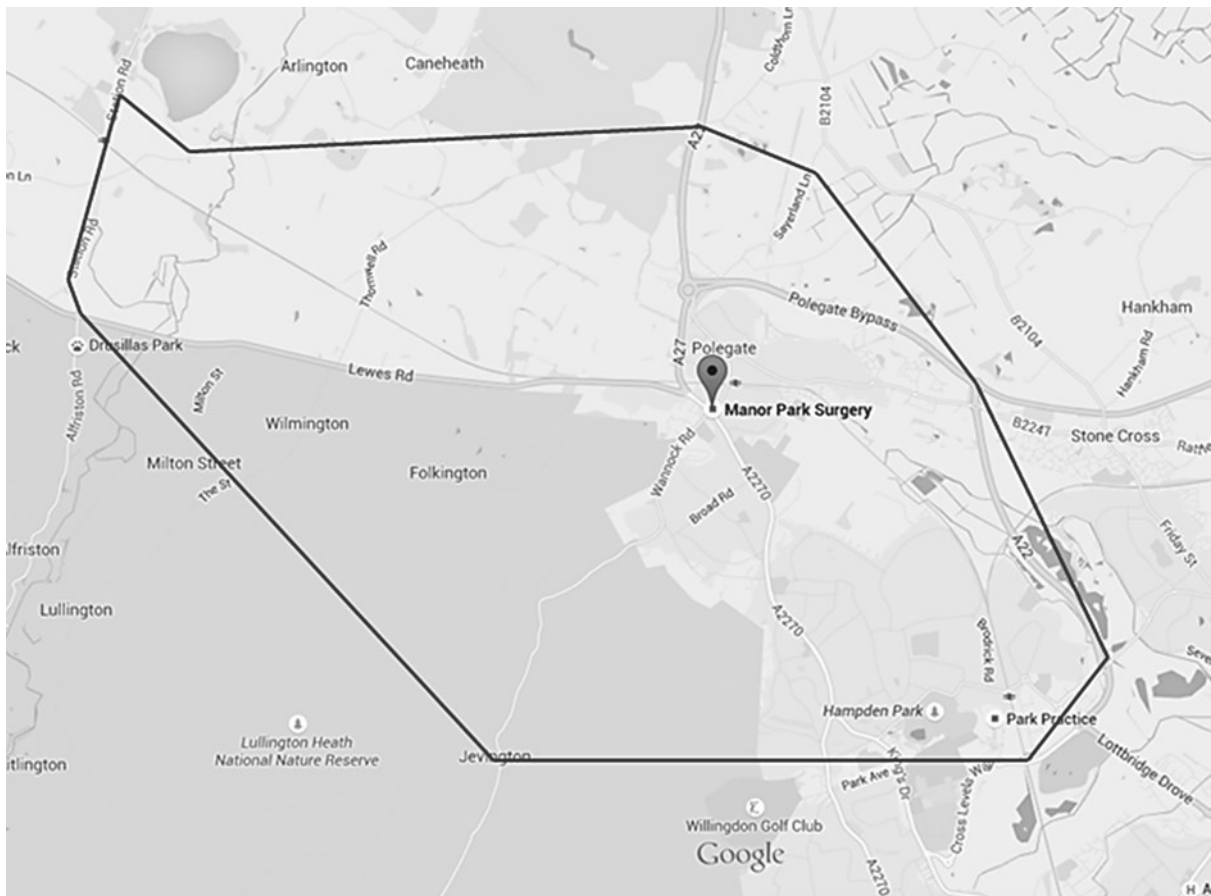
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Manor Park Medical Centre has two Partners:

Dr Russell Brown MB ChB (1993 Leicester) and Mrs Anita Taylor

The Practice is a ground floor premises and there is parking on site for our patients. We have a level path from the carpark to the front door allowing access to those with mobility requirements.

Downlands Medical Centre (/)

(/?c=logo)

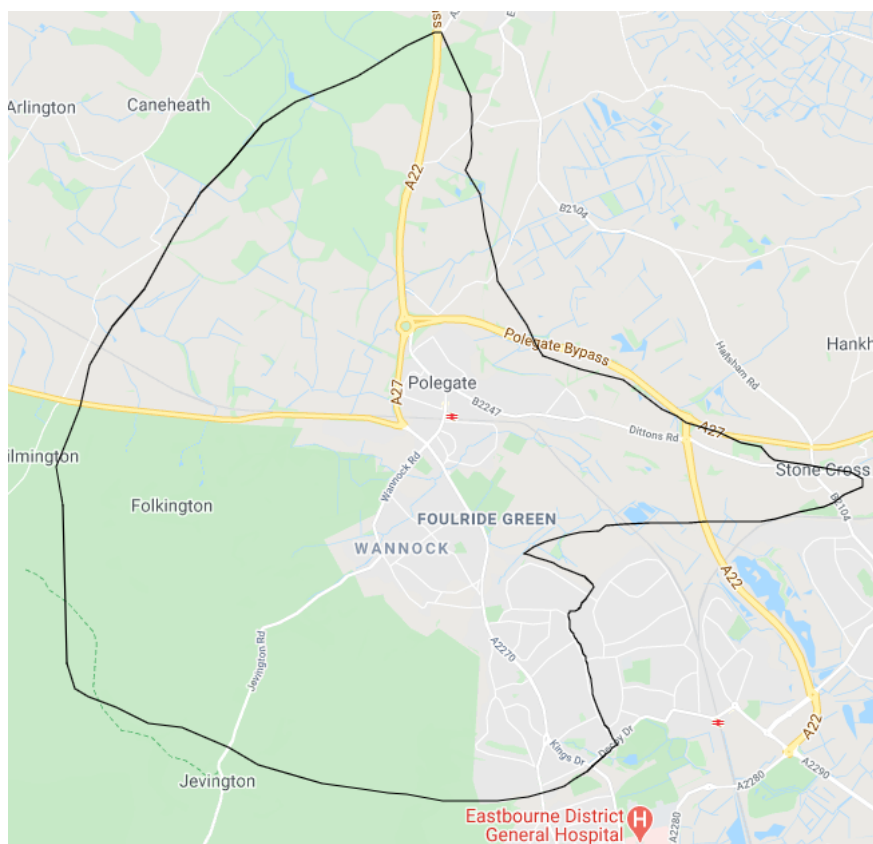
New Patients

Register as New Patient

If you live in our practice area and would like to register with us, please ask at reception for our registration forms.

Whilst patients have to the right to express a preference of GP they see, we do expect patients to see the same doctor consistently as this provides continuity of care, which has proven to be in the patient's best interest.

The GP Partners at Downlands Medical Centre manage their own patient lists and we therefore ask that you deal with your own registered Doctor wherever possible. If your Doctor is absent there may be a Locum GP seeing patients or one of the other Partners may deal with urgent requirements which cannot await the return of your own Doctor.



Online 'Pre-Registration' with the practice

If you wish to pre-register click on the image below to open the relevant new patient registration form which you can then print. Please bring the completed forms to the surgery. Anyone in England can register with a GP surgery.

You do not need proof of address or immigration status, ID or an NHS number.

Please also print and complete a GMS1 form in all cases.

Please note appointments cannot be booked until you have fully registered with the practice as a new patient. We need 7-10 days to complete the registration process.

