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Copy to: Passenger Transport Team; Highway Implementation Team; PRoW Team

Date: 08.12.21 & 12.05.22 & 04.11.22
Our Ref: WD/2021/2198/MAO
District/Borough Ref: WD/2021/2198/MAO

Applicant: Croudace/Berry

Location: LAND AT BIRD IN EYE FARM, SOUTH OF BIRD IN EYE HILL, FRAMFIELD, TN22 5HA

Development: OUTLINE PLANNING APPLICATION FOR THE ERECTION OF UP TO 290 DWELLINGS, ASSOCIATED LANDSCAPING, INFORMAL OPEN SPACE AND STRATEGIC SANG, WITH ACCESS FROM THE B2102.

Road Name or Number	B2102 Bird In Eye Hill	**Consultation Date**	1 October 2021
National Grid Reference	548366120913	**Contact Officer Details:**	Kal Kamboh 01273 482287 kal.kamboh@eastsussex.gov.uk

Recommendation:

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

Comments on Transport Assessment Addendum dated September 2022 following Highway response dated 12.05.22.

Access provision for servicing this proposal was outstanding from the previous comments and matters relating to this aspect of the proposal are still not complete for purposes of giving full consideration of this application.

Being outline, the application form states that approval is sought for access. This means access and accessibility.

Site Access – this has been revised in terms of its position and is shown on drawing 5330/021 Rev. H. In fact, 2 access proposals have been produced, 1 having a ghost right turn lane as recommended, and one as a simple priority working junction. Paragraph 2.25 in the Addendum 2 is incomplete. The applicant at the time of compiling the addendum2 had instructed a RSA audit for the access provision, but to date this has not been provided. A recent email from the transport consultant dated 14/10/22 indicated that this is still awaited. The County Council indicate in their highway guidance for major new development that a RSA should be provide with a designer's response. The proposed access would be serving a major housing development alongside the existing operations on Bird in Eye Farm and a proposed SANG. The access would need to support many types of users and ensuring that the level of road traffic alongside pedestrians with children and/or dogs, cyclists, business/farm vehicles which is from a rural road. A road safety audit is essential to ensure that what is being proposed is fundamentally deliverable and can support its demand. The highway authority wishes to raise comments on the current proposed arrangement with the right turn facility:

- 30mph speed limit extension. This is desirable in principle for an urban extension, and the scale of proposed development gives rise to an increase in activity on the highway by a variety of user types. Sussex Police are required to comment on the speed limit reduction but there is insufficient detail provided to support this. It has been raised on numerous occasions that with actual speeds at 42.4mph EB and 45.9mph WB, that traffic calming and visual influence indicating a change in the environment is required, which a gateway sign cannot provide adequately. Examples are visible frontage development, footways, street lighting, and infrastructure that supports the movement of non-motorised users which are absent.
- The straight through lanes at the new access are only 2.75m wide. Ideally all lanes should be 3m in width though it is noted that the available highway and achieving the required driver sightlines has dictated this arrangement. If a 30mph speed limit can be realistically considered, then the arrangement with narrower lanes either side of the stack lane may be acceptable.
- The Right Turn facility appears to be sufficient in terms of its capacity based on the junction modelling.
- A traffic island at the eastern end of the right turn lane would help to highlight it to drivers travelling towards Uckfield. It may be an issue that drivers could potentially cutting the corner which would conflict with vehicles waiting in the right turn lane, including cyclists as there is no provision for eastbound cyclists returning to the site having a safe means to join the shared path. The principle of a traffic island east of the junction would highlight the road alignment and offer some protection to right-turning vehicles, but may conflict with vehicles turning right from the site and a swept path plan would need to demonstrate the manoeuvres by the largest vehicle regularly requiring access.
- Dragon's teeth markings are not prescribed by the TSRGD 2016. In addition, research carried out on their effectiveness concluded that these markings are only really visible to a driver at the last minute, and it is doubtful, therefore, that they would contribute much to any slowing down effect on the approach. Due to this, the markings are considered an unnecessary maintenance burden and will not be authorised.
- The proposal for access as a simple priority junction is not supported on the basis that the 30mph limit cannot be supported for reasons highlighted above. Existing speeds are in excess of 40mph and a right turning vehicle waiting in the carriageway has a risk of being impacted by an eastbound vehicle.
- The revised position of the access further east is much closer to the adjoining boundary, where is dense vegetation. There is a highway verge allowing some to be cut back, though it is generally required that the hedge is not destroyed. Any growth left unmaintained is likely to hinder a driver's visibility at the access, from a set back point of 2.4m and shallower gradient.

This is the third iteration of the proposed site access submitted which is not supported by a RSA and has problems highlighted that would need to be addressed. Given that this application has now been appealed on non-determination grounds, the proposed access has not been demonstrated to be acceptable for the proposed development. Taking into account the quantum of housing, the generation of traffic and a promotion of a travel plan (encouraging active travel) and its location which would in effect should reflect the design of an urban extension, a 30mph speed limit would be a measure that is sought to support the safety of active users. The existing conditions are not appropriate for the proposed light touch measures such as signs, road markings (which are not acceptable) and a traffic island to effectively bring speeds to 30mph and support a large development in a predominantly rural position. Attention is drawn to the first planning appeal at Mornings Mill Farm which was dismissed on highway grounds based on insufficient details relating to access and accessibility (WD/2017/1942).

Framfield Road:

- Plan 5330/017 rev F shows a raised table zebra crossing outside no. 45. A formal crossing point is supported as was referred to in the previous highway response, but the constraints of a zebra type crossing had been pointed out. Nevertheless, a raised zebra crossing has been indicated by the applicant and road safety colleagues have highlighted that a single traffic calming feature like this is not desirable as it will be unexpected by drivers. There would need to be speed reducing features in advance of any vertical traffic calming such as this.
- The bus stop in advance of the crossing seems less than ideal. A car overtaking a bus would have limited time/space to see someone crossing, especially if they are crossing from north to south.
- It is not clear what the benefits of installing parking bays are, as there are already parking restrictions to control where parking takes place. Enforcement of the any parking restrictions is unlikely.
- Inclusion of bus cages and tactile paving/dropped crossing points is a benefit, though the overall conditions of the walking and cycling environment along Framfield Road are unchanged.

Cycle Track/area to west of the site:

- The bus stops east of no. 185 aren't positioned correctly. The markings don't line up with the flag/high level kerbing. However, it was raised in an earlier response that closer bus stops would be expected to ensure that all dwellings could be within the ideal distance of 400m. A provision

close to the access, within the site (with suitable turning) would be considered provided it did not impact on the timetabling of the services.

- Having the westbound bus stop within the shared cycle/footway would present a conflict unless enough space for people to wait for a bus outside of it is provided. Passenger transport would wish to see shelters at these stops which would potentially obstruct the shared cycle/footway. This aspect of the active travel/sustainable travel provision would need to complement one another.
- Access for pedestrians/cyclists has been raised previously and the provision for eastbound cyclists to join the path indicated has not be accommodated for.

Summary

Access provision is not acceptable for this site as indicated on drawings provided in the Addendum2 for the reasons indicated in this response.

Traffic modelling, in particular impact when considering wider sites is yet to be validated, and to this site there is some concern in terms if expected town bound impact on Framfield Rd Junction with New Town. Further exacerbation on town centre roads is also expected, with knowledge that these roads are already straining to cope with current traffic volumes.

As such highway objection is presented to this development proposal. Again, previous comments highlight that a joint working relation with site proponents for Bird In Eye North would enable a more comprehensive approach to reaching urban extension characteristics that this site cannot achieve with the access arrangement as shown and with the illustrative layout being concealed from the street scene. Framfield Road characteristics are urban and have constraints as set out in earlier responses which cannot be overcome through a parking scheme. An alternative crossing provision that is more appropriate to the function of Framfield Road needs to be considered.

Accessibility proposals (footway/cycleway) have scope to be provided but are expected to join Framfield Road where there are constraints with narrow footways and lack of crossing points.

Highway objection is sustained, for the following reasons:

1) The proposal would result in a material change in the volume of traffic using B2102 Bird in Eye Hill where speeds are derestricted, and hazards would be introduced by the slowing, stopping, and turning traffic at the proposed access, contrary to para 111 of the National Planning Policy Framework

2) The proposal would lead to increased traffic hazards on the B2102 Bird in Eye Hill by reason of the inadequate visibility at the proposed access and would therefore be contrary to para 111 of the National Planning Policy Framework

3) Insufficient measures have been submitted on the highway to support an urban extension, for purposes of reducing traffic speeds which are required to support sustainable transport modes.

4) Non-car travel choices for residents/users are limited between the site and Uckfield town centre as a result of substandard highway infrastructure which would not encourage sustainable travel modes and would therefore be contrary to para 104 and 106 of the National Planning Policy Framework.

END – KK 04/11/22

Comments on Transport Assessment Addendum dated March 2022 following Highway response dated 08.12.21.

2.1 Site Access – Right turn lane requirement
Reference is made to the appeal decision dated 2006 and AADT flows at that time on Bird-In -Eye Hill (4400 vehicles). Data provided by the County Monitoring Team indicated 2019 AADT flows are 5560 and 2020 flows are 4830. As stated previously, the 2020 flows are evidently lower as a result of Covid travel restrictions. The 2019 flows are applicable and should be used for this application. The figures presented by the applicant are less at 3900 and cannot be accepted. PICADY modelling at the proposed site access has been provided but there is no breakdown of the farm/industrial unit related trips in peak periods which would need to be added to the proposal related peak trips. The PICADY analysis should be presented on flow diagrams for each peak for scenarios baseline 2019, baseline 2019 + development and existing uses, 2027 baseline, and 2027 baseline + development and existing uses.

For access to the site, the junction arrangement is required to have a right-turn lane for several reasons:

i) Site related traffic would be weighted towards the west with more right turns into the site than left turns.
ii) Emergency vehicles (associated with the nearby hospital) would be obstructed by right turners waiting within the carriageway to make a right turn.
iii) This arrangement would afford right-turning vehicles (including cyclists) some protection and assist free flow of major road through traffic.
iv) The daily traffic cumulation from the site exceeds 1400 trips. For developments generating an AADT of over 500 vehicles, right turning traffic should not impinge on general flows which are 5560. Furthermore, the event that other potential development such as Bird In Eye North comes forward, it is likely that the flows on Bird In Eye Hill will increase further.

The modelling provided is incomplete and although it is stated by the applicant that a priority junction would not result in significant queues for right turning vehicles, it is unclear form the submission what data has been used for the PICADY analysis.

Quotes from the 2006 former planning application and dismissed appeal are outdated and not valid for the current proposal now 16 years on. Furthermore, the former application was for 197 dwellings, not 290 and highway response dated June 2007 had requested that the priority junction be upgraded to be a right turn lane. The current standards are in DMRB CD123 CD 123 Geometric design of at-grade priority and signal-controlled junctions.

Access Visibility
A speed survey demonstrates 85th percentile speeds of 42.4mph EB and 45.9mph WB.
The required driver sightlines based on actual speeds are 113m looking west and 127m looking east, from a setback point of 2.4m (desirable minimum distances). The distances stated in the transport assessment addendum are not accepted. Manual for Streets standards are applicable where 85th percentile speeds are up to 37mph, and higher speeds should take account of Stopping Sight Distances. In this case desirable minimum distances should be applied. The sightline looking west is indicated on drawing 5330/020D as only 91m, some 22m short of the requirement based on actual speeds.

The proposal to extend the 30-mph speed restriction was not supported previously unless speeds can be reduced to an appropriate and conducive speed. This was proposed historically by the Parish Council, and it was indicated to them that traffic calming measures would be required to effectively provide suitable traffic calming. It was due to the cost of installing engineered measures that the speed limit reduction was not proceeded with. Any proposal to extend the 30mph limit will require a highway related scheme that would effectively reduce speeds and be self-enforcing and an extent of the limit extension would need to

be agreed. A matter to flag up is the bend in the road to the east of the site which should not conflict with the terminal point of a 30mph limit as traffic may be encouraged to accelerate towards this section. Such traffic calming schemes should ideally benefit from frontage development to guide drivers that they are entering a change in environment. It is expected that a continuation of built form should be visible from drivers' position to support a change to 30 mph. The 30-mph limit extension will require engineered speed reducing solution to bring mean speeds to a maximum of 33mph. Speed limit reduction schemes should accord with the guidance found in ESCC document Local Speed Limits PS05/02 which can be forwarded to the applicant's transport consultant. As shown in appendices 4 and 5, I note that a 30mph extension is shown which terminates just east of the proposed access position. The area of highway contained within the proposed 30mph extension has no significant change in character or appearance other that additional signage and three islands over a section of 500m which may not have a speed influencing effect that would be necessary for accommodating residential development associated travel needs such as walking and cycling.

A change to the speed limit would need to be authorised by a Traffic Regulation Order and have support from Sussex Police, the enforcing body. It is advised that further discussion with the highway authority is necessary to develop a suitable traffic calming scheme. As mentioned previously, collaborative working with site proponent for Bird In Eye North would assist to influence a suitable design for a traffic calming scheme from the junction for Uckfield Hospital up to a suitable point east of the proposed site access.

Following the previous RSA1, a further audit has been commissioned and the designer's response refers to scheme amendment drawings that have not been provided as part of the Transport Addendum. The only highway related application plans are provided in appendices 4, 5 and 6 [5330/020D; 5330/008E; 5330/1001]. The RSA response refers to drawings 5330/16E; 5330/18D and 5330/17E which are part of appendix 9 which in accordance with their revisions, would supersede the plans in the original TA.

Framfield Road

The parking scheme on Framfield Road has received comments from the Traffic and Safety Team in relation to the build-outs: The series of build outs proposed on Framfield Road do not appear to form part of the audit (first) and do not appear to serve any useful purpose? At the same width as the parking bays, they offer no contribution in terms of traffic calming and as there is a bollard central to each one, they do not aid crossing movements. As such, an alternative proposal in Framfield Road may offer more value to assist pedestrians crossing. It is noted that plan 5330/017 rev E shows an uncontrolled crossing with dropped kerbs and tactile paving outside 52 and 45 Framfield Road. There has been a request to the Traffic and Safety team from a local Councillor for a formal crossing with suggestion for a zebra crossing in the vicinity of Harcourt Road/Alexandra Road. There may be constraints in terms of the physical requirements for a zebra, in terms of driveways, junctions and bus stop but a more formal crossing would be preferable to one that is informal.

Proposed build outs have been questions and the locations of them are questioned.

i) the build out opposite the former church potentially prevents a bus from stopping close to the kerbs to allow passengers to board and alight safely. Installation of bus cages here is likely to be more useful than a build out.

ii) parking bays marked either side of 69 Framfield road leave a very narrow space for access into an under croft access leading to a yard in which a vehicle is parked. Access is likely to be restricted to the yard area if vehicles are parked at capacity either side of the access and opposite within the shown marked bays. See extracts below. Furthermore, the build-outs are provided but it is not known the reason. DYLs are present to restrict parking around the junction Keld Avenue.

iii) the proposal indicates demarked bays for parking, though no restrictions for parking where the caged areas are not shown. It is presumed that the parking would still be permitted in the areas outside the marked bays unless DYLS are provided. As parking restrictions are secured through a TRO requiring public consultation, there would need to be a convincing scheme not only to the Highway Authority, but to the local residents that a parking scheme would be beneficial. I have noted the2nd parking survey provided, undertaken on 9th February 2022. I do not understand what information the first table provides. Does the survey have a plan and photographs indicating the areas that are restricted that have been used for parking?
The parking scheme and survey required further discussion to understand how the survey was carried out and what the overall benefits are of the parking scheme.

Road Safety Audit
Again, a number of safety matters were raised by the auditor.
Regarding the proposed access, as I have indicated that a right turn facility should be the design standard for the proposed scale of development, this element would need to be revisited and so further comments on the access proposal are not provided to this aspect of the audit. Access provision is reliant on achieving driver sightlines and potentially reducing the speed limit with engineered traffic calming features. Turning provision of larger vehicles should also be considered at this stage and not left to detailed design as this application seeks approval for the access and accessibility.

Splitter islands on Bird in Eye Hill: the proposed tapers are not in accordance with CD123, and revisions have been made in dwgs 5330/008E, 020C and 016E. I do not have access to these drawings as they are not provided as part of the TA addendum or application submission.

Problems highlighted on Framfield Rd, that relate to the parking reconfiguration would need to be further discussed and so further comments in this regard are not provided.

Problems A.4.2, A.4.3, and A.4.4 relate to access and accessibility and are likely to require further intervention in design terms and should not be left to detailed design stage. Problem A.4.4 may be affected by off-site highway works relating to Mallard Drive (Harlands Farm) approved development which is under construction. As part of their s278 agreement, bus stops on Framfield Road close to the medical centre are enhanced and tactile paving at the existing dropped kerbs are technically accepted. A drawing can be provided on request.

Relocation of street furniture and telegraph poles can be reviewed as part of the detailed design as these can be moved. The footway sign is adjacent to land being opened up for the footway/cycleway route into the site and there would be scope to relocate this sign and potentially alter the content to indicate direction into the site. For cyclists wishing to continue eastbound, there would need to be a measure for safely re-joining the carriageway.

My concerns remain intact with regard to achieving suitable access and accessibility based on the points raised and having had discussions with the transport consultant with regard to the access, and the need to have verified the impact of the development on the adjacent and wider network, the application attracts objection. Discussions with the applicant have been arranged and the above will be raised to seek solutions.

K Kamboh – 12.05.22

Original response Dec 2021

Executive Summary

This application can only be considered on the access arrangements proposed. The impact of the development cannot yet be considered as the applicant has agreed to jointly work together with other development proponents to consider wider highway impact on the network in Uckfield and surrounding areas. As this work is being carried out currently with purpose to study the existing network and identify the opportunities, constraints and potential mitigation required for future growth that has not been possible through the local plan process, the impact on the network and principle of the development is not yet accepted or understood. Until this joint working group has completed the transport modelling the formal highway response cannot be provided in full. As such a highway objection is presented based on insufficient information that the applicant is fully aware of.

Response:

This application seeks outline planning consent for up to 290 dwellings on a greenfield site (agricultural) and retains an area of existing development comprising Bird-In-Eye farm business units (12 in total). The site is shown to be served from Bird-in-Eye Hill (B2102). The site has history of a planning appeal dismissal for housing dating back to 2009 (WD/2006/3564 for 197 dwellings), when 2 other sites were subject to the appeal inquiry (Downlands and BIE North). At the time of that appeal, the development at Ridgewood Farm had not been submitted or approved.

A Transport Assessment, Road Safety Audit and Travel Plan have been submitted which will be referred to within this response. Pre-application advice for approximately 175 dwellings was provided for site but was not extensive as the scope for the proposed development kept changing and a response was provided which highlighted the constraints of the site location and connectivity by non-motorised users. The applicant refers to meetings with the County Highway Authority which relate to wider impact modelling for several major sites in the Uckfield area.

<u>Existing conditions – B2102</u>

Actual speeds for the B2102 have been measured in two separate positions either side of the proposed access for a 7-day period 9-15th July 2019 and the results of the speed survey indicate that the 85th percentile speeds are 42.4mph EB and 45.9mph WB. Peak period flows 08-0900hrs and 17-1800hrs are approximately 400 vehicles in each hour segment.

The B2102 has Average Annual Daily Traffic count of 5560 (1% HGV) vehicles as of 2019; and 4830 (1% HGV) in 2020. The count for last year demonstrates a Covid19 related reduction in overall trips on the network, hence the 2019 data should be used as baseline and the 2020 is not accepted.

Police reported crash data within the highway has been interrogated for a period of 5 years for area between Sandy Lane junction and Framfield Road junction with Newtown/High Street. A total of 8 injury crashes (categorised as 5 slight, 2 serious and 1 fatal) occurred. Although this is unfortunate, the contributing factors were driver error in all cases, and not contributory to the road design or character.

The site is located within 2km walking distance of Uckfield High Street shops and amenities and approximately 1-1.5km from the railway station and bus station.

The pedestrian infrastructure towards the town centre, when using Framfield Road, is poor as a result of narrow footways, parked vehicles straddling footways, no defined crossing points until the signalised junction with New Town/Bridge Farm Road. Here the inter-visibility for pedestrians is poor, there is little footway width and when pedestrians are waiting to cross the road, there is little space for other pedestrians to pass by. The junction here is very much vehicle dominant and the current pedestrian experience between the site and the Framfield Road signalised junction is not convivial nor would it encourage travel on foot.

Cycling is a mode of travel available to confident cyclists who are not discouraged by the existing local infrastructure/characteristics. However, encouraging new users or less confident cyclists would require the use of quiet residential streets, as an alternative to the main roads that are bus routes and carry high volumes of traffic. The availability of permeable residential streets to serve a suitable cycle route is a convoluted route through Keld Avenue which avoids a potential wait at the signals but this location has uncontrolled connection between the B2102 (New Town) and Mill Drove.

Public bus transport is available on Framfield Road, but which is very limited and cannot support commuter journeys. Although there are bus stops within 300m of the site, the most regular service (231 Uckfield to Etchingham) operates 6 buses per day between 0740 and 1740 so allows a passenger to reach destinations up to Etchingham before 0900 but the last bus to return arrives at 1726 with no option after that. Bus services are also available in the town centre/bus station, but entails a 1.3km walk which exceeds the recommended distance (400m), the walking environment is below a suitable standard and would take 20 minutes plus bus waiting time, which is not convenient and encourage car use instead.

Rail services are available within 1.1km which is an acceptable distance to walk for commuting long distances and trains generally run to schedule with waiting times minimal for regular users. Again, the walking route is using Framfield Road, where constraints have been highlighted.

Employment areas in Uckfield are the Bell Lane and Ridgewood industrial estates; High Street (tertiary sector).

The Application

For the proposed development of 290 units comprising 189 market and 101 social/affordable (unit type unspecified), the main issues to consider and requirements that would need to be met are:

- Access - Suitable vehicle, pedestrian and cycle access, to include sufficient width, gradient and visibility splays are a standard requirement.

The proposed vehicular access into the site is in a position a short distance east of the existing farm access which would be closed as part of the proposal. The retained uses at BIE Farm, and existing dwellings Lycroft, 18 and 19 Bird In Eye Hill would have vehicular access from the proposed arrangement. The proposed access is within a section of Bird In Eye Hill (B2102) that is currently subject to a derestricted speed limit (60mph).

The geometry and configuration of the access should take account of the traffic expected to use it and 290 dwellings, 12 business units and 2 existing dwellings would generate in excess of 1400 trips per day. The types of business or related vehicles are not provided. The type of junction shown is a simple priority

arrangement, and at pre-application stage, when 175 dwellings were proposed, the site proponent was requested to consider a right-turn stack lane and given the uplift to the quantum of housing proposed within this application with daily trips on the minor access road exceeding 1400 movements, a right turn lane is recommended, bearing in mind the anticipated distribution of traffic being predominantly weighted to and from Framfield Road junction. Furthermore, the assessment at the site access has been based on 2020 observed trips which are not acceptable and does not account for trips that are derived from the existing dwellings and businesses served by the site access. The TA indicates in 5330/405D the proposal will generate 80 trips turning right into the site in the PM peak hour which is likely to be greater as a result of the businesses and visitors to the proposed SANG (the existing Horsted Green Park SANG should be considered as an example in terms of trip generation).

Driver sightlines at the access should reflect either posted speed limit, or where speeds are lower, the 85th percentile recorded speeds over a period of 7 days. The emerging 85th percentile speeds of 42.4mph EB and 45.9mph WB would require sightlines to be imposed in accordance with Manual for Streets 2. The actual speeds would need to be much lower for consideration for 30 mph speed limit reduction as the speed limit should be self-enforcing. As 30mph limit is suited to urban areas, the extension of an urban zone would need to display the visual character [frontage development, street lighting, built form, footways - as examples] to provide visual guidance for road users that they are within a restricted area. Speed limit signage alone is not acceptable for self-enforcement in this case. The required driver sightlines based on actual speeds are 113m looking west and 127m looking east, from a set back point of 2.4m (desirable minimum distances). The distances stated in the transport assessment are not accepted, nor is there a plan to demonstrate what is achievable.

It is repeatedly mentioned that a 30mph limit extension is supported by the highway authority. This is not the case, and this is not explicitly stated in the pre-application response as this notion is reliant on the view of ESCC Road Safety Team and Sussex Police and as mentioned earlier is reliant on visual characteristics for an urban area to enable self-enforced lower speeds. These parties have been consulted and their views can be provided in due course.

Road safety audit

The vehicular access to the site should be supported with a RSA 1 and scheme promoter's response. It is noted that this has been provided and a total of 10 problems have been highlighted.

1) LOCAL ALIGNMENT - proposed access

Auditor Comment: Vehicles may approach Bird in Eye Hill at inappropriate speeds. The application site is currently set at a level above the adjacent Bird in Eye Hill with the existing access rising gradually away from the main carriageway. The proposals relocate the existing access to Bird in Eye Farm in order to serve a proposed development of 300 residential dwellings as well as two existing dwellings outside of the application site. The scheme drawings do not identify the gradient of the proposed carriageway at this stage, however, the land in proximity appears to be approximately 2 to 2.5 metres higher than the level of the existing carriageway. A gradient in excess of 1 in 20 on approach to a simple priority access could lead to junction overshoot type incidents. It is recommended that the access road is set at a gradient shallower than 1 in 20 on approach to
the B2102.

Designer Response: The proposed access will be designed with 1 in 20 or slacker gradient than in accordance with standards with the land either side, graded up away from the carriageway at an appropriate gradient.

LHA view – it is considered that the access details are required as part of the detail for this outline application and the appropriate gradient proposed should be presented as part of the matters for considering suitability and deliverability of the vehicular access. As such as there are no access details such as cross sections, or junction geometry, the access detail is incomplete.

2) GENERAL – Bird in Eye Hill

Auditor Comment: Drivers approaching the proposed traffic island may not become aware of the feature at a safe distance. In proximity of the proposed access, Bird in Eye Hill is derestricted, subject to the 60 mph national speed limit and accommodates a number of bends in proximity of the proposed access. The proposals that are subject to this Stage 1 Road Safety Audit includes two options; one to extend the existing 30mph zone to a point just east of the proposed access and another where the derestricted nature of the road remains unchanged but a splitter island is to be installed just to the west of the proposed access to ensure that eastbound vehicles approaching the proposed access, do not encroach the opposing lane and thus ensure the achievable visibility accords observed speeds. The scheme drawing illustrates that illuminated keep left bollards are to be provided which should highlight the features to approaching drivers, however, due to the existing alignment of Bird in Eye Hill to the west as well as vegetation abutting the carriageway, forward visibility for eastbound drivers is limited. As such, there may be insufficient warning of the traffic island which could lead to vehicles striking the feature and a loss of control type incidents. It is recommended that sufficient forward visibility is achievable to an object within the carriageway.

Designer Response: The Highway Authority are supportive of the extension to the 30mph speed limit and as set out in MfS2, the starting point for visibility on non-trunk roads is MfS. It is clear that Bird in Eye Hill is not a trunk road and sufficient forward visibility is achievable.

LHA view – the 30mph speed limit extension cannot be supported without clear acceptance from Sussex Police and the Road Safety Team at ESCC. Frontage development and an environment conducive to supporting lower speeds is a prerequisite. Although forward visibility is available there is evidence that traffic does breach the speed limit. The presence of the isolated island within a derestricted speed limit that is not supplemented by street lighting or frontage development may encourage middle of road driving during quieter times such as night when road traffic volumes are low.

3) GENERAL – Proposed access

Auditor Comment: Existing Telegraph / Electric pole will become an obstruction to vehicles. Signage and telegraph poles are situated within the existing verge along Bird in Eye Hill. The proposals relocate an existing access approximately 30 metres to the east which is to serve the existing dwellings as well as the proposed development of 300 dwellings. However, a telegraph/electric pole is situated in the proposed bell mouth access in the path of vehicles and will be an obstruction. It is recommended that the telegraph/electric pole is relocated, and the access is free of obstructions.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.

LHA view: The pole would need to be relocated to accommodate the access, and it is agreed that this should be reviewed at detailed design stage (S278) and the pole placed in a position that does not obstruct access safety requirements of the highway and its users.

4) GENERAL - Proposed Access and Bird in Eye Hill

Auditor Comment: Existing road gully will be within the path of vehicles. Bird in Eye Hill is cambered with surface water falling to the channels either side of the carriageway where road gullies are present. During the site visit associated with this Audit, a number of gullies in proximity to the proposed works were observed to be blocked and therefore ineffective. The proposals that introduce a traffic island to the west of the proposed access, widen the Bird in Eye Hill carriageway where a gully is present either side of the road. No details of the proposed surface water drainage have been provided at this stage; however, an insufficient network is likely to result in ponding during inclement conditions which increases the likelihood of loss of control type incidents. Furthermore, a road gully within the path of a vehicle could give rise to loss of control type incidents particularly for two wheeled vehicles and vehicles undertaking a braking manoeuvre. It is recommended that an adequate surface water drainage network is provided.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.
LHA view: it is agreed that features in the highway that are affected by a highway related scheme can be reviewed at detailed design stage (S278).

5) JUNCTIONS – Bird in Eye Hill

Auditor Comment: Drivers approaching and waiting to turn right into the proposed access may not become aware of each other at a safe distance. In proximity of the proposed access, Bird in Eye Hill is derestricted, subject to the 60 mph national speed limit and accommodates a bend on each approach. The proposals that are subject to this Stage 1 Road Safety Audit includes two options; one to extend the existing 30mph zone to a point just east of the proposed access and another where the derestricted nature of the road remains unchanged but a splitter island is to be installed just to the west of the proposed access to ensure that eastbound vehicles approaching the proposed access, do not encroach the opposing lane and thus ensure the achievable visibility accords with the splays illustrated. The Audit Team took measurements whilst on-site and visibility splays of 2.4x117.2 metres and 2.4x102 metres are achievable from the proposed access to an approaching vehicle, however, due to vegetation within the verge to the north of the carriageway, forward visibility to and from a vehicle attempting to turn right into the access, is restricted to below 117.2 metres for westbound drivers. As such, a westbound driver will have insufficient warning of the traffic attempting to turn right and vice versa. It is recommended that the sufficient forward visibility is achievable.
Designer Response: As stated by the Auditor's, the proposed access is clearly visible for westbound drivers and as such, one would approach cautiously in the knowledge that a vehicle may attempt to turn right. It must be noted that a right turning vehicle will be moving across the carriageway and not be a stationary object. The Highway Authority are supportive of the extension to the 30mph speed limit and in any event, MfS2 advises that the starting point for calculating visibility for non-trunk roads should be MfS. It is evident that sufficient visibility is therefore achievable to/from the proposed access.
LHA view: designer response is assuming that a 30 mph speed limit is supported, and vehicles would approach cautiously, and a right turning vehicle is not stationary (a vehicle waiting to turn has to ensure that it is safe to do so and eastbound vehicles may prevent this). Furthermore, there would be an increase in traffic volume approaching from the west as a result of the proposal. It was raised that a ghost right turn lane at the proposed access should be considered. The auditor comments remain valid.

6) JUNCTION - Proposed access

Auditor Comment: No road markings are provided to highlight the need for exiting vehicles to give-way. The existing access arrangement serving a mixed-use development on land at Bird in Eye Farm does not accommodate any road markings. The proposals subject to this Stage 1 Road Safety Audit are to provide a priority access that serves a development of 300 dwellings. The scheme drawings provided with the Audit Brief provided do not identify that any carriageway markings are to be provided at its junction with Bird in Eye Hill. Vehicles exiting may not therefore align themselves sufficiently to allow space for a vehicle to enter simultaneously which could give rise to sideswipes type incidents as well as rear end shunts along Bird in Eye Hill and junction overshoot type incidents. It is recommended that road markings are provided to guide vehicles sufficiently.
Designer Response: Give-way and road centreline markings are to be provided.
LHA view: it is considered that the access specification is required as part of the detail for this outline application and the appropriate junction configuration should be presented as part of the matters for considering suitability and deliverability of the vehicular access. As such as there are no access details such as cross sections, gradient, or junction geometry, and the access detail is incomplete.

7) JUNCTION – Proposed access

Auditor Comment: Insufficient space may be provided to allow service vehicles to enter. The existing access to Bird in Eye Farm is approximately 5 metres wide with large corner radii that allow for Heavy Goods and Agricultural Vehicles to manoeuvre safely. The proposals include the relocation of the priority access with 8 metre corner radii which provides access to a 5.5m wide carriageway. No swept path analysis has been provided with the Audit Brief and as such, the corner radii may not be sufficient to allow for the infrequent HGV movements that could be expected from a development of 300 dwellings. Should turning movements be restrictive, vehicles could be required to encroach the opposing lane or vehicles may be required to reverse out of the proposed access or in order to enter and exit the access raising the risk of rear-end, sideswipe collisions.

Designer Response: A swept path analysis has been undertaken and the proposals are adequate for the expected vehicles.

LHA view: A refuse truck has been tracked through the access as shown. The access details are insufficient as stated previously. A further note is that the access will serve existing industrial related uses and although the weekly occurrence of a refuse truck would ordinarily be accepted with some overhang onto adjacent lanes, more frequent use of such vehicles for the 12 business units (details been excluded in this application) would require an access that accommodates larger vehicles that require regular use. The access should accommodate regular use by all vehicles without the risk of conflict on the highway or at the access.

8) WALKING, CYCLING & HORSE RIDING – proposed footpath connection BIE Hill

Auditor Comment: Existing signage will become an obstruction to pedestrians. In proximity of the proposed footway cycleway access the verges of Bird in Eye Hill accommodates a number of telegraph / electric poles and road signs. The proposals introduce a connection between Bird in Eye Hill and the local pedestrian network, to the west of the proposed access via footpath through a wooded area. An existing telegraph / electric pole is situated just to the west of the proposed connection will be situated central to the footway and become an obstruction to pedestrians that could force one to enter the carriageway suddenly raising the risk of vehicle collisions with pedestrians. It is recommended that the telegraph pole is relocated.

Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.

LHA view: Agreed, though the proposal should be able to demonstrate deliverability and any relocation of telegraph poles and road signage would require alternative locations that are suitable for their revised positions and should not compromise accessibility or highway safety.

9) WALKING, CYCLING & HORSE RIDING – proposed footpath connection BIE Hill

Auditor Comment: Cyclists are likely to utilise the proposed footpath. Bird in Eye Hill benefits from a footway along the southern side that terminates just to west of the gated access to the application site. The scheme drawing provided with the Audit Brief illustrates that a footpath connection is proposed at this location which is approximately the same width as the existing footway, however, as identified within the Transport Assessment associated with the scheme, a 3.0-metre-wide shared use footway / cycleway link is to be provided. The proposed link is considerably shorter than following Bird in Eye Hill and as such, it is highly likely that cyclists will utilise the link. Should the link be insufficient to accommodate a high number of pedestrians and cyclists, there could give rise to cyclist-pedestrian collisions. It is recommended that the width of the facility is increased appropriately to accommodate cyclists.

Designer Response: The section of footway between the pedestrian/cycle access and the bus stops to the west will be widened to 3m to facilitate its use as a shared footway/cycleway.

LHA view: Agreed, though the proposal should be included as part of access detail submission included in the audit brief, and considering the provision being up to the carriageway, it is advised that a section of verge of say 0.5m is included to separate the non-motorised provision with the carriageway to prevent users from sidestepping into oncoming traffic that may be driving close to this facility (HGV and bus route).

10) WALKING, CYCLING & HORSE RIDING – proposed footpath connection BIE Hill

Auditor Comment: Existing road sign could become an obstruction to users of the footway. Bird in Eye Hill benefits from a footway along the southern side that terminates just to west of the gated access to the application site at a location where a 'pedestrians in carriageway' road sign with a 'no footway for 1 mile' plate is present. The sign face appears to provide insufficient headroom for a pedestrian to walk beneath. Should a pedestrian step slightly off the existing footway, the sign would be an obstruction resulting in a personal head injury. It is recommended that the sign face is relocated further back from the edge of footway or raised to a suitable level.
Designer Response: All existing street furniture, utility covers and gullies will be reviewed during the detail design of the scheme.
LHA view: Auditor recommendation is accepted, and detailed design of the scheme can include the minor adjustment of the sign in position or height provided it does not conflict with the proposed provision of the footway/cycleway

To summarise the Road Safety Audit, it is apparent that insufficient details were included in the audit brief and submitted as part of the application documents. A 30mph speed limit can only be accepted if the environment is conducive to supporting a self-enforcing reduction in speeds. This would be assisted by frontage development, street lighting, and a visual change in character supported by urbanising the street infrastructure. It is contested that the highway authority supports a 30mph as this would be reliant on a suitable scheme to support this notion. Consideration of the Bird In Eye North site which is being offered as a potential housing site has the potential to contribute to the urban extension of Uckfield and the sites are advised to be considered collaboratively as they can coordinate highway enhancements for mutual and wider benefit. As such the vehicular access details submitted are not accepted.

Pedestrian and Cycle Access

This is indicated on the submitted plan as a route from the northern corner on the westernmost point where the site meets the highway. The submitted plans do not show this in detail though a plan is provided within the Transport Assessment documents (5330/008C) which also includes the proposal for a 30mph limit with gateway features.

The ESCC Passenger Transport team have been consulted on this proposal and have provided the following comments and contribution request:

In terms of this application, I have the following observations/concerns.
The size of the site means that dwellings in the south east part of the development will be in excess of 500 metres walking distance to the B2102. The consultant's Transport Assessment, in Appendix 21, appears to be it acceptable to walk a further 450 metres to the existing 'Uckfield Community Hospital' bus stops on the B2102 to the west. Clearly this is totally inappropriate.

Two new bus stops (one in each direction) would need to be provided adjacent to the main site entrance, and even then, they would be in excess of the accepted 400 metre walking distance. Each would need to have a raised kerb, bus stop clearway, bus shelter with seating, new bus stop pole (sourced from Externiture), lighting and real time information provision. A safe and accessible road crossing point would be required.

In Appendix 22 it is noted that the consultant has approached the bus operator for costed proposals to improve the frequency of the weekdays daytime only 2 hourly bus service 231. A couple of return journeys are also provided on Saturdays by a community transport operator.

It is not appropriate for the developer to secure service improvements directly through a bus operator. The current contract with the bus operator of service 231 is due to end in 2022. The indicative prices provided that operator in April 2021 will now have significantly increase due to the cost of securing driving staff due

to the national shortage of bus drivers. The particular is suggesting future contract price increases of up to 20% so as to account for additional driver costs and other cost pressures.
The level of service specified is also not sufficient. Already the existing service is reaching capacity at school times, so additional provision will be needed for pupils from the development attending secondary schools in Heathfield and Uckfield. There is additionally the requirement for an early morning, evening and Sunday service. In particular, the last journey from Uckfield currently is 1735, which is too early for commuters from a wider (eg. from Brighton making connections at Uckfield Bus Station, and train commuters from London). We estimate the additional cost of these bus requirements to be:

- *£69,256 per annum for the level of Monday to Saturday provision as shown in Appendix 22 (ie a 20% increase).*
- *£10,120 per annum for the additional early morning provision (Mondays to Fridays).*
- *£43,560 per annum for the additional evening provision (daily).*
- *£18,061 for the Sunday daytime service provision.*

Therefore, a total of £140,997 per annum, which will be required for a minimum of 3 years.

The proposals on Framfield Road include a crossing point in vicinity of 2-8 Framfield Road. This is close to a signalised junction where traffic queues back to and beyond, and where footways are narrow (less than 1.5m in width). This is not included in the RSA and cannot be considered as a deliverable solution as part of accessibility strategy. Bus stop improvements are proposed but these are not to the requirements of the Passenger Transport Team nor have these been part of the RSA.

The installation of parking controls on Framfield Road has been presented by the applicant and supported by a parking survey on one day. The Lambeth methodology requires :

Residential Developments The Council requires a parking survey to cover the area where residents of a proposed development may want to park. This generally covers an area of 200m (or a 2 minute walk) around a site. For further detail see 'Extent of survey' below. The survey should be undertaken when the highest number of residents are at home; generally late at night during the week. A snapshot survey between the hours of 0030-0530 should be undertaken on two separate weekday nights (ie. Monday, Tuesday, Wednesday or Thursday).

The methodology is directed at proposed development and not necessarily for securing parking restrictions for existing development that benefits from unrestricted parking provision. If the applicant wishes to understand where residents park, it may not be solely on Framfield Road as other minor roads are also utilised. The outcome of the parking survey is therefore not considered to be an appropriate parking assumption for this road and further surveys are recommended, jointly with the BIEN site proponents in accordance with a methodology that is agreed with the Highway Authority.

A non-motorised user audit is required carried out to understand any constraints experienced by pedestrians and cyclists using the highway network to connect to local service providers and amenities, to then seek appropriate and commensurate solutions to assist accessibility for this group of highway users. Ideally, as BIEN has a direct relationship to this site and potential link to the north of the railway line, and mentioned earlier, a collaborate approach drawing together sustainable solutions from each site (they are very much reliant on each other) would benefit both sites. Joint solutions to overcome the accessibility constraints for both these sites are likely to be more meaningful and effective if both sites work together to prevent conflicting mitigation measures that come forward independent of each site.

It is recommended that these sites coming forward independently is likely to result in collaborative working to address appropriate and safe mitigation measures later down the line, and as such it would make sense not to have conflicting solutions and have solutions and measures that are conducive to both sites worked out form the outset, given that both these sites have been considered at appeal with the Inspector's comments highlighting the constraints and opportunities in this location.

Since pre-application discussions, which I highlight were not conclusive and did not indicate support for a 30mph extension explicitly (no reference was made within the pre-application response that the applicant has provided in appendix 1).

At this stage, the access and accessibility aspects of the application have not been fully addressed or justified.

Highway Impact

Modelling for this site is being prepared in conjunction with several other major sites in Uckfield as part of an agreed strategy between the County Highway Authority and Wealden District Council. The applicant has signed and committed to a Statement of Common Ground to understand the wider impact of traffic on the highway network. The trip assessment of the proposal, as mentioned earlier is based on 2020 baseline surveys which were taken during a Covid restricted period and are unrepresentative.

Proposals to install SCOOT has been explored as part of the highway assessment for land at Eastbourne Road for 90 dwellings (WD/2020/0410). At that time both MOVA and SCOOT solutions were considered by the East Sussex Highways signals team and deemed as ineffective and it is unlikely that this can be considered as a solution or be modelled to demonstrate mitigation at the critical junctions Framfield Rd or High Street/Bell Lane. Further comments on this aspect of the application cannot be provided until the outcome of the wider modelling exercise is complete.

Internal Layout

An indicative layout of the proposed development is provided. The details do not give any indication fo housing types or amount of parking. The TA suggests that the parking will be provided in accordance with the ESCC parking standards. This is essentially a reserved matter, though it should be clear at this stage that the indicative layout can meet the proposal description and highway related requirements. The SANGS car parking area shown as 30 spaces appears to be served from a minor road which is potentially to unadopted standard. If the SANG is available to the general public it would have amenity value and road that connects to it should ideally be adopted or responsible to the SANG managing authority for its maintenance if it remains privately owned.

There is a public right of way that runs along the south boundary of the SANG, and suitable connections should be provided to allow SANG users to link to it, though gated sections.

Swept path plans have been provided throughout the site, though the application seeks consent for access only. As the layout is not for determination, the swept path plans are not considered as part of this response. The swept path plan for the access is shown though the details of the access are not complete and it has been requested that other vehicle movements from the business units are considered as they would require use of this access.

It has not been specified if the proposed site road network is to be offered for adoption. This should be indicated at outline stage.

Travel Plan

This is required to be secured through a s106 agreement.
It is essential that this site and its proposed uses are supplemented with a suitable travel plan which covers a 5 year period (and phased, if phases identified). The applicant has provided with the application a framework travel plan which is welcomed. The Passenger Transport team has suggested that bus service and infrastructure improvements are required as part of this development. In addition, hard measures

which have yet to be agreed and would be identified through a NMU audit, would need to form part of the Travel Plan so that it can be promoted effectively and define non-motorised routes.

Measures that have been included in the submitted travel plan framework are:

1) Travel Plan Coordinator
2) Residents' information pack – to include local walking and cycle routes, cycle journey planning resources, promotion of cycle training, public transport information on routes and timetables, locations of nearby destinations and mapping with cycle/walking times and distances. A £150 travel voucher offered for sustainable travel.
   This pack should also include car club membership details/promotion, home deliveries for shopping, setting up a local group on a social network site by the travel plan coordinator which should also promote car sharing, walking and cycle groups.
3) Car club - only 1 vehicle has been included and is likely to be appropriate initially.
   For a development of this scale 2 EVs are recommended with fast-charge facilities within an adopted road to enable wider use. For each household, Car club membership for a minimum of 2 year period with 50 miles drivetime should also be provided for each household.
4) *For inclusion: A twice annual Dr Bike visit to the development ensure that resident's cycle equipment is maintained to a good standard during the travel plan period.*

Monitoring of the travel plan – baseline surveys should be provided by 25th occupation and future surveys are required in years 1, 3 and 5 at this site, on the basis that sustainable travel modes should be reinforced on a much more regular basis to minimise where possible, the potential impact on the highway network by single occupancy vehicles. This attracts an audit fee of £6k.

Summary:

The application is currently incomplete in terms of access, accessibility and modelling details. Assumptions for a 30mph extension and SCOOT infrastructure are not accepted. Mitigation measures to improve non-motorised environment along Framfield Road should derive from the outcome of a NMU audit, ideally in conjunction with proponents of BIEN site to achieve meaningful and effective transport schemes to create a more sustainable environment.

To note:

S106 requirements (not conclusive)

1) Travel Plan for a 5-year period and travel plan audit fee of £6k. TP to include and flexible voucher for £150 for use on sustainable travel measures; car club membership for first occupant of each dwelling for 2 years and 50 miles drive time.
2) Car club provision – 2 E-vehicles and 2 dedicated fast-charging bays within the site
3) Road layout and access provision - subject to a combined s278/s38 agreement where internal roads are offered for adoption.
4) Provision of bus infrastructure (Two new bus stops adjacent to the main site entrance with a pedestrian crossing, raised kerb, bus stop clearway, bus shelter with seating, new bus stop pole, lighting, and real time information provision - subject to a s278 agreement and service improvement contribution of £140,997 per annum, which will be required for a minimum of 3 years.
5) Accessibility related highway works – to be agreed

On behalf of the Highway Authority
For Director of Communities, Economy and Transport