
LAND AT BIRD IN EYE FARM, UCKFIELD, EAST SUSSEX

TECHNICAL NOTE 1 – HIGHWAYS AND TRANSPORT CONSIDERATIONS

1 INTRODUCTION

- 1.1 Miles White Transport (MWT) have been appointed by Kassie Smith QC (our client) to provide highway engineering and transport planning advice in relation to an outline planning application that was submitted to Wealden District Council (planning reference WD/2021/2198/MAO) by Croudace Homes Ltd and Mr & Mrs Berry in August 2021 for the erection of up to 290 dwellings, associated landscaping, informal open space and strategic SANG.
- 1.2 The planning application was supported by a Transport Assessment (TA) and Framework Travel Plan (FTP) that were prepared by Bellamy Roberts LLP.
- 1.3 Our client objects to this proposed development. This Technical Note provides a critical assessment of the proposed scheme (and the information submitted with the planning application) from a highways and transport perspective.
- 1.4 The application documents contain information dealing with the potential impacts of the proposed development in relation to the following highways and transport related issues:
 - Site Access Arrangement
 - Traffic Impact and Road Safety
 - Accessibility by Sustainable Modes

2 SITE LOCATION

- 2.1 The site is located to the south of Bird in Eye Hill (the B2102) approximately 1.2km east of Uckfield town centre as shown overleaf in **Figure 1.1**.
- 2.2 The B2102 leads through Uckfield in a broadly east-west direction linking to the A22 Uckfield Bypass to the west (as Bell Farm Road) and the B2192 at Blackboys to the east as Framfield Road/High Street.
- 2.3 The A22 provides the primary route to/from Uckfield and connects to east Grinstead and the M25 (and beyond to Purley) to the north and to the south coast at Eastbourne in the south.
- 2.4 The A22 connects with the A26 to the south of Uckfield, which provides a link to Lewes and then to Newhaven as the A26 and to Brighton via the A27.
- 2.5 **Figure 1.2** overleaf shows the local highway network around Uckfield and the site area.

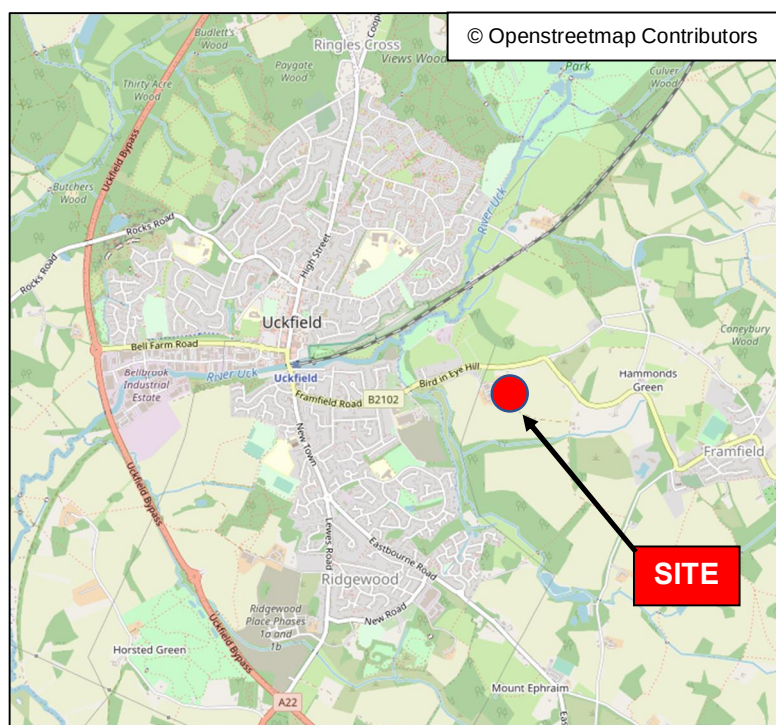


Figure 1.1: Site Location

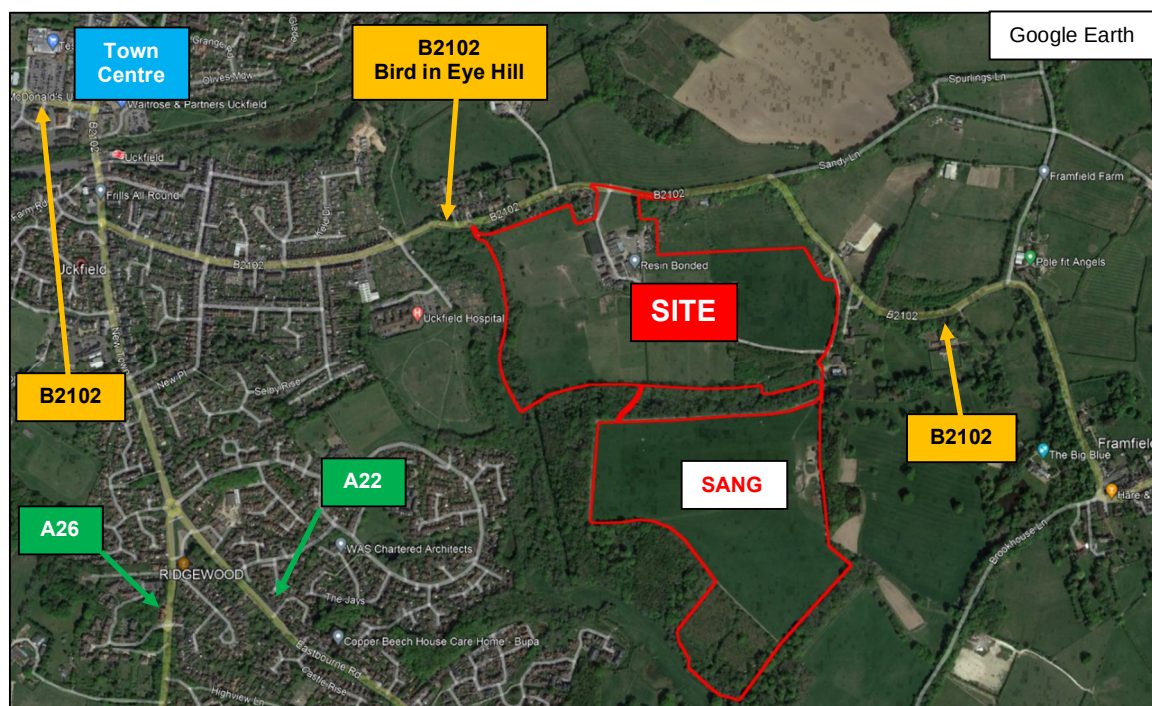


Figure 1.2: Local Highway Network

3 PROPOSED VEHICULAR ACCESS

Access Junction

- 3.1 Vehicle access to the site is proposed to be achieved directly from Bird in Eye Hill via a simple priority T-junction arrangement. A separate shared footway/cycleway will connect to the existing network at the northwest corner of the application site.
- 3.2 The existing site is accessed via a simple priority T-junction on the southern side of Bird in Eye Hill. The proposal will relocate this access approximately 30m to the east to serve the proposed development and is purported to be supported by East Sussex County Council (ESCC), as the Local Highway Authority.
- 3.3 In addition to providing access to the existing farm, access is also provided to two residential properties. The relocated site access will serve the farm and existing properties.
- 3.4 The Bird in Eye Hill carriageway in the vicinity of the proposed site access is approximately 5.5m wide and allows for two-way free flowing traffic.

Junction Form

- 3.5 The TA states in section 5.10 that ESCC identified in their pre-application comments that a right-turn lane (ghost island) would be appropriate to serve the scheme given the number of residential dwellings proposed.
- 3.6 CD 123 of the Standards for Highways (previously TD42/95 of the Design Manual for Roads and Bridges ĩ DMRB) provides guidance on the selection of the type of priority junction provided on single carriageway roads based on the traffic flows on both the major and minor road. **Figure 3.1** below reproduces Figure 2.3.1 of CD 123.

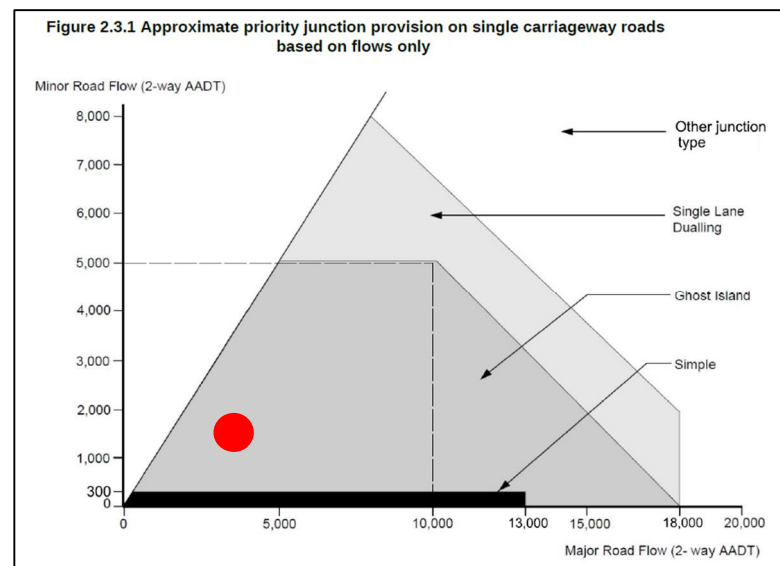


Figure 3.1: Approximate Capacity of Priority Junctions

- 3.7 The daily traffic volumes contained in the TA (Table 1) and the likely number of trips generated by the proposed development identified in the TA (Table 7) means that the traffic volumes associated with the proposed access junction lie well outside the typical operational capacity of a simple priority junction as shown by the red dot in **Figure 3.1**.
- 3.8 **Figure 3.1** shows that a ghost island priority junction, i.e. with a separate right turning lane to avoid vehicles waiting to turn right into the site obstructing eastbound through traffic, is required in traffic flow terms and thus supports ESCC's position that such a junction should be provided to access the site.

Junction Capacity

- 3.9 As well as requesting a right turn lane, ESCC stated further in their pre-application comments that the stack capacity should be determined based on the results of capacity modelling of the proposed site access junction.
- 3.10 The TA contains a PICADY assessment of the site access for a design year of 2027 with the addition of the traffic generated by the development of up to 290 units as well as the two existing residential properties and Bird in Eye Farm that are accessed from the existing access junction.
- 3.11 The TA states in section 7.12 that the PICADY model contains an *assumption of the number of movements associated with the existing dwellings* but does not specify this further. Thus, it is unclear whether the traffic levels assessed are realistic for the existing and proposed development that will use the proposed site access junction.
- 3.12 The PICADY assessment in the TA shows that the proposed layout (i.e. a simple priority junction without a right-turn lane) operates with minimal queuing on the major arm (the B2102 Bird in Eye Hill).
- 3.13 The TA then concludes that the provision of a right-turn facility is not required to serve the proposal (from a capacity perspective).
- 3.14 However, the TA does not address the road safety aspects associated with not providing a right turning lane at the site access junction even though such an arrangement was requested by ESCC and is required based upon traffic flows using guidance from the DMRB.
- 3.15 Given this, it is surprising that the TA does not specifically demonstrate that adequate forward visibility is available for vehicles approaching the site from the west on the B2102 in order to prevent accidents occurring when vehicles are waiting in the road to turn into the site and obstructing through traffic.

Visibility Splay

- 3.16 The TA states in section 5.7 that ESCC *recommended and support extending the existing 30mph speed limit on Bird in Eye Hill beyond the proposed site access*. However, the speed limit will only change to 30mph if a Traffic Regulation Order (TRO) is published and approved.
- 3.17 It is noted that the visibility splay to the west is measured to the centreline of the road rather than the nearside kerb as usually required.

- 3.18 Whilst Manual for Streets does allow the visibility splay to be measured to the centre of the major road carriageway where *“circumstances make it unlikely that vehicles approaching from the left on the main arm will cross the centreline of the main arm”* this is usually as a result of existing overtaking restrictions such as double white lines or when opposing flows are physically segregated.
- 3.19 The proposed site access junction is not located on a stretch of the B2102 where overtaking is restricted or prohibited and so the visibility splay would normally be required to be measured to the nearside kerb.
- 3.20 However, the TA notes in section 5.8 that the scheme *“incorporated (sic) a traffic island to the west of the access, allowing the visibility splay to be taken to the carriageway centreline, in accordance with MfS guidance (ref. paragraph 7.75)”*.
- 3.21 The provision of a traffic island in this location appears to be a contrived measure added simply to enable the visibility to be measured in a way that means that the splay avoids third party land if vehicle speeds remain at present levels and a 30mph speed limit is not introduced via a TRO. **Figure 3.2** below provides an extract of the site access drawing and shows the location of the proposed traffic island and the site access junction.

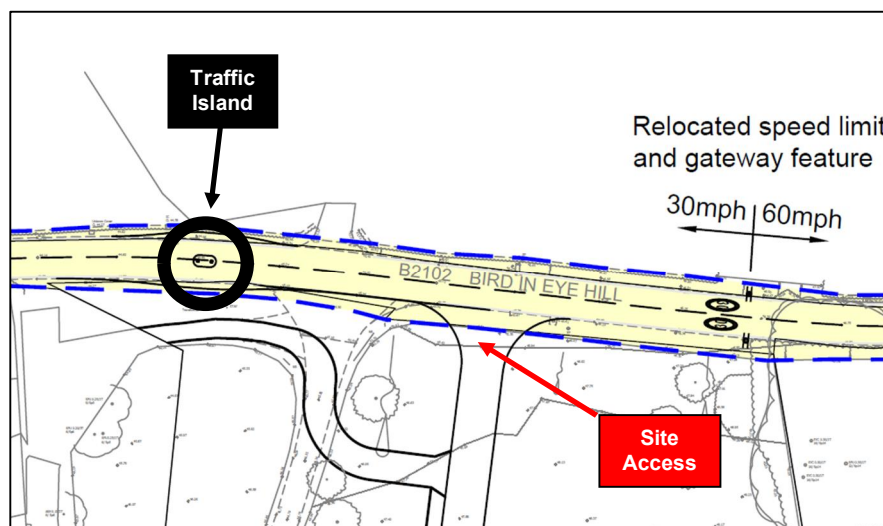


Figure 3.2: Proposed Traffic Island west of Site Access Junction

- 3.22 It is important to note that the visibility spay (sight line) to the west just manages to avoid the northeast corner of the garden of number 18 (Bird in Eye Hill) as shown overleaf in **Figure 3.3** by the green circle, which just so happens to be outside the red line/site area. If the visibility splay had been drawn to the nearside kerb, then part of the garden of number 18 would be required to achieve the visibility splay based on the surveyed speeds on this part of the B2102.
- 3.23 Given there are no footways in the vicinity of the proposed traffic island and as there are proposed roundels advising of the 30mph speed either side of the island, it is unclear precisely what function this proposed feature will have other than to enable the visibility splay to be measured in a way that suits the applicant.

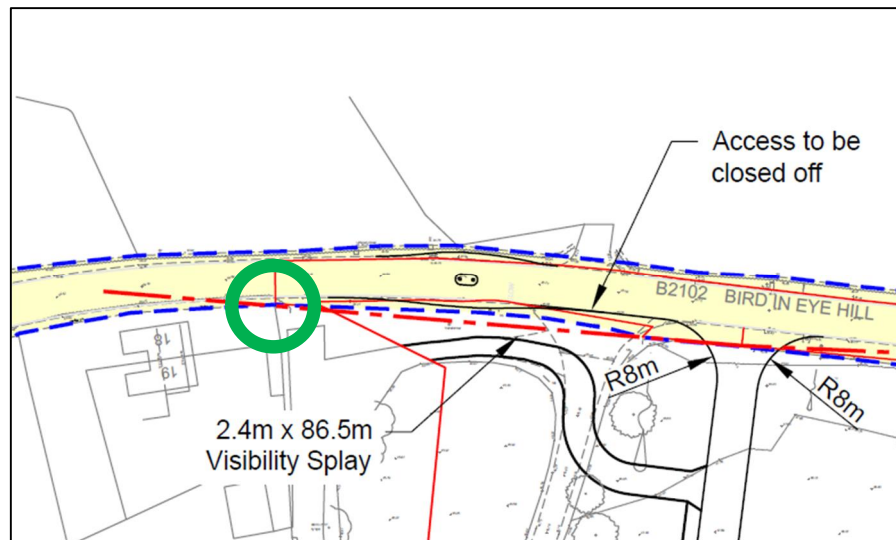


Figure 3.3: Visibility Splay and Number 18 Bird in Eye Hill

Swept Paths

- 3.24 The TA contains swept path analysis showing a refuse vehicle entering and exiting the site via the proposed access junction.
- 3.25 **Figure 3.4** below provides an extract of the exit manoeuvres and shows that the left and right turns out of the site are problematic in that they involve the vehicle encroaching across all of the B2102.

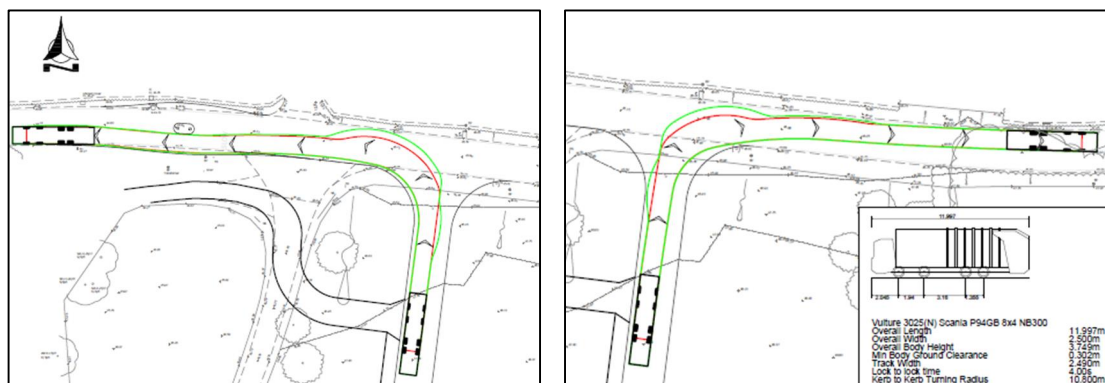


Figure 3.4: Visibility Splay and Number 18 Bird in Eye Hill

- 3.26 Whilst the TA states in section 5.14 that such vehicles can *conveniently and safely* leave the site in a forward gear, this is questionable based upon the images shown in **Figure 3.4**.

Farm Access

- 3.27 The TA states that the proposed site access will serve the farm and existing properties as well as the proposed residential development yet does not demonstrate how this will work given the distance between the access junction (on the B2102) and the proposed turning into the farm is only 25m.

- 3.28 It is our view that there is a potential for conflict between different users of the access road, particularly if larger vehicles are visiting the farm at peak times when there could be queuing at the site access junction.
- 3.29 Appendix 14 of the TA contains a swept path analysis for a large car entering and exiting the farm access from the proposed residential access road but does not show any larger vehicles undertaking these manoeuvres. It is our view that there will be an abundance of larger vehicles visiting the farm on a regular basis given the nature of activities at the farm (vehicle body repairs, building material supplier etc) and that this should have been assessed in the TA.

Road Safety Audit

- 3.30 A Stage 1 Road Safety Audit (RSA) was undertaken by Fenley and included within the TA as Appendix 12. This document also includes the designer's response (Bellamy Roberts) to the various problems and recommendations identified in the RSA.
- 3.31 Eight problems were identified at, or in the vicinity of, the proposed vehicular access as shown below in **Figure 3.5**.

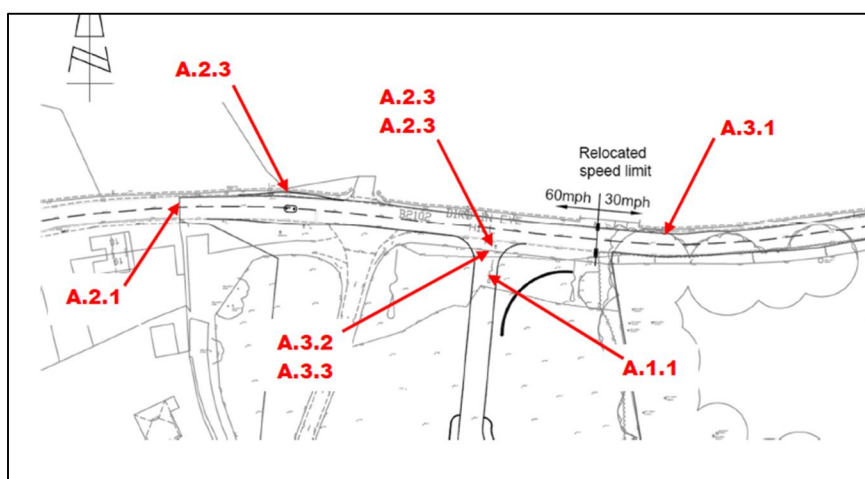


Figure 3.5: Location of Problems identified in RSA at Vehicular Access

- 3.32 One of these problems (A.2.1) relates to the traffic island discussed above in section 3.21, which enables the visibility to be measured in a way that avoids third party land. An alternative approach to this issue would be to locate the site access junction in a position where it could provide the required visibility (for the surveyed speeds) rather than introduce traffic islands where they do not appear to be needed for any other reasons.
- 3.33 Problem A.3.1 relates to forward visibility between westbound vehicles and vehicles waiting to turn right into the site. The RSA identifies that vegetation within the verge north of the carriageway restricts visibility and, as such, drivers will not have enough warning of right turning vehicles into and from the site. The designer's response refers to the proposed 30mph speed limit (which will need a TRO) but otherwise offers no solution to this issue.
- 3.34 Problem A.3.3 relates to the swept path analysis mentioned in section 3.25 above and the fact that larger vehicles are likely to encroach into opposing lanes (the RSA was written without the benefit of seeing the swept path analysis included in the TA as

Appendix 14). The designer's response states that the swept path analysis shows that these manoeuvres are adequate but this is not accepted as stated in section 3.26 above.

Relevant Planning Policy

- 3.35 A number of policies in the Adopted Wealden Local Plan (1998) were saved by approval of the Secretary of State. Saved policy TR3 states the following (our underlining):

"Planning applications for new developments will be permitted where the following criteria are met:

(1) the proposed development does not create or perpetuate unacceptable traffic conditions;

(2) a satisfactory means of access (vehicular, cycle and pedestrian) is provided to meet Local Planning and Highway Authority standards;

(3) where appropriate the provision of suitable public transport facilities".

- 3.36 The proposed access junction is not appropriate to serve a development of 290 residential dwellings (as well as a farm) and so, in our professional view, fails to meet the underlined parts of the policy above.

4 PROPOSED PEDESTRIAN AND CYCLE ACCESS

- 4.1 The TA notes that there is an existing footway along the southern side of Bird in Eye Hill, which will provide a route from the north-western corner of the application site to the centre of Uckfield.
- 4.2 It is proposed that the main pedestrian/cycle access to the site will be achieved from this location and not form the vehicular access. As part of the proposal, a footpath link within the site will be provided to the existing footway on Bird in Eye Hill. This route within the site will be 3m wide to facilitate its use as a shared footpath/cycleway.
- 4.3 The section of footway along the southern side of Bird in Eye Hill between the pedestrian cycle access and bus stops will be widened to 3m and designated as a shared footway/cycleway. However, it is unclear what happens to cyclists when the shared footway/cycleway terminates at the westbound bus stop just before the access to Uckfield Community Hospital as shown below in **Figure 4.1**.

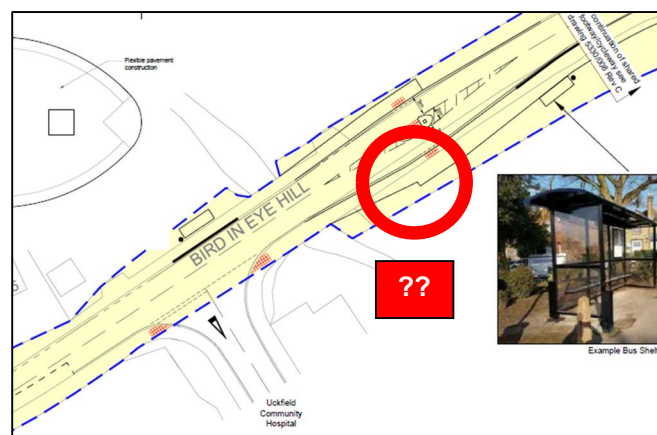


Figure 4.1: Termination of Shared Footway/Cycleway

- 4.4 The quality of the pedestrian and cycle routes into the town centre is dealt with in Section 6 of this Technical Note.

5 **TRAFFIC IMPACT**

Traffic Data

- 5.1 To assist with discussions at the pre-application stage, Bellamy Roberts undertook initial traffic surveys of the local highway network in July 2019, which included the following:
- Two Automatic Traffic Counters (ATC) on Bird in Eye Hill either side of the proposed site access (9th to 15th July 2019).
 - Turning count and queue length surveys at the Framfield Road/High Street/Bridge Farm Road signalised crossroads (9th July 2019).
 - Turning count and queue length surveys at the High Street/Bell Lane signalised T-junction within the centre of Uckfield (9th July 2019).
- 5.2 It is unusual to undertake traffic surveys in July as is not a neutral month because some of the schools will already have closed for the summer, particularly the private ones, and so the surveys are not representative of normal traffic conditions in these locations.
- 5.3 This view is supported by the request from ESCC in their pre-application comments for a 7-day survey of the town centre junctions being required before they could comment on the suitability of the traffic modelling undertaken to consider the impact of the proposed development.
- 5.4 As requested, Bellamy Roberts commissioned additional turning count/queue length surveys at the two town centre junctions over a 7-day period, between 14th to 19th October and again on the 3rd November 2020, which was required as the equipment was damaged on the 20th October thus meaning 7 days' worth of data had not been collected.
- 5.5 The TA states that the flows recorded during the October/November 2020 surveys were comparable to those from July 2019.
- 5.6 Restrictions associated with the COVID-19 pandemic were in place in October/November 2020 and so these surveys are also not realistic.
- 5.7 Indeed, the UK Government has been publishing data on transport use during the coronavirus (COVID-19) pandemic since the 1st March 2020 (*Transport use during the coronavirus (COVID-19) pandemic and developing faster indicators of transport activity - GOV.UK (www.gov.uk)*). This shows motor vehicle traffic flows as a proportion of the anticipated levels during more normal times. During the week surveyed traffic volumes were estimated to be as shown overleaf in **Table 5.1**.
- 5.8 It can be seen that the average weekday traffic volumes would be approximately 11% higher during normal conditions, which explains why the October/November 2020 surveys compared well to the July 2019 surveys as that is similar to the level of reduction experienced when the schools start to break up for the summer.
- 5.9 Thus, it is our professional view that the traffic data collected and used in the assessment of the traffic impact of the proposed development is not representative of normal traffic volumes at the two town centre junctions of interest.

Day	Normal	Covid-19	Conversion Factor
Wednesday 14 th October 2020	100%	88%	X 1.14
Thursday 15 th October 2020	100%	88%	X 1.14
Friday 16 th October 2020	100%	91%	X 1.10
Saturday 17 th October 2020	100%	92%	X 1.09
Sunday 18 th October 2020	100%	93%	X 1.08
Monday 19 th October 2020	100%	89%	X 1.12
Tuesday 3 rd November 2020	100%	92%	X 1.09
Average Weekday	100%	90.4%	X 1.11

Table 5.1: Motor Traffic Levels during Survey Week (Covid-19 versus Normal)

Capacity Assessment of Traffic Signal Junctions

- 5.10 Notwithstanding the concerns regarding the traffic data used in the junction assessments in the TA, the junction modelling undertaken has been critically reviewed as part of our work.
- 5.11 The Wealden Core Strategy Local Plan (February 2013) states in paragraph 6.6 that:
- “There is significant traffic congestion in the town centre at the junction of the B2102/Lower High Street and at the Bell Lane roundabout. The Highway Authority is currently modelling design solutions for delivery of a traffic management scheme in the town centre aimed at addressing these issues”*
- 5.12 Thus, clearly the operation of these junctions is already a cause for concern and so any additional traffic through this junction needs to be assessed accurately to avoid increased congestion in the future.
- 5.13 At the outset, ESCC confirmed that the traffic signals at the two town centre junctions currently operate independently of each other, i.e., they do not operate a SCOOT type system.
- 5.14 The LINSIG modelling in the TA shows that the two signal-controlled junctions in the town centre are operating close to their theoretical capacity in the base year (2020). The addition of traffic growth (to 2027) and the traffic associated with committed development in the town will cause the junctions to operate *“above their theoretical capacities”* (section 7.7 of the TA).
- 5.15 Table 9 in the TA identifies the Practical Reserve Capacity (PRC) for the existing junction in 2020. The TA defines the PRC as a *“measure of how much additional traffic could pass through a junction whilst maintaining a maximum degree of saturation of 90% on all lanes. A positive PRC value indicates that a junction has spare capacity to accept additional traffic whereas a negative PRC value indicates that the junction is over capacity”* Table 9 is reproduced overleaf as **Figure 5.1**.

Table 9: Summary of PRC Values – 2020 Base Year		
Junction	AM	PM
	PRC (%)	PRC (%)
High Street/Framfield Road/Bridge Farm Road	11.5%	5.1%
High Street/Bell Lane	12.1%	8.0%

Figure 5.1: Summary of LINSIG Assessment of Traffic Signal Junctions (2020)

- 5.16 The existing junction operates with a PRC in excess of 10% in the morning peak hour and 5% in the evening peak hour, yet this is described in the TA as being 'close' to their theoretical capacities.
- 5.17 Therefore, the TA proposes to improve the existing situation by linking the two signalised junctions via a SCOOT (Split Cycle Offset Optimisation Technique) type system. In summary, such a system will coordinate the two town centre junctions which currently operate independently of one-another.
- 5.18 Table 12 and 13 in the TA show the results of the LINSIG assessment of the two junctions in 2027 with committed development and the traffic associated with the proposed residential development in place and also with a SCOOT type system at the junctions. These tables are reproduced below as **Figure 5.1**.

Table 12: Summary of Junction Modelling – 2027 Design Year + Committed Development + Proposed Development (290 units)						
Road Name	AM			PM		
	Deg. Sat.	Average Delay per PCU (s/PCU)	Mean Max Queue (PCU)	Deg. Sat.	Average Delay per PCU (s/PCU)	Mean Max Queue (PCU)
Signalised Cross-Roads						
High Street (Northbound)	67.3%	45.5	12.4	45.5%	24.7	9.6
Framfield Road	78.3%	51.1	15.6	78.8%	78.1	8.7
Bridge Farm Road	63.0%	91.6	3.4	44.0%	78.8	2.2
High Street (Southbound)	62.6%	42.7	10.6	78.8%	30.4	17.5
Signalised T-Junction						
Bell Lane	88.8%	73.9	16.6	61.7%	13.4	7.2
High Street (Southbound)	55.6%	14.0	5.5	64.8%	27.8	11.5
High Street (Northbound)	90.8%	50.0	24.5	25.7%	1.2	0.2

Table 13: Summary of PRC Values – 2027 Design Year + Committed Development + Proposed Development (290 units)		
Junction	AM	PM
	PRC (%)	PRC (%)
High Street/Framfield Road/Bridge Farm Road	14.9%	14.2%
High Street/Bell Lane	-0.9%	24.0%

Figure 5.2: Summary of LINSIG Assessment of Traffic Signal Junctions (2027)

- 5.19 Table 13 shows that the PRC is above 10% for all scenarios save for the morning peak hour at the Bell Lane/High Street junction, which operates with a negative PRC of -0.9%.
- 5.20 The TA concludes that the PRC values compare favourably to the 2027 scenario (without the development traffic and SCOOT) and suggest that the impact is not severe in terms of Paragraph 111 of the NPPF.
- 5.21 At this point is important to recall that the TA itself states in section 7.4 that *“a negative PRC value indicates that the junction is over capacity”*
- 5.22 These results are considered in parallel with the questions over the accuracy of the traffic data (i.e. the main input into the LINSIG model), then the validity of the TA’s conclusion in relation to the severity of the residual traffic impact (in NPPF terms) is unproven.

Road Safety

- 5.23 Personal injury collision data was obtained in the TA for the most recent 3-year period (2018-2020) from the CrashMap website. It is worth noting that a 5-year period is normally selected for such an assessment. The data collected is summarised in Figure 4 in the TA, which is reproduced below as **Figure 5.3**.

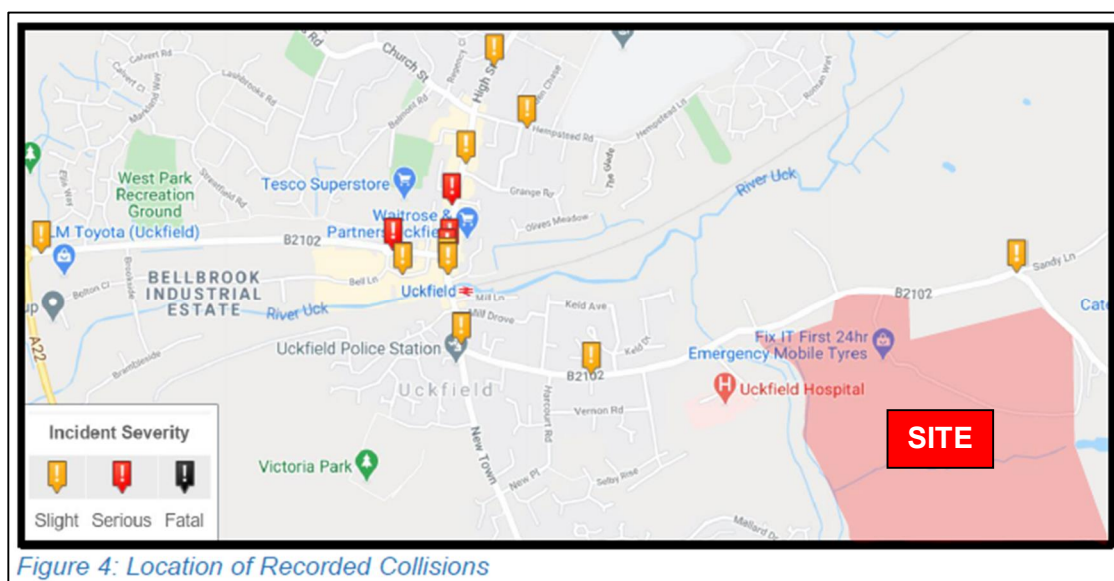


Figure 5.3: CrashMap Data from the TA

- 5.24 This shows that there were no accidents close to the proposed site access (and the existing farm access) and just one accident at the junction of Bird in Eye Hill (the B2102) and Sandy Lane to the east of the site.
- 5.25 However, an interrogation of the CrashMap website identifies that two further accidents occurred in the vicinity of the site as shown overleaf in **Figure 5.4**. The CrashMap reports for these accidents are contained as **Appendix A** of this Technical Note.

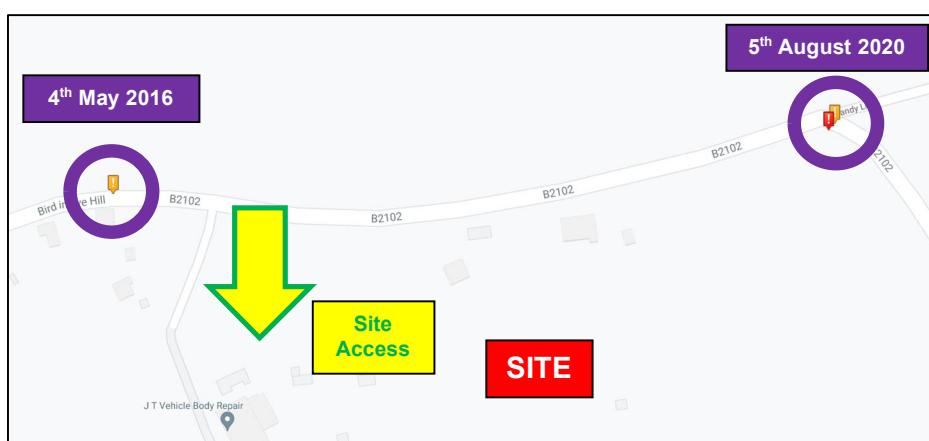


Figure 5.4: Additional CrashMap Data

- 5.26 The accident to the west of the site access occurred in 2016 and so would have been identified in the TA if a 5-year period had been selected as is usual. This accident involved a van and a cyclist and resulted in slight injuries being sustained by the cyclist. The location of the accident close to the proposed site access, where forward visibility has been raised as an issue in the RSA, adds to the concerns over the safety of the proposed access junction.
- 5.27 The other additional accident occurred at the junction of Bird in Eye Hill and Sandy Lane to the east of the site. Whilst this accident is likely to have been added to the CrashMap database since the TA was completed, it is important to note its occurrence. This accident involved two cars and resulted in slight and serious injuries being sustained by the occupants of the two cars.
- 5.28 The emergence of these additional accidents suggests that the stretch of the B2102 in the vicinity of the proposed site access junction is not as safe as concluded in the TA and this will be exacerbated by the increase in traffic volumes associated with the proposed development and the provision of a substandard access junction.

6 **ACCESSIBILITY BY SUSTAINABLE MODES**

Quality of Walking Route

- 6.1 The TA states that the existing footway network varies in width but is generally in excess of 1.5-1.8m wide, and 1m at its narrowest in the vicinity of 2-8 Framfield Road. Manual for Streets provides guidance on the width of footways as shown in **Figure 6.1** below.

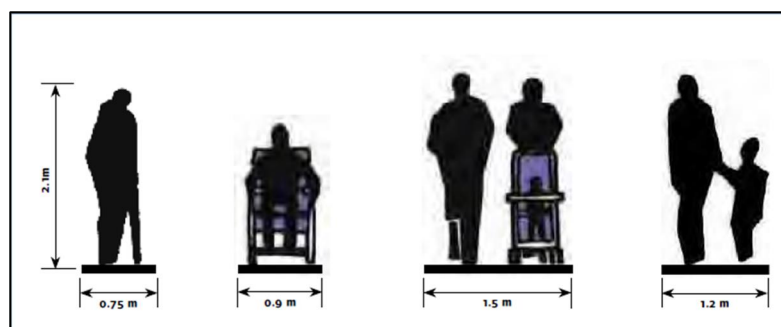


Figure 6.1: Footway Widths from Manual for Streets

- 6.2 **Figure 6.1** shows that the parts of Framfield Road with a footway width below 1.5m will not allow a buggy and pedestrian to safely pass and so will not encourage future residents to walk to local facilities. Whilst the TA states that pedestrians can cross Framfield Road at this point (and proposes to provide tactile crossing at this location) this is not ideal and will do little to maximise sustainable travel to/from the site.
- 6.3 Such width restrictions will affect the perceived quality of the walking route between the town centre and the site and influence the propensity of future residents to undertake journeys on foot. Moreover, a pedestrian route that is attractive and direct, as well as being safe and secure, will generate higher numbers of pedestrians than one that is narrow, involves crossing movements and is generally of poor quality as is the case along parts of Framfield Road.

Cycling

- 6.4 There are no dedicated on-carriageway cycle facilities on the local highway network, such as shared footway/cycleways or on-carriageway cycle lanes etc.
- 6.5 The TA states that the proposed extension to the 30mph speed limit to include this area will reduce speeds along Bird in Eye Hill and help to encourage safer cycle use. Whilst this may be true, the introduction of a 30mph speed limit will need a TRO and, as such, is not guaranteed.
- 6.6 Therefore, the ability to cycle to and from the site needs to be assessed in the context of existing vehicle speeds. It is our view that few residents will cycle to/from the site without the provision of additional cycling facilities, which it is noted are not part of the mitigation package identified in the TA.

Distance to facilities

- 6.7 The TA identifies various facilities that are all allegedly within an acceptable walking distance of the site.
- 6.8 Acceptable walking distances will vary considerably depending on various factors such as fitness and land topography; however, the Providing for Journeys on Foot guidelines produced by the Chartered Institution of Highways and Transportation (CIHT) identifies suggested acceptable walking distances for different types of journey as shown below in **Figure 6.2**.

Table 3.2: Suggested Acceptable Walking Distance.			
	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

Figure 6.2: Suggested Acceptable Walking Distances (CIHT)

- 6.9 **Table 6.1** below identifies the walking distances (and times) from the notional centre of the developed site to various local facilities in comparison to the acceptable distances suggested by the CIHT.

Facility	Distance	Walking Time	CIHT Maximum Guidance
Bus Stops B2102	600m	7 mins	400m
Primary Schools	2,000m	24 mins	2,000m
Town Centre	2,000m	18 mins	1,200m

Table 5.1: Walking Distances and Times versus CIHT Guidance

- 6.10 **Table 6.1** shows that none of the key local facilities are within the maximum distances in the CIHT Guidelines despite the TA stating in section 4.12 that numerous facilities are *located within easy walking distance of the site*.
- 6.11 Therefore, it is our view that it is very unlikely that future residents will walk to/from local facilities and will instead use their private car to access these facilities. Thus, the proposed residential development is not located so as to maximise travel by more sustainable modes of travel (such as walking and cycling) and, if permitted, will lead to the creation of a significantly car-borne development, which is contrary to local and national planning policy.

7 SUMMARY AND CONCLUSIONS

Summary

- 7.1 In summary, this report demonstrates that:

- The likely number of trips generated by the proposed development lies well outside the typical operational capacity of a simple priority junction and thus a ghost island priority junction, i.e. with a separate right turning lane to avoid vehicles waiting to turn right into the site obstructing eastbound through traffic, is required in traffic flow terms, which supports ESCC's position that such a junction should be provided to access the site.
- Whilst the PICADY assessment in the TA shows that the proposed layout operates with minimal queuing on the major arm and concludes that the provision of a right-turn facility is not required to serve the proposal, it fails to address the road safety aspects associated with not providing a right turning lane at the site access junction even though such an arrangement was requested by ESCC.
- The provision of a traffic island to the west of the proposed site access junction appears to be a contrived measure added simply to enable the visibility to be measured in a way that means that the splay avoids third party land if vehicle speeds remain at present levels and a 30mph speed limit is not introduced via a TRO.
- Given there are no footways in the vicinity of the proposed traffic island and as there are proposed roundels advising of the 30mph speed either side of the island, it is unclear precisely what function this proposed feature will have other than to enable the visibility splay to be measured in a way that suits the applicant.

- Several of the proposed vehicle movements to/from the site will introduce conflict between different users, such as refuse vehicles exiting the site and larger vehicles visiting the farm at peak times, and create a road safety hazard.
- The RSA identifies design deficiencies at the proposed site access that are not satisfactorily resolved in the designers response and so the safety of the proposed access junction is unproven.
- The proposed access junction is not appropriate to serve a development of 290 residential dwellings (as well as a farm) and fails to meet the relevant Local Plan policy requirements in this regard.
- The section of footway along the southern side of Bird in Eye Hill between the pedestrian cycle access and bus stops will be widened to 3m and designated as a shared footway/cycleway. However, it is unclear what happens to cyclists when the shared footway/cycleway terminates at the westbound bus stop just before the access to Uckfield Community Hospital.
- The average weekday traffic volumes would be approximately 11% higher during normal conditions than those collected when COVID-19 restrictions were in place. Therefore, the traffic data collected and used in the assessment of the traffic impact of the proposed development is not representative of normal traffic volumes at the town centre junctions of interest.
- If the results of the town centre junction capacity assessments are considered in parallel with the questions over the accuracy of the traffic data, then the validity of the TA's conclusion in relation to the severity of the residual traffic impact (in NPPF terms) is unproven.
- An interrogation of the CrashMap website identifies that two further accidents occurred in the vicinity of the site. The emergence of these additional accidents suggests that the stretch of the B2102 in the vicinity of the proposed site access junction is not as safe as concluded in the TA and this will be exacerbated by the increase in traffic volumes associated with the proposed development and the provision of a substandard access junction.
- Parts of Framfield Road have a footway width below 1.5m, which will not allow a buggy and pedestrian to safely pass. Whilst the TA states that pedestrians can cross Framfield Road at this point (and proposes to provide tactile crossing at this location) this is not ideal and will do little to maximise sustainable travel to/from the site.
- Such width restrictions will affect the perceived quality of the walking route between the town centre and the site and influence the propensity of future residents to undertake journeys on foot. Moreover, a pedestrian route that is attractive and direct, as well as being safe and secure, will generate higher numbers of pedestrians than one that is narrow, involves crossing movements and is generally of poor quality as is the case along parts of Framfield Road.
- The ability to cycle to and from the site needs to be assessed in the context of existing vehicle speeds. It is our view that few residents will cycle to/from the site without the provision of additional cycling facilities, which it is noted are not part of the mitigation package identified in the TA.

- None of the key local facilities are within the maximum distances in the CIHT Guidelines and so it is very unlikely that future residents will walk to/from local facilities and will instead use their private car to access these facilities. Thus, the proposed residential development is not located so as to maximise travel by more sustainable modes of travel (such as walking and cycling) and, if permitted, will lead to the creation of a significantly car-borne development, which is contrary to local and national planning policy.

Conclusions

- 7.2 In conclusion, it is clear that the proposed development proposes a substandard access arrangement, is not in a sufficiently accessible location and would be a significantly car borne development causing increased traffic congestion and road safety hazards, which cannot be appropriately mitigated.
- 7.3 Given this, we respectfully request that the application be refused

APPENDIX A

Additional CrashMap Data

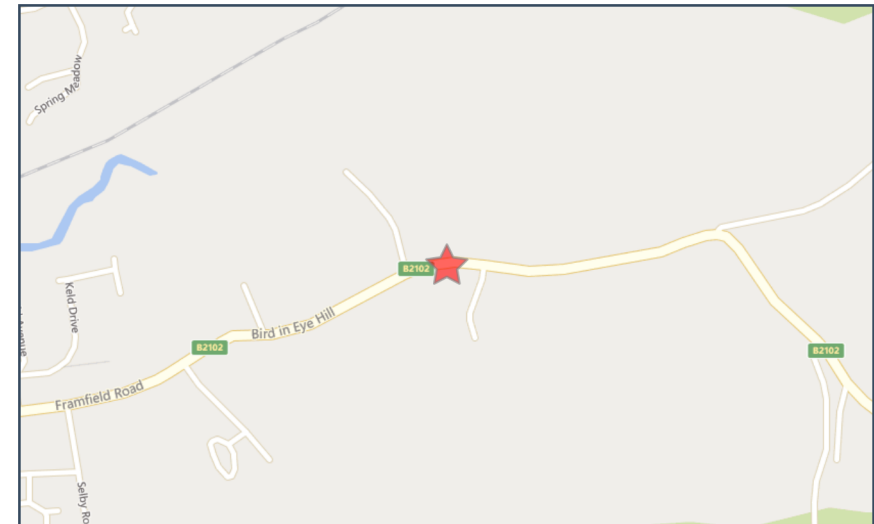


crashmap.co.uk

Validated Data

Crash Date: Wednesday, May 04, 2016 **Time of Crash:** 6:55:00 AM **Crash Reference:** 2016471602592

Highest Injury Severity:	Slight	Road Number:	B2102	Number of Casualties:	1
Highway Authority:	East Sussex			Number of Vehicles:	2
Local Authority:	Wealden District			OS Grid Reference:	548327 120935
Weather Description:	Fine without high winds				
Road Surface Description:	Dry				
Speed Limit:	40				
Light Conditions:	Daylight: regardless of presence of streetlights				
Carriageway Hazards:	None				
Junction Detail:	Not at or within 20 metres of junction				
Junction Pedestrian Crossing:	No physical crossing facility within 50 metres				
Road Type:	Single carriageway				
Junction Control:	Not Applicable				



For more information about the data please visit: www.crashmap.co.uk/home/Faq
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Validated Data

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Van or goods vehicle 3.5 tonnes mgw and under		1 Male	26 - 35	Vehicle proceeding normally along the carriageway, not on a bend	Front	Journey as part of work	None	None
2	Pedal cycle		-1 Male	26 - 35	Vehicle proceeding normally along the carriageway, not on a bend	Back	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
2	1	Slight	Driver or rider	Male	26 - 35	Unknown or other	Unknown or other

For more information about the data please visit: www.crashmap.co.uk/home/Faq

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Validated Data

Crash Date: Wednesday, August 05, 2020 **Time of Crash:** 11:12:00 AM **Crash Reference:** 2020470969998

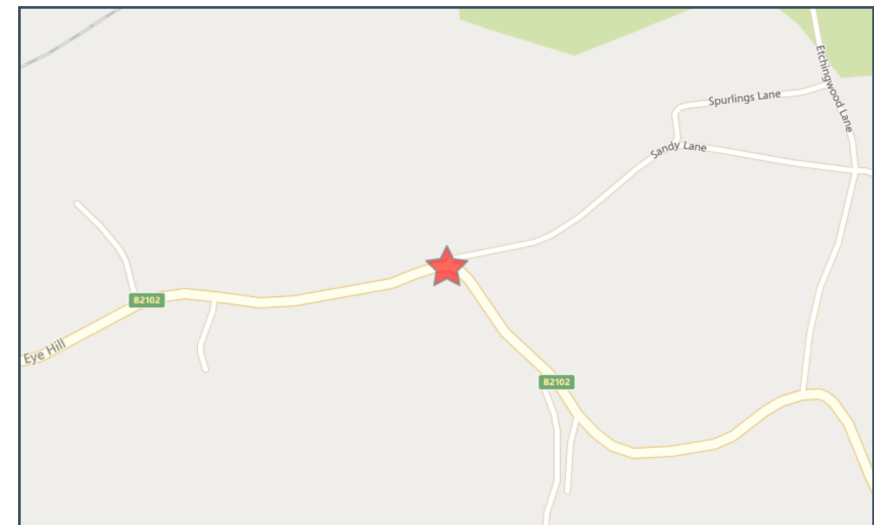
Highest Injury Severity: Serious
Highway Authority: East Sussex
Local Authority: Wealden District
Weather Description: Fine without high winds
Road Surface Description: Dry
Speed Limit: 60
Light Conditions: Daylight: regardless of presence of streetlights
Carriageway Hazards: None
Junction Detail: T or staggered junction
Junction Pedestrian Crossing: No physical crossing facility within 50 metres
Road Type: Single carriageway
Junction Control: Give way or uncontrolled

Road Number: B2102

Number of Casualties: 2

Number of Vehicles: 2

OS Grid Reference: 548722 120982



For more information about the data please visit: www.crashmap.co.uk/home/Faq

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Validated Data

Vehicles involved

Vehicle Ref	Vehicle Type	Vehicle Age	Driver Gender	Driver Age Band	Vehicle Manoeuvre	First Point of Impact	Journey Purpose	Hit Object - On Carriageway	Hit Object - Off Carriageway
1	Car (excluding private hire)	5	Male	46 - 55	Vehicle is in the act of turning right	Front	Other	None	None
2	Car (excluding private hire)	8	Female	56 - 65	Vehicle proceeding normally along the carriageway, on a right hand bend	Front	Other	None	None

Casualties

Vehicle Ref	Casualty Ref	Injury Severity	Casualty Class	Gender	Age Band	Pedestrian Location	Pedestrian Movement
1	1	Slight	Driver or rider	Male	46 - 55	Unknown or other	Unknown or other
2	2	Serious	Driver or rider	Female	56 - 65	Unknown or other	Unknown or other

For more information about the data please visit: www.crashmap.co.uk/home/Faq

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