LAND AT BIRD IN EYE FARM, UCKFIELD, EAST SUSSEX

TECHNICAL NOTE 3 – FURTHER TRANSPORT OBSERVATIONS

1 INTRODUCTION

1.1 Miles White Transport (MWT) have been appointed by Kassie Smith KC 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) prepared by Bellamy Roberts LLP.

1.3 MWT prepared Technical Note 1 in December 2021 to provide a critical assessment of the proposed scheme (and the information submitted with the planning application) from a highways and transport perspective.

1.4 A Transport Assessment Addendum (TAA) was prepared by Bellamy Roberts LLP in March 2022 following receipt of the Local Highway Authority's (LHA's) comments on the planning application in early December 2021.

1.5 Technical Note 2 was prepared in May 2022 to provide further observations on the highways and transport aspects of the proposed development following the LHA's response and the submission of the TAA.

1.6 A Transport Assessment Second Addendum (TASA) was prepared by Bellamy Roberts LLP in September 2022 following receipt of the Local Highway Authority's (LHA's) comments on the planning application in May 2022.

1.7 The content of Technical Notes 1 and 2 remain valid unless specifically superseded by observations included in this Technical Note 3.

1.8 The issues covered in this Technical Note are as follows:

- Site Access
- Framfield Road Improvements
- Road Safety Audit

2 SITE ACCESS

Right Turn Lane

2.1 Despite continuing to argue that a right turn lane is not required or necessary at the proposed site access junction, the applicant has now agreed to provide such an arrangement.

2.2 The design of the right turn lane junction, which is confirmed as being the access arrangement that the applicant proposes, appears to meet current design standards and so, in that respect, is acceptable.

Access Visibility

2.3 East Sussex County Council (ESCC) have identified that a visibility splay of 2.4m x 113m to the west and 127m to the east is required to be provided at the site access junction.

2.4 The TASA states in section 2.23 that the allowance for bonnet length "*is not a requirement of the y-dimension*". However, this is not correct as the y-dimension is based on the Stopping Sight Distance (SSD) for vehicles travelling along the major road at a junction. Manual for Streets clarifies that the SSD figure "*relates to the position of the driver*" and that the "*distance between the driver and the front of the vehicle is typically up to 2.4m*" and it is "*therefore recommended that an allowance is made by adding 2.4m to the SSD*".

2.5 Section 2.25 of the TASA appears to have some text missing at the end of the sentence. This section confirms that the visibility to the east has been measured to the nearside kerb, which is acceptable.

2.6 However, the visibility to the west has been measured to the centre of the eastbound lane (it is worth noting that this was previously measured to the centreline of the road) rather than the nearside kerb as is required unless overtaking movements are restricted.

2.7 Technical Note 1 identified that 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 because of existing overtaking restrictions such as double white lines or when opposing flows are physically segregated.

2.8 The provision of a traffic island in this location will not prevent overtaking manoeuvres and so the visibility splay to the west should be measured to the nearside kerb. If this is the case, then the visibility splay will pass through the northeast corner of the garden of number 18 (Bird in Eye Hill) as shown overleaf in **Figure 2.1**.

2.9 Given that there are no footways in the vicinity of the proposed traffic 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 avoids third party land.

2.10 The proposed provision of a 30mph speed limit in this location will require a TRO and the TASA states in section 2.28 that ESCC have advised that any such proposal "*will require a highway related scheme that would effectively reduce speeds and be self-enforcing*".

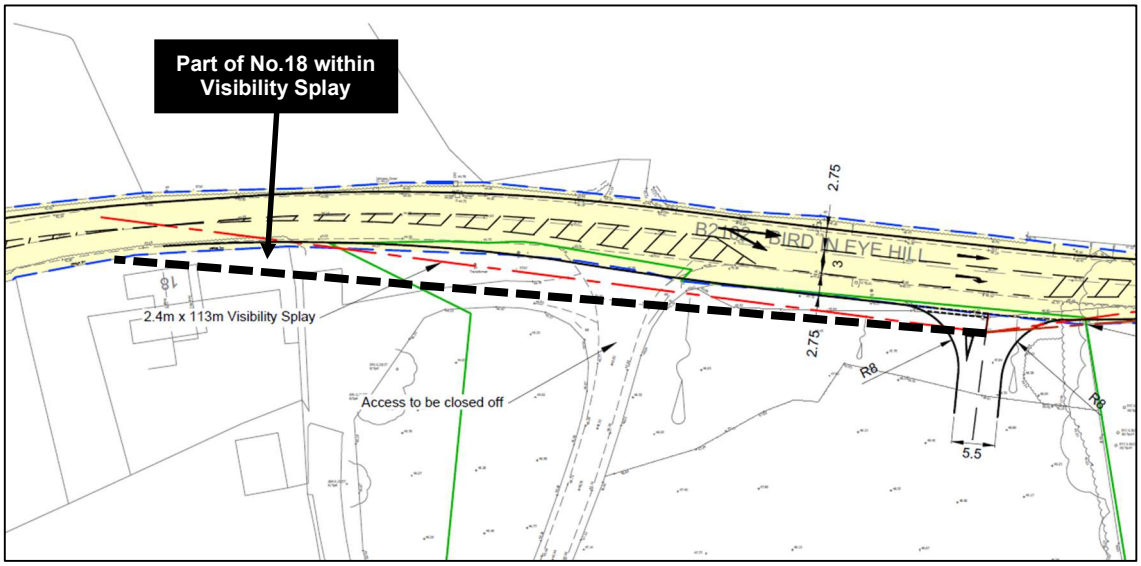

Figure 2.1: Visibility Splay to the West

2.11 Given that the introduction of a 30mph speed limit is by no means guaranteed, the level of visibility afforded at the site access junction must accord with actual speeds on the B2102 and be measured in the correct manner.

2.12 Clearly this is not the case at present so it is maintained that the site access will not be safe due to a lack of visibility to the west.

3 FRAMFIELD ROAD IMPROVEMENTS

3.1 It is noted that the applicant is yet to agree a suitable improvement scheme along Framfield Road with ESCC.

3.2 Therefore, comments previously made in Technical Notes 1 and 2 regarding pedestrian safety and potential conflict on this stretch of road remain a concern.

4 ROAD SAFETY AUDIT

4.1 A Stage 1 Road Safety Audit (RSA) has been commissioned for the right turn lane access arrangement and improvements along the B2102 but the results are not yet available.

4.2 Therefore, until an independent RSA is available the safety credentials of the proposed access junction arrangement cannot be verified.

5 SUMMARY AND CONCLUSIONS

5.1 In summary, several transport related issues or problems (as identified in Technical Notes 1 to 3 prepared by MWT) will result from the development as proposed. These are summarised below and overleaf:

- Insufficient visibility at the proposed site access junction and the safety credentials of the access are unproven until an independent RSA is available for review.

- Potential conflict between different users, such as refuse vehicles exiting the site and larger vehicles visiting the farm at peak times, which will create a road safety hazard.
- 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.
- Parts of Framfield Road have a footway width below 1.5m, which will not allow a buggy and pedestrian to safely pass 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.
- 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.

5.2 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.

5.3 Given this, we respectfully request that the application be refused