



Land south of the A271 and east of the A22, Lower Horsebridge, Hailsham

Proof of Evidence on Transportation of Henk Gelens BSc, MIHT

Appeal by Hertfordshire Holdings Limited

Planning Inspectorate Ref. APP/C1435/W/23/3335625

LPA Ref. WD/2022/3222/MAO

On behalf of **Hertfordshire Holdings Limited**

Project Ref: 332110699/9000 | Rev: A | Date: March 2024

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For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved
A	11 March 2024	Amended following comments and agreement with ESCC	RH	ML	HG
B	21 March 2024	Amended following team comments	RH	ML	HG
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1 Introduction

1.1 Qualifications and Experience

- 1.1.1 My name is Henk Gelens. I hold a bachelor's degree in civil engineering from the University of Zwolle (NL). I am a Chartered Member of the Institution of Highways and Transportation, and a member of KIVI (Dutch Institute of Engineers) and the Urban Land Institute. I have over 30 years' experience in the field of transportation planning and engineering.
- 1.1.2 I have appeared as an expert witness at a number of Public Inquiries, including CPO Inquiries and Examinations in Public.
- 1.1.3 I started my career at Peter Brett Associates and continued after the acquisition by Stantec.
- 1.1.4 I am now a Director at Stantec UK. Stantec is a global multi-disciplinary development and infrastructure consultancy that advises public and private sector clients with respect to planning, design and construction of infrastructure and land development projects, including a large number of residential developments.
- 1.1.5 I have worked on a variety of major transport infrastructure and land development projects, many of which required forecasting, assessment of impacts and design of transport and traffic management solutions.
- 1.1.6 I am familiar with the appeal site, the development proposals, the surrounding area, and the local transport network and have visited the site on various occasions. Stantec has been instructed by Hertfordshire Holdings Limited to provide, amongst other disciplines, Transportation support since the inception of the project in 2021.
- 1.1.7 The evidence which I have prepared and provided for this appeal (reference APP/C1435/W/23/3335625) is given in accordance with the professional standards and Code of Conduct of the Institution of Highways and Transportation and I confirm that the opinions expressed are my true and professional opinions.

1.2 Scope of Evidence

- 1.2.1 My Evidence is structured as follows:
- **Section 2:** Sets out the development background relevant to transport;
 - **Section 3:** Presents relevant transport policies;
 - **Section 4:** Provides an overview of the transport strategy for the proposed development;
 - **Section 5:** Addresses the reasons for refusal and the Council's subsequent withdrawal of the reason for refusal;
 - **Section 6:** Responds to the 3rd party objections.
 - **Section 7:** Conclusion

2 Development Background

2.1 Current Application (*WD/2022/3222/MAO*)

2.1.1 The planning application for the development proposal seeks outline consent with all matters reserved except for access. The application was validated by Wealden District Council (WDC) on 2 February 2023. The application was supported by a comprehensive suite of technical reports including a Transport Assessment (CD 1.8) and Framework Travel Plan (CD 1.9).

2.1.2 East Sussex County Council's (ESCC) first consultation response was dated 13 April 2023 (CD 3.4), and outlined their reasons for their objections, these reasons were summarised as follows:

"It has not been demonstrated that, the site is suitably accessible by non-car modes, and the impacts of the development at Boship roundabout have not been suitably assessed and mitigated. The development would therefore be contrary to para 111 and 112 of the National Planning Policy Framework."

2.1.3 Stantec responded to ESCC on 7 June 2023 (CD 2.10), included in this response were amendments and improvements to the access arrangements to satisfy the objections raised by ESCC. These improvements were shown in drawing 332110699_5510_SK008_P01. These improvements included:

- *"A 3m shared walking and cycling path, with a 0.5m carriageway separation, provided on the A271 Lower Horsebridge between Boship Roundabout and the urban footprint to the east of the site."*
- *A reduction of the speed limit on A271 Lower Horsebridge Road to 30mph, between the Boship Roundabout and the existing 30mph limit to the east of the site."*
- *A New pair of bus stops, pole, shelters, real time information signs and crossing provision, at an appropriate location to the west of the current bus stops. An indicative location for the bus stops is shown in **Appendix A** (this is subject to agreement with WDC, third-party land ownership checks and a Road Safety Audit).*
- *A contribution of £1,100 per dwelling towards improving bus services in the area."*
- *An uncontrolled crossing facility on the A271 Lower Horsebridge Road comprising a pedestrian island, dropped kerbs and tactile paving."*

2.1.4 Following this a subsequent second response was received from ESCC dated 7 June 2023 (CD 3.5). The response states that ESCC:

"remain concerned that the site is not suitably accessible. While the applicant has sought to improve walking, cycling and bus services at the site, the distances, and routes to local services- schools, employment, retail etc remain unattractive. It is unlikely that this site can meet my requirements due to third party landownership, the distances involved and the site location. The site is located adjacent to the A22 and does not adjoin the existing built up area to the south. In effect it faces away from Hailsham. This will no doubt mean car trips will remain attractive at the site as residents seek a most direct/unencumbered route to Hailsham via the by-pass or by-pass Hailsham to reach other towns/centres."

"It has not been demonstrated that, the site is suitably accessible by non-car modes, and the development would therefore be contrary to para 111 and 112 of the National Planning Policy Framework."

- 2.1.5 Following the lodging of the planning appeal further discussions were held with ESCC and a Statement of Common Ground was drafted. ESCC agreed that, since the submission of the planning application, the site's accessibility had improved, and that with the addition and agreement of the S106 obligations, ESCC would withdraw their objection.
- 2.1.6 The Statement of Common Ground was thus agreed and signed by both parties (CD 13.7) on the 22nd of February 2024.
- 2.1.7 It is noted that the Statement of Common Ground states in paragraph 3.4.1 that drawing 332110699_5501_SK008_P01 (**Appendix A**) is the preferred plan.
- 2.1.8 Both the Appellant and ESCC see this as the preferred option, however, as the proposed eastbound bus stop is outside the Appellant's red line boundary, and also outside its land ownership, this bus stop cannot be delivered by the Appellant.
- 2.1.9 Hence, the Site Access drawing submitted for approval and determination is drawing 332110699_5501_SK009_P02 (CD12.1) and is included in **Appendix B**.
- 2.1.10 This updated drawing retains the proposals under the control of the Appellant including the westbound bus stop and the pedestrian crossing with refuge but does not include the eastbound bus stop on the northern side of the A271.
- 2.1.11 This approach has been agreed with ESCC (Claire Warwick emails dated 18th March 2024 and the 25th of March 2024).
- 2.1.12 Wealden District Council has confirmed that the applicable Reason for Refusal 3, would not be contested.

3 Relevant Transport Policy and Guidance

3.1 National Planning Policy Framework, 2023

- 3.1.1 Paragraphs 114 and 116 of the NPPF state that development proposals should promote opportunities to increase walking, cycling and public transport services, and mitigate adverse impacts on the transport network.
- 3.1.2 Paragraph 117 requires development proposals that generate significant people movements to be supported by a transport assessment and a travel plan to assess the likely impacts of the development proposals. These were provided for the development proposal.
- 3.1.3 Paragraph 115 states that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety and these cannot be mitigated.
- 3.1.4 The NPPF is a material consideration of significant weight, and my evidence will demonstrate that the development satisfies the requirements identified above.

3.2 Wealden Local Plan 1998

- 3.2.1 Wealden Local Plan 1998 is a key planning document for the district council and guides future development for the district. The relevant transport policies are:
 - *EN1 – Regarding the pursuit of sustainable development.*
 - *EN2 – Regarding the Council's desire to maintain settlement patterns and that developments are located efficiently in relation to existing development and to public transport connections.*
 - *TR3 – Regarding permitting planning applications for those that do not result in unacceptable traffic conditions, have satisfactory access for all users, and provide suitable public transport facilities.*
 - *TR13 – Regarding the Council seeking the provision of safe and convenient pedestrian routes within developments.*
 - *CS1 – Regarding the requirement for the Council to be satisfied that the capital works required to service development are provided to permit development.*

3.3 Wealden Core Strategy Local Plan 2013

- 3.3.1 Wealden Core Strategy Local Plan 2013 is the overarching planning policy document for the Wealden District Area. The relevant transport policies are:
 - *SPO7 – encourages the reduction of the need to travel with development accessible by public transport and active travel.*
 - *SPO15 – new development will be expected to contribute to strategic and local infrastructure through both facilities and financial contributions.*
 - *WCS7 – The release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development.*

- *WCS14 – When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework*

3.4 Conclusion

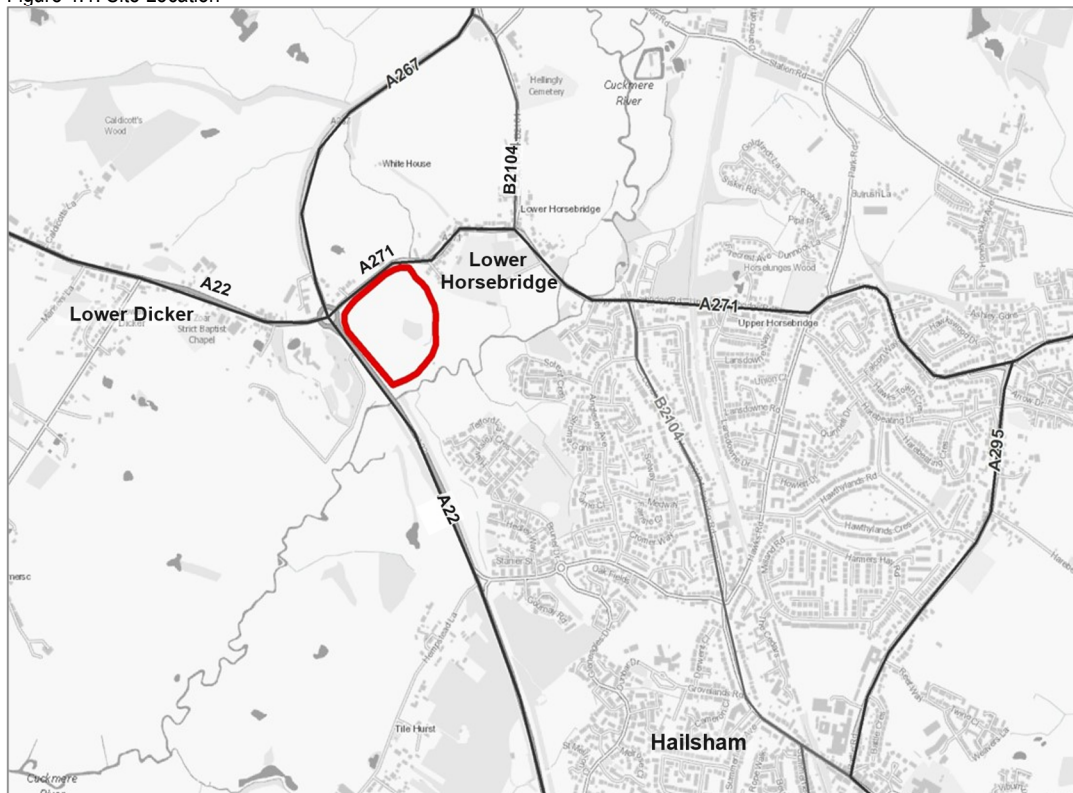
- The transport proposals are in full accordance with the relevant Transport Policies.
- In withdrawing their reason for refusal, the Council accepts that the proposed development is in accordance with the relevant transport policies.

4 Proposed Development Transport Strategy

4.1 Site Location

- 4.1.1 The site is located adjacent to the village of Lower Horsebridge and shown in **Figure 4.1**. It is bounded by the A22 Hailsham bypass to the west and the A271 Lower Horsebridge Road to the north. This description of the locality and the surrounding area has been agreed with the Council within the SoCG (CD 13.7).

Figure 4.1: Site Location



4.2 Existing Situation

- 4.2.1 Based on a number of site visits, observations and survey results, the existing situation along the A271 Lower Horsebridge Road is very poor, especially for pedestrians and cyclists. The clear perception of its current state is that the use of this road is uncomfortable at best and potentially dangerous at worst. The recorded accidents (PIC data) are included in the TA, and although the A271 itself shows few accidents, the Boship roundabout has had 10 accidents in the last 5 years. 4 accidents involved cyclists including one fatality.
- 4.2.2 The current footway is a single sided narrow path (0.5 – 1.0m) with poor surfacing running immediately adjacent to the main carriageway.
- 4.2.3 The vehicles, including a significant number of heavy goods vehicles, drive very close to the footpath, at high speeds, especially outside the 30mph zone, where currently the speed limit is unrestricted.
- 4.2.4 This path forms the cycle route between Lower Horsebridge and Lower Dicker and beyond along the A22 and is identified for improvement in the East Sussex LCWIP, as routes HL15 and HL3.

4.2.5 A few images below to show the current situation.



Footway joining Bishop roundabout at an uncontrolled crossing of the A22



Lower Horsebridge road looking east



Narrow footpath with unrestricted speed limit.

4.3 Development Proposals

- 4.3.1 The development proposals are set out in Section 5 of the Planning, Design and Access Statement (CD 1.7) and are visualised in the Illustrative Masterplan (CD 1.4).

4.4 Transport Strategy

- 4.4.1 The Transport Strategy is set out in Chapter 5 of the Transport Assessment (CD 1.8).
- 4.4.2 The proposed access arrangement is shown in the drawing in **Appendix B**. This strategy has been agreed in principle with ESCC and is also summarised in the Transport SoCG (CD13.7). It is agreed that this drawing will be the site access lay out drawing submitted for approval.
- 4.4.3 This plan demonstrates how the Site can provide a safe vehicular access onto the A271 and also tie in to the Bishop roundabout, including the proposed improvements as part of the ESCC MRN strategy. Importantly, it also improves the comfort and safety of pedestrians and cyclists and enhances connectivity along the site frontage.
- 4.4.4 Since the planning application was submitted, the new Regency 28 bus service running between Brighton and Eastbourne via Lewes and Hailsham was introduced on 23 July 2023. This is a service running every 30-minutes Monday to Saturday daytime along the site frontage, improving on the still operational 54 service that runs hourly between Uckfield and Eastbourne.

4.4.5 This additional bus route improves the level of public transport services significantly and increases the accessibility by non-car modes. Residents of the proposed development now have frequent bus services towards main destinations throughout the week.

4.4.6 The Transport Strategy will be supported by a number of agreed financial contributions to support both off-site highway works and public transport provision.

4.5 Proposed Off-Site Pedestrian/Cycle Improvements

4.5.1 As shown in the access arrangement drawing in **Appendix A**, a number of pedestrian and cycle improvements are proposed. These include;

- a *3.0m wide shared footway/cycleway* along the southern side of the A271 carriageway, between the edge of the village and connection to the proposed improvement works at the Boship roundabout. It includes a 0.5m buffer to the highway.
- A new 3m wide pedestrian crossing with refuge island providing access across the A271. to the now approved Wealden Sports Hub application site via the pedestrian/cycle access.
- A further improvement of the pedestrian crossing near the bus stops at Pay Gate Cottages.

4.5.2 The agreed financial contribution towards the LCWIP will further assist in improving the off-site pedestrian and cycling facilities.

4.6 Proposed Public Transport Improvements

4.6.1 The Appellant has agreed to the following improvements to the bus services in the vicinity of Site:

- A new bus stop for westbound bus services with, pole, shelter, real time passenger information signs at an appropriate location to the west of the current bus stops with direct footway links into the Site.
- Agreed improvements to the existing bus stops at Pay Gate Cottages (subject to agreement with ESCC and third-party land ownership checks).
- A contribution of £1,100 per dwelling towards further improving bus services in the area."

4.7 Travel Plan

4.7.1 A Framework Travel Plan has been submitted as part of the application (CD 1.9). The document follows ESCC and national guidance and includes a number of measures to encourage non car trips. A further detailed travel plan will be prepared to support future Reserve Matters Application(s).

4.7.2 The Travel Plan and its targets will focus on promoting the use of active travel and public transport for the future residents.

4.8 Vehicular Access

4.8.1 Vehicular access to the proposed development will be gained via a new priority junction with ghost-island right turn provision on the A271.

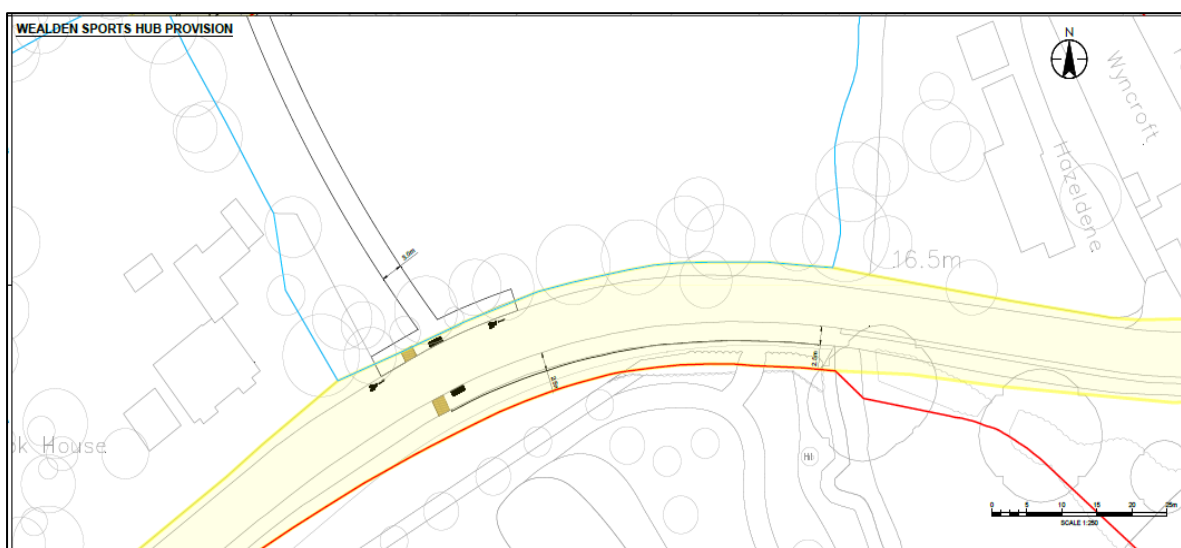
- 4.8.2 This access proposal includes extending the 30mph zone from the current edge of the village location to the Boship Roundabout, which is considered a benefit to both road safety and improvement of the experience of pedestrians and cyclists using the new wide foot and cycleway.
- 4.8.3 The implementation of the 30mph limit will require a Traffic Regulation Order separate to the planning process and the applicant has agreed to cover ESCC costs for undertaking the legal process by funding the fee of £5000.
- 4.8.4 The proposals are supported by an approved Stage 1 Road Safety Audit (CD 2.6).

4.9 Car Parking

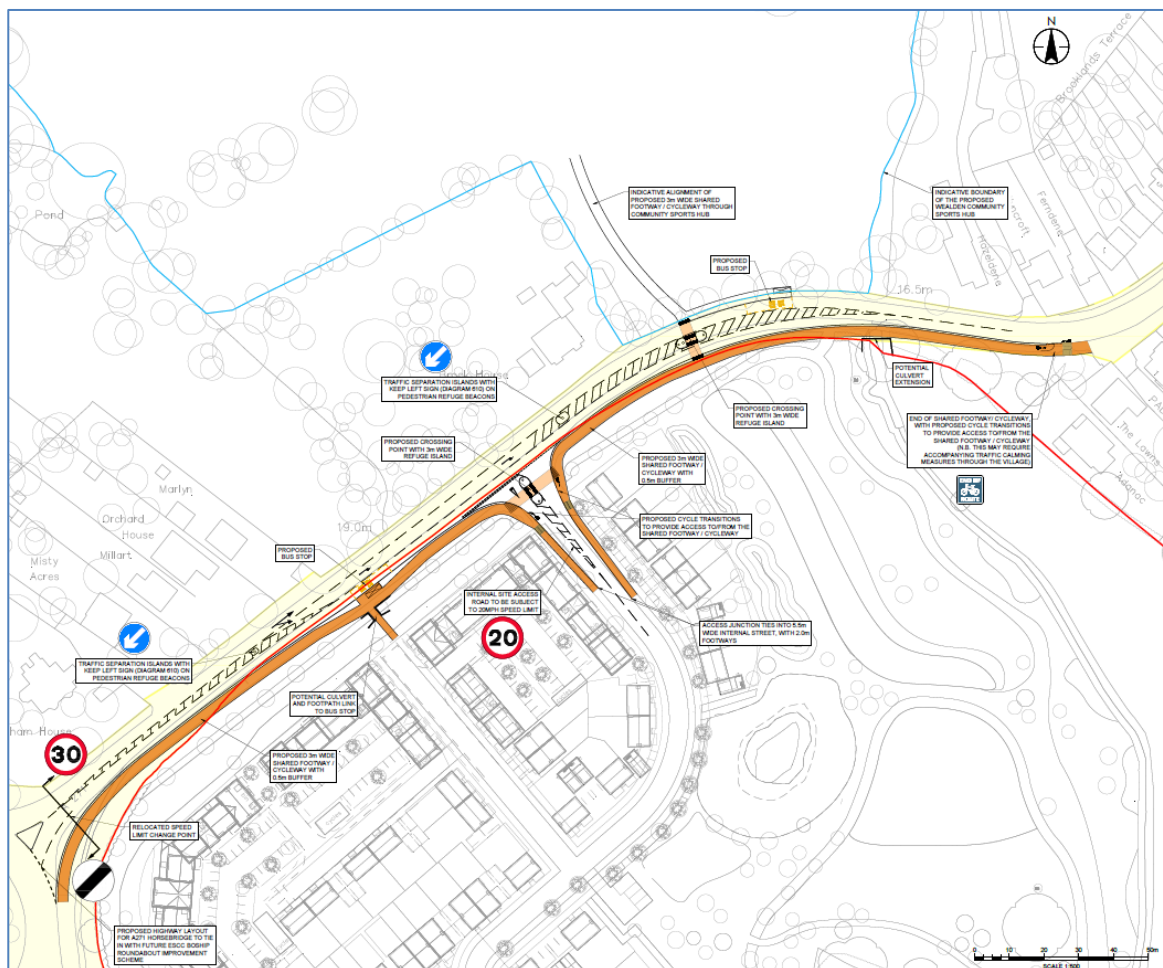
- 4.9.1 Car parking will be a reserved matter; however, the car parking provision will be in accordance with the ESCC Parking Standards.

4.10 The Wealden Sports Hub

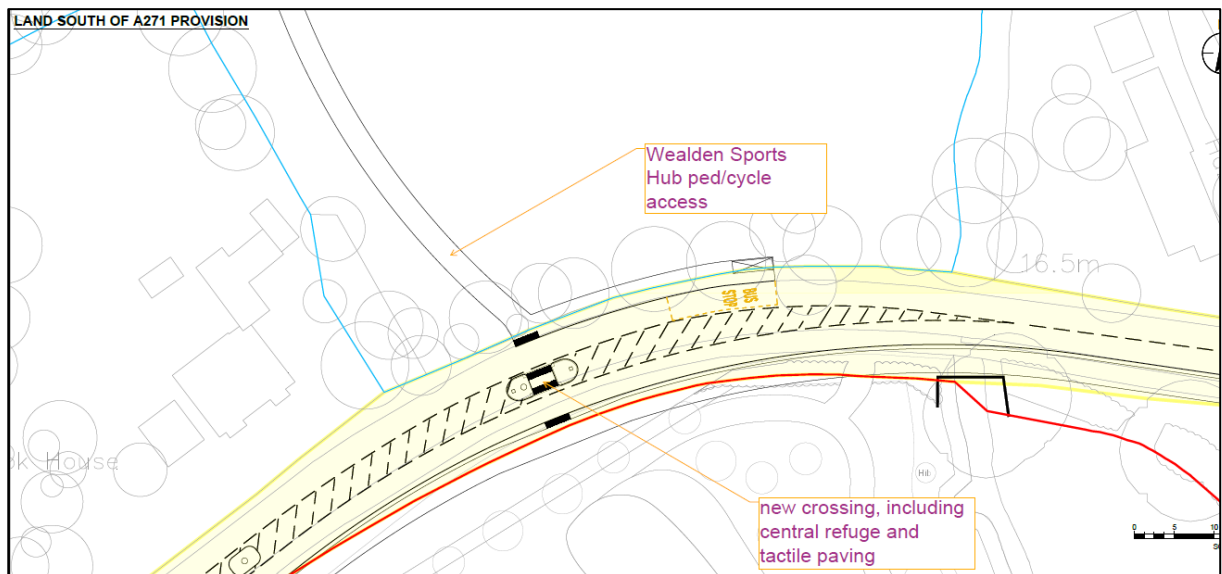
- 4.10.1 The proposals for the Wealden Sports Hub have recently been approved by Wealden District Council (Land at Knights Farm – WD/2023/2100/DC)
- 4.10.2 Stantec has commented on this application on behalf of the Appellant and highlighted that a number of improvements the Appellant is proposing would benefit both applications. However, these comments were not taken into account on the grounds that the Appellant's scheme was refused.
- 4.10.3 Although it is recognised that the Wealden Sports Hub transport proposals will be of benefit to non-motorised users, it is my opinion that these do not go far enough, and that the Appellant's proposals provide a substantial improvement over and above the Sports Hub scheme.
- 4.10.4 The following section describes these benefits, especially in relation to its accessibility, active travel, and public transport provision.
- 4.10.5 The Sports Hub application proposes the following access arrangement for cyclists and pedestrians at the access point off the A271 Horsebridge Road, i.e. opposite the Appellant's Site:



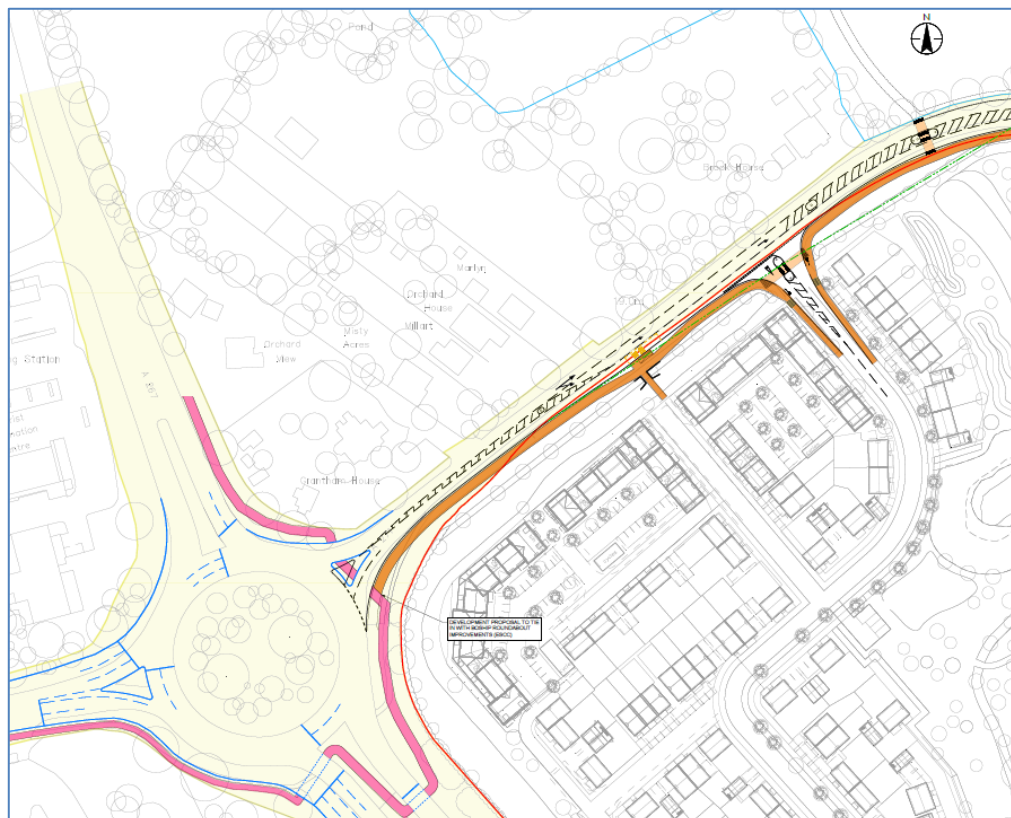
- 4.10.6 As shown in the application drawing above, the Sports Hub proposals are for a pedestrian/cycling access connecting to the A271, an uncontrolled crossing of the A271 and a limited widening of the existing footway on the southern side of the A271 to 2.5m. (*where achievable!*). This footway would then provide access to the existing bus stops at Pay Gate Cottages, where east bound travellers will have to cross the A271 again.
- 4.10.7 To compare both applications, the Appellant's proposals are shown in the submitted drawing in **Appendix A**, with an extract below:



- 4.10.8 The first improvement and benefit is the provision of a better crossing point at the Wealden Sports Hub access. This is possible as the Appellant's proposed access junction requires local widening of the A271 in this location, see plan extract below. This is a clear safety improvement.

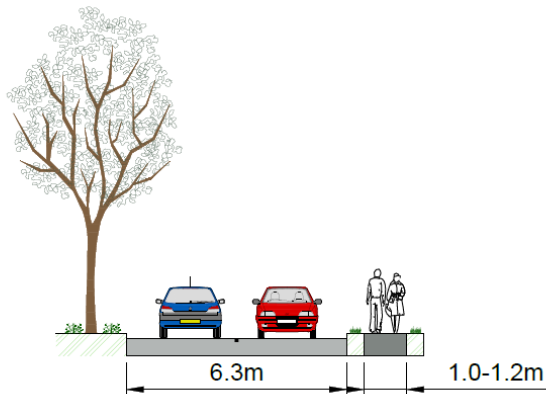


4.10.9 The second betterment is that the Appellant's scheme provides a shared foot and cycle way along the *full frontage of the site* along the A271, including a connection to the Boship roundabout, where active travel improvements will continue as part of the ESCC MRN improvements. In addition, the Appellant is able to provide a constant 3.0m width (in accordance with the design standards) including a 0.5m buffer to the Highway, as the land required is within the Appellant's ownership. This is highlighted in the plan in **Appendix C**, with an extract below. This also includes the proposed improvements at the Boship roundabout. This would mean a safe crossing point and good quality active travel opportunities (in both directions along the A271) for the visitors of the Sports Hub, including connecting to the Boship roundabout.

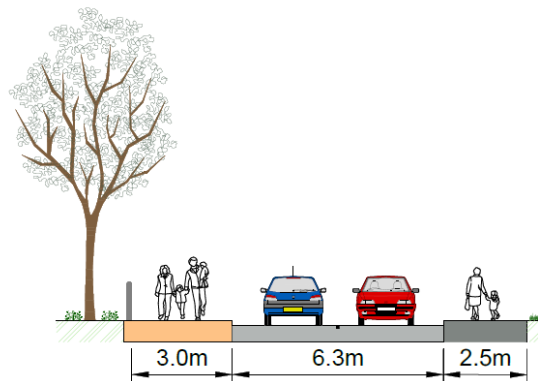


4.10.10 To better understand and visualise the differences in design, I have produced the following 3 schematic cross sections, taken at the entrance to the Wealden Sports hub.

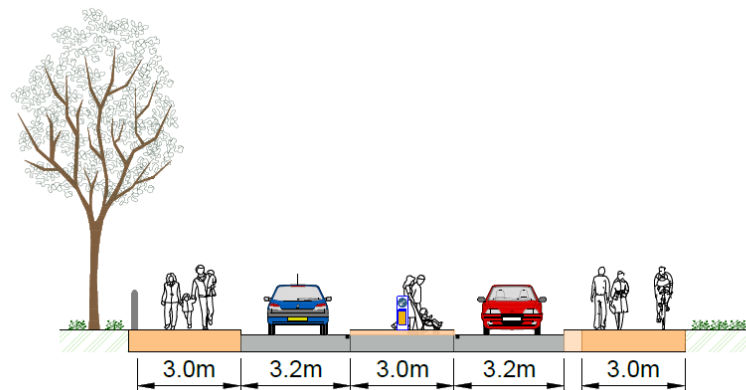
- Section 1 – Existing cross section



- Section 2 – Wealden Sports hub proposal

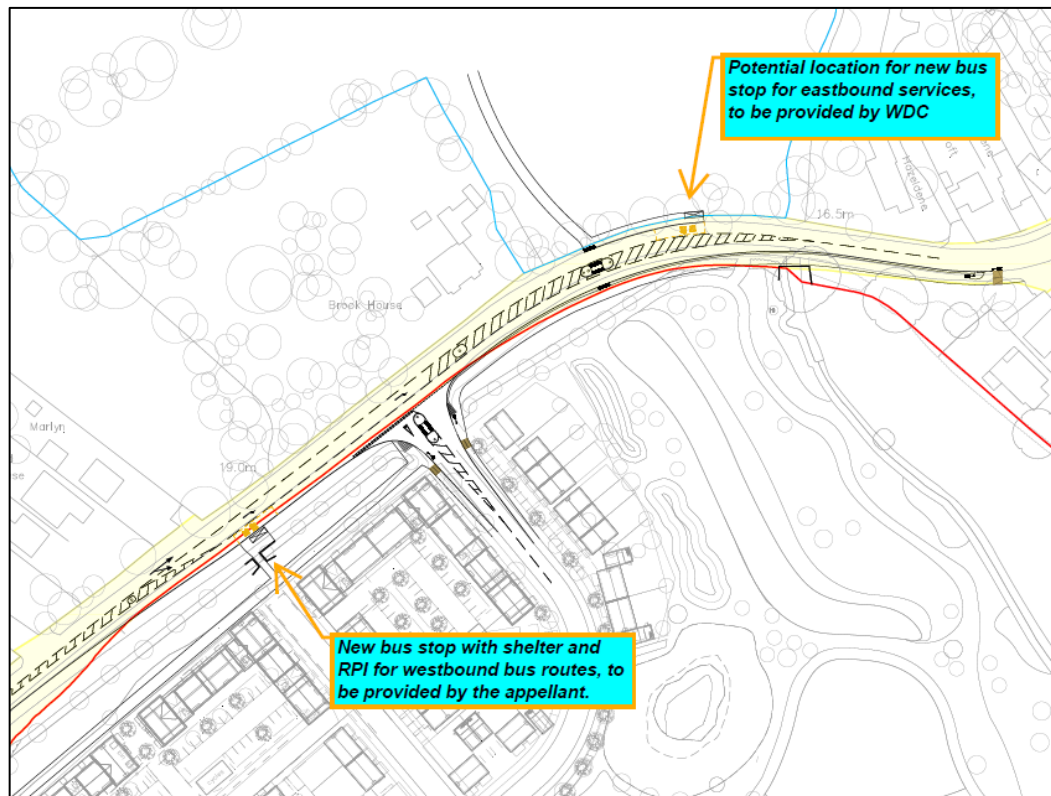


- Section 3 – Appellant's proposals



A full drawing showing both lay out and cross section is included in **Appendix D**.

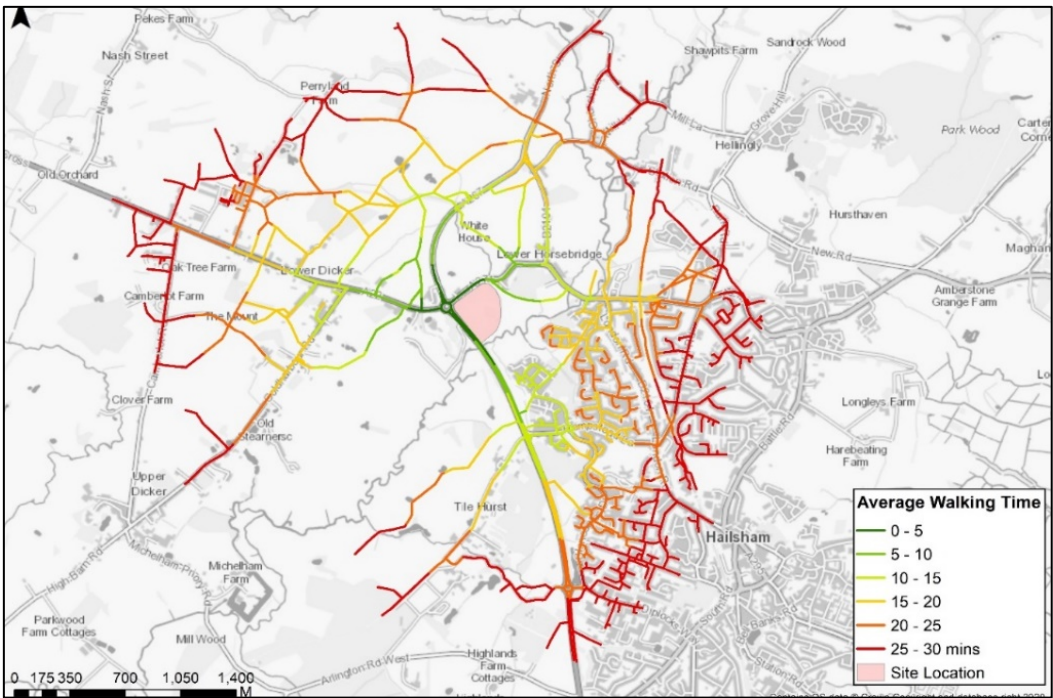
- 4.10.11 The third potential improvement is the provision of a new westbound bus stop to the west of the proposed site access. Accessibility would be improved further still if an additional westbound bus stop was provided, but this will be in the remit of Wealden District Council both as part of their planning consent and provision of the required land.



4.11 Development Site Accessibility

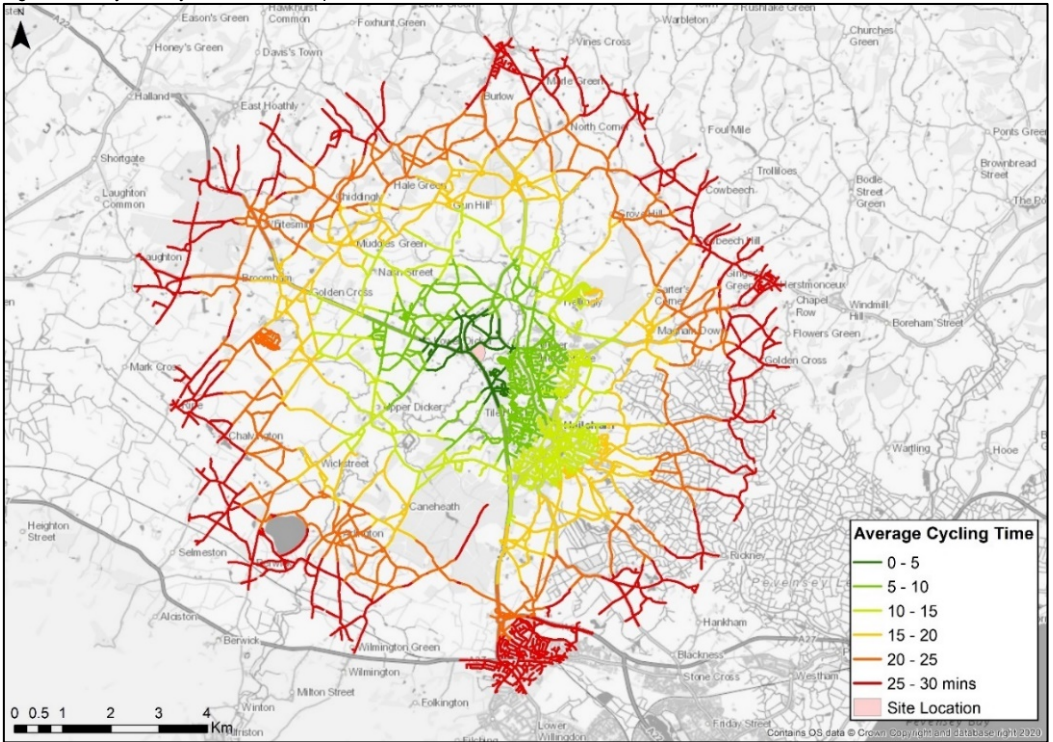
- 4.11.1 Following the first set of comments by ESCC, to demonstrate the site is suitably accessible by non-car modes, an accessibility review of the area was carried out building on the previously submitted Transport Assessment and is included in as Attachment 2 of the Stantec response to ESCC Highways objection (CD 2.10).
- 4.11.2 A 30-minute walkability catchment map for area surrounding the Site is shown in **Figure 4.2**. The map shows the Lower Horsebridge area is within a 10-minute walking distance and Hailsham Town Centre is just over a 30-minutes walking distance.

Figure 4.2: Walkability Catchment Map of Site



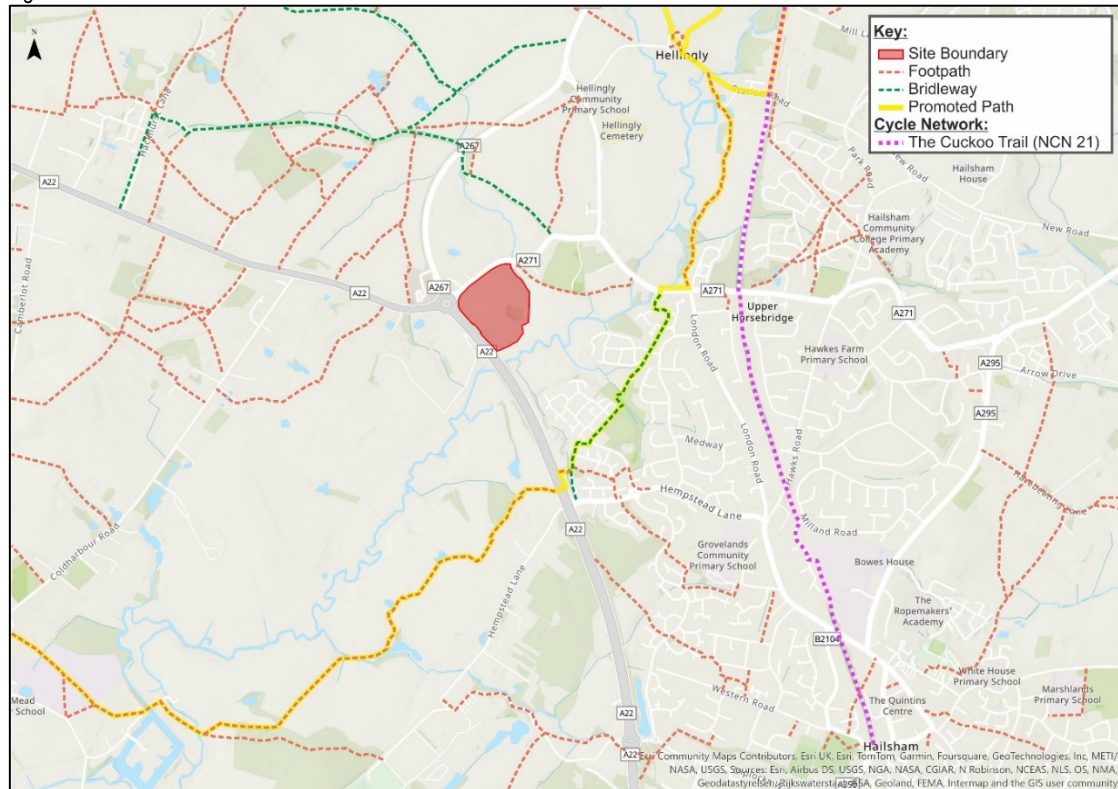
4.11.3 A 30-minute cyclability catchment map for area surrounding the Site is shown in **Figure 4.3**^{Error! Reference source not found..} The map shows the Lower Horsebridge area is within a 5-minute cycling distance and Hailsham Town Centre is a 10–15-minute cycling distance. The services and facilities that are within a reasonable cycling distance are outlined in Table 5.2 below and are shown graphically in **Figure 4.6**.

Figure 4.3: Cyclability Catchment Map of Site



- 4.11.4 A map showing the walking/cycling infrastructure surrounding the Site is shown in **Figure 4.4**. The map shows that the NCN Route 21 (The Cuckoo Trail), a north-south mostly traffic free route is c.1.2km east of the Site, accessible via Horsebridge Road.

Figure 4.4: Active Travel Routes



- 4.11.5 **Figure 4.5** shows the nearest bus stops to the Site which are approximately 150m east of the Site access on the A271 Horsebridge Road. Additionally, there are other bus stops located on the B2104 North Street which provide access to further bus services.
- 4.11.6 The routes to the existing bus stops consist of a narrow (c.1.0m) footway with sections of overgrown vegetation along the site frontage. This poor-quality provision is why the development proposals include a 3.0m shared foot/cycleway between the Boship Roundabout and along the site frontage. The existing footways then continue into the built up area of Lower Horsebridge, on both sides of the A271 Horsebridge Road, with the available width varying between 1.0 and 1.5m.
- 4.11.7 **Figure 4.5** also shows the available bus routes. This map shows that significant connectivity is provided between Hailsham and surrounding population centres via bus. Some inter-regional services are shown to pass the Site along the A271 Horsebridge Road.

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Table 4.1: Bus Stops surrounding Site Service Details

Bus Stop	Distance to site access	Service Route	Days of operation	Frequency
Pay Gate Cottages	150m (less than 5-minute walk)	28: Brighton – Hailsham – Eastbourne	Monday - Sunday	All Week – Every 30 minutes until 8pm then every hour until Midnight
		42: Berwick – Hailsham	Wednesday only	Single service
		48: Eastbourne – Michelham Priory	Tuesday & Thursday	4 Services to Michelham Priory at 10:10, 12:10, 14:55, 16:45 2 Services to Eastbourne at 13:42, 15:47
		54: Uckfield – Eastbourne	Monday to Saturday (excl. public holidays)	Weekday Hourly from 07:30am to 23:17 Saturday every 2 hours from 09:30 to 19:05
North Street	650m (less than 10-minute walk)	51 (and 51X): Heathfield – Eastbourne	Monday to Sunday	Monday – Saturday: 30 minutes until 19:11 then hourly until 11pm Hourly on Sundays
		269: Cade Street – Hailsham (school service)	Monday to Friday (excl. public holidays)	Single service in morning (7:37am) and afternoon (3:40pm)

Source: [Brighton & Hove Buses](#), [Cuckmere Buses](#), [Live Bus Times & Timetables | Stagecoach \(stagecoachbus.com\)](#), [Bus Times – Seaford and District](#) (Accessed: February 2023)

4.11.10 The location of local services and facilities within close proximity to the Site have been identified in **Figure 4.6** below. **Table 4.2** displays a summary list of the local services and facilities with their approximate walking and cycling time. Overall, the Site is located within walking and cycling distance of a range of services and facilities.

Table 4.2: Local Services and Facilities

Land Use	Name	Distance (km)	Walk Time	Cycle Time
Shopping	Shell Petrol Station and Store*	0.3	5 min	3 min
	Greggs & Starbucks	0.3	5 min	3 min
	Co-Op Store	1.4	18 min	4 min
	Brights Convenience Store	1.8	25 min	6 min
	Hawkswood Store	2.1	29 min	7 min
	Power Petrol Station and Store	2.4	33 min	7 min
	Tesco Superstore	3.1	40 min	13 min
	Waitrose	3.2	43 min	12 min
	ASDA	3.2	43 min	13 min
Employment	Swallow Business Park	1.8	27 min	7 min
Education	Hellingly Community Primary School	0.8	11 min	3 min
	Hawkes Farm Primary Academy	1.7	20 min	6 min
	Hailsham Primary Academy and Pre-School	2.1	25 min	7 min
	Grovesland Community Primary School	2.3	32 min	10 min
	Hailsham Community College	3.0	36 min	11 min
Health	Kamsons Pharmacy	2.1	30 min	7 min
	Quintin Medical Centre	2.4	29 min	7 min

Land Use	Name	Distance (km)	Walk Time	Cycle Time
Leisure	Battle Road Surgery	3.0	37 min	11 min
	Boots Pharmacy	3.1	43 min	12 min
	Hellingly Sports Club	0.5	5 min	1 min
	The White Hart	0.4	5 min	1 min
	King's Head Inn	0.5	6 min	1 min
	Knockhatch Adventure Park	3.1	42 min	10 min
	Hailsham Leisure Centre	3.2	44 min	12 min
	Hailsham Country Park	2.4	33 min	12 min

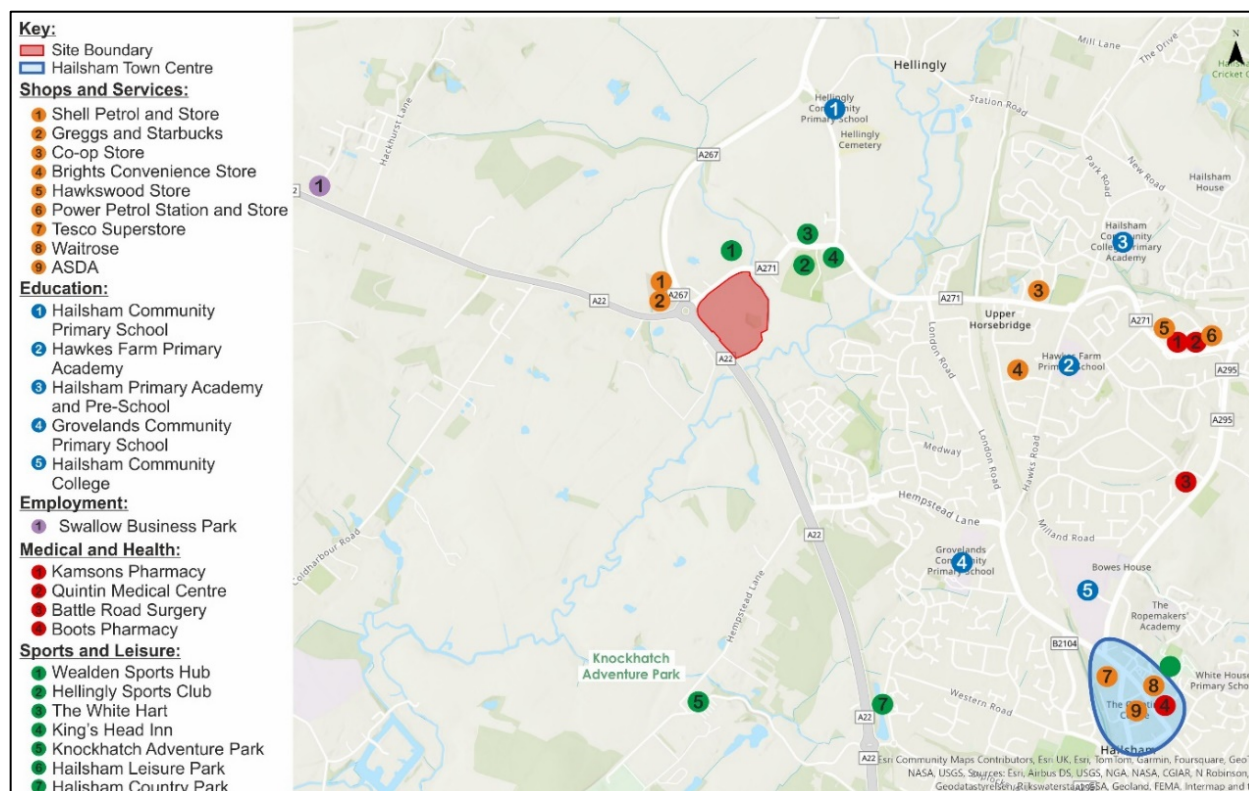
Note: Walking and cycle times based on average speeds (4.5 km/h and 16km/h respectively)
* No footways and pedestrian crossing to Shell Petrol Station present

4.11.11 The development proposals contribute to improved access routes to these facilities. The routes east (local shops and Hailsham beyond) will benefit from the agreed LCWIP contributions. Immediate access to Lower Horsebridge and going west towards the Boship roundabout and destinations located there (the petrol station with shop and food outlets, the hotel) the route will be improved substantially with the new 3m foot and cycleway.

4.11.12 It is noted that the Wealden Sports Hub resolution to grant permission means that a large and modern leisure facility is likely to be within easy walking distance of the Site (see green dot number 1 in the figure below).

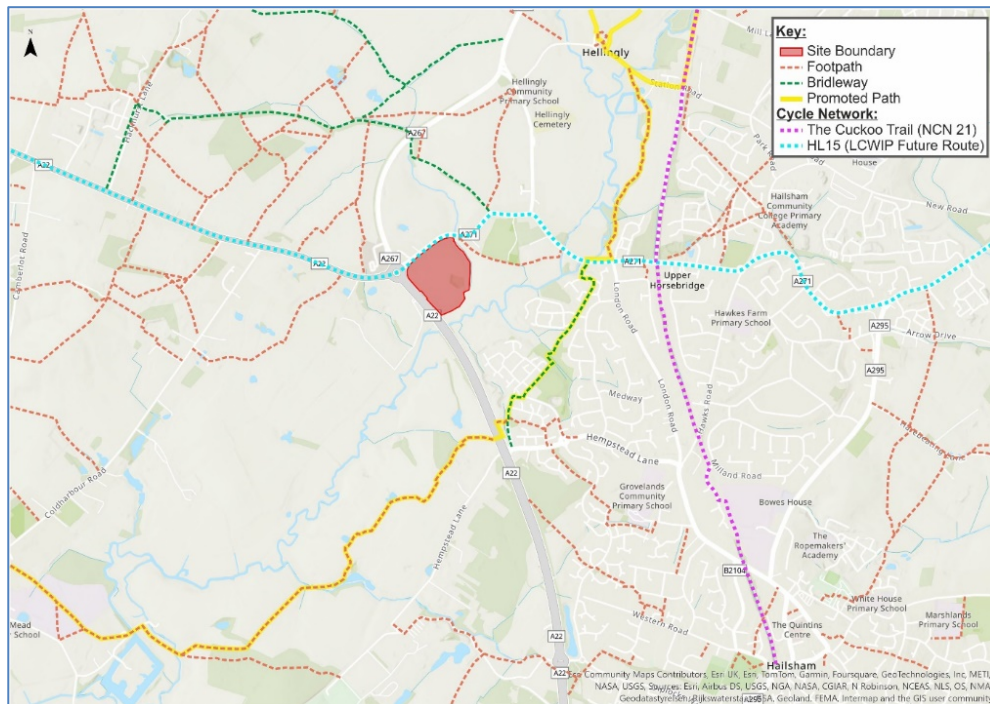
4.11.13 Hailsham Town Centre is located c.3.1–3.4km from the Site and provides access to a greater range of facilities. These further facilities include a typical Town Centre offer including Retail Stores, Pharmacies, Banks, Post Office, Cafés, Restaurants, Cinema, Library, etc.

Figure 4.6: Local Amenities



4.11.14 Finally, it is noted that the walking and cycling route along the site frontage and beyond has been identified for improvement by ESCC through its inclusion in their Local Cycling and Walking Infrastructure Plan (LCWIP), as routes HL15 and Route HL3. The final draft S106 agreement now includes a contribution towards the LCWIP schemes. Route HL15 is shown in Figure 4.7 below.

Figure 4.7: Site Location and LCWIP route proposals



5 Addressing the Reasons for Refusal

5.1 Position with Planning Authority

- 5.1.1 Following further discussion and negotiation the Highway Authority, ESCC, have now removed their objection. This is reflected in the Statement of Common Ground that has been agreed and signed.
- 5.1.2 Wealden District Council have accepted this and have consequently removed their Reason for Refusal 3.

5.2 Compliance with Planning Policy

In Chapter 3, I set out the most relevant Planning Policies and the text below deals with these policies in the same order and summarises how compliance is achieved.

NPPF

- 5.2.1 The paragraphs below set out compliance of the scheme proposals with the NPPF, in particular with the applicable paragraphs 114 (Sustainable Transport, safe access and transport network capacity), 115 (Highway impact), 116 (active travel, mobility, place making) and 117 (Transport Assessment and travel Planning).
- 5.2.2 The proposed development is located on the existing edge of Hailsham, situated on the A271 with the opportunity to benefit from the now frequent bus services along the A271. In addition, it will neighbour a newly approved Sports Hub, which will provide open space and recreational sports opportunities to future residents as well as further active travel connections. It is noted that WDC intend to allocate a large new employment area to the northwest of the Boship roundabout, which will also have good interconnectivity with the development site through the proposed active travel improvements and bus services.
- 5.2.3 The highway access and the proposed improvements to the existing footpath along the southern side of the A271 to create a shared footway/cycleway to connect between the Boship Roundabout and Lower Horsebridge, are shown in the drawings in the Appendices.
- 5.2.4 Further Improvements to the bus services along the A271 are proposed, or included in the S106 agreement, including improvements to existing bus stops with shelters (if feasible), poles, and real-time passenger information.
- 5.2.5 The planned improvements to the Boship Roundabout include new and safe crossing points for pedestrians and cyclists. This will provide a continuous route between Lower Horsebridge (including the development) and the A22 (Lower Dicker and beyond) to the west of the Boship roundabout.
- 5.2.6 It is my opinion that the proposed improvements to active travel connections and public transport, improve both the accessibility and the sustainability of the proposed development and the existing community. In addition, the approved Wealden Sports Hub will provide open space and sports facilities to the future residents of the proposed development as well as further active travel connections.

- 5.2.7 There is the clear potential to further improve the Site's accessibility by non-car modes by providing a new pair of bus stops either side of the A271. The Appellant has committed to build the westbound bus stop and there is the evident opportunity for the Wealden Sports Hub to include a bus stop for the eastbound services as they are in control of the required land. The new bus stops would service both the Sports Hub and the development and would provide real benefits to both developments.

Wealden Local Plan 1998

- 5.2.8 **Table 5.1** shows how I consider that the proposed development fully accords with the Policies of the Wealden Local Plan 1998.

Table 5.1: Wealden Local Plan 1998 Policies

Policy Ref	How the Proposed Development Complies
EN1	The proposed development will provide improvements to the path along the southern side of A271 to create a shared footway/cycleway to tie into the proposed improvements at Boship Roundabout. The recently approved Sports Hub is located opposite the proposed development and will provide facilities for future residents to be able to access without the need to travel by car, utilising the proposed crossing facilities across the A271.
EN2	The proposed development is located on the route of a regular existing bus service, the Regency 28 service running every 30-minutes along the site frontage, along with additional local services. Funding is to be provided to install new infrastructure or improve existing bus stops on the A271 adjacent to the site. Further financial contributions to improve bus services are included in the S106 agreement. The site is located opposite a recently approved Sports Hub which will provide recreational and green space to future residents.
TR3	The planning application is in accordance with this policy on the basis that: 1) It has been demonstrated the proposed development will have a minimal impact (1.3 – 1.5%) on the Boship roundabout, which is already overcapacity, however once the improvement scheme is implemented through Major Route Network (MRN) funding the roundabout will operate within capacity and will address the safety issues without being significantly impacted by the proposed development. This is evidenced by roundabout traffic modelling carried out by ESCC on behalf of my client. 2) The vehicular access, with a new right turn lane, is shown to operate without detriment to the traffic flow on the A271. In addition, a Road Safety Audit (RSA) was conducted by an independent auditor to address any issues with the access design. Three recommendations were provided, all of which were adopted into the updated design. 3) The proposed development includes the provision of upgraded bus stops, with shelters, poles, and real time information panels.
TR13	The proposed development layout will be designed in accordance with the Manual for Streets with safe and convenient connections to the existing footpath network. The development is proposing improvements along the southern edge of the A271, connecting into the ESCC MRN Scheme at Boship Roundabout, connecting eastbound to the existing footways in Lower Horsebridge and including a pedestrian refuge island providing improved and safer access to the Wealden Sports Hub.
CS1	Insurance that the capital works required to service the proposed development are in place at the time of the development, will be secured by the S106 Legal Agreement, this will include the requirement for access, the provision of funds for public transport services and infrastructure improvements. It is noted that these S106 contributions are in addition to the substantial CIL payments that will be paid to the Council.

Wealden Core Strategy Local Plan 2013

5.2.9 **Table 6.1** shows how I consider that the proposed development fully accords with the Policies of the Wealden Core Strategy Local Plan 2013.

Table 5.2: Wealden Core Strategy Local Plan 2013 Policies

Policy Ref	How the Proposed Development Complies
SPO7	The proposed development will include funding to improve bus services that service the site, together with new/improved public transport infrastructure. The development also includes improvements to support active travel. The path along the southern edge of the A271 will be upgraded to a shared footway/cycleway along the full frontage of the site and to tie into the ESCC scheme at the Boship roundabout. The development will be situated opposite a Sports Hub, which will provide opportunities for recreation for future residents without the need to travel by car.
SPO15	The following contributions/measures are agreed in principle as part of this application: • £1,100 per dwelling for bus services serving the site. • £12,000 per RTPI (2 bus stops) • £500 per bus stop clearway (4 bus stops) • £5,000 TRO fee to extend 30mph zone to Boship roundabout. • £5,000 TRO fee for the implementation of the 20mph within the site. • £1,000 per dwelling for MRN schemes (Boship roundabout) • Provision of a new access junction including a right turning lane and pedestrian crossing facilities. • Provision of shared footway/cycle along the site frontage to the Paddock to tie in the ESCC scheme at Boship roundabout. • A financial contribution towards the Local Cycling and Walking Infrastructure Plan (LCWIP) These measures all contribute to “strategic and local infrastructure requirements.
WCS7	It has been demonstrated that the proposed development will not have a significant impact on the local highway network in terms of operation or safety. Improvements to both active travel routes and improvements to the local bus infrastructure are proposed as part of the development, which will be secured through the S106 legal agreement.
WCS14	The proposed development is deemed to be sustainable with the improvements to both active travel routes and public transport provision, along with it being located in close proximity to local amenities as well as a recently approved Sports Hub, as in accordance with the NPPF.

5.3 Summary

5.3.1 The development proposals fully accord with the policy references. The appropriate obligations and legal agreements are agreed in principle between the Appellant, WDC, and ESCC.

6 3rd Party Comments

6.1 Introduction

- 6.1.1 A number of comments have been submitted by local residents in relation to planning application (WD/2022/3222/MAO). This section of my evidence seeks to address the highways and transport issues raised to provide further clarification and help to alleviate any of the concerns raised.
- 6.1.2 The objections have been categorised by main theme and are addressed below.

6.2 Highway Impact

Impact on the A271

- 6.2.1 A number of comments have been raised in relation to congestion on the A271 with an increase in traffic as a result of the development.
- 6.2.2 Some parties have tried to quantify the number of new trips the development will generate with one stating *"The A271 access road would be ridiculous, as you well know every morning during rush hour that road queues way past London Road junction and adding another 124 houses with the possibility of that number of cars would be crazy"*. Trip rates have been obtained from the industry standard TRICS database and used to inform the assessment which has been set out in the TA and agreed with ESCC. In line with industry standards, an assessment of AM and PM Peak hours has been undertaken and this demonstrates that up to 68 and 71 car trips could be generated by the proposed development in the AM and PM peak hours, respectively.
- 6.2.3 It should be noted that the Site is located to the northwest of Hailsham and provides good access to the A22. The predicted traffic has been assigned to the local highway network using Census Journey to Work analysis is set out in Section 4 of the TA. This has been agreed with ESCC.
- 6.2.4 It has been agreed with ESCC that *"The TA demonstrates that the new Right Turn Lane access will operate satisfactorily without detriment to the traffic flow on the A271."*
- 6.2.5 Some residents raised concerns about the speed at which vehicles travel along the A271. This concern is justified and as such it is proposed to relocate the start of the 30mph zone towards the Boship roundabout to improve safety for existing and future residents.

Impact on Boship Roundabout

- 6.2.6 A number of concerns have been raised in relation to the impact of the development on the Boship Roundabout.
- 6.2.7 This concern was recognised at an early stage and ESCC were commissioned by the Appellant to conduct modelling of the Boship Roundabout for the base year 2018 and future year 2028 with and without development and accounting for the proposed MRN improvements.
- 6.2.8 The modelling demonstrated that Boship Roundabout, in its existing lay out, in the future year 2028 operates over capacity with and without the development. However, with the planned improvements to the roundabout it will perform much better. ESCC state *"that with the proposed signalisation of the roundabout as part of ESCC's MRN package of works, that the roundabout would operate satisfactorily"*. The proposed development will provide a contribution of £1,000 per dwellings towards the works on Boship Roundabout.

6.3 Site Access Arrangements

Site Access

- 6.3.1 A few comments have been raised by local residents in relation to the location and safety of the site access. The proposed site access has been designed in accordance with Manual for Streets / Manual for Streets 2 guidance and has been subject to a Road Safety Audit to demonstrate that it provides a safe and suitable access for the proposed development. This has been demonstrated in Section 5 of this evidence.

Pedestrian Access

- 6.3.2 Several local residents have made comments regarding the access to the Site for pedestrians and the existing path being insufficient and unsuitable to provide access to the Site, considering the current speed limit is 60mph.
- 6.3.3 These are very valid comments and, as part of the development proposals, the existing footway is to be widened and converted into a 3.0m shared footway/cycleway along the Site's northern frontage with the A271, with a 0.5m buffer and to tie into the proposed improvements at Boship roundabout. In addition, a reduction of speed to 30mph along the A271 from the Boship roundabout is to be implemented to improve safety.

6.4 Public Transport

Bus

- 6.4.1 Some local residents supplied comments regarding the current state of bus facilities and services not being suitable to service future residents. The proposed development is addressing this potential issue and is providing funding towards (new/upgrading existing) bus stops along the A271 to serve existing and future residents.
- 6.4.2 In addition, a sum of £1,100 per dwelling, will be provided to improve the public transport service.

7 Conclusions

- 7.1.1 In this Proof of Evidence and supporting transportation documents prepared to support this planning application, I have demonstrated that the Appellant has provided a planning application that is fully compliant with the relevant transport related policies and standards.
- 7.1.2 The Reason for Refusal (nr. 3), as stated by Wealden District Council in their original decision notice has been withdrawn, following agreement with ESCC, and as set out in the Statement of common Ground.
- 7.1.3 I have demonstrated that safe and suitable access to the Site can be achieved for all in accordance with paragraphs 115 and 116 of the NPPF (previously paragraphs 111 and 112).
- 7.1.4 A number of accessibility improvements have been proposed and accepted, with a new 3.0m wide footway, improved highway crossing facilities, agreed improvements to existing bus stops and a further financial contribution in support of the LCWIP proposals to assist with active travel improvements in the wider area. Public transport accessibility has already improved (since the decision notice) by the addition of a bus service between Eastbourne and Brighton (30 min service) and will be further supported by committed improvements to local bus stops and a financial contribution to support bus services.
- 7.1.5 The highway design has been revised to consider the comments made by ESCC and the issues raised by the Road Safety Auditor. The final design will deliver an improvement to the A271 in terms of safety by providing traffic separation islands, an extension of the 30mph zone along the A271 to Boship Roundabout and a new 3m wide shared footway/cycleway from Boship Roundabout to Lower Horsebridge along the southern side of the A271 carriageway.
- 7.1.6 Comprehensive junction modelling of Boship Roundabout has been undertaken by ESCC, on behalf of the Appellant, to support this application. In conclusion ESCC state *“that with the proposed signalisation of the roundabout as part of ESCC’s MRN package of works, that the roundabout would operate satisfactorily”* with the proposed development.
- 7.1.7 It has also been demonstrated that the Appellant’s proposals will positively contribute to the safety and accessibility of the recently approved Wealden Sports Hub application.
- 7.1.8 On this basis, and as agreed with the Highway Authority ESCC, I see no highway or transport related reason why this development should not be permitted in accordance with Policies EN1, EN3, TR3, TR13 and CS1 of the Wealden Local Plan 1998 and Spatial Planning Objectives SPO7 and SPO15 and Policies WCS7 and WCS14 of the Wealden Core Strategy Local Plan 2013 and the NPPF.