TRANSPORT REBUTTAL TO UCKFIELD TC STATEMENT OF CASE

OUR REF.
SM/32699

CLIENT
Obsidian Strategic Asset Management

SITE
Mockbeggars Farm, London Road, Budletts Common, Uckfield, TN22 2EA

PREPARED BY
Simon Moon

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PLANNING REFERENCE
APP/C1435/W23/3330872

1.1 INTRODUCTION

1.1.1 This Transport Rebuttal has been produced in response to the points made in the Uckfield Town Council (TC) Statement of Case (SoC) in relation to the appeal for planning at Mockbeggars Farm, London Road, Budletts Common, Uckfield, TN22 2EA (Planning Reference: APP/C1435/W23/3330872). This Rebuttal does not look to respond to the Uckfield TC SoC line by line, but instead focusses on the salient points raised.

1.2 COMMENTARY

Traffic Congestion

1.2.1 At paragraph 4.3 the Uckfield TC SoC references the East Sussex County Council (ESCC) highway response WD/2022/2785/MAO dated June 2023, with specific focus on the capacity of junctions within the town centre. This highway response however is for a different site (Land North of Eastbourne Road, Uckfield) and not Mockbeggars Farm. Therefore, reference to this response should be disregarded as all applications need to be considered on their own merit.

1.2.2 The DHA Transport Assessment (TA) dated January 2022 (CD3.12), which accompanied the original planning application, considers traffic impacts on all relevant local junctions. As summarised in Section 7 of the Transport Hearing Statement the proposed development will not lead to unacceptable or severe

impacts on the local highway network, as defined by the National Planning Policy Framework.

1.2.3 Furthermore, and with specific attention to the junctions within the town centre, the TA found that the trip distribution from the proposals in this direction will be de minimis. There is not expected to be more than approximately five vehicle movements in this direction in any hour – one further vehicle movement every 12 minutes on average. This has been accepted by ESCC as the highway authority.

Risk of Accidents

1.2.4 Regarding the risk of accidents, at paragraph 4.4 the Uckfield TC SoC notes the following:

> *"Crash data from the Sussex Safer Roads Partnership (appendix C) shows there have been two fatal incidents and a serious crash in Coopers Green Road. Ringles Cross junction continues to see frequent vehicular incidents, some more severe than others, and of those recorded, there have been five crashes (three serious)."*

1.2.5 It is noted that the accident data appended to the Uckfield TC SoC extends back some eight years as apposed to the three or five years you may normally expect within a Transport Assessment. In addition, although no descriptions of the incidents are provided within the Uckfield TC SoC, the online resource, Crashmap, has highlighted that only one vehicle was involved in both the two fatal accidents. This possibly points towards extraordinary unfortunate events.

1.2.6 From inspection, and again with respect to details provided on Crashmap, there appears to be four accidents recorded (two slight and two serious) within the latest eight years at the junction between London Road, Snatts Road and Coopers Green Road (assumed to be the aforementioned Ringles Cross junction), not five. Although unfortunate this is not necessarily beyond that which may be expected at this form of junction over this time period.

1.2.7 Importantly, the TA found that the trip distribution towards this junction as a result of the proposals will be minimal, with a maximum of three vehicles routing along Coopers Green Road in any peak. Therefore, the impacts on this junction will be negligible.

1.2.8 The Uckfield TC SoC went on to note that the Budletts roundabout and Blackdown roundabout on the A22 record frequent accidents. Once more, a review of the data presented on Crashmap does not seem to indicate a quantum of accidents which is necessarily above that which may be expected in this location.

1.2.9 Research completed by the Transport and Road Research Laboratory in the 1980s indicated, in very general terms, that approximately 0.5 accidents may be expected at most junction types per year. Although this is now elderly research, it does at least give an indication of likely accident frequencies, and shows that the numbers outlined above are not necessarily out of the ordinary.

The Use of Shortcuts

1.2.10 With respect to the use of shortcuts, paragraph 4.6 of the Uckfield TC SoC notes that residents already use minor roads for this purpose (Church Street / Rocks Road and Snatts Road) and that the proposed development is close to these roads, which are narrow and poorly lit.

1.2.11 It is highlighted that the TA did not show any vehicle trips generated by the proposed development using these routes on a regular basis. Indeed, for those coming and going from the site on a daily basis these roads would not offer a desirable link to any meaningful destination.

SANGS Car Park Access

1.2.12 With regard to the access to a SANGS car park, at paragraph 4.7 the Uckfield TC SoC notes the following:

> *"If approved, the SANGS car park to be sited in Snatts Road will cause increased vehicle movements where the road bends; having restricted visibility."*

1.2.13 The Uckfield TC SoC goes onto note:

> *"We also raised concerns with the safety of a new pedestrian access at the junction of Snatts Road and Rocks Road (see photos in appendix F)."*

1.2.14 It must be made clear that the above aspects are not associated with the proposals at Mockbeggars Farm. The reference is in connection with the proposals at Downlands Farm. As noted above, the TA has shown that the proposals at Mockbeggars Farm are not expected to distribute additional trips on to Snatts Road.

Connections on Foot / Bicycle

1.2.15 Regarding the connections on foot and bicycle, the Uckfield TC SoC raises a number of points at paragraph 4.8, where the salient comments are considered below. In the first place it has been noted that:

> *"The point at which pedestrians exit the development would be on a straight stretch of London Road which due to its rural setting sees vehicles accelerating either from Ringles Cross or from Budletts Roundabout. ES Highways raised concern of risk of side impact collisions and difficulties with judging speeds – asking for furniture to slow traffic;18"*

1.2.16 Footnote 18 references ESCC highways response WD/2022/0648/MAO dated 16th February 2023 (CD7.1). Within this response the Officer refers to an outdated Stage 1 Road Safety Audit where the above comment regarding judging speeds originates. This point has in fact been resolved through the proposed extension of

the 40mph speed limit on London Road, as acknowledged by the independent Auditor in Appendix B of the DHA Transport Technical Note dated November 2022 (CD3.14).

1.2.17 It is further noted that the Automatic Traffic Count (ATC) completed at the site access and attached to the TA, recorded 85th percentile speeds of 50.3mph and 52.10mph in the northbound and southbound directions respectively. The average speeds were recorded at approximately 45mph, indicating that even without the proposed speed limit in place speeds are not excessive.

1.2.18 The Uckfield TC SoC goes onto note that footways are narrow in Ringles Cross and to walk from the site to town takes approximately 40 to 45 minutes. As set out in the Hearing Statement at Section 5 the relevant footway in this location will be widened as necessary. Furthermore, Section 4 of the same document shows that many services and facilities can be accessed on foot within 20 minutes, including Uckfield town centre.

1.3 CONCLUSION

1.3.1 This Transport Rebuttal has been prepared to address the points made in the Uckfield Town Council (TC) Statement of Case (SoC) in relation to the appeal for planning at Mockbeggars Farm, London Road, Budletts Common, Uckfield, TN22 2EA (Planning Reference: APP/C1435/W23/3330872).

1.3.2 The information provided addresses all points raised and confirms that the proposed development would have no unacceptable impacts.