



DaSA Local Plan Examination

PROPOSED ALLOCATION - BEX9

Land off Spindlewood Drive, Bexhill-on-Sea

April 2019

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1. EXECUTIVE SUMMARY

- 1.1 Rother District Council have prepared their Development and Site Allocations Local Plan, this was submitted to the Secretary of State for Examination in January 2019. The key focus is related to the soundness of the plan, i.e. effective, positively prepared, justified and consistent with national policy, in the context of giving effect to the core strategy.
- 1.2 Exigo has an in depth technical knowledge of existing transport patterns in Bexhill, especially in relation to Policy BEX9, where work commenced on preparing a planning application in 2011, which was submitted in 2017 and received no objection from Highways England and East Sussex County Council in 2019, subject to planning conditions relating to necessary mitigation.
- 1.3 The timing of the planning application and DaSA examination have overlapped, the inspector has raised a highway related matter in relation to Policy BEX9, provided below;

"Matter 7 Selection of sites allocated for development

Issue: For each area, are the individual sites selected sound

Bexhill...

Policy BEX9 Land off Spindlewood Drive, Bexhill...

Is the site deliverable in the light of the highway requirements including the need, identified by Highways England, to avoid severe impact at the A259 Little Common Roundabout."

- 1.4 This was specifically analysed in depth as part of the planning application. Highways England and East Sussex County Council (Local Highway Authority) have provided consultation responses as part of the application process related to delivering Policy BEX9 and offer no objection subject to necessary conditions. This was provided after detailed analysis was submitted by the applicant and this was tested against local and national policy. The NPPF (Feb 2019) is clear that development cannot be supported that has a severe residual effect on the network, the detailed analysis proves that there is not a severe effect, and this was agreed by Highways England and ESCC.
- 1.5 The analysis carried out in the various transport reports submitted as part of the planning application has been produced in accordance with local and national policy. These reports identify the effect of the development on the highway network, including sensitivity testing, and propose suitable mitigation that has been conditioned as part of the recommendation to approve the planning application in line with national planning policy.
- 1.6 This evidence demonstrates that Policy BEX9 is sound, due to the evidence agreed as part of the live planning application.

2. INTRODUCTION

- 2.1 Rother District Council prepared their Development and Site Allocations (DaSA) Local Plan/, this was submitted to the Secretary of State for Examination in January 2019.
- 2.2 The focus of the examination is on soundness and compliance of the DaSA with the necessary legal requirements.
- 2.3 **In order to prove "soundness" the plan must be effective, positively prepared, justified and consistent with national planning policy, in the context of giving effect to the core strategy.**
- 2.4 Exigo has an in-depth technical knowledge of existing transport patterns in Bexhill, especially in relation to Policy BEX9, this document provides evidence necessary in specific response to the Inspectors Matters, Issues and Questions;
- "Matter 7 Selection of sites allocated for development***
Issue: For each area, are the individual sites selected sound
Bexhill...
Policy BEX9 Land off Spindlewood Drive, Bexhill...
Is the site deliverable in the light of the highway requirements including the need, identified by Highways England, to avoid severe impact at the A259 Little Common Roundabout."
- 2.5 Due to the overlap of a validated planning application related to Policy BEX9 and the Secretary of State examination of the same, it is considered that the Inspector would benefit from evidence that the matter raised above has been positively addressed via the current planning application. Highways England, East Sussex County Council (Local Highway Authority) and the Applicant team are satisfied that the planning application accords entirely with national and local policy and as a direct result the planning application has been recommended for approval and is only awaiting a Planning Committee decision.
- 2.6 It would be unrealistic for each policy to be assessed in such detail, however in this instance the evidence is available to provide a suitably detailed **response to the inspector's matter raised above, confirming** without doubt that this has been assessed and is sound.
- 2.7 Exigo Project Solutions Ltd commenced appraising the site in 2011 on behalf of the applicant. In early 2012 Exigo commenced detailed scoping discussions with Highways England and ESCC, resulting in a planning application in 2017.
- 2.8 The effect on the Strategic Road Network (SRN) has involved detailed discussions, sensitivity tests and further traffic surveys to ensure that all parties are satisfied **that Policy BEX9 can be delivered. HE and ESCC's** consultation responses, confirm that the site is sound in terms of achieving national and local policy, these are provided at Appendix A.

3. PLANNING APPLICATION RR/2017/1705/P
- 3.1 The delivery of dwellings covered by Policy BEX9 is currently underway, a planning application is currently live and is recommended by Rother planning officers to be approved by the council. This section of the report summarises the journey taken by the highway experts in concluding that the effect of this development on the local highway network, in particular Little Common roundabout, would NOT be severe.
- 3.2 Scoping discussions with ESCC and HE commenced in 2012, this agreed the following elements adhered to national and local guidance;
- Trip Generation
 - Trip Distribution and Assignment
 - Study Area
 - Committed Development
 - Predicted Effect and Mitigation.
- 3.3 ESCC have been proactive in considering the effect of development across the county and Rother have developed a SATURN model taking into consideration the base scenario and the effect of all planned development until 2028.
- 3.4 Traffic data related to the base situation was collected on 15th April 2015, this was collected in line with the Department for Transport (DfT) guidance, being considered valid in 2017 (application submission year), subject to local growth factors being applied. It was agreed with ESCC and HE however, that a 2028 assessment would be included, to take account of the local plan period and include traffic data from the ESCC Saturn model to ensure consistency.
- 3.5 The 2017 assessment included data related to planning consents that had been granted, but not generating traffic recorded in the traffic survey. Barnhorn Green (application reference RR/2012/1978/P and RR/2015/3115/P) is key as this committed to enhance capacity at the Little Common Roundabout. This enhancement was audited and included in the TA.
- 3.6 The TA submitted as part of the planning application package concluded that there was not a severe effect on the network and in particular at the Little Common Roundabout, this is available at Appendix B.
- 3.7 During the application process, Highways England requested additional information to ensure that everything reasonably practicable is carried out to reduce the effect on the Little Common Roundabout.
- 3.8 The opening of the link road, which was factored into the 2028 ESCC model data, was not reflected in the 2017 assessment year data. As such new counts were carried out on 27th September 2017. The data was not significantly different to data collected in 2015, as the effect of the link road is mainly due to the new development opportunities realised by its delivery,

which is not in place, the effect of which is included in the 2028 traffic model created by ESCC.

- 3.9 The opportunity to upgrade an existing junction onto Barnhorn Road was explored. In order to ensure that this was deliverable, an independent Road Safety Audit was commissioned by HE in strict accordance with HD 19/03.
- 3.10 The inclusion of a direct access to Barnhorn Road altered the trip distribution, as vehicles can now access the SRN without using Little Common Roundabout; in order to understand the effect, additional modelling was carried out as a sensitivity test. At the same time, to remove any ambiguity in relation to likely trip generation per dwelling, a high rate of 0.7 trips per dwelling in the peak hour was employed. This is robust as it is higher than the figures used in the ESCC model and that calculated using the TRICS Good Practice Guide. This sensitivity test ensured that the maximum predicted effect on Little Common Roundabout could be accommodated without there being a severe effect.
- 3.11 As a result of the above exercise there is no reasonable doubt that an access from Policy BEX9 can be provided directly onto Barnhorn Road.

Trip Generation

- 3.12 The modelling has been assessed and is shown on the flow diagrams attached. The following vehicular trips have been assigned to the network and tested in the modelling submitted in the original Transport Assessment.

Time Period	Arrivals	Departures
AM Peak	27	64
PM Peak	62	41

Table 3.1 – Trip Generation Tested in the Modelling

- 3.13 This is identical to the vehicle trip rate recorded by the agreed TRICS data and therefore demonstrates that the modelling is indeed robust. It should also be noted that the assessment looks at a maximum of 170 units whereas the final planning figure applied for is below this at circa 160 dwellings, therefore, the TA is extremely robust.
- 3.14 As agreed, even though the above is correct and representative of a robust transport assessment, a sensitivity test has been carried out. This utilises a trip rate suggested by Highways England at 0.7 two-way trips per dwelling.

Time Period	Arrivals	Departures
AM Peak	34	85
PM Peak	85	34

Table 3.2 – Trip Generation Tested in the Sensitivity Modelling

- 3.15 Comparing Table 3.1 with Table 3.2, the effect of an increase in trip generation per dwelling has an effect on the overall trip generation experienced as part of this development, this equates to a 31% increase in the AM peak and a 16% increase in the PM peak.

3.16 As a result of the above exercise there is no reasonable doubt that the trip generation related to Policy BEX9 would be greater than that assessed as part of the sensitivity test.

Junction Analysis

3.17 Industry standard modelling software has been utilised to assess the effect of Policy BEX9 on the highway network, using the parameters discussed above. A traffic model determines junction capacity i.e. the number of vehicles and turning movements that can be accommodated over the course of the modelling period based on the geometry provided. In the case of the Little Common Roundabout this included the geometrical improvements conditioned as part of the planning application related to Barnhorn Green and the application related to BEX9, now implemented.

3.18 The ratio of flow (demand) to capacity is expressed as a decimal with 1 being the maximum demand that can travel through the junction in the model period. In this case the model period is 1 hour in the AM peak and the PM peak period.

3.19 Little Common Roundabout has been assessed using ARCADY, which is specifically designed to assess the effect of additional traffic on a roundabout. The enhanced access on Barnhorn Road has been assessed using PICADY, specifically designed to assess the effect of additional traffic on a priority junction.

3.20 The ARCADY Output was subject to a detailed review by **Parson's Brinkerhoff** on 28th January 2016, where all parameters were checked against the then recently approved Barnhorn Green development TA. All parameters matched, and it was subsequently agreed with ESCC and HE. Exigo have carried out further detailed analysis and remain confident that the existing and proposed parameters are accurate. The ARCADY model parameters will need to be checked throughout the detailed design process.

3.21 The 2017 count data has been included within the updated modelling presented in this correspondence, the summary results from the ARCADY modelling without any improvements to the junction are provided below;

	AM		PM	
	Queue (PCU)	RFC	Queue (PCU)	RFC
(Default Analysis Set) - Base 2017				
Arm A	5.76	0.86	3.41	0.78
Arm B	0.29	0.23	0.16	0.14
Arm C	1.22	0.55	0.69	0.41
Arm D	1.94	0.66	1.27	0.56
Arm E	1.04	0.51	1.32	0.57

Table 3.3 – Little Common Roundabout - ARCADY output based on 2017 Count Data and parameters as per Ordnance Survey data.

3.22 The queue information has been validated against the surveys, a queue is defined as stationary traffic, rolling traffic with variable headways are common in urban areas, this is not shown in the model as it is not stationary traffic.

3.23 The agreed development flows were issued to ESCC for inclusion in the SATURN run, which was audited by the both ESCC and HE. The data utilised in this pre-existing model was provided for inclusion in the 2028 assessment. For complete clarity, the only data provided by Exigo in relation to the SATURN modelling was the development flows relating to the subject site. On this basis, the subject site received technical approval in relation to the traffic impact of up to 170 dwellings on land promoted as Policy BEX9.

3.24 The following changes have been made to reflect specific requests from Highways England;

Trip Generation

- New trip rate of 0.7 per dwelling has been tested as sensitivity assessment.

Trip Distribution and Assignment

- Distribution is now based on the 2017 count data.
- *Traffic has been Assigned based on 10% of eastbound traffic and 100% of westbound traffic using the Barnhorn Road access.*

Study Area

- The study area has been increased to take account of the new access to the site.

Committed Development

- The ARCADY model has been audited to take account of the enhancement works approved as part of the committed development traffic.

3.25 In order to demonstrate the effect on the local network a trip rate of 0.7 trips per dwelling in each peak hour has been carried out as a sensitivity test.

3.26 This has been combined with the points noted above, the results are provided below;

	AM		PM	
	Queue (PCU)	RFC	Queue (PCU)	RFC
(Default Analysis Set) - Base 2017 + Com				
Arm A	14.59	0.95	6.79	0.88
Arm B	0.40	0.29	0.21	0.17
Arm C	2.24	0.70	0.95	0.49
Arm D	3.84	0.80	1.57	0.61
Arm E	1.44	0.59	1.54	0.61
(Default Analysis Set) - Base 2017 + Com + Dev				
Arm A	17.72	0.96	7.07	0.88
Arm B	0.44	0.31	0.22	0.18
Arm C	2.51	0.72	1.11	0.53
Arm D	3.94	0.80	1.63	0.62
Arm E	1.66	0.63	1.63	0.62
(Default Analysis Set) - Base 2028 + Saturn				
Arm A	6.95	0.88	21.97	0.97
Arm B	0.47	0.32	1.22	0.56
Arm C	0.47	0.32	0.74	0.43
Arm D	3.17	0.76	1.28	0.56
Arm E	1.33	0.57	1.25	0.56
(Default Analysis Set) - Base 2028 + Saturn + Dev				
Arm A	8.09	0.90	24.45	0.98
Arm B	0.50	0.33	1.59	0.62
Arm C	0.48	0.33	0.90	0.48
Arm D	3.25	0.77	1.34	0.57
Arm E	1.61	0.62	1.31	0.57

Table 3.4 – Little Common Roundabout – Sensitivity Output.

- 3.27 The ARCADY output for the Little Common Roundabout, shows the greatest effect is experienced on the arm that is over operational capacity, which is expected; however, the effect would be imperceptible as it increases the queue by 3 vehicles in the AM peak period and 0 vehicles in the PM peak period in 2017. In 2028 the effect of the development is lower at 1 vehicle in the AM peak and slightly higher in the PM peak with 2 vehicles.

Movement	RFC	Queue
2017 AM Peak + Committed Development + Proposed Development		
Site Access	0.291	0
Barnhorn Road Right Turn	0.039	0
2028 AM Peak + Committed Development + Proposed Development		
Site Access	0.257	0
Barnhorn Road Right Turn	0.048	0
2017 PM Peak + Committed Development + Proposed Development		
Site Access	0.044	0
Barnhorn Road Right Turn	0.043	0
2028 PM Peak + Committed Development + Proposed Development		
Site Access	0.070	0
Barnhorn Road Right Turn	0.062	0

Table 3.5 – Barnhorn Road / Improved Farm Access Sensitivity Test - PICADY Output Summary

- 3.28 The above summary illustrates that there would be a minimal effect on the network as a result of the priority junction when combined with the sensitivity test figures. On the basis of the above there would not be a capacity issue at this junction.

Network Improvements

- 3.29 Both ESCC and HE were clear throughout pre-application discussions that network improvements would need to be in place to address any effect on this network.
- 3.30 The development flow diagrams were agreed with ESCC prior to inclusion in the SATURN model, the same flow diagrams have been utilised in this assessment.
- 3.31 The submitted Transport Assessment demonstrated that the access from Spindlewood Drive would not have a severe effect on the network and as such is technically correct and meeting the criteria set out by local and national policy. However, to positively address local stakeholder comments and those of Highways England, it was considered beneficial to assess the effect of providing a vehicular link to Barnhorn Road from the site.

- 3.32 The inclusion of an additional access onto the SRN is expensive and has involved a significant amount of work to ensure that it is fully compliant with the guidance. However, this would replace the mitigation required elsewhere on the network and it has addressed comments from local stakeholders.
- 3.33 The most significant improvement is the introduction of a ghost right turn lane at the existing access point, this would then connect to the development and would be in place for construction traffic as well as residents.
- 3.34 It is clear that the above improvements can be delivered by the applicant in order to deliver Policy BEX9. Indeed, the capacity improvements at Little Common Roundabout have been delivered by the Barnhorn Green application. Based on current development appraisals the costs associated with delivering the above requirements would not be prohibitive to delivering Policy BEX9.

Determination of a Severe Effect

- 3.35 **The dictionary definition includes words such as “very serious”, “extreme” and “very difficult”. This sets a very high threshold. NPPF could not be any clearer; a development with a small, moderate or even a large traffic impact should be permitted if it meets the sustainable access criterion. By “residual”, it refers to the impact after consideration of sustainable transport measures. The scheme effortlessly surpasses the minimum requirements in terms of sustainable access, especially given the measures included as part of the planning application, an extremely robust approach was taken in that the traffic generation was not reduced to reflect this.**
- 3.36 On the basis that in every assessment period (2017 AM Peak, 2017 PM Peak 2028 AM Peak and 2028 PM Peak) all traffic connected with this junction would continue to travel through the junction within the hour, it would be **extremely difficult to define the effect as “very serious” “extreme” or “very difficult”.**
- 3.37 The effect on the queue is minimal rising from 15 vehicles to 18 vehicles in the 2017 AM peak period, a total of 3 vehicles and from 22 vehicles to 24 vehicles an increase in 2 vehicles in the PM peak in 2028. This is likely to be unnoticed in the day to day operation of the junction.
- 3.38 As a result of the above, combined with the evidence submitted, both Highways England and ESCC considered that the residual effect was not severe.

Traffic Impact Summary

- 3.39 The junction modelling results predict that all junctions will continue to operate within design capacity for all tested scenarios, resulting in every vehicle wishing to travel through the junction in the peak hour, getting through the junction within that hour.
- 3.40 The proposals are therefore considered to have a limited effect on the highway network at peak times and the traffic generated by the proposed

development can be accommodated on the highway network without any further improvement to junction capacity above that already consented.

- 3.41 The effect of the development has been agreed with both ESCC and HE, it is therefore agreed that no further capacity improvements are required.
- 3.42 In relation to the SATURN model, this is a model created and controlled by ESCC to ensure a consistent approach is taken in relation to traffic modelling and the effect of new developments in this part of East Sussex. It is a complex model considering a variety of different trip producers and attractors. It is important to look at macroscopic modelling to avoid potential double counting in relation to area wide trip redistribution and creation. For instance, if houses and employment uses are allocated adjacent to each other, then it is likely traffic will be redistributed rather than all the trips being entirely new.
- 3.43 The detailed assessment above enabled ESCC and HE to provide a consultation response detailing that the effect on the network would be acceptable and not severe. This concludes that the delivery of Policy BEX9 in relation to highways is sound.

4. POLICY

National Planning Policy

National Planning Policy Framework (NPPF) February 2019

4.1 The National Planning Policy Framework sets out the **Government's planning** policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development are produced, relevant sections are analysed below.

Section 9- Promoting Sustainable Transport

4.2 **Section 9 of the NPPF focuses on 'Promoting Sustainable Transport', which states "*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:***

- *The potential impacts of development on transport networks can be identified;*
- *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised- for example in relation to the scale, location or density of development that can be accommodated;*
- *Opportunities to promote walking, cycling and public transport are identified and perused;*
- *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account- including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.*

4.3 Policy BEX9 is connected to both Spindlewood Drive and Barnhorn Road by 2m wide footways. There are also public rights of way linking the site via car free routes to Clavering Walk, etc. The site is on the edge of the established residential area, the routes are accessible by all and connect the residents of the proposed site to key facilities and services in Little Common, such as retail, services, public transport, etc by foot. The centre of Little Common is within a 1km walk.

4.4 Barnhorn Road provides access to bus stops within 400m or 5 **minutes' walk** of the site. As part of the planning application ESCC requested funding for the evening service to provide a comprehensive alternative modal choice for all residents. As this development would increase the use of the bus service and the likelihood of trips being required out of peak times, off peak services should be invested in by the applicant.

4.5 All of the above has been addressed as part of the live application, all points required by national policy have been positively addressed ensuring Policy BEX9 can be delivered.

Considering Development Proposals

- 4.6 The NPPF states, when assessing potential development sites, it must be ensured that:
- *"Appropriate opportunities to promote sustainable modes can be – or have been – taken up, given the type of development and its location;*
 - *Safe and suitable access to the site can be achieved for all users; and*
 - *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*
- 4.7 The site location achieves all key accessibility criteria; employment, retail and leisure activities are provided in the centre of Little Common, less than 1km from the Policy BEX9. A trip from the proposed site can be carried out by foot as 1km is seen as a desirable distance.
- 4.8 Bus stops are within the nationally accepted 400m (5 minutes) walk from the site. At peak times public transport services are regular and have available space, it was recognised that the local bus network was not regularly available off peak and the delivery of this development would increase the likelihood of off peak services being required, as such it was agreed by all parties that it was necessary to fund additional off peak services.
- 4.9 Access on foot is provided using 2m wide footways tying into the local footway network, which once Spindlewood Drive is crossed provides a seamless journey to Little Common centre, at this point formal crossing points are provided for onward travel.
- 4.10 Cycling is carried out on the highway, the local residential road network is relatively lightly trafficked, with low speeds. The roads can pass two vehicles simultaneously and as such a cyclist can pass a car in the opposite direction with ease.
- 4.11 Access for private vehicles was discussed as part of the application. It was agreed that vehicular access would be taken from Spindlewood Drive and Barnhorn Road. Both involve improving existing vehicular access points, both have been subjected to an independent Road Safety Audit instructed in accordance with the Design Manual for Roads and Bridges (DMRB) guidance.
- 4.12 In accordance with national policy the application was accompanied by a Transport Assessment and Travel Plan. The Transport Assessment considers the base situation, identifying weekday peak hours; local consented applications are included as committed development, in this case the ESCC SATURN model is also used covering development to 2028.
- 4.13 Barnhorn Green is a large residential development to the north of Barnhorn Road, as part of that planning consent the applicant has provided improvements to the Little Common Roundabout.

- 4.14 The improvements to Little Common Roundabout were included within the planning application made in respect of Policy BEX9 and the consultation responses included a condition to ensure that these improvements are in place prior to the occupation of dwellings related to Policy BEX9.
- 4.15 The improvements agreed by all parties: HE, ESCC and the applicant for Barnhorn Green, were audited by Exigo and the parameters used in the with **"committed development" and "Policy BEX9" development scenario utilised** the capacity improvement.
- 4.16 The HE requested that the application relating to Policy BEX9 did everything reasonably practicable to reduce the effect at Little Common Roundabout. It was agreed that a second vehicular access point could be provided in line with DMRB guidance. This access improvement was subjected to an independent Road Safety Audit, where any points raised were addressed in the designer response. This is available at Appendix E.
- 4.17 The combination of the capacity improvements, the addition of a junction which would enable traffic to access the SRN without using Little Common Roundabout, the improvement to public transport and the inclusion of a Travel Plan to encourage modal shift, resulted in HE agreeing that there would not be a severe impact at the Little Common Roundabout. This process is entirely in line with national policy.
- 4.18 **The framework also states that, "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." With this quote in mind, the document advises that developments should;**
- *"Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - *Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - *Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - *Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - *Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."*
- 4.19 The application submitted to deliver Policy BEX9 demonstrates that direct safe access is provided for pedestrians from both Spindlewood Drive and Barnhorn Road. The pedestrian routes from Policy BEX9 to key destinations was audited and no significant barriers existed between the new

infrastructure and the destinations within a desirable and acceptable walking distance. With the exception of crossing Spindlewood Drive, pedestrians travelling from the site to the centre have priority, the same exists in relation to the access from Barnhorn Road, providing pedestrians with a safe route to the closest bus stops.

- 4.20 Public transport improvements are included as part of the mitigation package, this not only enhances services for the dwellings connected with policy BEX9 it also increases access to services for all residents in Little Common and Bexhill.
- 4.21 All new infrastructure has been designed to meet the needs of all users, with all new crossing points provided with tactile pavers and dropped kerbs. The footway network is sufficiently wide enough to pass wheelchairs, prams and pedestrians in two directions simultaneously.
- 4.22 The routes connecting Policy BEX9 benefits from natural surveillance; new routes would be illuminated, designated crossing points included and footways sufficiently wide enough to allow all users to pass, making the routes safe, secure and attractive. The existing infrastructure also achieves this criterion.
- 4.23 The proposed access arrangement does not encourage conflict between pedestrians, cyclists and vehicles. Additional detail will be included at the detailed design stage, this will ensure that there is not unnecessary street clutter.
- 4.24 Policy BEX9 shares a boundary with Spindlewood Drive, dwellings on Barnhorn Road and Maple Walk. As such this development is fully integrated into the existing residential neighbourhoods, enabling existing delivery routes to be easily extended encouraging efficient delivery. The routes are all shown to be to adoptable highway standard and would enable safe access by emergency service vehicles.
- 4.25 The development has the ability to provide EV charging to all residents, there are multiple options available at present from a first fix to communal fast charge units.
- 4.26 **Finally, the NPPF states that ,“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.”**
- 4.27 The planning application related to the delivery of Policy BEX9 is accompanied by a Transport Assessment and Travel Plan. ESCC have included a planning condition in relation to the implementation of the Travel Plan, to ensure sustainable travel is promoted and facilitated by the development.
- 4.28 When assessing the transport impacts for this development, the guidelines outlaid in the NPPF have been closely followed specifically in regards to promoting sustainable travel to the development.
- 4.29 As a result of the above, it is clearly demonstrated that Policy BEX9 complies with the NPPF entirely.

National Planning Practice Guidance (NPPG) March 2014

- 4.30 The National Planning Practice Guidance (NPPG) brings together various planning guidance for England across all disciplines, as well as provide a link between guidance and the aims of the NPPF. The NPPG discusses the role of Travel Plans and Transport Statements/Assessments for developments and how they relate to each another.
- 4.31 The NPPG sets out the key roles of Transport Assessments, Statements and Travel Plans.

"The development of Travel Plans and Transport Assessments or Transport Statements should be an iterative process as each may influence the other.

The primary purpose of a Travel Plan is to identify opportunities for the effective promotion and delivery of sustainable transport initiatives e.g. walking, cycling, public transport and tele-commuting, in connection with both proposed and existing developments and through this to thereby reduce the demand for travel by less sustainable modes. As noted above, they should not be used as a way of unfairly penalising drivers.

*Transport Assessments and Transport Statements primarily focus on evaluating the potential transport impacts of a development proposal. (They may consider those impacts net of any reductions likely to arise from the implementation of a Travel Plan, though producing a Travel Plan is not always required). The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid **unacceptable or 'severe'** impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to ongoing occupation and operation of the development.*

*Transport Assessments or Statements can be used to establish whether the residual transport impacts of a proposed development are likely to be **'severe'**, which may be a reason for refusal, in accordance with the National Planning Policy Framework."*

- 4.32 The Transport Assessment reports the existing modal split recorded in Little Common, the Travel Plan presents measures to reduce single car occupancy and its use. The Travel Plan accompanying the application for the delivery of Policy BEX9 identifies the opportunities for the effective promotion and delivery of sustainable transport initiatives.
- 4.33 The Transport Assessment accompanying the application for the delivery of Policy BEX9 focuses on the potential impact of the development proposal. Given the sensitive nature of the development, a robust approach was undertaken in relation to the modelling to demonstrate that the effect would not be severe in the unlikely event that the TP measures were ineffective.
- 4.34 The submitted assessments present a very robust case which concludes, with consultees agreeing, that there would not be a severe effect on the Little Common Roundabout. The sensitivity test assessed the following;
- **Upgrade an existing junction on Barnhorn Road to provide an all movements junction directly linking the application site to Barnhorn Road;**

- Carry out an additional survey of Little Common Roundabout post link road opening;
 - Utilise the new traffic count data for the 2017 test scenario;
 - Utilise the SWETS model data for the 2028 test scenario;
 - Carry out a sensitivity test in relation to the trip generation using 0.7 two way trips per residential unit;
 - Model the network in 2017 AM and PM peak data, distributing the sensitivity test trip generation using the new 2017 turning count data;
 - Model the network in 2028 AM and PM peak data, distributing the sensitivity test trip generation using the 2028 SWETS model turning count data;
 - Carry out a further sensitivity test on the basis of the above, with all development traffic using the Barnhorn Road access and no traffic using Spindlewood Drive.
- 4.35 The NPPG discusses why Travel Plans, Transport Assessments can contribute to:
- *"Encouraging sustainable travel;*
 - *Lessening traffic generation and its detrimental impacts;*
 - *Reducing carbon emissions and climate impacts;*
 - *Creating accessible, connected, inclusive communities;*
 - *Improving health outcomes and quality of life;*
 - *Improving road safety, and*
 - *Reducing the need for new development to increase existing road capacity or provide new roads."*
- 4.36 The TA and TP demonstrate how close key services are to the site, the acceptable walking distance of 2km covers much of Bexhill, with the majority of Little Common being covered by the desirable distance of 1km.
- 4.37 Through the application process it was agreed that additional investment in the public transport would be made by the applicant delivering Policy BEX9 and thus providing a comprehensive bus service. .
- 4.38 The TP commits to provide a variety of measures to encourage modal shift, thereby reducing carbon emissions and climate impacts.
- 4.39 Policy BEX9 bounds the existing residential areas on 3 sides, the links for all users are provided to ensure that the development creates an accessible, connected and inclusive community.
- 4.40 The TP encourages residents to walk to local services, the additional bus infrastructure provides access to services further away, all of which improves health outcomes and quality of life.
- 4.41 Road safety has been a paramount consideration as part of the planning application to deliver the development at Policy BEX9. Two existing

substandard access points are significantly upgraded to meet the latest DRMB guidance in relation to Barnhorn Road and the ESCC guidance at Spindlewood Drive. Both of which have been subjected to an independent RSA, which raised issues, all of which were addressed as part of the designer response, culminating in the agreement that it is acceptable from Highways England.

- 4.42 The measures included in the Travel Plan encourage modal shift minimising car use. Only the minimum road infrastructure enhancements are included to ensure that there would not be a residual severe impact as a result of the delivery of Policy BEX9.
- 4.43 With regards to Transport Assessments, the NPPG discusses the key principles that should be taken into account in preparing a Transport Assessment or Statement:
- *"Proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible;*
 - *Established at the earliest practical possible stage of a development proposal;*
 - *Be tailored to particular local circumstances (other locally determined factors and information beyond those which are set out in this guidance may need to be considered in these studies provided there is robust evidence for doing so locally);*
 - *Be brought forward through collaborative ongoing working between the Local Planning Authority/Transport Authority, transport operators, rail network operators, the Highways Agency where there may be implications for the Strategic Road Network, and other relevant bodies. Engaging communities and local businesses in Travel Plans, Transport Assessments and Statements can be beneficial in positively supporting higher levels of walking and cycling (which in turn can encourage greater social inclusion, community cohesion and healthier communities)."*
- 4.44 The planning application was accompanied by a bespoke Transport Assessment, the study area was proportionate to the scale of the development and was established in 2012. Discussions with ESCC and Highways England began in 2012, with a full scoping exercise being undertaken.
- 4.45 A significant amount of work has taken place between the applicant team, RDC, ESCC and Highways England, prior to the planning application submission.
- 4.46 This application has been assessed against national policy, the effect of the development has been estimated, mitigated and agreed with all technical consultees. The effect on the network has been rigorously assessed and testing has concluded that the effect on the operation of the network is acceptable and not considered severe.

Local Planning Policy

East Sussex Local Transport Plan 2011-2026

- 4.47 East Sussex County Council as a local transport authority operates to deliver infrastructure required to enable sustainable economic growth throughout Greater Essex, Medway, Kent and East Sussex via a Local Transport Plan (LTP).
- 4.48 The East Sussex LTP3 (2011-2026) main objectives are to reflect those **outlined in the Sustainable Community Strategy for East Sussex, 'Pride of Place' and the Council Plan for the region. The LTP3 main aims are:**
- Improve economic competitiveness and growth;
 - Improve safety, health and security;
 - Tackle climate change;
 - Improve accessibility and enhance social inclusion;
 - Improve quality of life.
- 4.49 East Sussex have identified key areas within the region which have identified for needing greater investment. These include:
- Hastings/Bexhill;
 - Eastbourne/South Wealden;
 - Newhaven.
- 4.50 LTP3 aims to benefit these areas by delivering sustainable economic growth and the following transport infrastructure:
- Localising road improvements to tackle congestion at bottlenecks on the network;
 - Target strategic transport improvements within and outside East Sussex to improve the connectivity within the county and within the south east London and beyond;
 - Road safety through enforcement, education and engineering measures including integration of highway maintenance with safety improvement schemes;
 - Promotion and infrastructure for public transport e.g. accessible bus stops, shelters;
 - Implementation of infrastructure to support integrated sustainable travel – walking, cycling, public transport, car sharing etc. For example – bus priority measures, cycle lanes and facilities, improvements to pedestrian routes to key trip attractors, better rail/bus/cycle interchanges, less street clutter and enhanced public spaces;
 - Better use of technology to make the best use of the existing transport network e.g. Urban Traffic Control (linking of traffic signals), Real Time Bus Information, charging points for electric vehicles and smart ticketing initiatives;
 - Parking control and enforcement.

East Sussex 'Pride of Place'

- 4.51 The East Sussex 'Pride of Place' document sets out to 'raise the quality of life for all residents by securing their future prosperity and well-being and improving the places where they live, work and spend their leisure time'.
- 4.52 East Sussex have identified the issues in which affect the quality of life for people in East Sussex and have set out strategic priorities which include:
- Developing our economy, creating jobs and increasing prosperity;
 - Providing high quality education, learning & skills opportunities;
 - Improving travel choices and access to services;
 - Providing high quality affordable housing;
 - Protecting our natural and built environments and adapting and responding to climate change;
 - Improving health and well-being;
 - Ensuring people and communities are safe and secure;
 - Creating strong communities and community leadership;
 - Enabling people to enjoy culture, sports and leisure.

Summary

- 4.53 Overall the development achieves the aspirations of national and local policy. The site is located within an accessible area and would provide modal transport choice. The proposed Travel Plan would further encourage sustainable travel patterns.

5. HIGHWAYS ENGLAND RESPONSE TO THE DASA CONSULTATION

- 5.1 Highways England (HE) have written in respect of the DaSA consultation and have objected to Policy BEX9 on 26th October 2018. Having reviewed the consultation response, it is objecting to the entire plan coming forward in its current state and not the individual sites per se. The comments made are generic and not directed at policy BEX9, but as one of the policies it must be subjected to the same approach, albeit the exercise was carried out as part of the planning application process related to the same site.
- 5.2 Each site being considered on its own merits and planning submission. This is qualified under the heading Development and Site Allocations Local Plan: *"...the Local Plan must propose **mitigation which delivers "nil detriment" and which we can be confident is deliverable within highway land or land under the control of either yourselves as Local Planning Authority or the applicant and is compliant with all of the requirements of the Design Manual for Roads and Bridges (DMRB). Further, we must be confident that funding for any required highway mitigation is or will be in place and available at the appropriate point in the build out of the Local Plan. Mitigation schemes therefore need to be development to a sufficient stage at outline design to enable robust cost estimates to be derived, which should be confirmed with Highways England."***
- 5.3 The application relating to the development delivering Policy BEX9 has carried out this entire exercise with HE and has satisfied all requirements including a Road Safety Audit and Designer Response being provided and approved by HE.
- 5.4 HE state that the consultation material informing this objection is limited to;
- Development and Site Allocations Local Plan – Proposed Submission October 2018
 - Highways Capacity Assessment (HCA) Report (2028 Development and Site Allocations) Version 4.2 November 2018
 - Infrastructure Delivery Plan February 2015.
- 5.5 As the planning application related to Land off Spindlewood Drive is not listed and not part of the DaSA consultation, HE could not use the information to determine a response in relation to the DaSA response.
- 5.6 HE state that policies BEX6, BEX9, BEX10 and BEX11 include requirements to provide offsite highway works to make the development acceptable in highway terms. To ensure that BEX9 comes forward as required in the planning application HE have included the following in their response *"In the case of BEX9 Spindlewood Drive, this site will also be required to upgrade the existing access onto the A259 Barnhorn Road as well as provide an access to Spindlewood Drive on the local road network. This was shown to be necessary to avoid 'severe' impact at the A259 Little Common Roundabout."*
- 5.7 This has been further clarified in an email from the HE officer who provided the objection to the DaSA and also provided the HE consultation responses for the BEX9 planning application. The officer reiterates that whilst HE are

“content” with the BEX9 development, the cumulative impact of all developments have not been represented in the HCA report. A copy of the email can be found at Appendix F.

- 5.8 It is clear that whilst the HE require further information on all sites in the DaSA, specific mitigation is noted in line with that received in relation to the planning application, a comprehensive approach clearly stating that this site has carried out due process in line with national policy, identifying the effect using agreed industry standard methodology, providing mitigation and **addressing the effect to ensure that it is not ‘severe’**.
- 5.9 The applicant has committed to provide the mitigation necessary to make the development acceptable, there are no additional offsite infrastructure projects required to make the development acceptable in terms of national policy and as such all improvements will be in place prior to the development being fully occupied.
- 5.10 In respect of soundness, this demonstrates that Policy BEX9 is sound because there is a transport evidence base which assesses the cumulative effect of this site and all other committed developments, which proposed deliverable mitigation as agreed with HE as being justified and effective.

6. CONCLUSION

- 6.1 Rother District Council have prepared their Development and Site Allocations Local Plan, this identifies Policy BEX9 – Land off Spindlewood Drive for residential development. Exigo have been working on a planning application to deliver this site for residential development since 2012, which has been recommended for planning approval and is only awaiting a planning committee decision.
- 6.2 **The Secretary of State’s local plan examination** is currently underway, and the inspector has raised a matter in relation to whether Policy BEX9 has a severe effect on the Little Common Roundabout.
- 6.3 The two elements are intrinsically linked, placing Exigo in position to give expert advice in relation to the effect of Policy BEX9 on the Little Common Roundabout.
- 6.4 Exigo has engaged with Highways England and East Sussex County Council and as such provides detailed evidence to demonstrate that Policy BEX9 is sound.
- 6.5 As a result of detailed discussions between relevant highway experts there is no reasonable doubt that an access from Policy BEX9 cannot be provided directly onto Barnhorn Road.
- 6.6 As a result of detailed discussions between relevant highway experts there is no reasonable doubt that the trip generation related to Policy BEX9 would be greater than that assessed as part of the sensitivity test.
- 6.7 The consultation responses related to the live planning application confirms that both Highways England and East Sussex County do not consider that there would be a severe residual effect on the Little Common Roundabout as a result of delivering Policy BEX9.
- 6.8 The NPPF is clear in respect of the dealing with the impact of a development, **NPPF states that “development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”**, Policy BEX9 fully achieves the aspirations of the national and local planning policies.
- 6.9 National planning policy has been reviewed in detail in relation to matter 7 Policy BEX9 raised by the inspector; it is clear from the planning application made in relation to the subject site has fully adhered to national planning policy.
- 6.10 The applicant has accepted the conditions connected to the committee report put forward to councillors and considers that at this time the scheme would be deliverable.
- 6.11 HE objected to the DaSA on the basis of the cumulative effect of the Plan and not directly to policy BEX9, **the application for the same site has a “no objection subject to conditions” consultation response from HE.**
- 6.12 As a result of the detailed evidence presented to highway experts in relation to the planning application and the commitment made by the applicant, it is considered that BEX9 can be delivered and is therefore sound.

APPENDIX A
Highway England and ESCC Consultation Responses

**To: Head of Planning
Rother District Council
Town Hall, Bexhill on Sea**



APPLICATION NUMBER	HW/RR/17/1705/P
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Applicant: Exigo Project Solutions

Location: Spindlewood Drive - Land off, Bexhill

Development: Outline: Residential development for circa 160 dwellings with all matters other than access reserved.

Road Name or Number	U6150	Consultation Date	27 July 2017	Use Class	
National Grid Reference	571043 107608	Contact Officer	Ben Lenton 01273 336114		

Recommendation:

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

The Proposal

The development proposal is for the construction of up to 170 dwellings on land to the east of Spindlewood Drive, Bexhill.

Site Access

The submitted Transport Assessment indicated that the development would be served via a single access point onto Spindlewood Drive; however, following further discussions with Highways England and East Sussex County Council it was considered beneficial to provide a second access into the site from Barnhorn Road (A259).

Barnhorn Road Access - Highways England is the highway authority, traffic authority and street authority for the strategic road network (SRN) and therefore they have assessed the suitability of the access onto Barnhorn Road. Highways England has now concluded that subject to the inclusion of appropriate conditions the new access onto Barnhorn Road is acceptable.

Spindlewood Drive Access - Access into the site from Spindlewood Drive is proposed via a simple priority junction (Drawing No. T277_15). The submitted plan indicates that the new access will have a width of 6.5m. This is considered to be appropriate and tracking drawings have been provided to show that the access layout is able to accommodate larger vehicles (Drawing No. T277_21).

2.0m wide footways will be provided on either side of the new access and these will connect with the existing pedestrian facilities on Spindlewood Drive. Dropped kerbs and tactile paving will be provided either side of the new access.

Spindlewood Drive is subject to a 30mph speed limit and therefore the visibility requirements according to MfS are 2.4m x 43m either side of the new access. I am satisfied that appropriate visibility splays can be provided.

The site access has been subject to a Road Safety Audit and this has raised some minor issues regarding the proximity of the access serving the nearby electricity sub-station. In order to address these issues the Designers Response has suggested alterations to the sub-station access and gates and proposed that a lay-by for service vehicles to park is provided close to the junction with Spindlewood Drive. These alterations will require discussing further with the electrical company responsible for maintaining the sub-station; however, I am satisfied that the concerns raised in the audit can be addressed.

With the above in mind I have no major concerns regarding the access proposed off Spindlewood Drive; however, it should be noted that the new access and all associated off-site works will require constructing in accordance with ESCC specification with all works within the highway being carried out under the appropriate license or legal agreement.

Trip Generation and Highway Impact

Trip Rates - In order to estimate the level of traffic likely to be generated by the proposed development the TRICS database has been interrogated to compare the proposal with similar developments in similar locations within the UK.

Data obtained from the TRICS database has suggested that the proposed development will generate approximately 93 two-way trips during the AM peak period and 106 two-way trips during the PM peak period.

I am satisfied that the methodology used provides a robust indication of the vehicle movements likely to be associated with the proposed development; however, a sensitivity test of the Little Common Roundabout has also been carried out and this utilises a trip rate suggested by Highways England of 0.7 two way trips per dwelling.

As a result of the increased trip rate per dwelling the overall trip generation equates to 119 two-way trips during the AM peak period and 118 two-way trips during the PM peak period.

Traffic Distribution - The original assessment is based on the development site being served by a single access onto Spindlewood Drive; however, the updated assessment takes into account the additional survey information and second access onto Barnhorn Road and redistributes traffic accordingly.

Traffic from the site has been assigned on the basis of two determining factors, proximity to the Barnhorn Road junction and the deterrence factor relating to delays at the Little Common Roundabout. All traffic travelling from or to the west would use the Barnhorn Road junction. A total of 10% of the vehicles travelling

north, east and south would also use this junction for convenience rather than travelling through the residential development. All remaining traffic generated by the site would use the Spindlewood Drive access.

Based on the trip rates derived from the TRICS database the traffic flows at each access point are as follows:

AM peak flows based on 2017 turning patterns:

Total 93 trips (28 arrive and 65 depart) of which 56% (16) arrive and 42% (27) depart via the Spindlewood access and 44% (12) arrive and 58% (38) depart via the Barnhorn Road access.

PM peak flows based on 2017 turning patterns:

Total 106 trips (64 arrivals and 42 departures) of which 76% (49) arrive and 57% (24) depart via the Spindlewood access and 24% (15) arrive and 43% (18) depart via the Barnhorn Road access.

Based on the higher trip rates derived for the sensitivity test the traffic flows at each access point are as follows:

AM peak flows based on 2017 turning patterns:

Total 119 trips (34 arrive and 85 depart) of which 56% (19) arrive and 42% (36) depart via the Spindlewood access and 44% (15) arrive and 58% (49) depart via the Barnhorn Road access.

PM peak flows based on 2017 turning patterns:

Total 119 trips (85 arrivals and 34 departures) of which 76% (65) arrive and 57% (19) depart via the Spindlewood access and 24% (20) arrive and 43% (15) depart via the Barnhorn Road access.

Based on the above distribution patterns and using the trip rate derived from TRICS the level of development traffic using the Spindlewood Drive access will be approximately:

43 two way trips during the AM peak period and;
73 two-way trips during the PM peak period..

Using the higher trip rate derived for use in the sensitivity test this increases to:

55 two-way trips during the AM peak period and;
84 two-way trips during the PM peak period

Consideration has been given to the route through the site being used as rat run from Barnhorn Road to Spindlewood Drive and vice-versa; however, the site layout proposed provides a convoluted route and with suitable traffic calming measures in place I am satisfied that this will not be the case. With this in mind the above methodology is considered an accurate assessment of the level of traffic likely to use each of the two access points.

Highway Impact - The development impact on the highway network has been assessed on both the local and strategic road network using traffic flow data from the SATURN model.

The SATURN model takes into account all forthcoming developments, SHLAA sites plus the link road and distributes traffic from all sites based on origin/destination surveys.

As agreed at pre application stage the following junctions have been assessed as part of the proposal:

- Little Common roundabout,
- Cooden Sea Road/Meads Road/church Hill Ave
- Maple Walk/Meads Road/Spindlewood Drive
- Site access/Spindlewood Drive.

Following the alterations to the proposed layout the site access onto Barnhorn Road has also been assessed.

Analysis has been undertaken to make comparison between the '2017 Base + Committed' and '2017 Base + Development' traffic conditions on the surrounding local highway network under the future assessment year of 2028 (i.e. 10 years after registration of the planning application). By adopting this approach, it has been possible to determine whether the vehicular trips associated with the proposed development in conjunction with the other permitted / allocated schemes can be accommodated on the identified junctions during the weekday AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods.

The potential cumulative impact of the proposed development on the operation of the above junctions during the weekday peak periods of the day has been assessed using ARCADY and PICADY.

The assessments of the identified junctions are as follows:

Spindlewood Drive/Site Access junction - the assessment confirms that the site access will operate satisfactory with no capacity or queuing issues.

Barnhorn Road/Site Access junction - the assessment confirms that the site access will operate satisfactory with no capacity or queuing issues. Highways England has confirmed that they are satisfied with this assessment.

Maple Walk/Meads Road/Spindlewood Drive junction – the assessment confirms that the junction will continue to operate well within capacity post development. Turning counts have been undertaken in order to establish the existing distribution of traffic at this junction; however, the existing traffic flows are particularly low and as a result the data cannot be used to predict the distribution of development traffic. Despite this I am satisfied that a majority of development traffic will make use of Meads Road to the north rather than Maple Walk which is a narrow, privately owned road that provides a convoluted route to the south. The developer has also agreed to provide additional signage to clarify that Maple Walk is a private road to discourage its use by development related traffic. The construction management plan will also ensure that no construction traffic uses Maple walk.

It is acknowledged that on-street parking reduces stretches of Meads Road to a single car width and as a result a shuttle system operates as vehicles give way to approaching traffic during the busiest periods of the day. In this instance parking restrictions (double yellow lines) and private accesses on Meades Road prevents long sections of unbroken on-street parking and this provides a number of areas suitable for vehicles to pass. As a result the impact that on-street parking has on road capacity is reduced. This is confirmed in the submitted Transport Assessment which confirms that the road will operate well below capacity based on 2028 traffic flows and development traffic. On-street parking also acts as a natural traffic calming measure and as a result is beneficial in reducing vehicle speeds on this relatively straight stretch of road.

With this in mind I am satisfied that development traffic will not have a detrimental impact on Meads Road from a highway safety or capacity perspective.

Cooden Sea Road/Meads Road/Church Hill Ave junction – the assessment again confirms that the junction will continue to operate well within capacity post development; however, it is observed that on some occasions the geometry of the junction causes delay when vehicles exiting Meads Road can block vehicles wishing to turn into the road. Whilst the junction modelling shows sufficient capacity, it was considered beneficial to both existing and development traffic to realign the junction to improve its functionality. In order to provide this improvement the carriageway of Meads Road on its approach to the junction will be increased from 5.37m to 6.0m. Footway widths of 1.8m minimum will be maintained either side of the junction.

Tracking drawings have been provided to illustrate that the increased carriageway width provides an improvement to vehicle movement at the junction. As a result I am satisfied that any delay currently experienced at this junction would not be exacerbated by development traffic.

The offsite works are therefore considered to be acceptable; however, this is subject to all works being subject to a road safety audit with any issues raised being addressed in a satisfactory manner. The offsite works would be carried under the appropriate license or legal agreement.

Little Common Roundabout – the assessment of the roundabout is based on the data provided by the SATURN model

Turning counts were also collected from traffic surveys during April 2015.

To ensure that the data was reflective of typical traffic conditions additional data was also obtained from previous ESCC traffic counts.

The ESCC surveys recorded lower figures than those obtained from the survey carried out for the purpose of this assessment. As the data used in the assessment is higher this provides a more robust test of the junction capacity.

In order to ensure a robust assessment Highways England requested that updated traffic surveys were carried out in 2017 to address any potential issues related to the introduction of the link road.

The original assessment utilised a trip derived from the TRICS Database; however, a new trip rate of 0.7 per dwelling has been tested as a sensitivity assessment.

Little Common Roundabout is part of the A259 trunk road and is therefore the responsibility of Highways England. Highways England have now confirmed that the assessment of the roundabout is acceptable and subject to the inclusion of appropriate conditions for highway access improvements they are satisfied that the proposals will not materially affect the safety, reliability and/or operation of the strategic road network.

With the above in mind I have no major concerns regarding the development proposal from a highway capacity perspective.

Accessibility

Pedestrian facilities in the vicinity of the site are generally good with 1.8m wide footways on both sides of Spindlewood Drive; however, in order to provide a safe and convenient route from the site to the footway on the north side of Spindlewood Drive a pedestrian crossing with dropped kerbs and tactile paving should be provided in a suitable location to the east of the site access. This crossing point will improve the link to the footway on Meads Road which in turn provides a direct route north towards the services and facilities available on Cooden Sea Road. These facilities include surgery, shops, post office, cafes, restaurants etc. Little Common school is also only a relatively short distance east of Cooden Sea Road.

The closest rail service is located at Cooden Beach train station less than 1 mile to the south of the proposed site access. The train station can be reached on foot via Maple Walk; however, there are no footways available on Maple Walk and therefore Cooden Sea Road provides a safer route for pedestrians.

The proposed development is not ideal in terms of sustainable transport walking distances, with parts of the site being some 500 metres away from the nearest bus stops in Cooden Sea Road (St Marthas Church) and Barnhorn Road (The Broadwalk).

In terms of potential offsite works and financial contributions:

- The westbound Barnhorn Road (The Broadwalk) bus stop would need to be relocated to a safer position in view of the access road arrangement. Both the westbound and eastbound bus stops require upgrades in terms of heightened kerbs to at least 125mm (to provide access for wheelchair users by way of bus wheelchair ramps), bus stop clearway protection (to allow buses unimpeded access to the kerbs), new bus stop poles and real time information provision. Shelters should also be provided to the specification required by Rother District Council.
- In order to provide a safe and accessible walking route across Barnhorn Road a new pedestrian crossing with dropped kerbs and tactile paving will be required.

- Both the bus stops at Cooden Sea Road (St Marthas Church) require real time information sign provision, but are otherwise compliant in terms of disabled access provision.
- The bus stops in Barnhorn Road and Cooden Sea Road are served by a frequent service (Wave 99) on Mondays to Saturday's daytime, running every 20 minutes. On Sundays the service is hourly. There are no buses running after approximately 8.15pm towards Bexhill and Hastings, nor after approximately 9.30pm towards Eastbourne. Pump funding is requested so that the bus operator can provide a later journey in each direction on Mondays to Saturdays. The contribution requested for doing so is £50,000 which would allow such an additional provision for at least 3 years after which it is anticipated the service may be sustainable on a commercial basis.
- Due to additional walking distance beyond 400 metres we would expect additional mitigation measures within the Travel Plan so as to maximise sustainable transport use. We would expect new residents to be provided with free bus travel for a period of 3 months, with discounted bus season tickets for a further period of 6 months. These arrangements can be made directly with the main service provider, Stagecoach.

With the above in mind I have no concerns regarding the accessibility of the site; however, this would be subject to the provision of the accessibility improvements detailed above.

Internal layout

This is an outline application only and therefore details of the internal layout and parking provision provided are limited at this stage; however, with regards to the road being put forward for adoption or being brought up to adoptable standards I would like to make the following comments and observations:

- A minimum width of 5.5m is required for the main 'spine road'.
- A minimum width of 4.8mm is required for the secondary roads.
- With regards to waste collection it should be noted that residents should not be required to carry waste more than 30m whilst waste collection vehicles should be able to get within 25m of the storage point.
- The design speed for the road should be 20mph and as a result speed reducing features should be considered on the longer stretches of road.
- We would not wish to adopt the car parking areas.
- Tracking drawings are required using appropriate sized refuse vehicles. The guidance provided in the Good Practice Guide for Property Developers – Refuse and Recycling at New Residential Developments within the Wealden and Rother Areas should also be taken into account.
- Further information would be required regarding the surfacing, drainage and lighting within the site.
- In order to discourage other road users using the site as a cut through from Barnhorn Road to Cooden Sea Road appropriate traffic calming features should be provided on the main spine road.
- The Highway Authority would wish to see the roads within the site that are not to be offered for adoption laid out and constructed to adoptable standards.

Road adoption would be secured through a s38 agreement with ESCC. The extent of the highway adoption would have to be agreed, and would depend on the emerging layout at reserved matters stage. A full safety audit on the internal road layout should also be completed along with agreed lighting and highway drainage proposals. This element of the proposal can be considered at Reserved Matters stage.

Parking

The East Sussex Residential Parking Demand Calculator has been designed to calculate the number of parking spaces required at new residential development on a site specific basis. The calculator predicts levels of car ownership using information relating to the site location (ward), unit type, size and the number of allocated spaces.

It is acknowledged that this application is outline only and that the layout is yet to be finalised; however, the final layout will need to provide parking in accordance with the above calculation.

It should also be noted that parking spaces would need to meet the required minimum dimensions to be counted towards the overall provision. The minimum sizes are as follows:

Parking Spaces: 2.5m x 5m

Car Ports: 2.8m x 5m

Garages 3m x 6m

Regardless of size garages remain less likely to be used for parking and as a result are only considered to represent 0.3 of a parking space towards the overall provision.

Cycle Parking - Safe, secure and covered cycle parking facilities need to be provided at new developments. The level of cycle parking will need to meet the requirements of the ESCC Guidance which indicates that 1 space should be provided per unit for one & two bedroom dwellings and 2 spaces per dwelling with three bedrooms or more.

Construction Traffic Management Plan

This highway authority is keen to ensure that this development does not have an adverse effect on the existing highway infrastructure and therefore request that a Construction Traffic Management Plan is submitted to and agreed with ESCC prior to the commencement of works to be secured by a relevant planning condition. This would include a construction traffic routing agreement, hours of working, wheel washing, and secured compounds for materials storage, machinery and contractor parking.

Travel Plan

A Travel Plan framework has been submitted as part of the proposal and I am satisfied that this covers the main points required. Further details regarding the Travel Plan will be submitted and agreed at detail stage. The Travel Plan will be secured by legal agreement (S106).

Conclusion

Subject to the above recommendations being taken into account I have no major concerns regarding the site access from a highway safety or capacity perspective.

With regards to the impact further afield I am satisfied that the assessment carried out confirms that the highway network and junctions in the vicinity of the site are able to accommodate the additional traffic likely to be generated by the development proposal. Highways England has also confirmed that they are satisfied with the assessments carried out on the Barnhorn Road access and the Little Common Roundabout.

As an outline application details regarding the housing mix, parking provision and internal layout are yet to be finalised and therefore cannot be assessed fully at this stage.

To conclude, with the above in mind I do not object to the proposal and include a summary of highway measures to be provided to ensure highway safety for the site and surrounding network, capacity accommodation on the network, sustainability, accessibility to local services and encouraging provision for travel modes other than the private car.

S106/278 Agreement

The off-site works and financial contribution that I wish to secure as part of this development via a S106/278 agreement are:

- The vehicular access into the site on Spindlewood Drive with appropriate width and radii (as detailed above).
- New access to include 2m wide footways on both sides and a crossing point with tactile paving across the site access.
- A pedestrian crossing on Spindlewood Drive close to the east of the site access to include dropped kerbs and tactile paving
- Improvements to the bus stops on Cooden Sea Road (as detailed above).
- Relocation of the westbound Barnhorn Road (The Broadwalk) bus stop.
- Improvements to the westbound and eastbound bus stops on Barnhorn Road (as detailed above)
- Financial contribution towards improved bus service on Cooden Sea Road and Barnhorn Road (as detailed above).
- The realignment of the Cooden Sea Road/Meads Road junction (as detailed above).

These improvements are necessary to ensure the development site complies with government policy for accessible developments by non-car modes of travel.

The Barnhorn Road access and improvements to the bus stops on Barnhorn Road are to be agreed and secured via legal agreement with Highways England.

Recommendation:

Subject to the agreement of the points raised above, the completion of a legal agreement for off-site works and the following conditions I do not wish to restrict grant of consent.

1. Access - No development shall commence until the vehicular accesses serving the development has been constructed in accordance with plans and details submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of road safety.

2. Visibility - No part of the development shall be first occupied until visibility splays of 2.4m by 43m have been provided at the proposed site vehicular access onto Spindlewood Drive. Once provided the splays shall thereafter be maintained and kept free of all obstructions over a height of 600mm.

Reason: In the interests of road safety.

3. Car parking space - No part of the development shall be occupied until the car parking spaces have been constructed and provided in accordance with plans and details submitted to and approved in writing by the Local Planning Authority. The area[s] shall thereafter be retained for that use and shall not be used other than for the parking of motor vehicles.

Reason: To provide car-parking space for the development.

4. Cycle parking - No part of the development shall be occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details submitted to and approved in writing by the Local Planning Authority. The area[s] shall thereafter be retained for that use and shall not be used other than for the parking of cycles.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

5. Turning space - No part of the development shall be occupied until the vehicle turning space has been constructed within the site in accordance with details submitted to and approved in writing by the Local Planning Authority. This space shall thereafter be retained at all times for this use and shall not be obstructed.

Reason: In the interests of road safety

6. Internal Roads - No part of the development shall be occupied until the road(s), footways and parking areas serving the development have been constructed, surfaced, drained and lit in accordance with plans and details submitted to and approved in writing by the Local Planning Authority.

Reason: To secure satisfactory standards of access for the proposed development.

7. Construction Management Plan - no development shall take place, including any ground works or works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not be restricted to the following matters:

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and egress and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision and utilisation of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

8. Travel Plan - No part of the development shall be occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport and/or as advised by the Highway Authority.

Reason: To encourage and promote sustainable transport.

9. This Authority's requirements associated with this development proposal will need to be secured through a Section 106/278 Legal Agreement between the applicant and East Sussex County Council.

Informative

1. The Highway Authority would wish to see the roads within the site that are not to be offered for adoption laid out and constructed to standards at, or at least close to, adoption standards

2. This Authority's requirements associated with this development proposal will need to be secured through a Section 106/278 Legal Agreement between the applicant and East Sussex County Council.

Signed: Ben Lenton

Date: 13/06/18

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

HT401

THE AREA HIGHWAY MANAGER WILL REQUIRE NOTICE OF COMMENCEMENT OF WORKS ON OR ADJACENT TO THE HIGHWAY. SEE NOTE m) OVERLEAF.

Notes to be read in conjunction with attached highway comments and conditions

(a) In urban areas the treatment of the radii shall be accordance with the requirements of the Highway Construction Engineer.

(b) Any existing ditch shall be cleaned out to even fall and piped to a size to accept the maximum flow of water likely to arise (internal diameter 300mm or as agreed with the Highway Construction Engineer).

(c) Where an existing access is to be stopped up the applicant is required to raise the existing dropped kerb and make good the footway/verge and kerb.

(d) Any existing footway shall be made good with similar construction and surfacing.

(e) Where the edge of the carriageway is already defined by Continental Channel, dropped Continental Channel sections (if available) or concrete channel blocks shall be used instead of dropped kerbs and if necessary the transition between the constructions made in in-situ concrete to the satisfaction of the Highway Construction Engineer.

(f) Any gates are to be set back a minimum distance of 5 metres (11 metres for farm or industrial accesses) from the edge of the carriageway and are to open away from the highway.

(g) The applicant's attention is drawn to the necessity to ensure that no surface water is allowed to flow from the development onto the highway and similarly no surface water from the highway should be allowed to flow into the site. The provision (by the applicant) of positive drainage measures may be required to collect any flow of surface water.

(h) Any necessary alterations to the property or services of, any statutory authority or undertaker shall be carried out at the expense of the applicant and under the supervision of such authority or undertaker to their satisfaction.

(i) If the requirements outlined in these details and/or notes conflict with the requirements of the Fire Officer then the Fire Officer's requirements shall prevail.

(j) Reference to Sub-Base (Type 1) in the access section diagram refers to graded granular sub base complying with Clause 803 Specification for highway works (SHW). (March 1998 updated with amendments including November 2005, May and November 2006 and May 2007) and subsequent amendments.

(k) You must ensure that the contractor has ten million pounds public liability insurance and one of their employees holds a current Supervisors New Roads and Street Works Act Certificate and at least one operative on site should hold an Operators Certificate. A list of contractors with the required certificates is available from the Transport Development Control team Please email us at development.control.transport@eastsussex.gov.uk or call us 01273 335443. (If you decide to use one that is not on the list, you must ensure that copies of the certificates are supplied by the contractor to the Transport Development Control team).

(l) Your attention is drawn to the fact that your contractor will have to book road space under the Traffic Management Act 2004. Please ask them to contact the Network Co-ordination Team on 0845 60 80 193 who will need at least 21 days notice of the commencement of works.

(m) The County Council charges a fee for works on or adjacent to the highway. Please email us at development.control.transport@eastsussex.gov.uk or call us 01273 335443. The Highway Inspectors require at least 15 days notice of your intention to commence works under a PWA in order that the necessary utility service checks may be completed before works commence. Three months notice is required for major schemes.



Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEPR 16-01)
Formal Recommendation to an Application for Planning Permission

From: Simon Jones (Divisional Director),
Operations Directorate
South East Region
Highways England.
PlanningSE@highwaysengland.co.uk

To: Rother District Council (FAO Case Officer: Ms Jo Edwards)
Jo.Edwards@rother.gov.uk

CC: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: RR/2017/1705/P

Location: Land Off Spindlewood Drive, Bexhill on Sea.

Proposal: Residential development for circa 160 dwellings with all matters other than access reserved.

Highways England Ref: HAMIS 78617

Referring to the planning application (consultation received of 27 July 2017) referenced above, in the vicinity of the A259 that forms part of the Strategic Road Network, notice is hereby given that Highways England's formal recommendation is that we:

- ~~a) offer no objection;~~
- b) recommend that a condition should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B (covering access to the SRN) is relevant to this application.¹

HIGHWAYS ENGLAND ("we") have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This represents Highways England's formal recommendation (prepared by the Area 4 Spatial Planning Team) and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority disagree with this recommendation they must consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gsi.gov.uk.

Signature: 	Date: 07 June 2018
Name: Patrick Blake	Position: Spatial Planning Manager
Patrick.Blake@highwaysengland.co.uk	
Highways England: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ	

¹ Where relevant, further information will be provided within Annex A.

Annex A Highways England recommended Planning Conditions

We recommend that the following condition be attached to any permission granted:

- 1) Prior to the first occupation of the residential development hereby permitted, the highway improvements to the A259 Barnhorn Road junction with Barnhorne Manor access shall be improved and opened to traffic in accordance with Exigo Drawing No. T277-37A.DWG Rev A (Revised Barnhorn Access Arrangement Accommodating All Comments From Independent Road Safety).

Reason: To ensure that the A259 Barnhorn Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.

- 2) Prior to the first occupation of the residential development hereby permitted, the highway access to Spindlewood Drive shall be provided and opened to traffic in accordance with Exigo Drawing No. T277-38.DWG (Revised Spindlewood Drive Access Amended to Address Independent Road Safety Audit) or other such scheme to the same effect as approved by the Local Planning Authority (who shall consult with East Sussex County Council).

Reason: To ensure that the A259 Barnhorn Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980, to satisfy the reasonable requirements of road safety and to prevent environmental damage.

- 3) The commencement of the development hereby permitted will not occur until a Construction Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority (who shall consult with Highways England).

Reason: To ensure that development construction traffic does not result in avoidable congestion on the A259 Trunk Road and to ensure that the A259 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Informative: The improvement to the A259 Barnhorn Road access to Barnhorne Manor as shown on Exigo Drawing No. T277-37A.DWG Rev A (Revised Barnhorn Access Arrangement Accommodating All Comments From Independent Road Safety) has been accepted by Highways England only on the basis of the proposed development (160 dwellings) plus existing uses. Any further intensification of use of this access by further development would require a more substantial upgrade of this junction in line with the relevant requirements of the Design Manual for Roads and Bridges.