

## APPENDIX D

### Agreed Travel Plan

**Travel Plan,**

Proposed Residential Development,

SPINDLEWOOD DRIVE, BEXHILL ON  
SEA

July 2017

## CONTENTS

	Page
1. EXECUTIVE SUMMARY	1
2. INTRODUCTION	2
3. RELEVANT POLICY GUIDELINES	3
4. PROPOSED DEVELOPMENT – ACCESSIBILITY – SITE ASSESSMENT	4
5. THE TRAVEL PLAN - OPERATION	8
6. TRAVEL PLAN TARGETS	9
7. TRAVEL PLAN MEASURES	10
8. MONITORING AND REVIEW	11

Appendix A

Location Plan

Appendix B

Proposed Site Layout

Appendix C

Questionnaire

1. EXECUTIVE SUMMARY

- 1.1 This Travel Plan has been produced in support of the proposed residential development Spindlewood Drive, Bexhill on Sea, as requested by Rother District Council (RDC).
- 1.2 This Travel Plan has been prepared to achieve the following aims:
- To increase the awareness of the advantages and potential for travel on sustainable modes and;
  - To introduce a package of physical and management measures that will facilitate travel on sustainable modes to access the site.
- 1.3 In order to achieve these aims the following measures are being proposed;
- Provision of information related to Walking, Cycling and Bus Routes / Timetables,
  - Internet Access to real time bus information,
  - Provision of Travel Advice on how to get to the site.
- 1.4 All of the above items will be implemented prior to occupation, with the exception of the provision of data the other hard measures will be included as part of the construction phase.
- 1.5 Once resident and visitor travel surveys are carried out a baseline position will be established and targets will be set to encourage those that can travel sustainably to do so.

Travel Plan Co-Ordinator \_\_\_\_\_

Date Plan Activated \_\_\_\_\_

## 2. INTRODUCTION

- 2.1 This document is a Travel Plan (TP) and has been prepared as part of the planning application for a new residential development at Spindlewood Drive, Bexhill on Sea.
- 2.2 A key element of any Travel Plan is a baseline travel survey of resident and visitors to consider how people are currently travelling to the site and to assess which measures would encourage people to use sustainable modes.

### Objectives of the Travel Plan

- 2.3 A Travel Plan is a long-term strategy for reducing the dependence of single occupancy private car travel to the site. The aims of the strategy are;
  - (a) To increase the awareness of the advantages and potential for travel on sustainable modes and;
  - (b) To introduce a package of physical and management measures that will facilitate travel on sustainable modes to access the site.
- 2.4 These objectives reflect current Government policy in respect of transport.

### 3. RELEVANT POLICY GUIDELINES

The Essential Guide to Travel Planning: DfT, 2008

- 3.1 The DfT guidance document, '*The Essential Guide to Travel Planning*' states that a company Travel Plan is:
- ***"a strategy for managing the travel generated by [an] organisation, with the aim of reducing its environmental impact. Travel Plans typically combine measures to support walking, cycling, public transport and car sharing. These are reinforced with promotion and incentives and by the management of workplace parking. Travel Plans also include action to reduce the need to travel, such as telecommuting. They focus on both commuter and business travel".***
- 3.2 The document states that support of a Travel Plan and the measures contained in it by upper level management is an important factor and a necessary one to ensure a satisfactory outcome from the plan.
- 3.3 The document suggests that in order to be successful, a Travel Plan should have the following attributes:
- Travel Plan Coordinator: a named person, who can engage the decision makers in the company;
  - Travel Plan Document: published and made available to the public
  - Concrete Measures: evidence that measures involve tangible outputs e.g. cycle storage, database of car sharers;
  - SMART Targets: the Travel Plan contains targets that are Specific, Measurable,, Attainable, Realistic and Time-bound;
  - Baseline Data: a resident travel survey and a site audit have been undertaken at the start to establish baseline trip mode data and car parking;
  - Monitoring Mechanism: evidence of a systematic approach to measuring the performance and thus impact of the Travel Plan.
- 3.4 This plan is based on the above two documents and previous Travel Planning experience.

#### 4. PROPOSED DEVELOPMENT – ACCESSIBILITY – SITE ASSESSMENT

##### Highway Network

- 4.1 Access to the development site would be gained via Spindlewood Drive. This is a typical residential estate road, with the carriageway being designed to accommodate two-way traffic flows and footways on either side of the carriageway. Spindlewood Drive has a length of approximately 310 metres and provides access to in the region of 45 dwellings as well as three Culs-de-sac.
- 4.2 Spindlewood Drive links to Maple Walk and Meads Road via a simple priority junction, which form part of the residential estate road network.
- 4.3 The Little Common roundabout is a 5 arm roundabout located approximately 470 metres from the proposed site. This provides access to the A259, Bexhill town centre & Hastings to the east and Westham to the west.
- 4.4 Access to the coast is gained via Cooden Sea Road to the south.
- 4.5 Due to the geometry of the highway network, traffic speeds are likely to be in the region of 20mph on Spindlewood Drive, Maple Walk and Meads Road.
- 4.6 As is typical for most towns, overall the network is well trafficked at peak times, with the majority of junctions operating with some localised queueing and delay.

##### Accessibility

##### Pedestrian and Cyclists

- 4.7 Spindlewood Drive is bounded on both flanks by footways, giving pedestrian access onto Maple Walk and Meads Road, with approximately 1.8 metres of width available on the western flank and 1.9 metres on the east flank. The proposed footway within the site would be a minimum of 2 metres in width, allowing a wheelchair or pushchair to pass simultaneously. Both flanks will be lit to the required standard.
- 4.8 This would ensure pedestrian access from the proposed site into surrounding residential areas and Little Common high street, which is located approximately 480 metres from the proposed site.
- 4.9 Dropped kerbing is located along Meads Road and continues along Spindlewood Drive. The proposed development would also provide dropped kerbs and tactile paving at the site access and within the scheme, allowing enhanced accessibility for pedestrians entering and leaving the development.
- 4.10 Due to the nature of both Meads Road and Maple Walk on approach to Spindlewood Drive, slow moving traffic is expected due to being located in a residential area, allowing safe road crossing opportunities.
- 4.11 Cycling is carried out on road. Although there are no cycle routes passing the proposed site frontage, it considered as being safe for cyclists to use

the road without high risk of a collision with a vehicle, given its residential nature.

- 4.12 The Cycling in East Sussex: Coastal Route Guide displays cycling routes from Brighton to Camber. This route passes through Bexhill to the south, allowing safe cycling capacity travelling east and westbound. This route can be accessed approximately 0.8 miles south of the proposed site.
- 4.13 It is considered that for employment people will consider a walk of up to 2km being acceptable and 1km being desirable. The Department of Transport (DfT) guidance suggests that trips of 5km can be carried out by cycle.
- 4.14 Overall the site would be an extension to Little Common and is considered to be accessible by cyclists and on foot.

#### Public Transport

- 4.15 The closest bus stops are located on Cooden Sea Road, less than 700 metres from the development site. Bus services which travel on Cooden Sea Road provide access to a number of areas including Bexhill, Hastings and Eastbourne.
- 4.16 The desirable acceptable distance to walk to a bus stop is considered to be 400 metres, i.e a 5 minute walk at a steady pace. However the preferred maximum distance can be up to 2 km.
- 4.17 Although the distance from the site to the bus stops is in excess of 400 metres, the additional distance is not considered to be sufficient to discourage public transport users as it would not add more than 5 minutes on to the total walking distance.
- 4.18 The table below provides information on the bus operation times, frequency and major destinations.

Number – Route	Start / Finish	Weekday Frequency	Saturday Frequency	Sunday Frequency
2 Ninfield, opp Church Lane - Bexhill, opp Town Hall - Little Common, <b>St Martha's</b> Church - Langney, in Asda grounds	09: 50/10: 36	Once Daily	No Service	No Service
96	09: 35/17: 00	Every hour	Every hour	No Service



Bexhill - Bexhill, opp Town Hall - Little Common, <b>St Martha's</b> Church - Little Common, adj Cowdray Close		2 hours after 14:35	No service for 2 hours after 11:35	
99 Silverhill, o/s 383 London Road - Hastings Town Centre, Havelock Road - Little Common, <b>St Martha's</b> Church - Roselands - Eastbourne Town Centre, Terminus Road	06:16/22:01	Every 20 mins	Every 20 mins	Every hour
320 Barnhorn, adj Coneyburrow Lane - Little Common, <b>St Martha's</b> Church - Ninfield, adj Moor Hall Drive -	07:45/08:42	Once Daily	No Service	No Service

Battle, opp Claverham College				
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Table 2.1 – Bus Frequency Table.

- 4.19 The closest rail service is located at Cooden Beach train station, located less than 1 mile to the south of the proposed site access. Cycle and Bus routes provide designated access from the site to the rail way station.
- 4.20 The proposed site is considered to be accessible by all modes of transport and in a sustainable location, with key services within Bexhill such as the Hospital being located approximately 2.6 miles to the east of the site. A Tesco Express store is located circa 370 metres north east of the proposed site location, which is within a reasonable walking distance. Additional stores include an Aldi located approximately 2 miles away and a **Sainsbury's store located around 2.3 miles to the east.**

## 5. THE TRAVEL PLAN - OPERATION

- 5.1 The developer and residents association will appoint a Travel Co-ordinator to implement and administer the Travel Plan.
- 5.2 The Travel Co-ordinator will be responsible for the administration of the Plan, the implementation of the Plan measures, the initial resident and visitor travel surveys and for on-going monitoring and review of the Plan.
- 5.3 A Travel Survey will be undertaken annually for a period of 5 years, in order to inform the annual monitoring and review of the Travel Plan.
- 5.4 A bespoke questionnaire is attached to this Travel Plan.
- 5.5 A period of 5 years is considered sufficient to establish sustainable travel habits.

## 6. TRAVEL PLAN TARGETS

### SMART Targets

- 6.1 The DfT guidance document '*Technical Guidance on Accessibility; Planning In Local Transport Plans – Technical Appendix 3: SMART Targets*' states that targets should be:
- "*Specific*: saying precisely what is to be achieved
  - *Measurable*: over the duration of the target. It must allow for regular evaluation of the effectiveness of the target. Thus the target must use data which is easily collected and updated over the duration of the target.
  - *Appropriate*: and linked to overall objectives and aims
  - *Realistic*: in terms of their potential for being achieved over the duration of the target
  - *Timed*: The target must define a date or series of dates by which it is expected to be **achieved**".
- 6.2 There is a need for a regular review of targets, to determine progress and to adjust and re-prioritise targets to reflect under-performance. The annual resident travel survey provides this requirement.
- 6.3 Appropriate SMART targets will be set within the Final Travel Plan for the site based upon the initial resident and visitor travel surveys. The targets will be monitored and reviewed annually following the annual monitoring survey.
- 6.4 The major objective of the Travel Plan is to effect a reduction in the use of private cars for single occupancy trips. A suitable indicator of the success of the Plan is the modal split.
- 6.5 Consideration of the initial travel surveys and discussions with DCC will inform the setting of targets for inclusion within the Final Travel Plan.

## 7. TRAVEL PLAN MEASURES

### Introduction

- 7.1 This section of the Travel Plan considers the potential for promoting sustainable travel and outlines the specific physical and management measures to be undertaken as part of the Travel Plan.
- 7.2 The implementation of the measures and infrastructure provision, as well as the location is core to the Plan.
- 7.3 As far as possible, the obligations outlined below are designed to be suitable for review and monitoring. The Travel Plan Co-ordinator can investigate other potential initiatives, to achieve the targets.

### Measures to Reduce the Need to Travel

#### Walking

- 7.4 There is great potential for promoting walking as a means of accessing the site. This could include new trips to the site, but as discussed there is potential for a significant amount of linked trips.
- 7.5 In terms of promoting walking as a means of accessing the site, then the following measures would be progressed.
- Displaying information and advice concerning safe pedestrian routes to the site at a location accessible to residents and visitors.
  - Displaying information on the website offering links to [www.transportdirect.info](http://www.transportdirect.info)

#### Cycling

- 7.6 The following measures to promote cycling as a means of accessing the site would be promoted:
- Displaying information and advice concerning safe cycle routes in a location accessible to residents and visitors.
  - A link to [www.transportdirect.info](http://www.transportdirect.info) for cycle route planning assistance.

#### Public Transport:

- 7.7 Promotion of the use of public transport for accessing the site through measures such as:
- Displaying up-to-date details of bus services, including bus stop locations, route information and service frequencies, in a location accessible to residents and visitors.
  - Displaying route disruption notices and alternative routes, when essential maintenance is in place.
  - Providing details of ticketing options to both residents and visitors.
  - Provision of up to date bus timetables and rail maps.
  - Introducing an opportunity to allow public transport to access the site and appropriately manoeuvre.

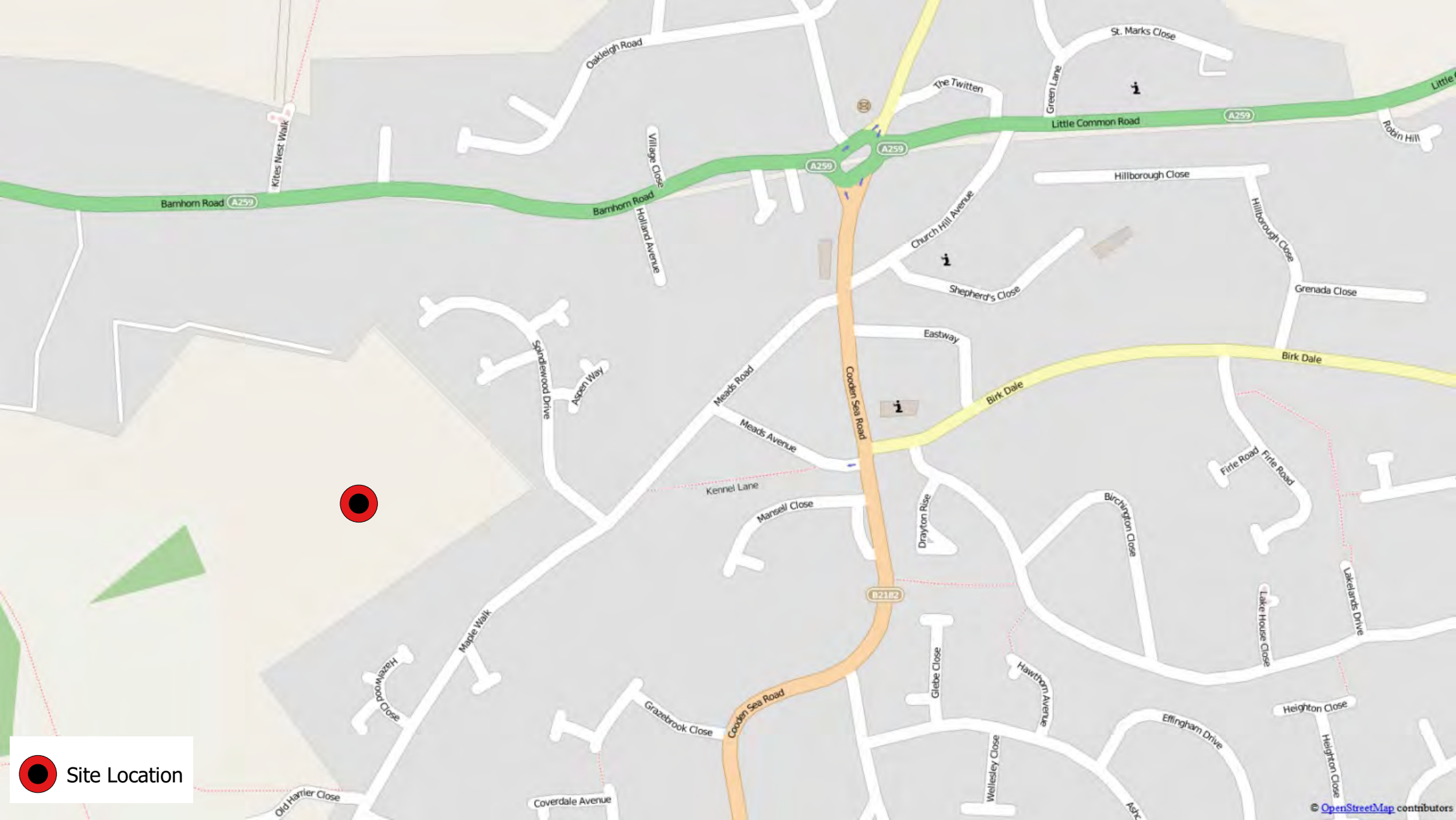
## 8. MONITORING AND REVIEW

- 8.1 A programme of monitoring and review has been designed to generate information to evaluate the Travel Plan.
- 8.2 Monitoring and review is the responsibility of the Travel Co-ordinator.
- 8.3 The monitoring tasks are outlined below;
- Monitor the level of usage of cycle parking;
  - Monitor demand for additional cycle parking for visitors and residents;
  - Record comments received from management and from residents relating to the operation and implications of the Plan.
- 8.4 Information gathered through the monitoring process will be recorded for input to the annual review.
- 8.5 The information will be made available to the planning authority, once collated and analysed.

### Annual Review

- 8.6 Each year, on the anniversary of the introduction of the Travel Plan, the Travel Co-ordinator will review the Plan.
- 8.7 The review will assess the success of the Plan and to identify the potential for future refinement of the details of the Plan.
- 8.8 The major element of the review will involve the re-issue of the resident and visitor travel surveys.
- 8.9 The new surveys gather new information about wider resident attitudes to travel. Comparison with data collected at the introduction of the Plan, will allow the effect of the plan to be estimated.
- 8.10 The Travel Plan Co-ordinator will compile a Review Report outlining the results of the annual review. The report will also incorporate the results of on-going monitoring throughout the preceding period. The report will be filed for record, with copies provided to the planning authority.
- 8.11 A consideration of how the Travel Plan has performed in relation set targets will be made.
- 8.12 The Travel Plan Review will identify successes and also consider improvements or alterations necessary to achieve or improve on targets.

APPENDIX A  
Location Plan



 Site Location

SCALE 1:10,000	DRAWN BY JA	CHECKED BY PR	 <b>EXIGO</b> PROJECT SOLUTIONS	SCHEME  Scheme	DRAWING TITLE  Location Plan
DRAWING REFERENCE  T277/GIS/01		REV  n/a		ON BEHALF OF  Client	
DATE 2/5/2015		CAD REF N/A			

Exigo Project Solutions, Unit 2c - The Gateway  
Silkwood Park, Wakefield, WF5 9TJ



## APPENDIX B

### Proposed Site Layout

## APPENDIX C

### Travel Questionnaire

# RESIDENT TRAVEL QUESTIONNAIRE

1. Your Name .....
2. Gender  
Male ☐ Female ☐
3. What time do you usually start and finish work? (Please indicate whether it's am or pm)  
  
Start Time ..... am/pm  
Finish Time ..... am/pm  
  
If you work any additional shifts (e.g. weekends) please indicate the start / finish times and days of these below.  
.....  
.....
4. Please tick if you know about any of the following:-  
a) Bus routes and services ☐  
b) Cycle Routes in the area ☐  
c) Public footpaths in the area ☐  
d) Other (please specify) ☐  
.....  
.....
5. Does your mode of travel vary on a daily basis?  
Yes ☐ No ☐
6. How do you usually travel to work and approximately how long does the journey take? (please mark only one answer)  
Mins  
a) Car driver on your own ☐ .....  
b) Car share with other staff ☐ .....  
c) Car share with other non staff ☐ .....  
d) Motorbike ☐ .....  
e) Bicycle ☐ .....  
f) Walk ☐ .....  
g) Bus ☐ .....  
h) Train ☐ .....  
i) Other (please specify) ☐ .....  
.....
7. If you use a car to get to work, what are the main reasons? Please mark a '1' for highest priority and '2' for second highest priority (mark no more than two answers).  
a) Car essential to job *please explain below* ☐  
b) Dropping/collecting children ☐  
c) Guaranteed/ flexible journey ☐
- d) Health reasons ☐  
e) Personal security ☐  
f) Lack of alternative ☐  
g) Cost of other travel ☐  
h) Don't like using public transport ☐  
i) Other (please specify) ☐  
.....  
.....
8. Which of the following changes would most encourage you to car share to work? (tick no more than two)  
  
N.B. If you already car share, which would you most like to see?  
a) Help finding a car share partner ☐  
b) Free taxi home in the event of an emergency ☐  
c) Assistance in getting home if let down by partner ☐  
d) Reserved car parking for car sharers ☐  
e) Would not be willing to car share ☐  
f) Other (please specify) ☐  
.....  
.....

*continued overleaf*

9. Which of the following changes would most encourage you to use public transport for your journey to work? (tick no more than two)  
N.B. If you already use public transport, which would you most like to see?
- a) More accessible bus routes ☐
  - b) More frequent services ☐
  - c) Discount tickets/travel passes available from work ☐
  - d) More convenient bus stop locations ☐
  - e) Better connections with bus/train Stations ☐
  - f) Easier timetable/route information ☐
  - g) Would not be willing to use public transport ☐
  - h) Other (please specify) ☐
- .....
10. Which of the following changes would most encourage you to cycle to work? (tick no more than two)  
N.B. If you already cycle, which would you most like to see?
- a) The provision of safe, well lit, cycle paths ☐
  - b) Improvements to existing cycle paths ☐
  - c) More information about local cycle paths ☐
  - d) Improved cycle parking ☐
  - e) Improved changing facilities and lockers at work ☐
  - f) Having a shower at work ☐
  - g) Would not be willing to cycle to work ☐
  - h) Other (please specify) ☐
- .....
11. Which of the following changes would most encourage you to walk to work? (tick no more than two)  
N.B. If you already walk, which would you most like to see?
- a) Better lighting & security ☐
  - b) Safer crossings / pedestrian priority on journey to work ☐
  - c) Would not be willing to walk to work ☐
  - d) Having a shower at work ☐
  - e) Other (please specify) ☐
- .....
12. Have you any other comments you wish to make?
- .....
- .....
- .....
13. Full Home Postcode .....
14. Age (please tick one only)
- a) Less than 25 ☐
  - b) 25-34 ☐
  - c) 35-44 ☐
  - d) 45-54 ☐
  - e) Greater than 55 ☐
15. Do you have a disability that affects your travel arrangements?  
Yes ☐ No ☐
16. How does your disability affect your choice of mode of transport?
- .....
- .....
- END OF QUESTIONNAIRE – THANK YOU

Thanks for completing this questionnaire.

## APPENDIX E

### Road Safety Audit and Designer Response

## Designer Response to Road Safety Audit

**Scheme:** PROPOSED UNCONTROLLED PRIORITY JUNCTIONS, BARNHORN ROAD & SPINDLEWOOD DRIVE, BEXHILL-ON-SEA

**Stage:** 1

**Drawing Issue:** T277-15 and T277-31

**Designers comments on the RSA**

Ref	Accepted	Brief Description	Comments
2.1.1	P	Existing adjacent vehicle access may conflict with new access road.	The existing dropped kerb serves a single residential dwelling, adjacent to the existing farm and holiday lodge access, the home owner and it's guests generate a low number of trips and are already aware of the existing adjacent arrangement. This is not a new situation; however the use will be intensified, which removes the unexpected potential use that occurs at present. There are multiple single dwellings that take access along Barnhorn Road without evidence that the arrangement contributes to the accident rate. However to address the risk, users of the residential driveway would be aware of the improved junction given the additional lining and signage, they would also benefit from the allocated road space in the carriageway. Overall it is considered through enhanced signage and intensification in use the situation would not increase the propensity for an accident, indeed the reallocation of road may be a benefit.
2.1.2	Y	Incomplete design may lead to conflicts	Lane Markings will be provided in line with TSGRD, signage will also be provided this will also include the temporary "New Road Layout" sign.
2.1.3	Y	Carriageway levels may lead to localised flooding.	The levels associated with the improved access will be designed to ensure water is managed to existing gullies, if additional gullies, channels or upstands are required these will be included as part of the detailed design process.
2.1.4	P	Stationary buses may impede visibility.	MfS addresses temporary obstacles to visibility, at paragraph 7.8.5. Bus stops are a temporary obstacle and indeed a recently approved layout at North Chailey included a new lay-by within the visibility splay, which passed both an independent safety audit as well as ESCC design checks. In any event, if necessary this would easily be resolved by relocating the existing bus stop, this could be carried out at many points on Barnhorn Road that meet the same criteria as the existing stop, this can be reviewed as part of the Stage 2 RSA.
2.2.1	Y	Electricity sub-station access situated close to turning vehicles.	The designer will ensure that the compound access arrangements do not encroach on the new footway. This is typical at many new residential developments in East Sussex.

APPENDIX F  
HE Objection DaSA and Email on BEX9

# Proposed Submission Development and Site Allocations (DaSA) Local Plan

O - 24582 - 7248 - Policy BEX9: Land off Spindlewood Drive, Bexhill - ii, iii

## 24582 Object

Part B: Site Allocation Policies

Policy BEX9: Land off Spindlewood Drive, Bexhill

**Respondent:** Highways England (Mr David Bowie) [7248]

**Agent:** N/A

**Full Text:** Rother District Council - Proposed Submission  
Development and Site Allocations (DaSA) Local Plan consultation

Highways England ref: #6113

Thank you for your email of 26 October 2018 inviting Highways England to comment on Rother District Council's Proposed Submission Development and Site Allocations (DaSA) Local Plan and its accompanying Sustainability Appraisal.

Highways England has 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 Highways England works 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. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Department for Transport Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development" and the September 2015 document 'The strategic road network Planning for the future - A guide to working with Highways England' explains how we engage on planning matters and the Local Plan process in order to deliver sustainable development whilst safeguarding the primary function and purpose of the SRN.

The SRN in Rother consists of the A21 and the A259 between Bexhill and Rye. As you are aware the SRN currently experiences congestion particularly in the peak hours. We therefore look to the Rother Local Plan to promote policies to help manage the impact of development traffic on the SRN.

The Rother District Local Plan Core Strategy 2011-2018 was adopted in September 2014. The DaSA has been produced to address the need, identified in the Core Strategy, for more detailed development policies and specific site allocations. The DaSA forms part 2 of the Local Plan and together with the Core Strategy will form the basis for determining planning applications.

In February 2017 Highways England commented on the DaSA Local Plan Options and Preferred Options consultation. Key among our comments was

- \* We recommended the transport evidence base be updated as the study which had informed the Core Strategy was from 2011.
- \* The transport evidence base should include proposals for employment sites
- \* The transport evidence should examine the maximum that individual / cumulative sites can be developed to without unacceptable impacts on the combined road networks (strategic and local) or the points at which there is a requirement for mitigation
- \* Funding for improvements on the SRN should not rely on CIL contributions but require section 278 agreements
- \* We suggested mini Infrastructure Development Plans be considered for each allocation

As part of the current consultation, we have reviewed the following documents and set out our comments below.

- \* 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

The headings and numbering below refer to those used in the consultation and supporting documents.

### Development and Site Allocations Local Plan

For Highways England to consider the Local Plan to be sound, the development proposed must be supported by a transport evidence base which assesses the cumulative traffic impact of all the development in the Plan upon the SRN. If required, 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 buildout period of the Local Plan. Mitigation schemes therefore need to be developed to a sufficient stage at outline design to enable robust cost estimates to be derived, which should be confirmed with Highways England.

### 5. Economy

Shopfronts, Signage and Advertising  
Paragraph 5.2

In terms of the A259 and A21, Highways England does not allow advertisements within the highway boundary in



# Proposed Submission Development and Site Allocations (DaSA) Local Plan

O - 24582 - 7248 - Policy BEX9: Land off Spindlewood Drive, Bexhill - ii, iii

## 24582 Object

Part B: Site Allocation Policies

Policy BEX9: Land off Spindlewood Drive, Bexhill

accordance with Circular 02/2013 paragraph A2.

### 6. Environment

Sustainable Drainage  
Paragraph 6.48

Highways England does not allow water run off due to any change of use into the highway drainage systems, nor new connections into these systems from third party development and drainage systems. On land where there is an existing drainage connection into the SRN drainage system then only the extant land use and existing outfall from that land will be accepted. Any continuation of the connection following change of use will not be permitted (Circular 02/2013 paragraph 50 applies.).

### 8. Overview

We note that the Core Strategy housing requirement target is at least 5,700 net additional homes up to 2028. Paragraph 8.6 states that the DaSA Local Plan and Neighbourhood Plans need to identify further sites for at least 1,574 dwellings in addition to those identified in the Core Strategy. In paragraph 8.17 there is an intention to have a margin of over provision, particularly in Bexhill, because the annualised housing requirement has not been achieved to date.

As noted above, the transport evidence should examine the maximum that sites can be developed to without unacceptable impacts on the strategic and local road networks or the points at which there is a requirement for mitigation to bring about a 'nil detriment'.

### 9. Bexhill

Policy BEX3: Land at North Bexhill - Infrastructure

We note that the development of the sites in policies BEX3a, BEX3b and BEX3c shall be required to contribute to shared infrastructure.

The cumulative impact of sites upon the SRN will need to be assessed and mitigated as necessary to result in a 'nil detriment' situation where the network is shown to be overcapacity. Any physical works will need to be agreed by Highways England, comply with design standards, be deliverable and fully funded by the development or an alternative realistic funding source identified. It is suggested that the policy context is re-worded to ensure that it is clear that 'nil detriment' (no worse than otherwise) is provided where the cumulative impact is 'severe' i.e the network is taken or is already over capacity.

This policy refers to direct provision and legal agreements in order to implement the shared infrastructure requirements. It should be noted that works to the SRN will be via a Section 278 of the Highways Act 1980 agreement and not a Section 106 of The 1990 Town & Country Planning Act agreement.

Policies BEX6, BEX9, BEX10 and BEX11 include requirements to provide off site highway works to make the development acceptable in highway terms. BEX14 requires works to improve junction of Beeching Road and London Road. It should be noted that combined, these sites may have a cumulative impact on the SRN and may therefore be reasonably required to contribute towards improvements on the wider road network. 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.

Highways Capacity Assessment (HCA) Report (2028 Development and Site Allocations)

We note that the transport study covering the Local Plan transport assessment work has been undertaken using a revalidated Bexhill Hastings Link Road assignment model. The Local Plan evidence base does not appear to include any documentation covering the revalidation of the model. Without an assessment of how good the model is we are unable to concur that the outputs are reliable.

In terms of any impacts upon the SRN, our concerns relate to the non-consented development element of the Local Plan. The two future year scenarios examined in the above report are the "2028 with DaSA" and "2028 without DaSA". In terms of the modelling approach our essential requirement is to compare the 2028 with consented development scenario against the 2028 with additional non-consented scenario. In this respect, the "with" and "without" scenarios in the report (based upon the allocations in Table 2-3) do not quite seem to equate to the housing and employment numbers or allocations in Table 18 and Paragraph 8.19 of the main "Development and Site Allocations Local Plan Proposed Submission" document. Clarification is required as to whether Highways England's requirement has been met in this regard particularly as the sites at Barnhorn Green, Grand Hotel and Worsham Farm appear to be committed development. Any non-consented windfall assumed should also be included in a non-consented scenario.

Page 6 of the Highways Capacity Assessment Report states that the "2028 without DaSA scenario" excludes traffic growth due to increases in households or employment in the locations of development in the DaSA scenario".

# Proposed Submission Development and Site Allocations (DaSA) Local Plan

O - 24582 - 7248 - Policy BEX9: Land off Spindlewood Drive, Bexhill - ii, iii

## 24582 Object

Part B: Site Allocation Policies

Policy BEX9: Land off Spindlewood Drive, Bexhill

Information should be supplied to explain how this was done.

The Highways Capacity Assessment Report shows in Table 2-3 the numbers of trips to and from the modelled site allocations. We would like to see TRICS outputs showing trip rates for the different allocations to establish whether they are robust.

The Highways Capacity Assessment Report states that for both future scenarios that a furness procedure has been used to determine the future trip distributions. We request that the trip row and column totals within the matrices be provided prior to furnessing to ascertain whether the differences are significant (unless the process was singly constrained).

The Highways Capacity Assessment Report has focussed on development solely within the Bexhill Bexhill/Hastings part of Rother District. The model does not extend out towards Rye in the east and Wadhurst in the north. Further information and potentially assessment is required of non-consented development impacts upon the SRN elsewhere in the District, or text on why further assessment is not required. At this stage we consider that although the model includes the A259 trunk road it should at least be extended to include the A21 north of Hastings.

The Highways Capacity Assessment Report assumes a number of highway improvements will have been implemented by 2028. These are:

- \* The North Bexhill Access Road (NBAR)
- \* Queensway Gateway Road (QGR)
- \* Complementary measures associated with BHLR - junction improvements on The Ridge at Queensway and Harrow Lane and bus priority measures on the A259
- \* Junction improvements due to North East Bexhill development
- \* Signalised junctions of B2182 Holliers Hill / A2036 Wrestwood Road and B2182.

Whilst we are aware of the programme for the more significant schemes (NBAR & QGR) there is no detail on these schemes, no junction or link analysis, nor a programme to show that all of these improvements will be in place at the appropriate point in the Local Plan.

Notwithstanding these comments and queries the highways report includes V/C outputs for the 2028 "with" and "without" scenarios. The plots appear to show increasing numbers of vehicles and capacity issues on certain sections of the A259 classed as SRN. For our purposes it would be more useful to look at queues and delays rather than V/C ratios to ascertain whether the differences between the scenarios require further more detailed examination and mitigation. Assuming that the above queries and comments can be resolved we would need to see outputs in these formats moving forward.

The assessment shows increases on the A259 during the AM and PM peak periods, in the range of 50-200 vehicles per peak period. With our earlier comments above in mind with regard to the use of V/C in the assessment, the V/C ratio analysis highlights specific sections of the A259 that are shown to be operating at over 80% capacity. These being:

- \* A259 West of Little Common
- \* A259 East of A269 signal junction
- \* A259 East of A2036 roundabout (near Bexhill Leisure Pool)

However, the report contains no mitigation proposals for any junction or link that is shown to exceed capacity in 2028. Whilst here is a "Potential Mitigation Measures" chapter this does not deal with specific measures and is rather vague and includes items such as MOVA or SCOOT, along with other undefined junction modifications / improvements. It is not possible for Highways England to give views on the suitability of the proposed developments without there being clear identification of where mitigation is required, and what form it will take.

Your attention is drawn to Paragraph 18 of Circular 02/2013 which states that "Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the strategic infrastructure needs."

In the absence of any proposed mitigation measures which have been demonstrated to provide a 'nil detriment' situation, nor costings and funding sources, Highways England has no confidence that the development in the Plan is deliverable without severe harm to the SRN.

In addition, within the councils Core Strategy adopted in September 2014, policy TR3 is clear that "development will be permitted where mitigation against transport impacts ... is provided." It would appear therefore, that the requirements of Policy TR3 are not met within the Highways Capacity Assessment Report, and therefore the developments proposed in DaSA are not shown to accord with the councils adopted Core Strategy.

Infrastructure Delivery Plan (IDP)

The IDP needs to be brought up to date once SRN mitigation required to deliver the development in the Local Plan has

# Proposed Submission Development and Site Allocations (DaSA) Local Plan

O - 24582 - 7248 - Policy BEX9: Land off Spindlewood Drive, Bexhill - ii, iii

## 24582 Object

Part B: Site Allocation Policies

Policy BEX9: Land off Spindlewood Drive, Bexhill

been agreed with Highways England. As part of this, any works will need to be costed and realistic funding sources identified. Funding via CIL contributions is not appropriate for SRN improvements as this does not provide sufficient certainty. All improvements/mitigations to the SRN will require section 278 of the Highways Act 1980 agreements.

There are also several references to the Highways Agency within the document which should be updated to Highways England.

Highways England can advise that the A259 Little Common roundabout improvement has been implemented.

Highways England's Current position

Highways England therefore considers that the DaSA Local Plan is not sound on transport grounds as it does not meet the tests of Justified nor Effective.

Whilst our current position may not be what the council had hoped for, we are keen to work with you, East Sussex County Council and any consultants employed by the councils to resolve our concerns and comments as advised above. We hope that we can reach a position prior to EIP which will enable us to enter into a Statement of Common Ground with the Council and County Council which shows that all parties consider the Local Plan is sound in terms of Transport matters. We look forward to your response in due course and hope that you find these comments, queries and advice useful.

**Summary:** Policies BEX6, BEX9, BEX10 and BEX11 include requirements to provide off site highway works to make the development acceptable in highway terms. BEX14 requires works to improve junction of Beeching Road and London Road. It should be noted that combined, these sites may have a cumulative impact on the SRN and may therefore be reasonably required to contribute towards improvements on the wider road network. 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.

### Change to Plan

Appear at exam?	Legal?	Sound?	Duty to Cooperate?	Soundness Tests
Not Specified	Not Specified	No	Not Specified	ii, iii

Attachments:

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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**From:** "Bowie, David" <\_\_\_\_>  
**Subject:** RE: RR/2017/1705/P and DaSA Part II  
**Date:** 20 February 2019 at 13:34:40 GMT  
**To:** Graham Stone <\_\_\_\_>  
**Cc:** Planning SE <\_\_\_\_>, "Franklin, Richard" <\_\_\_\_>, "Cleaver, Elizabeth" <\_\_\_\_>, Jo Edwards <\_\_\_\_>

Dear Graham,

Thank you for your email of the 15<sup>th</sup> February regarding my responses to Rother District Council's DASA and that of Spindlewood Drive. It may appear that there is conflict between my responses but this is not the case. I have also received communication from Rother's case officer for Spindlewood Drive asking the same questions and therefore have taken the opportunity to copy in Jo Edwards at Rother District Council to ensure you both receive this response.

My main concern with Rother's DASA is that the council have not provided a robust transport case for the full cumulative impacts of all their development proposals. Whilst individually some of these sites within the DASA could come forward, as has Spindlewood Drive along with its own mitigations, the combined effects of all sites have, in my opinion, not been properly considered and hence my response to the council expressing my concerns. As you know Spindlewood Drive has taken account of its own impacts along with that already committed at that time but we now need to go beyond this and understand what the implications of other sites coming forward may have on the road network. So whilst we are content with the Spindlewood Drive proposals we are not content with anything further until robustly demonstrated otherwise.

You may already be aware that we have responded to the application for Land at Clavering Drive. We have advised the council that further information is required as we are not satisfied with the evidence provided by the applicant so far. We have advised the council not to determine the application (other than refusal) until the information requested has been provided and that we are satisfied with its accuracy – our response can be viewed in full on the planning application website (reference RR/2018/3127/P). It is my understanding that the applicant is keen to resolve highway matters and has offered some minor improvements to the roundabout but I am not satisfied with the adequacy of these at this time. As you will appreciate I am obliged to work with the applicant to determine whether or not there are improvements that could be made within the development context.

I noted that Ashridge Court application No. RR/2016/3206/P - 31 new dwellings with a ghost right turn lane has now been approved at appeal. As with Spindlewood Drive we carefully considered the implications of this site at the time and are satisfied that with the proposed access arrangements the site can be accommodated within the existing road infrastructure without necessitating further improvements on the A259. I do not consider that this site will have any material impact on Spindlewood Drive or Little Common Roundabout but accept that it will need to be accounted for within the Transport Assessment supporting the DASA.

I trust the above of assistance to both yourselves and Rother District Council and clarifies our position in relation to current and future development in Bexhill. If you need any further information or clarifications please contact me again.

Kind regards

**David**

**David Bowie**

**Area 4 Spatial Planning Manager (Acting)**

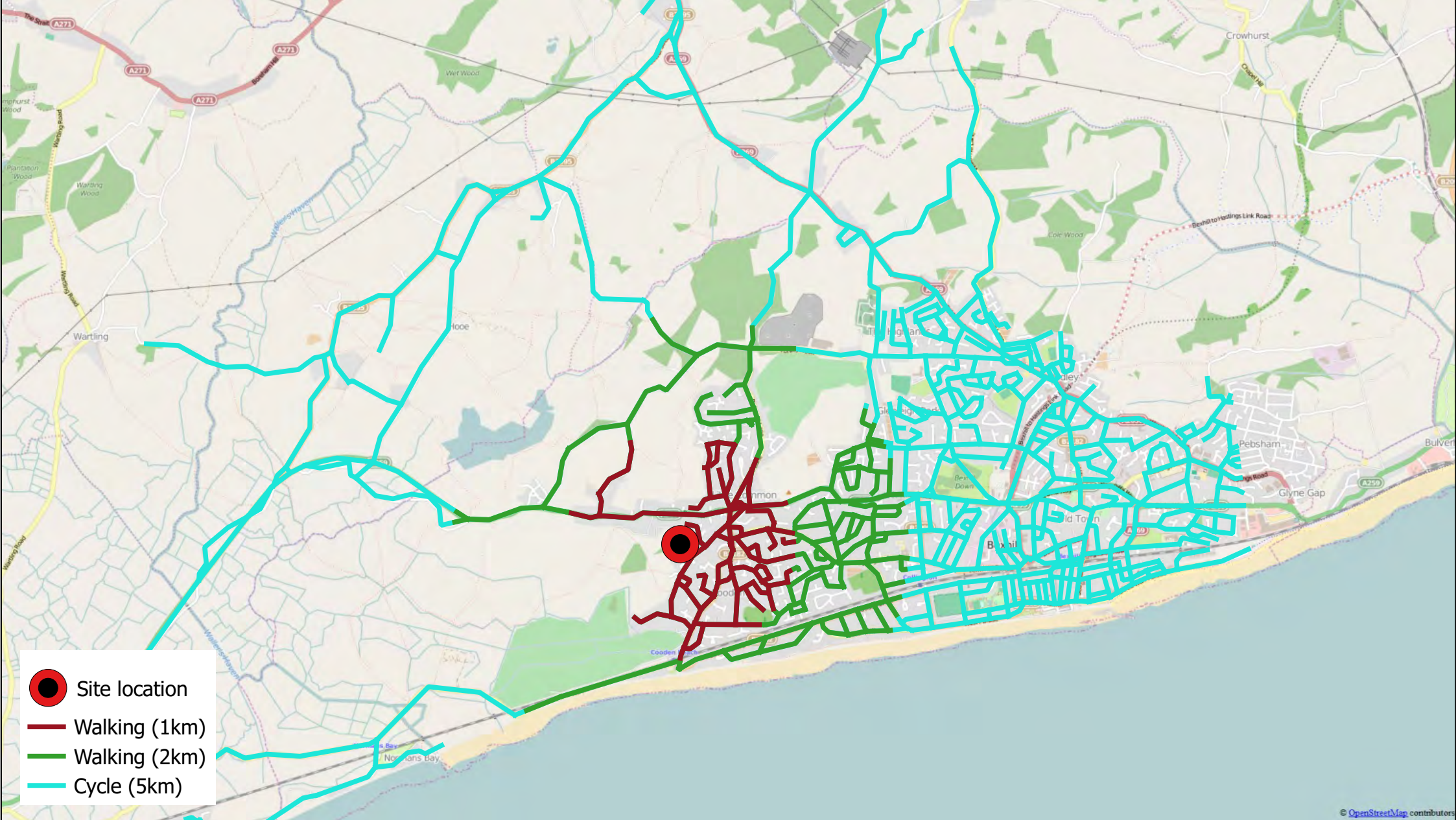
Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

**Mobile:**

Web: <http://www.highways.gov.uk>

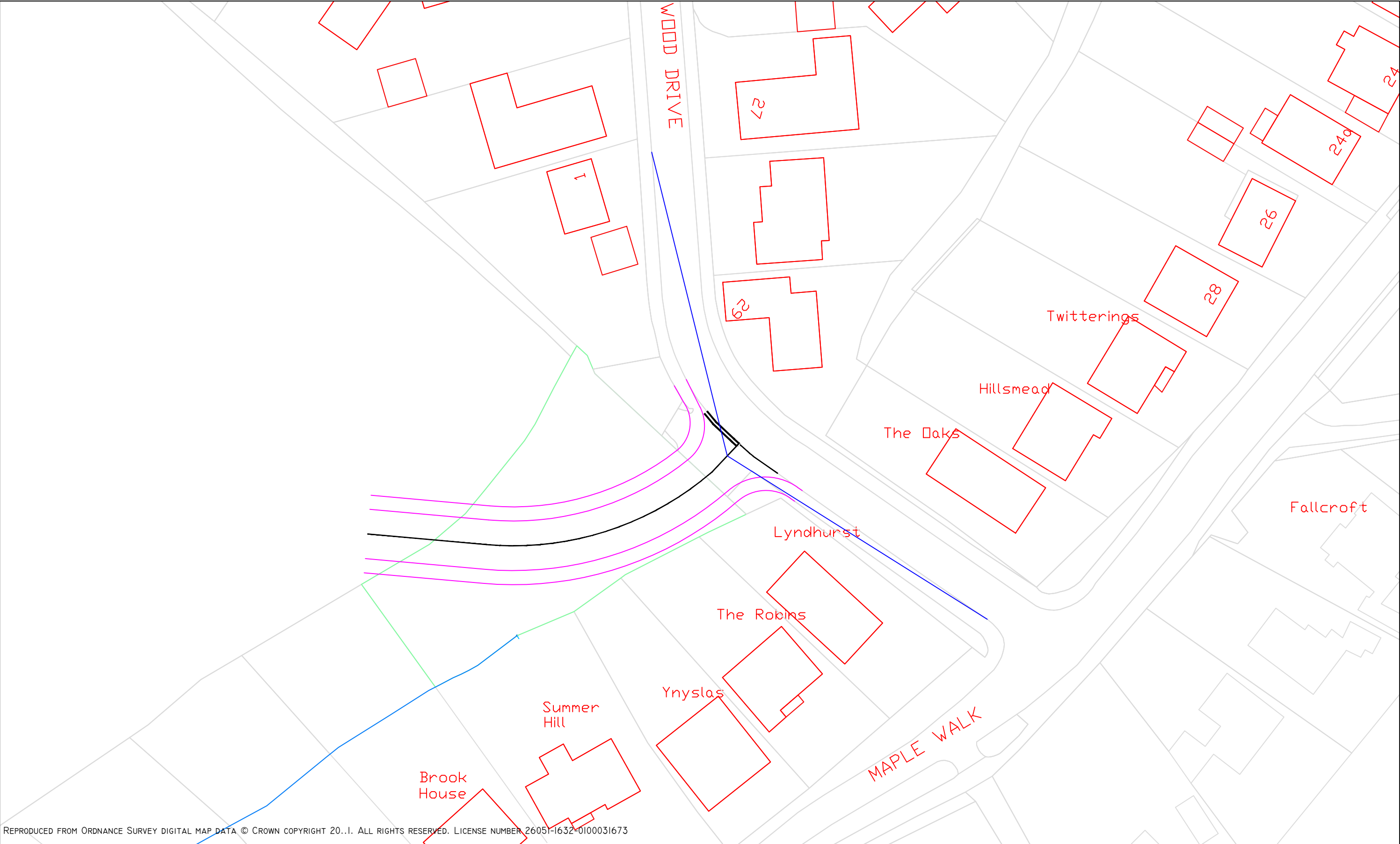
DRAWINGS





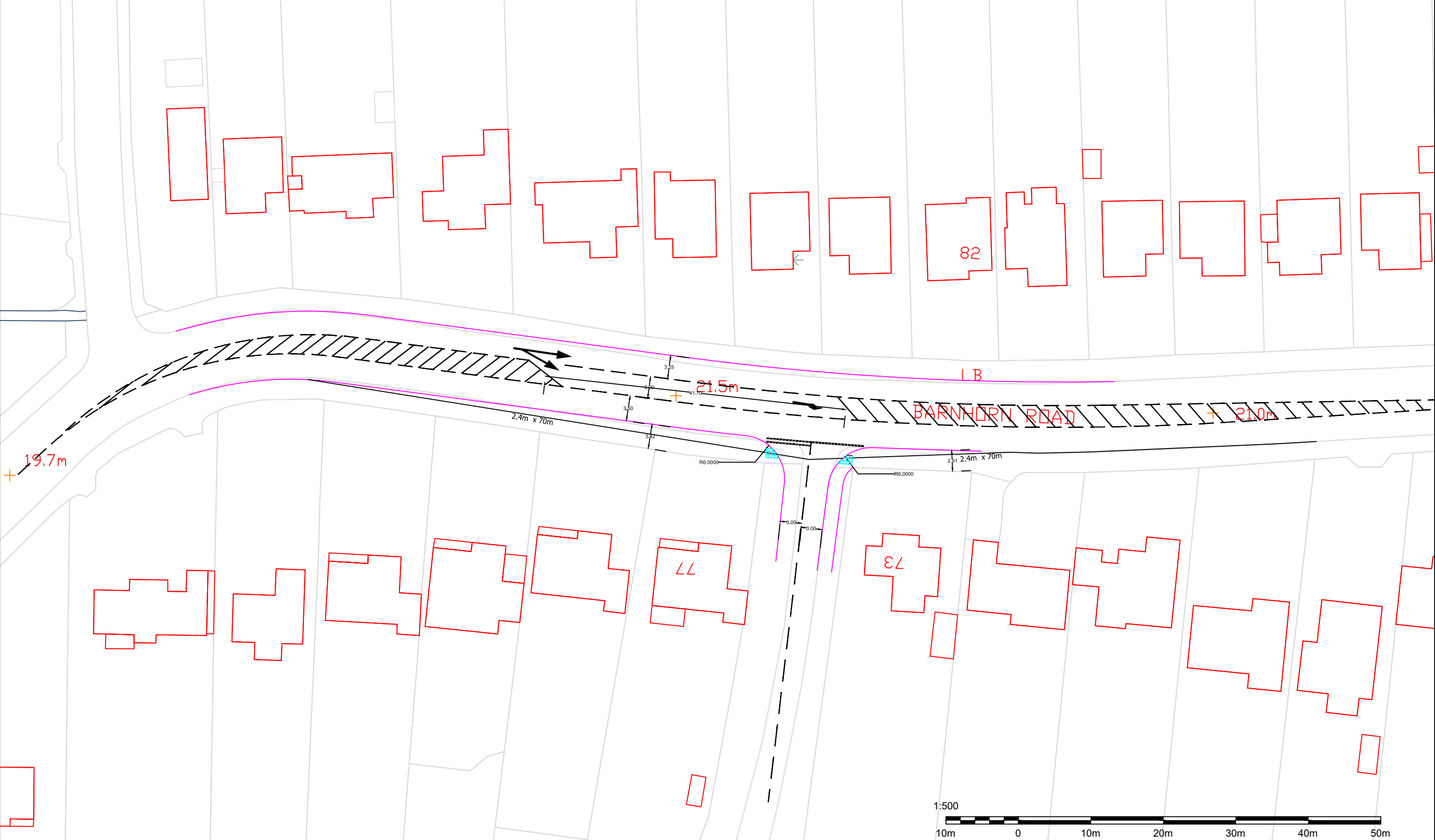
- Site location
- Walking (1km)
- Walking (2km)
- Cycle (5km)

SCALE 1:50,000	DRAWN BY JA	CHECKED BY PR	 Exigo Project Solutions, Unit 2c - The Gateway Silkwood Park, Wakefield, WF5 9TJ	SCHEME  Bexhill	DRAWING TITLE  Location Plan
DRAWING REFERENCE  T277/GIS/01		REV  n/a		ON BEHALF OF  Bedford Parks	
DATE 29/5/2015		CAD REF N/A			



SCALE @ A3 1:500		DRAWN BY MM		CHECKED BY PR			SCHEME BEXHILL		DRAWING TITLE  SPINDLEWOOD DRIVE ACCESS
DRAWING REFERENCE T277_I5				REVISION			ON BEHALF OF		
DATE Nov 16		CAD REF T277_I5.DWG		UNIT 2C, THE GATEWAY. SILKWOOD PARK, WAKEFIELD. WF5 9TJ					





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DRAWING REFERENCE	REVISION	
T277_31		
DATE Nov 16	CAD REF T277_31.DWG	



**EXIGO**  
PROJECT SOLUTIONS

UNIT 2C, THE GATEWAY. SILKWOOD PARK, WAKEFIELD. WF5 9TJ

SCHEME
BEXHILL
ON BEHALF OF
BEDFORD PARK DEVELOPMENTS

DRAWING TITLE
BARNHORN ROAD ACCESS

