

## 1.0 Introduction

- 1.1 This Technical Note (TN2) has been produced to respond to the East Sussex County Council (ESCC) comments on Rother District Council (RDC) planning application reference RR/2021/1656/P.
- 1.2 The planning application package submitted included a Transport Assessment (TA) produced by Tetra Tech (Tt).
- 1.3 The planning application seeks consent for up to 210-dwellings on Land off Fryatt Way in Bexhill.
- 1.4 The ESCC response objects to the proposed application and cited the following reason for refusal:

*“The proposed development is poorly placed in terms of sustainable transport modes due to the lack of non-car travel choices for residents and would therefore be would therefore be contrary to para 104 and 106 of the National Planning Policy Framework”*

- 1.5 The ESCC comments are attached at **Appendix A** and can be categorised into two main topics namely:
- 1) Sustainable Access – Concerns in relation to bus services and pedestrian accessibility
  - 2) Vehicular Access and Traffic Impacts – Deemed acceptable.
- 1.6 Each of those matters are responded to in sub-sections of this technical note.

## 2.0 LHA Comments

- 2.1 In summary, the LHA concerns relate to the following matters:
- Frequency of existing accessible bus services and concerns that any improvements to a DRT service would not be sufficient and once funding ceases would mean residents would be 'reliant solely on travel by private car'.
  - Pedestrian infrastructure in the vicinity of the site, in particular relating to a short section to the north of the site on Ellerslie Way which does not have footway provision and historical pedestrian safety concerns in the area due to the lack of footway
  - Walking distances to bus stops

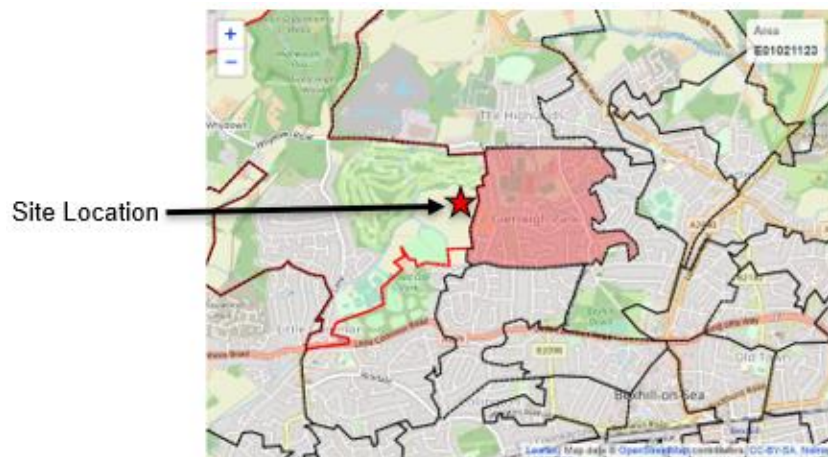
## 3.0 Response to the LHA Comments

### Matter 1: Frequency of Bus Services

- 3.1 The modal split has been established from 2011 census data using the lower super output area Rother

009F which is considered to be the most representative existing residential area (shown in **Figure 3.1**) and that data is detailed in **Table 3.1**.

**Figure 3.1 – Rother 009F**



**Table 3.1: Residential Modal Split**

Mode	Census Modal Share
Work from Home	6.9%
Train	6.5%
Bus, minibus or coach	0.7%
Motorcycle, scooter or moped	0.5%
Driving a car or van	71.2%
Taxi	0.4%
Passenger in a car or van	4.7%
Bicycle	2.5%
On foot	5.7%
Other Method	0.9%
<b>Total</b>	<b>100%</b>

\* Peach colour denoted sustainable mode of travel

- 3.2 A review of journey to work census data has found that the mode share for bus is 0.7% in the Rother 009F which is considered to be the most representative existing residential area. The total sustainable travel share is 19.4% and the travel by bus therefore represents 3.6% of the total sustainable travel in the area. It is evident that buses are not a panacea of sustainable travel and that other options for sustainable travel are available, accessible, and promoted via the Travel Plan. Moreover, although the Census only provides data with respect to commuting, it must follow that these sustainable modes are also available for other journey purposes.

3.3 Two conclusions can be drawn from this:-

- The services available in the vicinity of the Fryatts Way site, undoubtedly provide opportunity for some travel to be accommodated by public transport as shown by the use of those services for residents today.
- The remaining 18.7% (equating to 96.4% of all existing commuter sustainable travel) of sustainable travel choices used by existing residents is clearly available for future residents on the site.

#### **Matter 2: Pedestrian Infrastructure**

3.4 **Plan 4** in the TA shows that continuous footways / footpaths are provided to the south to connect with the bus stops, Bexhill Town Centre and the Little Common Shopping Area. It is accepted that the pedestrian route to the north via Ellerslie Way is less than ideal, however it should be noted that this section of road has not experienced any pedestrian related accidents between 2016 and 2020 inclusive.

3.5 Moreover, **Plan 3** has been reproduced to exclude the link to the north via Ellerslie Way and the updated **Plan 3** shows that a wide range of facilities and amenities are still accessible on foot.

3.6 **In that respect we are pleased to note that ESCC agree that alternative routes are also available to pedestrians, especially those travelling southwards and that there is scope to avoid the narrow stretches of carriageway which lack footways.**

3.7 The route via Broadoak Lane / Deerswood Lane has not experienced any pedestrian related accidents in the 5-year study period. Furthermore, an alternative route including continuous pedestrian footways is provided via Blackfields Avenue / Courthope Drive. The alternative route is c. 115m longer which equates to a 1 minute 22 second additional walk time (based on a walking speed of 1.4m/s). Even with the additional 115m, the route to Little Common Shopping area is still within 2km. Therefore, this additional walking distance is considered to be entirely immaterial.

3.8 Moreover, a full assessment of personal injury accidents was undertaken in the Transport Assessment submitted alongside the planning application. That did not indicate that there is any prevailing accident issue associated with current pedestrian movement in and around the area. Therefore, it cannot be the case that there is any evidence that would support that being an issue for future residents at the proposed development.

3.9 It should be also noted that the site is an extension to an existing residential area, not the construction of a new isolated residential development whereby residents would route along sections of the highway where there is no existing pedestrian activity. Future residents would be able to successfully use the existing network of footways and other pedestrian connections as is the case for existing local residents.

- 3.10 It is noted that ESCC request that dropped kerbs and tactile paving are provided to either side of Ellerslie Lane at a suitable location north of the Summer Hill Road junction. The applicant has agreed that should planning permission be granted they are willing to deliver these works. The potential footway works are shown in Tetra Tech drawing 7840A115791-TTE-00-XX-PL-D-001, which is attached as **Appendix B**.

### **Matter 3: Walking Distances to Bus Stop**

- 3.11 The closest bus stops are 600m from the site. Whilst it is noted that is 200m further than the recommended 400m, at a walking speed of 1.4 m/s, the walk to these bus stops is only 7 minutes and 9 seconds.
- 3.12 It is agreed that a walking distance to the bus stop of 2km (i.e. a 24-minute walk) would be significantly in excess of the recommended walking distance to a bus stop. That is not to say that no one would undertake that journey.
- 3.13 Moreover, the applicant is willing to fund the DRT service for 3 years as suggested to further improve sustainable travel choice. In the years that follow the residents would still have the choice of four alternative sustainable travel modes (namely on foot, by bike, by train, via car sharing and using ultra-low emission vehicles), all of which currently contribute to 96.4% of existing sustainable commuter travel and the site would therefore still be accessible. As stipulated previously, these sustainable travel options are equally available for all journey purpose

### **Response to ESCCs overall position**

- 3.14 The ESCC position is drawn based on concerns relating to existing pedestrian infrastructure and the existing bus services. The findings of our TA and this TN are that there are various pedestrian routes that can be taken. The routes have not experienced any pedestrian related accidents during the 5-year study period which is from 2016 to 2020 inclusive.
- 3.15 More confident walkers can choose to walk on carriageway to shorter certain routes however the slightly longer routes with dedicated infrastructure are also entirely acceptable alternatives.
- 3.16 It should be noted that in addition to bus journeys, the site is accessible on foot and using other sustainable travel modes.
- 3.17 Other sustainable travel modes are viable options for future residents on the site as they are for the existing local community. Those include:
- Ultra-Low and Zero Emission Vehicles
  - Cycling
  - Car sharing
  - Train

- On foot

- 3.18 Those modes along with walking are promoted within the Travel Plan that has been submitted as part of the planning application package.
- 3.19 The applicant has agreed that should planning permission be granted they are willing to implement the dropped kerbs and tactile paving works on Ellerslie Lane at a suitable location north of the Summer Hill Road.
- 3.20 Additionally, the applicant is willing to further improve public transport connectivity and fund an extension to the DRT service.
- 3.21 Moreover, it is relevant to note that whilst currently undetermined, there is a planning application (RR/2020/565/P) which seeks permission for 26-dwellings adjacent to the proposed development on land between Fryatts Way and Ellerslie Lane with a resolution to grant planning permission. Importantly a highway authority consultation response date 22<sup>nd</sup> January 2021 confirmed that whilst the site has limitations with regard to accessibility:

*“... it must also be acknowledged that the site is situated within a well-established residential area that has operated under these circumstances for many years. For this reason, despite the limited opportunities for non-car modes of travel available, it would be difficult to object to a proposal that is unlikely to significantly disrupt the current status quo; however, we would wish to secure the improvements as detailed above.”*

- 3.22 That highway authority response offer “no objection subject to the imposition of conditions”.
- 3.23 It is therefore of concern that the highway authority appears to be considering these exact issues in contrary manner with respect to the proposed development. It is hoped that the evidence provided within this TN2 enables a position of LHA support to the proposed development to be obtained.

## 4.0 Access and Traffic Impacts

- 4.1 The ESCC Response states:

*“Overall, I have no major concerns regarding the proposed access off Fryatts way as vehicle speeds on this residential cul-de-sac are low and good visibility is available in each direction. The access width and radii proposed are also considered to be appropriate for a development of this type.”*

- 4.2 It is noted that the proposed site access is acceptable to ESCC.

- 4.3 The ESCC Response states:

*“With this in mind, despite having some concern regarding the restrictive nature of some*

*stretches of road serving the site, based on the capacity assessments undertaken and the above observations I am satisfied that the roads will not be adversely affected by the additional traffic generated by the development proposal and will continue to function in a satisfactory manner."*

- 4.4 It is noted that the traffic impacts of the proposals are acceptable to ESCC.

## 5.0 Conclusions

- 5.1 ESCC has concerns regarding the sustainable accessibility of the site. As defined by the NPPF sustainable access comprises *"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport."*
- 5.2 In relation to the proposals:
- It has been demonstrated that the proposals are accessible on foot. A range of destinations are readily accessible on foot. Furthermore, there is no evidence of any existing highway safety issue with respect to pedestrians on the existing highway network.
  - There are also opportunities for future residents to access local bus services and the applicant is willing to fund improvements to the DRT service to further enhance provision.
  - Notwithstanding the above, bus accessibility is only one strand of sustainable travel opportunity. In that regard it has been demonstrated that all other sustainable travel modes will be readily accessible.
  - The applicant is willing to commit to a robust Travel Plan in order to maximise the use of sustainable travel modes.
- 5.3 In conclusion, the site is accessible by all of the five NPPF identified sustainable travel modes (on foot, by bike, by bus, by low emission/zero emission vehicles and through car sharing). Whilst it is recognised that bus accessibility has some limitations, it remains a valid travel choice and it forms only one option of sustainable travel.
- 5.4 The applicant has agreed that should planning permission be granted they are willing to implement the dropped kerbs and tactile paving works on Ellerslie Lane at a suitable location north of the Summer Hill Road.
- 5.5 Additionally, the applicant is willing to further improve public transport connectivity and fund an extension to the DRT service.
- 5.6 It is therefore the case that the development is in accordance with NPPF Para 104 part (c) which states, *"opportunities to promote walking, cycling and public transport use are identified and pursued"*

Paragraph 110 part (a) which states *“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;”*

- 5.7 On the basis of the above, it has been demonstrated the reason for refusal is not substantiated the policies which it references and that the proposals are in accordance with the key policies of the NPPF.

## Plans





# Proposed Residential Development

Bexhill, Fryatts Way

Gladman Developments Ltd

## Legend

- ★ Site Location
- Site Boundary

09 June 2021  
Scale: 1:20,000 @A3  
NGR: 573,874 E / 108,664 N

© Crown Copyright All rights reserved. Licence number:

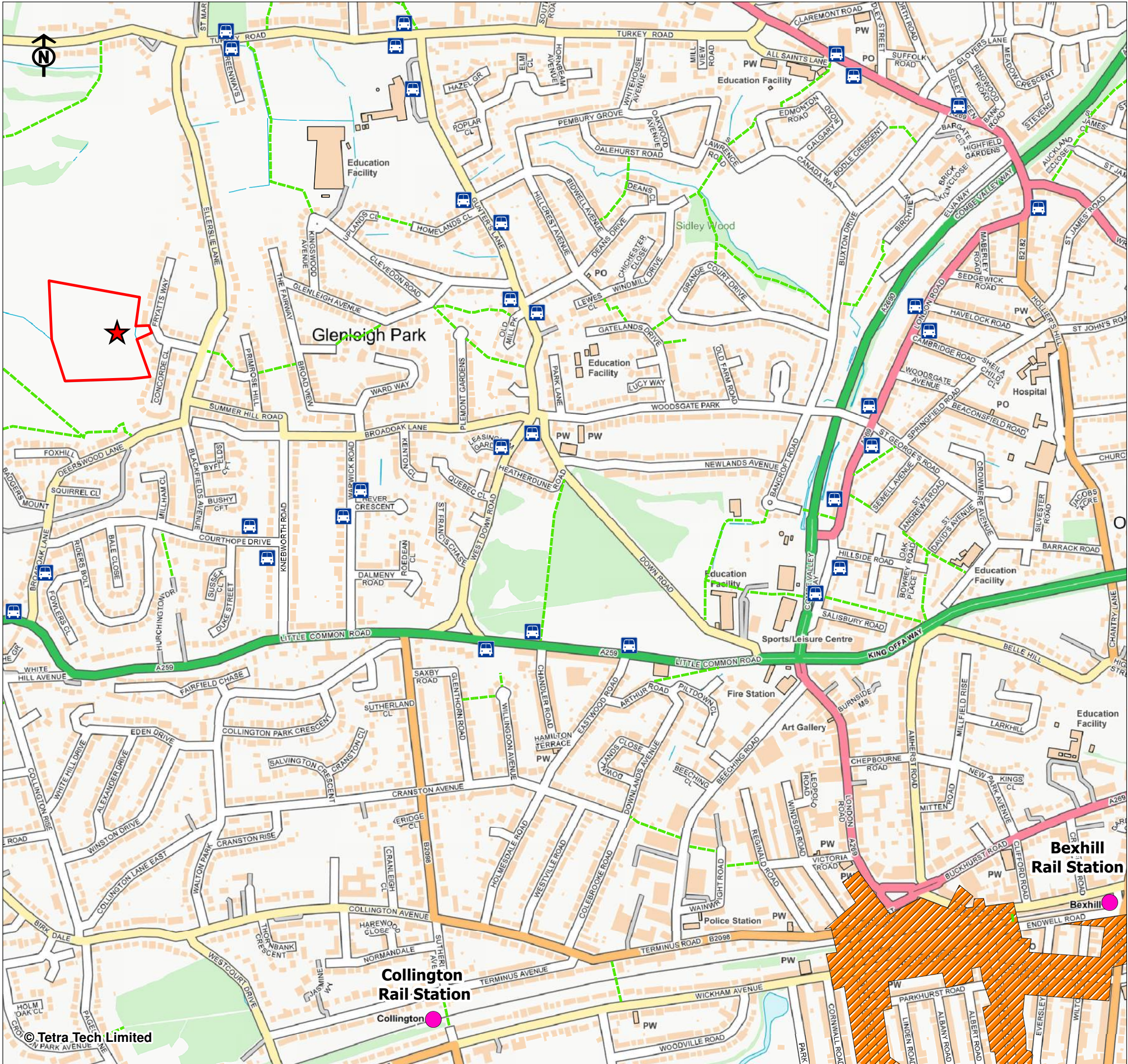
Plan 1: Site Location



Quay West at  
MediaCityUK,  
Trafford Wharf Road,  
Trafford Park,  
Manchester,  
M17 1HH

Drawn by: Y Liu  
Checked by: M Thompson  
Office: Manchester  
Drawing No. Plan 1  
Revision No.











## Proposed Residential Development

Bexhill, Fryatts Way

Gladman Developments Ltd

## Legend

-  Site Location
-  Site Boundary
-  Bus Stop
-  Rail Station
-  Public Rights of Way
-  Bexhill Town Centre Shopping Area

09 June 2021

Scale: 1:7,500 @A3

NGR: 573,386 E / 108,284 N

© Crown Copyright All rights reserved. Licence number:

Plan 2: Local Highway Network



Quay West at  
MediaCityUK,  
Trafford Wharf Road,  
Manchester,  
M17 1HH

Drawn by: Y Liu

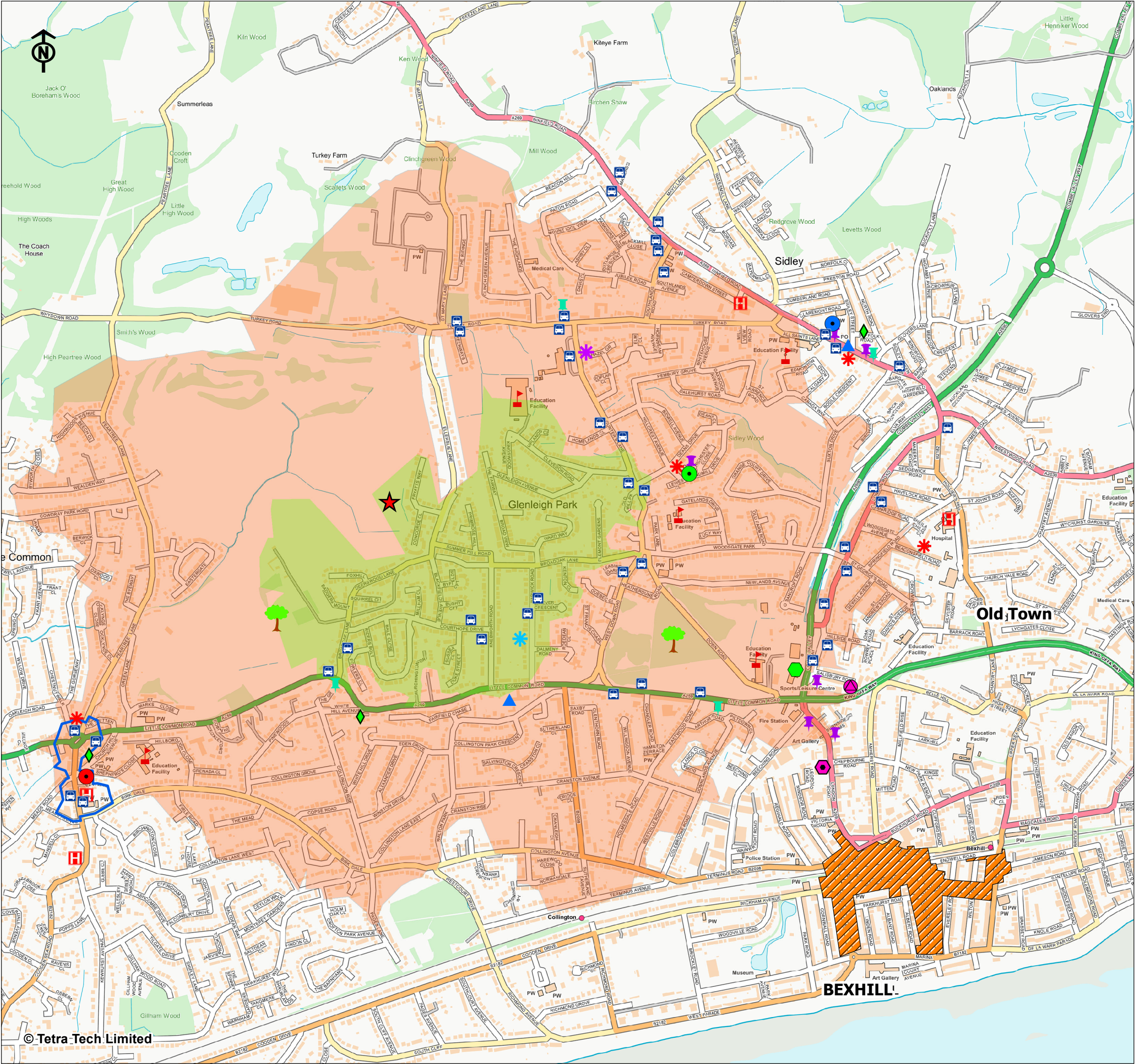
Drawing No. Plan 2

Checked by: M Thompson

Revision No.

Office: Manchester





# Proposed Residential Development

Bexhill, Fryatts Way

Gladman Developments Ltd

## Legend

- ★ Site Location
- 1km Walk Catchments
- 2km Walk Catchments
- Bus Stop
- Lidl
- Convenience Store
- Tesco Express
- Aldi
- Educational Facility
- Nursery
- Hazelmere Nursing Home
- Restaurant
- Bars and Pubs
- Medical Surgery / Hospital / Pharmacy
- Dentist
- Vets
- Bexhill Leisure Centre
- Post Office
- Kwik Fit
- Outdoor Area / Park
- Town Centre Shopping Area - as defined in RDC's Local Development Framework (2011)
- Little Common Shopping Area

21 February 2022

Scale: 1:12,500 @A3

NGR: 573,073 E / 108,591 N

© Crown Copyright All rights reserved. Licence number:

Plan 3 v1: Walk Catchments

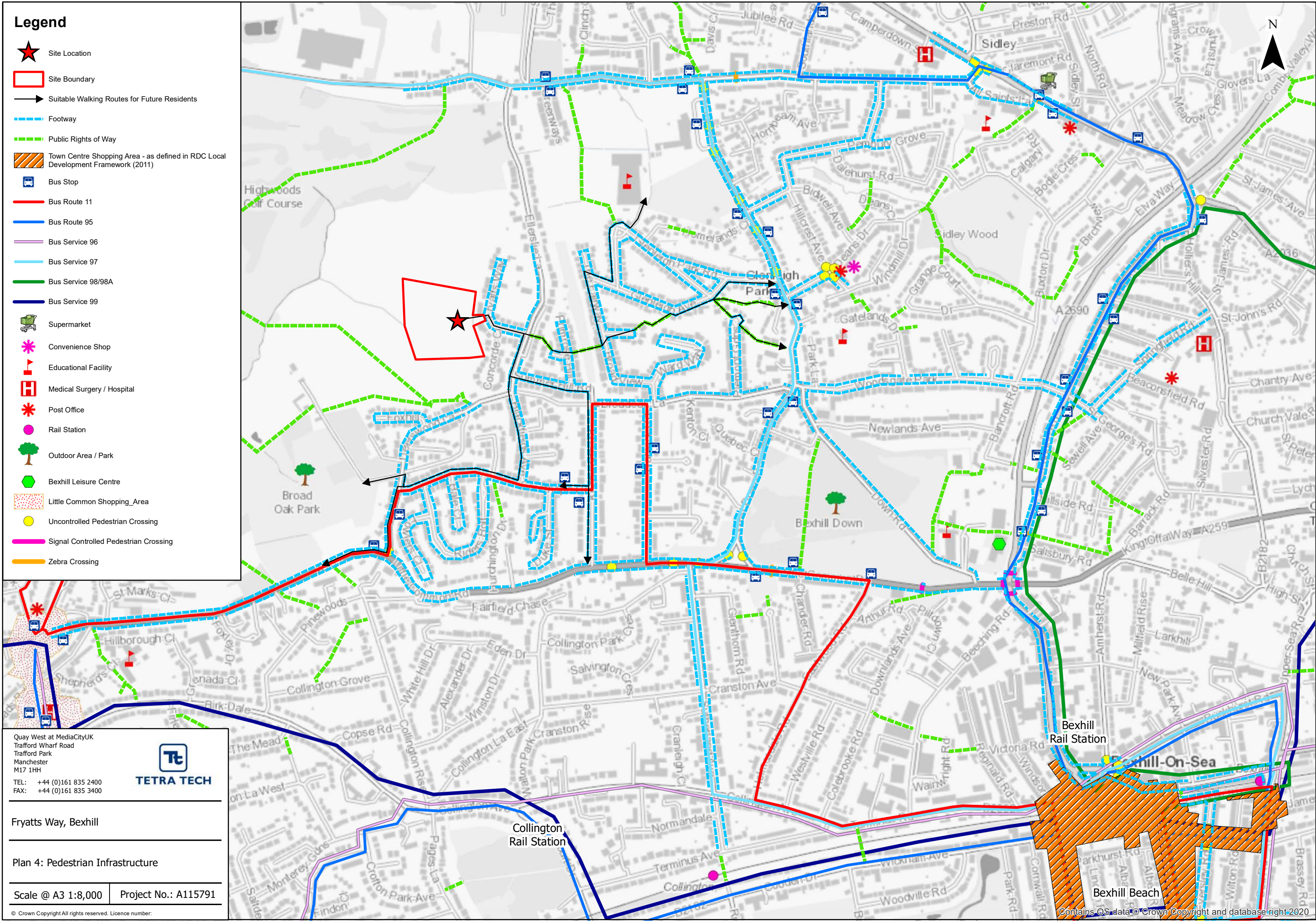


Quay West at  
MediaCityUK,  
Trafford Wharf Road,  
Trafford Park,  
Manchester,  
M17 1HH

Drawn by: Y Liu  
Checked by: M Thompson  
Office: Manchester

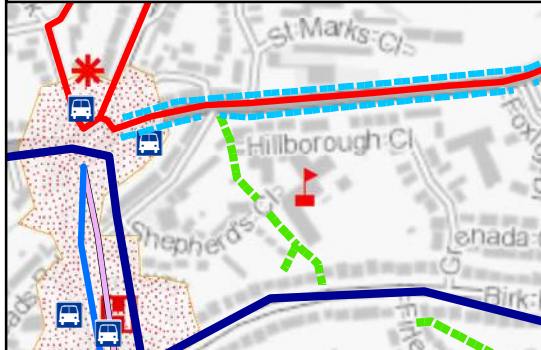
Drawing No. Plan 3  
Revision No.





### Legend

- ★ Site Location
- Site Boundary
- Suitable Walking Routes for Future Residents
- Footway
- Public Rights of Way
- ▨ Town Centre Shopping Area - as defined in RDC Local Development Framework (2011)
- Bus Stop
- Bus Route 11
- Bus Route 95
- Bus Service 96
- Bus Service 97
- Bus Service 98/98A
- Bus Service 99
- Supermarket
- Convenience Shop
- Educational Facility
- Medical Surgery / Hospital
- Post Office
- Rail Station
- Outdoor Area / Park
- Bexhill Leisure Centre
- Little Common Shopping\_Area
- Uncontrolled Pedestrian Crossing
- Signal Controlled Pedestrian Crossing
- Zebra Crossing



Quay West at MediaCityUK  
Trafford Wharf Road  
Trafford Park  
Manchester  
M17 1HH

TEL: +44 (0)161 835 2400  
FAX: +44 (0)161 835 3400

**TETRA TECH**

Fryatts Way, Bexhill

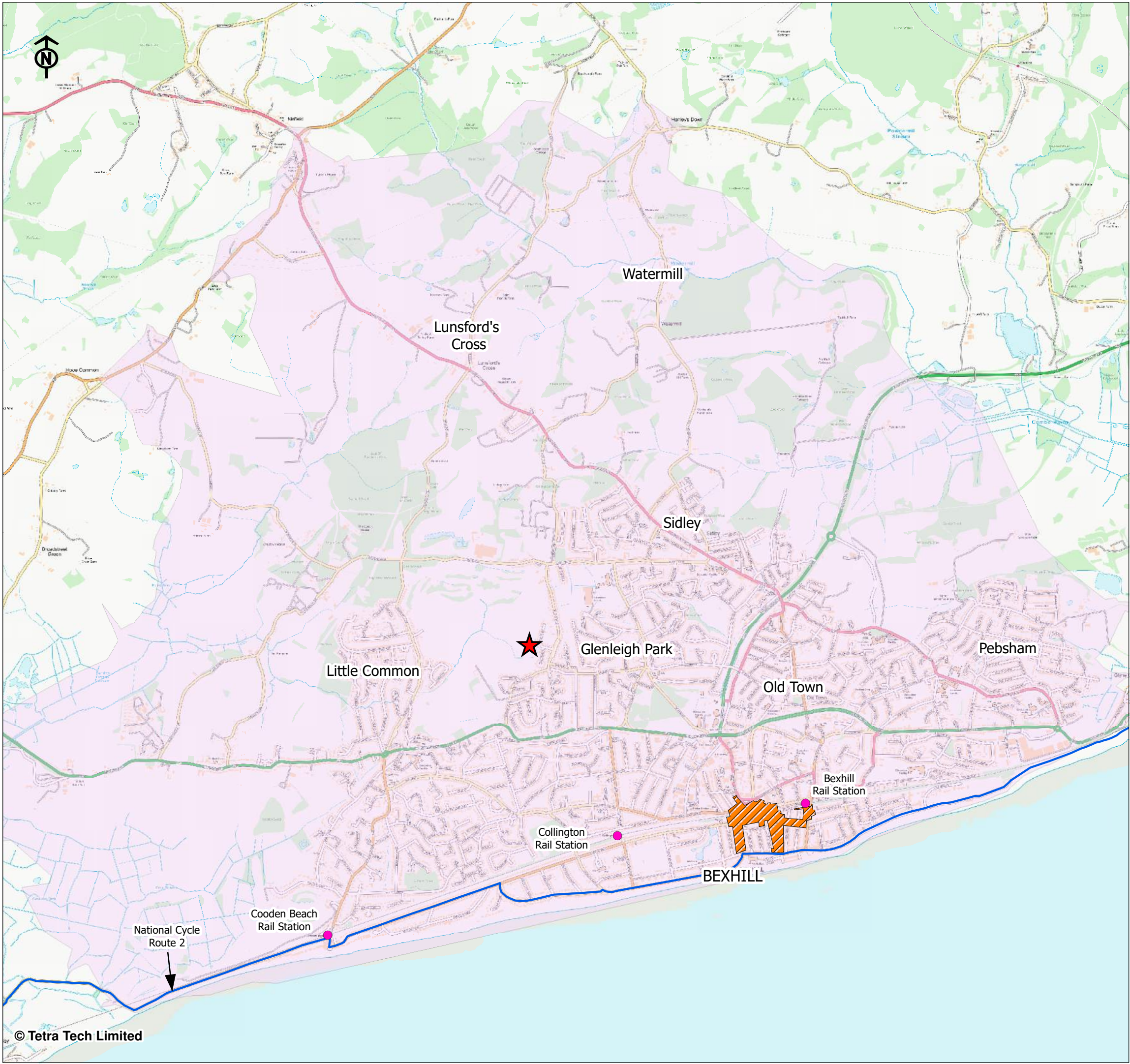
Plan 4: Pedestrian Infrastructure

Scale @ A3 1:8,000

Project No.: A115791

© Crown Copyright All rights reserved. Licence number:





# Proposed Residential Development

Bexhill, Fryatts Way

Gladman Developments Ltd

## Legend

- ★ Site Location
- Rail Station
- National Cycle Routes
- ▨ Town Centre Shopping Area
- 5km Catchment

10 June 2021

Scale: 1:27,000 @A3

NGR: 572,746 E / 109,504 N

© Crown Copyright All rights reserved. Licence number:

Plan 5: Cycle Catchment



Quay West at  
MediaCityUK,  
Trafford Wharf Road,  
Manchester,  
M17 1HH

Drawn by: Y Liu  
Checked by: M Thompson  
Office: Manchester

Drawing No. Plan 5  
Revision No.



## Appendices

## Appendix A – ESCC Comments



Rupert Clubb

BEng(Hons) CEng MICE

Director

Tel: 0345 60 80 190

www.eastsussex.gov.uk

**To: Head of Planning  
Strategy & Planning Service  
Rother District Council  
Town Hall, Bexhill on Sea  
TN39 3JX**

FAO: Ms C Gibbons

Date: 26/10/21

Ref: RR/2021/1656/P

Location: Fryatt's Way - land at, Bexhill

**Development:** Outline: Erection of up to 210 residential dwellings (including up to 30% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters to be reserved with the exception of the main site access.

<b>Road Name or Number</b>		<b>Consultation Date</b>	1 September 2021
<b>National Grid Reference</b>	572519108692	<b>Contact Officer Details</b>	Ben Lenton01273 336114ben.lenton@eastsussex.gov.uk

**Recommendation:**

<b>No objection</b>		<b>Objection</b>	<b>x</b>
<b>No objection subject to the imposition of conditions</b>		<b>Objection due to insufficient information</b>	

**Executive Summary**

The development proposal is an outline application for the erection of up to 210 residential dwellings (including up to 30% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface



water flood mitigation, vehicular access point and associated ancillary works. All matters to be reserved with the exception of the main site access.

I have concerns regarding the accessibility of the proposed residential development due to the lack of services and facilities within a suitable walking distance of the site. The nearest bus stops are also a considerable walk from the site whilst the bus service available at these stops is infrequent. The roads leading to the site are also narrow in places with no footways available along some stretches of the carriageway. The site is therefore considered to be poorly located from an accessibility perspective and it is unlikely that measures could be put in place to improve travel options sufficiently to provide residents with a viable alternative to travel by private car.

With this in mind I object to the development proposal for the following reason:

- 1. The proposed development is poorly placed in terms of sustainable transport modes due to the lack of non-car travel choices for residents and would therefore be contrary to para 104 and 106 of the National Planning Policy Framework**

## **Response**

### **The Site**

The site is located adjacent to an existing residential area approximately 2km from Bexhill Town Centre shopping area as defined in the RDC Local Plan. In the wider context it is located approximately 9km to the west of the centre of Hastings and 15km to the northeast of the centre of Eastbourne.

The site is currently an undeveloped green field which is bounded to the east by existing residential dwellings apart from a small section of the site (approximately 15m long) which forms a boundary onto Fryatts Way. To the south, west and north, the site is bounded by undeveloped green fields.

### **Accessibility**

**Pedestrian Facilities** – The pedestrian facilities in the immediate vicinity of the site are considered to be adequate; however, to improve the route to and from the site dropped kerbs and tactile paving are required either side of Concorde Close at its junction with Fryatts Way.

The walking distances to the bus services available on Turkey Road to the north and Little Common Road to the south of the site are considered to be excessive. It is also noted that the pedestrian links available are far from ideal in either direction. This is particularly evident towards Turkey Road in the north where the route is unlit and there are no footways available on Ellerslie Lane. It is also apparent that there is no opportunity to improve pedestrian facilities in this direction due to the narrow carriageway width and the lack of highway verge available. The pedestrian route in this direction is therefore considered to be poor.

To the south of the site a footway is available on Ellerslie Lane; however, to assist pedestrians wishing to cross the road dropped kerbs and tactile paving are required

either side of Ellerslie Lane at a suitable location north of the Summer Hill Road junction.

Broadoak Lane/Deerswood Lane branches to the west of Ellerslie Lane; however, the initial stretch of road from the junction has no pedestrian facilities available for a distance of approximately 50m. As this is the most direct route to the bus service on Little Common Road the lack of footway results in pedestrians being forced to walk within the carriageway on a relatively narrow stretch of road where inter-visibility between vehicles and pedestrians is poor. It would be preferred for this route to be improved for pedestrians; however, it is acknowledged that the scope for providing footways in this area is restricted by the narrow highway verge available on either side of the carriageway. Whilst this is not ideal it is noted that an alternative route to the bus stops on Little Common Road is available via Blackfield Avenue and Courthorpe Drive. This is a slightly longer route than traveling via Deerswood Lane and also poses steeper gradients; however, it is considered to be a viable option for pedestrians. Additional routes to the A259 are also available via Summerhill Road and Broadoak Lane.

The ESCC Road Safety team has been consulted on the development proposal and they have advised that there have been historical concerns raised in this area regarding the speed of traffic and the safety of pedestrians due to the lack of footway. The Road Safety Team therefore recommend that a development of this size should improve pedestrian connectivity to facilitate sustainable/ healthy transport options and reduce the dependency on use of motor vehicles within road networks that were not designed to support high volumes of traffic; however, there is little scope to achieve this on some stretches of road.

**Bus Services** - As detailed above, there are no bus stops within easy walking distance of the site that provide a frequent service to the local area. Within approximately 700m of the centre of the development site, which significantly exceeds the 400m recommended walking distance, the bus stops on Courthorpe Drive are served by the Bexhill Community Bus which provides an infrequent bus service (No.11), with four journeys a day (Monday to Saturday but with no peak or evening service).

If the proposed development is granted consent, ESCC would request that Bexhill Community Bus consider revising their route to encompass Blackfield Road and Summer Hill Road and new bus stops, placed either on the new section of route in Summer Hill Road, or on the existing section of route near the top of Knebworth Road could be provided as part of the development proposal. However, due to its infrequency and lack of peak hour service the No. 11 bus service is considered to be wholly inadequate in terms of providing residents with an alternative to the private car for journeys to work etc.

Additional bus stops are located on Gunter's Lane, West Down Road and Turkey Lane and these are served by bus route 97. The closest of these stops is located on Turkey Lane, or on Gunter's Lane, approximately 850m walking distance from the site access; however, the service available is also particularly infrequent.

The bus stops nearest to the site which offer a service suitable as an alternative to travel by private car are at the Little Common roundabout and on the A269; however, these are located approximately 2km away from the centre of the site. As the

recommended walking distance from the site to a bus stop is 400 metres this is not acceptable.

In order to improve the accessibility of the development a sizeable contribution could be sought, and this would be put towards a new pre-booked Demand Responsive Transport (DRT) to serve the site. This would provide a minibus to operate as part of a wider scheme to run the Bexhill area.

Due to the restrictive carriageway width towards the northern end of Ellerslie Lane a minibus would most likely access the development site via the Blackfields Avenue end of the road. Within the development a mobility hub would be required, and this should include a turning place for the DRT minibus, good quality waiting facilities, ie shelter, seating, lighting, cycle storage plus excellent walking and cycling routes between the hub and dwellings.

A contribution of £300k would be sufficient to fund a DRT service for 3 years and we would also require the travel plan to be provided as part of the development proposal to include provision 6 months discounted DRT travel for new residents. However, the service this would provide residents with would remain less than ideal and I would be concerned that once funding ceases the service would no longer be viable and residents would again be reliant solely on travel by private car.

With this in mind, whilst the applicant could make contributions towards public transport and improve some pedestrian links in the area the distance from the site to a reliable public transport service would not be adequately addressed. The accessibility of site therefore remains unacceptable.

### **The Development Proposal**

The proposals comprise up to 210 residential units including 30% affordable housing (up to 63 houses), planting landscaping, public open space and sustainable drainage system (SuDS). All matters are reserved except for access and therefore the housing mix, internal layout and parking provision are yet to be finalised.

Access to the site is via Fryatts Way which is a cul de sac running from a priority junction on Ellerslie Lane, with another, shorter cul de sac, Concorde Close, running off Fryatts Way at a priority junction. serving a number of detached houses each with private off-street parking for two or more cars.

Ellerslie Lane forms part of a local distributor route.

### **Site Access**

Vehicle and pedestrian access to the development will be from Fryatts Way via a priority junction.

The site access road will be 5.5m wide with 2m footways provided on both sides of the carriageway which will connect with the existing pedestrian infrastructure on Fryatts Way.

The submitted drawing shows that visibility splays appropriate for the 30mph speed limit along Fryatts Way can be provided either side of the new access.

Tracking drawings have also been provided to demonstrate that the proposed access layout can accommodate a large refuse vehicle, a removal van, and a fire tender safely manoeuvring in and out of the site from Fryatts Way.

The tracking drawings show that the vehicles will have to travel on the opposite side of the carriageway for a short distance when turning in and out of the site access junction but given that there are only likely to be infrequent large vehicle movements and Fryatts Way is very lightly trafficked, this is considered to be acceptable. Nonetheless, there is a risk that any on-street parking on this stretch of road would obstruct this turning manoeuvre and with this in mind parking restrictions may be required on the opposite side of the road to the new access. The need for these parking restrictions should be assessed following the occupation of the development and whilst their provision is unlikely to be necessary a financial contribution secured through via a legal agreement will be required to fund the monitoring process and also a Traffic Regulation Order if parking restrictions are required.

Overall, I have no major concerns regarding the proposed access off Fryatts way as vehicle speeds on this residential cul-de-sac are low and good visibility is available in each direction. The access width and radii proposed are also considered to be appropriate for a development of this type.

Dropped kerbs and tactile paving should be provided on either side of the access for the benefit of pedestrians walking on the south west side of Fryatts Way.

It should be noted that the access will need to be constructed in accordance with ESCC specification with all works carried out by an approved contractor and under the appropriate license or legal agreement.

### **Internal layout**

This is an outline application with all matters reserved except for access and therefore the internal layout and parking provision details provided are limited. These details will be submitted and finalised at reserved matter 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:

- Clarification would be required regarding the extent to which the internal layout will be put forward for adoption.
- A minimum width of 5.5m is generally required for the main 'spine road'. A minimum width of 4.8m is required for the secondary roads.
- We would not wish to adopt the car parking areas.
- Tracking drawings are required to ensure that the site layout can accommodate the largest refuse vehicles likely to serve the development.
- Further information would be required regarding the surfacing and lighting within the site.

- 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 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
- Bus infrastructure – provision of a mobility hub, and this should include a turning place for the DRT minibus, good quality waiting facilities, ie shelter, seating, lighting, cycle storage plus excellent walking and cycling routes between the hub and dwellings. The requirements to accord with advice by both highway authority and the bus service provider.

Road adoption would be secured through a s38 agreement. 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 Reserve 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.

The proposed housing mix is yet to be confirmed and therefore the level of parking required cannot be calculated at this stage; however, ESCC's Guidance for Parking at New Residential Development should be taken into account when finalising the level and type of parking provided within the site.

For guidance 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
- Disabled Parking Space - 5m x 3.6m
- Garages: 3m x 6m or 3m x 7m if cycle storage is included.

Regardless of size, garages remain less likely to be used for parking and therefore count for only 1/3 of a parking space.

Adequate visitor parking spaces should be distributed throughout the site to prevent excessive on-street blocking access for refuse vehicles.

Tandem parking is unlikely to be utilised to its potential, especially if both cars are in regular use.

The Council encourages developers to include charging facilities for electric vehicles at all properties with off-street parking in accordance with current standards and codes of practice as and when they become available. Charging points should also be considered for other parking areas.

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 East Sussex County Council standards which are 1 space per unit for one & two bedroom dwellings and 2 spaces per dwelling with three bedrooms or more. If communal storage is provided for flats then 0.5 spaces would be required per unit.

### **Trip Generation & Highway Impact**

In order to determine the impact of the proposal on the local highway network, the following junctions were identified as requiring detailed junction capacity assessment:

- J1: Site Access / Fryatts Way Priority Junction
- J2: Ellerslie Lane / Fryatts Way Priority Junction
- J3: Ellerslie Lane / Turkey Road / St Mary's Road Staggered Junction
- J4: Turkey Road/A269 Ninfield Road Mini Roundabout
- J5: Little Common Roundabout
- J6: Broadoak Lane /A259 Little Common Road Priority Junction
- J7: A269 / A259 Signal Junction

For the purpose of the impact assessment 2028 baseline traffic flows for the AM and PM peak hours have been obtained from the East Sussex Saturn Model. 2028 Saturn baseline traffic flows also includes the committed developments in the vicinity of the site

In order to determine the level of traffic likely to be generated by the development the Transport Reports submitted as part of the previous planning applications made use of the TRICS database to compare the proposal with similar developments in the UK.

Based on trip rates derived from this assessment the proposed residential development is estimated to generate approximately 120 two-way trips during the weekday morning peak hour and 120 two-way trips in the evening peak hour.

Trip distribution has been determined based on the 2011 Census 'journey to work'. This dataset contains information on the location of employment and the method of travel. It contains origin-destination data at the Middle Super Output Area (MSOA) level.

As Fryatts Way is a dead-end to the north, all development traffic will turn right out of the site onto Fryatts Way and progress to the junction with Ellerslie Lane.

The most likely route (or routes) between the development site and employment areas has been identified using Google Map routing. Traffic generated by the proposal was then distributed onto the local highway network using this distribution.

Based on the above distribution of traffic the development proposal is likely to generate the following traffic movements at each of the junctions nearest the site during both the AM and PM hour periods:

From Fryatts Way onto Ellerslie Lane 39 traffic movements are likely to head to and from the north with 82 traffic movements to and from the south

Of the 82 vehicles travelling to and from south approximately 50 will use Summer Hill Road and continue towards the A259 or east along Broadoak Lane.

The remaining 32 vehicles will travel to and from the south to the A259 via Broadoak Lane and Deerswood Lane.

To derive the future year assessment flows (i.e. 2028 with development) the development trip generation flows were added to the 2028 baseline flows.

The results of the capacity assessments demonstrate that the following junctions will continue to operate within their operational capacity:

- Site Access / Fryatts Way Priority Junction
- Ellerslie Lane / Fryatts Way Priority Junction
- Ellerslie Lane / Turkey Road / St Mary's Road Staggered Junction
- Turkey Road/A269 Ninfield Road Mini Roundabout

The increases in queues, delays and degree of saturation due to the inclusion of the development traffic on these junctions is low, and therefore the developments impact could not be considered severe or significant.

The assessment of the Little Common roundabout indicates that the junction will exceed capacity in both the base and with development scenarios. However, as these junctions form part of the A259 trunk road Highways England will comment on this aspect of the assessment.

Although the above assessment demonstrates that development traffic would not have a detrimental impact on local junctions from a capacity perspective, it is considered that the proposal would result in a material increase in traffic on Ellerslie Lane and the roads leading south of the site to the A259.

The key local roads to the site are identified as:

- Fryatts Way.
- Ellerslie Lane and Turkey Road which will be used by traffic accessing the site from the north, north east and north west.
- Broadoak Lane which provides access to the A259 to the south west.
- Summerhill Road / Knebworth Road which provide access to the A259 and Bexhill Town Centre to the southeast.

In order to help understand the likely impact of development traffic on these roads the Transport Assessment has assessed each in terms of their width and availability of pedestrian facilities etc:

- Fryatts Way is a two-way single carriageway cul-de-sac road that is subject to a 30mph speed limit. There are footways and street lighting present on both sides of the carriageway. The northern end of the street is the cul-de-sac with the eastern end of the road forming the minor arm of a priority junction with Ellerslie Lane.
- Ellerslie Lane is a two-way single carriageway road which extends north to south. It is subject to a 30mph speed limit. Approximately 620m to the north of its junction with Fryatts Way, Ellerslie Lane forms the minor arm of a priority junction with Turkey Road. Approximately 150m to the south of Fryatts Way, Ellerslie Lane forms a crossroad junction with Broadoak Lane and Blackfields Avenue.
- To the south of Ellerslie Lanes junction with Fryatts Way, footpaths are present on both sides of the carriageway. Where frontage access to residential dwellings are provided, Ellerslie Way features street lighting. Along its full length, Ellerslie Way is subject to a Traffic Regulation Order which restricts vehicles larger than 6ft 6inches (198cm) in width from travelling along the road, except for access.
- Turkey Road is a two-way single carriageway road that is subject to a 30mph speed limit. Close to its junction with Ellerslie Road, footways and street lighting are present on both sides of the carriageway. Turkey Road is also a bus route.
- Broadoak Lane is a two-way single carriageway road that is subject to a 30mph speed limit. The road extends from the A259, approximately 560m to the south west of Broadoak Lane's junction with Ellerslie Way to West Down Rd approximately 700m to the east. It features intermittent footways and continuous street lighting to both sides of the carriageway. The southernmost section between Courthope Drive and the A259 is also a bus route. At its southern end, Broadoak Lane forms the minor arm of a ghost island right turn priority junction with the A259 (Little Common Road).
- Summer Hill Road / Knebworth Drive are single carriageway roads that are subject to a 30mph speed limit. Footways and street lighting are present on both sides of the carriageway. At its western end, Summer Hill Road forms the minor arm of a priority junction with Ellerslie Lane. Summer Hill Road extends eastwards from Ellerslie Lane for approximately 190m before turning south as Knebworth Drive and heading southwards for approximately 450m until it meets with the A259 (Little Common Road) where it forms the minor arm of a ghost island right turn priority junction.

The roads leading to the site have also been assessed in detail to establish carriageway widths to determine whether the width of local roads will be able to accommodate the traffic likely to be generated by the proposed development.

A plan has been submitted (Appendix C of the TA) indicating that all roads in the vicinity of the site have a width greater than 4.1m and therefore all the roads near the site are wide enough to accommodate two cars travelling in the opposite direction.

The plan shows that most local roads are greater than 5.5m wide with just a few sections of road less than 5.5m wide. The sections of road that are less than 5.5m wide are mostly located along Ellerslie Road to the north of Fryatts Way where the road width ranges from



between 4.1m to greater than 5.5m wide. There is just one section of road on Ellerslie Road to the south of Fryatts Way that is less than 5.5m wide (being between 4.8m and 5.5m wide) with a further section of Knebworth Road ranging in width between 4.8m and 5.5m. There is also a section of Broadoak Lane to the south of the site which is also between 4.1 and 4.8m wide.

The TA concludes that whilst parts of the road network in the vicinity of the site are relatively narrow, the majority of the network can accommodate two goods vehicles travelling in the opposite direction at the same time. The TA also states that there are no parts of the network where two cars cannot pass each other.

Having reviewed and assessed the above roads myself it is accepted that the majority of the network can accommodate two-way traffic; however, Ellerslie Lane is particularly narrow on the section leading towards Turkey Road to the north of the site, as is Broadoak Lane leading up to the junction with Ellerslie Lane. Although a carriageway width of 4.1m is maintained along these stretches of road it is unlikely, given the alignment of the road, that two-way traffic could be accommodated throughout and therefore on occasions a shuttle system operates when traffic meets head on with vehicles waiting on wider stretches of road to allow the other to pass.

This is less than ideal, especially as there are no footways available to pedestrians travelling these routes; however, the flows on the roads serving the site would remain relatively low post development with approximately 80 additional vehicles using Ellerslie Lane to the south and 40 vehicles to the north during the peak hours. It is acknowledged that this would constitute a significant increase in traffic using Ellerslie Lane, especially to the south of the site; however, with a number of routes available to traffic travelling in this direction, flows will be distributed further which in turn will reduce the impact on individual roads. Alternative routes are also available to pedestrians, especially those travelling southwards, and therefore, whilst not ideal, there is scope to avoid the narrow stretches of carriageway which lack footways.

With this in mind, despite having some concern regarding the restrictive nature of some stretches of road serving the site, based on the capacity assessments undertaken and the above observations I am satisfied that the roads will not be adversely affected by the additional traffic generated by the development proposal and will continue to function in a satisfactory manner.

### **Travel Plan**

A travel plan framework has been submitted and this covers some of the points required; however, a full Travel Plan will be required for this development and this will be secured by legal agreement (Sec106). The legal agreement will need to secure the following:

- The agreement of a “measures” approach which; a) specifies targets / outcomes; and, b) identifies specific measures designed to achieve the agreed targets / outcomes and c) identifies the remedies and/or sanctions that shall be applied if the targets / outcomes are not achieved.
- The appointment of a Travel Plan Coordinator to coordinate implementation of the TP and take responsibility for achieving targets including handover arrangements from the developer to a management or residents’ group.

- The completion of the appropriate monitoring reports, including multi-modal travel surveys to be carried out for five years following occupation/operation of the Development based on the standard survey requirement in East Sussex, i.e. a Level 2 TRICS survey (known in this context as SAM: Standard Assessment Methodology).
- The provision of 6 months discounted DRT travel for new residents. This would need to be arranged between the developer and the bus service provider.

The travel plan will be secured through an appropriate legal agreement and surveys will be expected to be submitted at baseline stage (min occupancy of 20 units) and year 1, 3 and 5. The TP will attract an auditing fee of £6000.

### **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.

### **Conclusion**

The capacity assessments undertaken as part of the development proposal demonstrate that development traffic would not have a detrimental impact on local junctions from a capacity perspective.

It is, however, acknowledged that the proposal would result in a material increase in traffic on Ellerslie Lane and particularly the roads leading south of the site to the A259.

Some of the roads serving the site are narrow in places, particularly Ellerslie Lane on the section leading north towards Turkey Road, and Broadoak Lane leading up to the junction with Ellerslie Lane to the south.

During busier periods of the day the narrow carriageway widths on these roads result in a shuttle system operating when traffic meets head on with vehicles being forced to wait on wider stretches of road to allow the other to pass.

This is less than ideal; however, the assessments carried out demonstrate that despite the additional traffic that would be generated by the proposed development the overall flows on the roads serving the site would remain relatively low during the peak hours of the day.

It is also noted that the most likely route (or routes) between the development site and employment areas is to and from the south. Therefore, with a number of routes available to traffic travelling in this direction, flows will be distributed further which in turn will reduce the impact on individual roads.

With this in mind, despite having some concern regarding the restrictive nature of some stretches of road serving the site, based on the capacity assessments undertaken and the above observations I am satisfied that the roads will not be adversely affected by the

additional traffic generated by the development proposal and will continue to function in a satisfactory manner.

I have concerns regarding the accessibility of the site as it is located a considerable distance away from bus stops which would provide residents with a frequent service. Residents of the development would therefore have few opportunities for alternative modes of travel available and this would in turn result in an over-reliance on the private motor car. Facilities such as shops, doctor's surgery, schools, pubs etc are also located a significant distance away from the site whilst footway connections within the area are also poor in places.

Based on these observations the site is considered to be poorly located from an accessibility perspective and as opportunity for improvements to be put in place as part of the proposal is limited the development proposal as submitted is considered to be unacceptable and I therefore object on this basis.

**Note** - In order to address this issue suitable measures will need to be put in place to improve travel options for residents and to provide a viable alternative to travel by private car; however, it is unclear at this stage whether this is feasible. RDC Policy Team should therefore advise as to whether the north-west quadrant of Bexhill can be managed in terms of local public sustainable transport measures in their future local plan.

**In the event that consent is granted I would wish for the conditions listed below to be attached.**

Also, the off-site works that I would wish to secure as part of this development via a S106/278 agreement are:

- The provision of a new access into the site off Fryatts Way.
- The provision of dropped kerbs and tactile paving either side of the new access.
- The provision of dropped kerbs and tactile paving either side of Concorde Close at its junction with Fryatts Way.
- The provision of dropped kerbs and tactile paving on Ellerslie Lane in a suitable location north of the Summer Hill Road junction.
- Possible provision of a pair of new bus stops, placed either on the new section of route in Summer Hill Road, or on the existing section of route near the top of Knebworth Road. Both stops will require raised kerbs, hard standing, bus stop poles and bus stop clearway markings.

The Financial Contributions I wish to secure as part of this development are:

- A sum of £300k to fund a Demand Responsive Transport (DRT) to serve the site for 3 years.
- A sum of £5,000 towards a Traffic Regulation Order if parking restrictions on Fryatts Way are required. If the TRO hasn't been required within 3 years of occupation the sum will be returned.
- A Travel Plan auditing fee of £6000.

**Conditions**

1. The development shall not be occupied until details of the layout of the new access and the specification for the construction of the access have been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the development not be occupied until the construction of the access has been completed in accordance with the agreed specification.

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway

2. The access shall not be used until appropriate visibility splays are provided in each direction. The splays are to be cleared of all obstructions exceeding 600 mm in height and kept clear thereafter.

Reason: In the interests of the safety of persons and vehicles entering and leaving the access and proceeding along the highway

3. The development shall not be occupied until parking area have been provided in accordance with the approved plans/details which have been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the area shall thereafter be retained for that use and shall not be used other than for the parking of motor vehicles

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway

4. The development shall not be occupied until cycle parking area have been provided in accordance with the approved plans/details which have been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the areas shall thereafter be retained for that use and shall not be used other than for the parking of cycles.

Reason: In order that the development site is accessible by non car modes and to meet the objectives of sustainable development.

5. The development shall not be occupied until a turning space for vehicles has been provided and constructed in accordance with the approved plans/details which shall have been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the turning space shall thereafter be retained for that use and shall not be used for any other purpose;

Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway

6. Prior to the commencement of development details of the proposed surface water drainage to prevent the discharge of surface water from the proposed site onto the public highway and, similarly, to prevent the discharge of surface water from the highway onto the site shall be submitted to the Local Planning Authority for approval in consultation with the Highway Authority.

Reason: To ensure the appropriate management of surface water on and adjacent to the highway and prevent an increased risk of flooding

7. The new estate roads shall be designed and constructed to a standard approved by the Planning Authority in accordance with Highway Authority's standards with a view to their subsequent adoption as (a) publicly maintained highway

Reason: In the interest of highway safety and for this benefit and convenience of the public at large

8. Prior to the commencement of development on site, detailed drawings, including levels, sections and constructional details of the proposed road(s), surface water drainage, outfall disposal and street lighting to be provided, shall be submitted to the Planning Authority and be subject to its approval, in consultation with the Highway Authority

Reason: In the interests of highway safety and for the benefit and convenience of the public at large

9. 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 routeing 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.

10. No part of the development shall be occupied until a Travel Plan Statement 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.

## **Informative**

1. This Authority's requirements associated with this development proposal will need to be secured through a Section (106/184/171/278) Legal Agreement between the applicant

and East Sussex County Council The applicant is requested to contact the Transport Development Control Team (01273 482254) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.

2. Section 38 Agreement of the Highways Act, 1980 – Provision of Adoptable Highway  
The applicant is advised to enter into a Section 38 legal agreement with East Sussex County Council, as Highway Authority, for the proposed adoptable on-site highway works. The applicant is requested to contact the Transport Development Control Team (01273 482254) to commence this process. The applicant is advised that any works commenced prior to the Sec 38 agreement being in place are undertaken at their own risk.

3. 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.

-----  
On behalf of the Highway Authority  
For Director of Communities, Economy and Transport (semt by email)

*HRNoObjsubCond*

**HT401**

## Appendix B – Footway Works Drawing



- Notes
1. This drawing should be read in relation to the subject of the title only. Other information shown on the drawing is to be considered indicative only. References should be made to appropriate drawing series/specifications for other information.
  2. All dimensions are in metres unless specified otherwise
  3. This drawing is based on OS Mapping. Tetra Tech does not take responsibility for any discrepancies.

- Key
- Tactile Paving
  - Transition Kerb
  - Dropped Kerb

PRELIMINARY ISSUE

P01	PRELIMINARY FIRST ISSUE	22.02.2022	CB	MT	LR
Rev	Description	Date	Drawn	Checked	App

Document Control

Issuing Office  
**Tetra Tech Manchester**  
Quay West at Media City UK,  
Trafford Wharf Road, Trafford Park,  
Manchester, M17 1HH  
**Tel:** +44 (0)161 872 3223  
www.tetrattechurope.com



Client  
Gladman Developments Ltd.

Project Name  
Bexhill, Fryatts Way

Sheet Title  
Potential dropped kerb and tactile paved pedestrian crossing on Ellerslie Lane to the north of its junction with Summer Hill Road

TTE Project Number	Drawn By	Date	Checked By	Date	Approved By	Date	Scale @ A3	Suitability
A115791	CB	Feb '22	MT	Feb '22	LR	Feb '22	As Shown	S0
Client Project Number	Originator	Volume/System Level/Location	Type/Code	Role	Number	Revision		
A115791	- TTE	- 00 - XX	- PL	- D	- 001	P01		