Gladman House
Alexandria Way
Congleton
CW12 1LB

FAO Clare Gibbons
Rother District Council
Planning Division
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX

28th June 2022

Dear Clare

RE: Outline planning application for 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.

This technical note has been prepared at the request of the Rother District Council Planning Team and brings together all of the measures offered by the applicant through the planning application process.

1.0 **Background**

1.1 Gladman Developments Limited (Gladman) submitted an outline planning application to Rother District Council (LPA) on 29th June 2021.

1.2 The LPA validated the application on 31st August 2021 with an anticipated decision date of 30th September 2021.

1.3 East Sussex County Council (ESCC) Highways provided a consultation response to the application on 26th October 2021 objecting stating the "… proposed development is poorly placed in terms of sustainable transport modes due to the lack of non-car travel choices for residents…" (see Appendix A).

1.4 Gladman submitted Technical Note 2 (prepared by Tetratech) on 25th February 2022 which responded to the ESCC Highways comments (we have not replicated this note herein).

1.5 The LPA provided an email (dated 20th April 2022) with an extract response from ESCC Highways (see Appendix B) which concluded "… I remain concerned that the site is poorly located from an accessibility perspective; however, the provision of a DRT service for residents and improvements to the cycle/pedestrian link west of the site to Little Common would go some way to improving sustainable travel choice for new residents and this may be sufficient for my objection to be withdrawn.
It is therefore recommended that the developer investigate the provision of the improvement works proposed in the LCWIP at an early stage."

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1.6 Gladman requested meetings with the LPA and ESCC Highways to discuss the provision of improvement works and the DRT service on 21st April 2022, 5th May 2022, 10th May 2022 and 19th May 2022 but these requests were not met.

1.7 The LPA replied on 27th May 2022 to suggest Gladman put forward measures for consideration to address the points raised by ESCC Highways in terms of the application site constituting a sustainable location.

1.8 Gladman offered via email on 30th May 2022 (see Appendix C) a financial contribution towards expanding the Demand Responsive Transport (DRT) system currently operating in the area but requested confirmation this could be expanded to cover the application site. As an alternative Gladman proposed an on-site based car club using electric vehicles that could be used by new residents as well as existing occupiers in the area.

1.9 In the same email Gladman offered a monetary contribution towards footpath and cycleway improvements along the ESCC LCWIP routes 296.2 and 296.3 which seemed to be most aligned with the scheme proposals.

2.0 **Developer Proposals/Offering**

2.1 Gladman offers, secured through a s.106 legal agreement, the following provision in order to respond directly to ESCC Highways comments dated 20th April 2022:-

(a) A financial contribution (at a level to be agreed) towards the increased cost for the DRT to allow its expansion to cover the application site and allow users to access a to-the-door sustainable transport system. We'd welcome confirmation from ESCC Highways on the level of contribution required; or

(b) A financial contribution of £80,640.00 to provide an EV car club scheme on site for the use of new and existing residents. This scheme would be operated by HiyaCar or similar and provide up to 7 new vehicles. The scheme is funded by the developer for an initial 3-year period after which it becomes a self-funding model. The level of contribution is based on estimated costings provided at Appendix D (redacted to exclude mention of other sites) along with Developer Slides at Appendix E and Collaborative Mobility UK (CoMoUK) at Appendix F; and

(c) A financial contribution (at a level to be agreed) towards footpath and cycleway improvements to routes 296.2 and 296.3 of the ESCC LCWIP. We'd welcome confirmation from ESCC Highways on the level of contribution required.

2.2 It is proposed items (a) and (b) are interchangeable whereas item (c) is offered alongside the preferred option. These would be secured through a s.106 legal agreement.

3.0 **Next Actions**

3.1 ESCC/LPA to confirm which of option 2.1(a) or 2.1(b) is their preferred option. In respect of 2.1(a) a monetary sum should be identified by ESCC/LPA for inclusion in a s.106 agreement. Confirmation that the existing scheme can be extended to serve the application site should be provided by ESCC/LPA.

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3.2 ESCC/LPA to confirm the monetary sum to be secured by s.106 legal undertaking in respect of footpath/cycleway improvements to routes 296.2 and 296.3 of the ESCC LCWIP.
3.3 Gladman to include agreed contributions and measures in s.106 legal undertaking.

We also reiterate our willingness to work with the council through the application process and would welcome discussions and/or meetings in connection with our proposals.

Yours faithfully

Steve Barker
Senior Project Manager
On behalf of Gladman Developments Ltd
s.barker@gladman.co.uk

Appendix A

Communities Economy and Transport

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East Sussex County Council

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.

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

Recommendation:

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

Executive Summary

The development proposal is an outline applicatin 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 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 Courthope 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 the 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 se 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 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 though 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 practise 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 are 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.

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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 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 temporaryTraffic 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

From:	Clare Gibbons
To:	Sian Gulliver
Cc:	Victoria Richardson; Steve Barker
Subject:	RE: Land off Fryatts Way, Bexhill - Response from East Sussex County Highways
Date:	20 April 2022 10:01:24
Attachments:	image001.png image002.png image009.png

Dear Sian,

Further to the emails below, please find following the recent response from East Sussex County Highways:

Apologies for the delay in getting back to you on this.

I have been waiting for input from our Strategic Economic Infrastructure team on the best way forward; however, I am now able to provide the following response to the points raised in the submitted Technical Note:

Matter 1 Bus Frequency - journey to work census data has found that the mode share for bus is 0.7% in the Rother 009F and it is therefore suggested that this is evidence 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. However, the data provided reinforces my concern that the lack of a frequent service within walking distance of the site means that for new residents travel by bus is not a realistic alternatively means of transport to the private car. It also confirms that the infrequent bus service that is available relatively nearby is not generally utilised by residents in the area. With this in mind I am doubtful that the Travel Plan, which consists mainly of the provision of information packs, would have a significant impact on the travel behaviour of residents.

Matter 2 Pedestrian Infrastructure – It is acknowledged that whilst pedestrian facilities are not ideal on some stretches of road (and lacking altogether on the route north to Turkey Road) there are alternative routes available to pedestrians, especially those travelling southwards and that there is scope to avoid the narrow stretches of carriageway which lack footways.

Matter 3: Walking Distances to Bus Stops – the submitted information confirms that for residents in the area there is a high dependency on the private car for transport and that the bus service is little used. This is likely to be due to the infrequent and limited bus service available in the local area and the excessive walking distance to the much better services available at Little Common.

Funding the DRT service for 3 years would go some way to improving sustainable travel choice for new residents; however, this type of service is only likely to be useful for some types of journeys. With this in mind there remains a need for additional measures to be put in place to improve travel options for residents in the area and to provide a viable alternative to travel by private car.

In order to achieve this we would expect the developer to consider the information within the County Council's Local Cycling and Walking Infrastructure Plan (LCWIP). This should in particular consider walk and cycle times to key trip attractors including the bus services and facilities available at Little Common.

The East Sussex LCWIP provides a good evidence base on the current networks and potential suggested improvements to these networks.

Appendix 5G Sustrans LCWIP Report Bexhill Final.pdf (eastsussex.gov.uk)

Of particular relevance to this site are routes 296.2 and 3 (see Page 8 of the report) which would provide a safer and slightly shorter route for cyclists and pedestrians west of the site via Deerswood Lane towards Green Lane, which then leads south to Little Common. The recommendations for improving the route are listed further on in the report.

Route 298 also leads south from the local area to the A259 and beyond; however, the route west on the A259 is not ideal for cyclists and so accessing Little Common Roundabout from here would be more convoluted.

Therefore route 296 in particular would be relevant to this site and would provide a more direct and safer route for residents to and from Little Common and I would therefore recommend that the applicant investigates further the improvements that would be required to make this a more desirable route for cyclist and pedestrians as feasibility work or costing has not yet been undertaken on this route by ESCC.

Following this further discussions will be required between the developer and ESCC to determine how to secure the improvement works as part of the development proposal. This may be through the provision of a financial contribution or alternatively the developer may be required to carry out the works themselves under the appropriate legal agreement.

Technical transportation analysis, which involves reviewing the accessibility of development locations, improving and promoting active travel, is currently being undertaken as part of the evidence base for the next Local Plan. The conclusions of this work, support the approach I have suggested.

To conclude, I remain concerned that the site is poorly located from an accessibility perspective; however, the provision of a DRT service for residents and improvements to the cycle/pedestrian link west of the site to Little Common would go some way to improving sustainable travel choice for new residents and this may be sufficient for my objection to be withdrawn.

It is therefore recommended that the developer investigate the provision of the improvement works proposed in the LCWIP at an early stage.

I look forward to receiving your comments in due course,

Kind regards,

Ms Clare Gibbons BA, DipTRP, MRTPI,
Development Management Team Leader
Directorate of Place and Climate Change

Appendix C

From:	Victoria Richardson
To:	Clare Gibbons
Cc:	Steve Barker; Sian Gulliver; Jeff Pyrah
Subject:	RE: Land off Fryatts Way, Bexhill - Response from East Sussex County Highways
Date:	30 May 2022 15:29:57
Attachments:	image004.png image006.png image008.png image015.png

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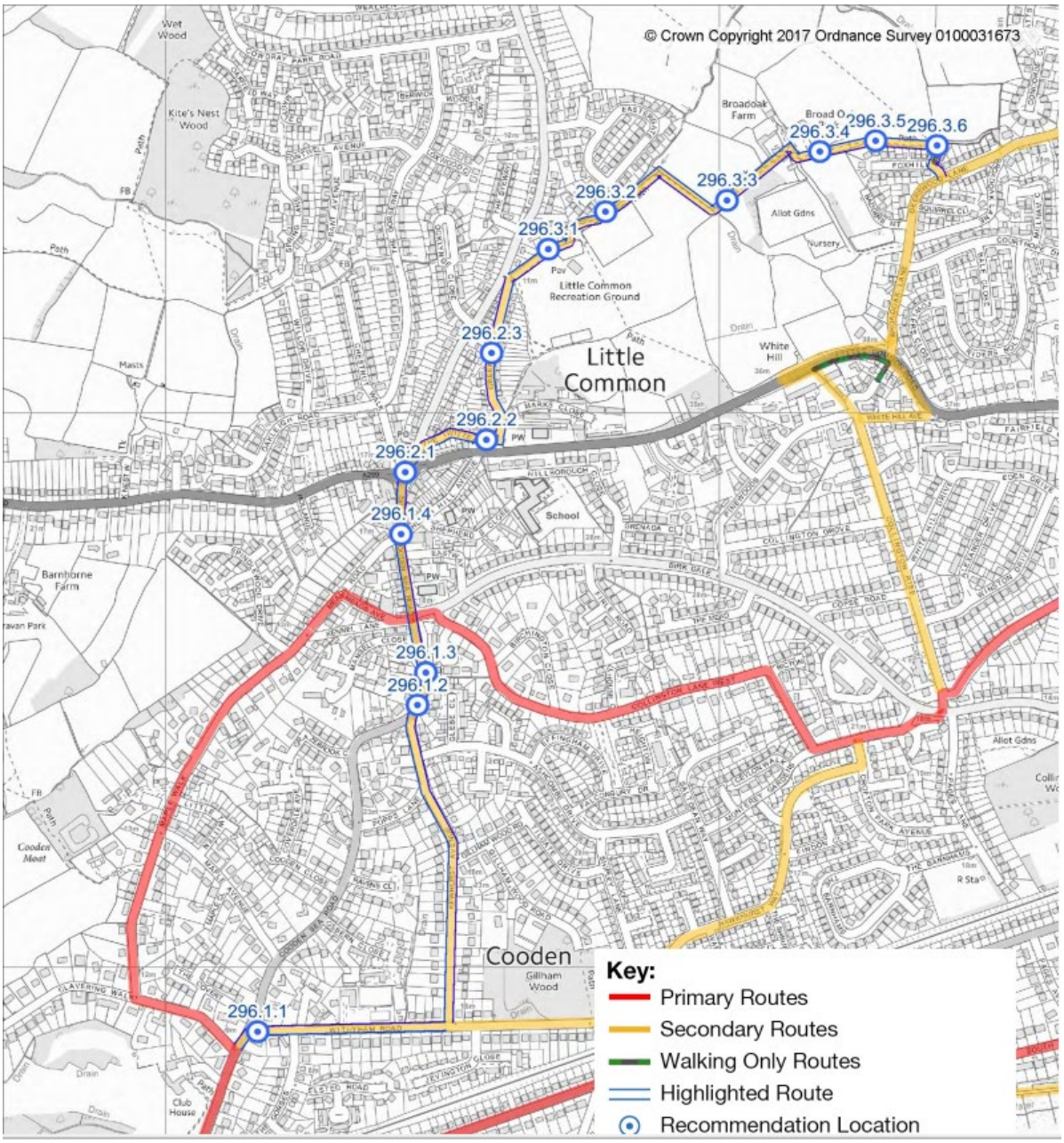
Dear Clare,

Many thanks for your prompt response.

In respect of the concerns raised about whether the application site constitutes a sustainable location, these have been addressed in our TN2 – Response to ESCC comments sent to you on 25th February 2022. The response sent to us on 20th April maintains concern around the use of public transport as a sustainable travel option. Whilst we do not agree with this position, we consider that:-

- In respect of the DRT – if ESCC can offer us certainty there is an existing service in place that can be expanded we can agree to make a reasonable contribution. However, maybe instead of the DRT we offer a car club scheme whereby we commit to providing a hybrid or fully electric vehicle on site for a 3 year period which is bookable through HiyaCar and leads to a self-funding sustainable transport option over the longer-term. As demand grows HiyaCar will increase the number of vehicles available for use. This would be a system bookable by residents and non-residents of our scheme. This should address Matter 1 and 3;
- We would also welcome your thoughts on the potential of a CIL-compliant contribution through this application process towards the improvements identified along 296.2 and 296.3 (as shown below) of the East Sussex LCWIP to further respond to Matter 3?



Overall, we consider that through the provision of a DRT service (or a Car Club such as HiyaCAR) and improvements to the cycle/pedestrian link, this objection could be overcome. Therefore, I would welcome the opportunity to discuss these measures, if you would be amenable to a Teams meeting?

Kind regards,
Tori

Victoria Richardson | Assistant Planner

T: 01260 288 914 | **M:** 07976 745266 | v.richardson@gladman.co.uk
www.gladman.co.uk

Appendix D

From: Keith Stark
To: Steve Barker
Cc: Sian Gulliver; Victoria Richardson
Subject: Re: Car Club
Date: 22 June 2022 11:05:20
Attachments: [redacted]

Good Morning Steve,

Sorry for the delay in coming back to you.

I have now had a chance to look at the sites you have mentioned [redacted]:

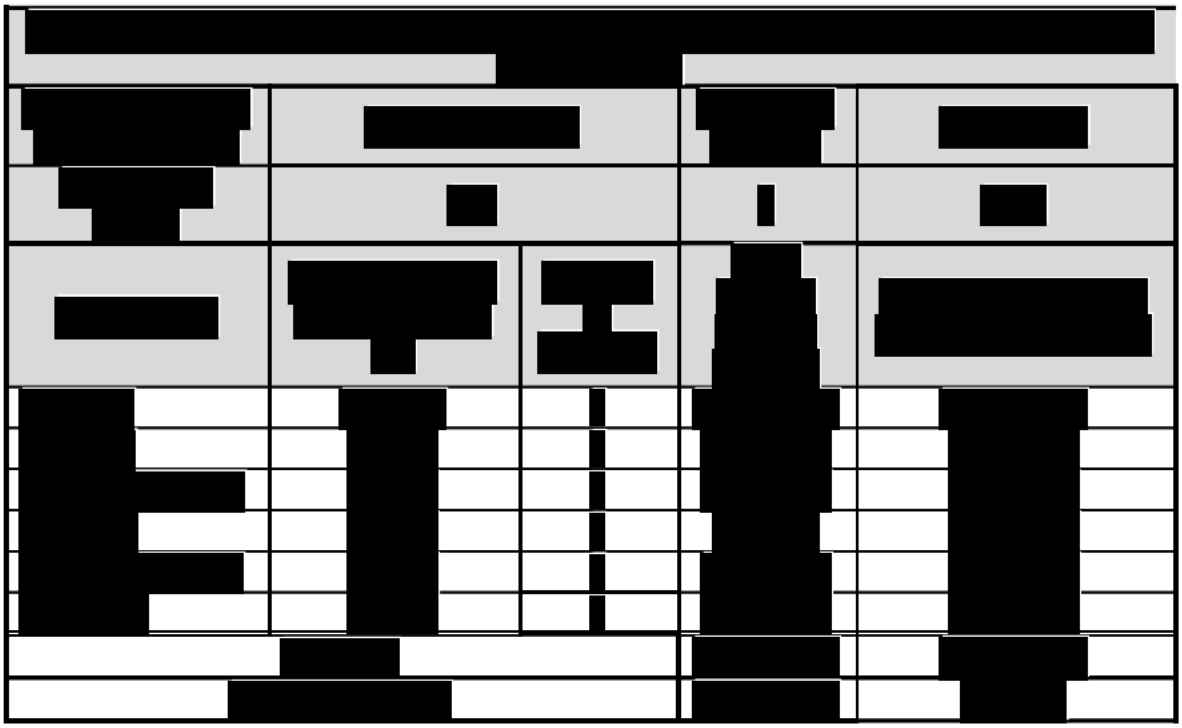
Post Code	Address or Name	How Many Units	Number of cars	Anticipated Occupation
TN39 4LW	Bexhill, Fryatts Way - Car Club	210	7	2025
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

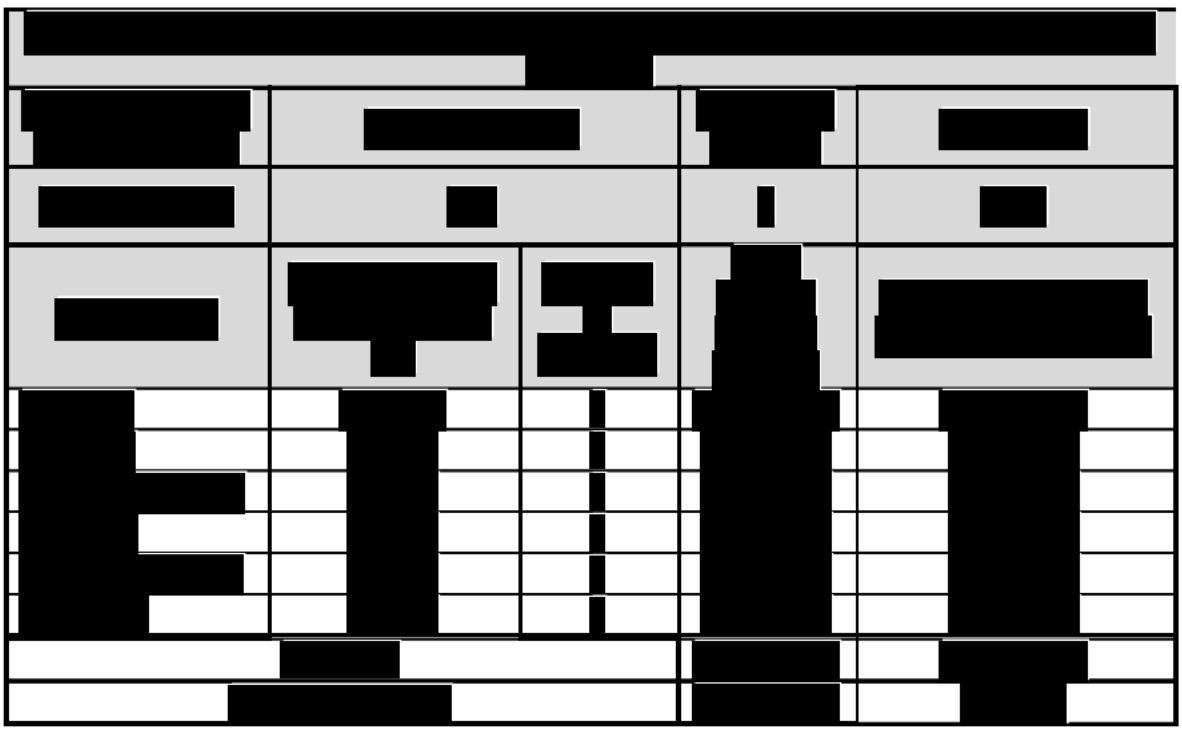
I have attached a Steer heat map which indicates that there is good potential uptake for a car club in Bexhill. I believe that working with yourselves we would be able to provide a thriving car club scheme in the area providing a number of significant benefits for the new residents as well as the existing community. I have attached some slides which give a bit more information about the benefits which car clubs can deliver in new developments as well CoMoUK's recently published 'New developments and shared transport: cutting car dependency' report.

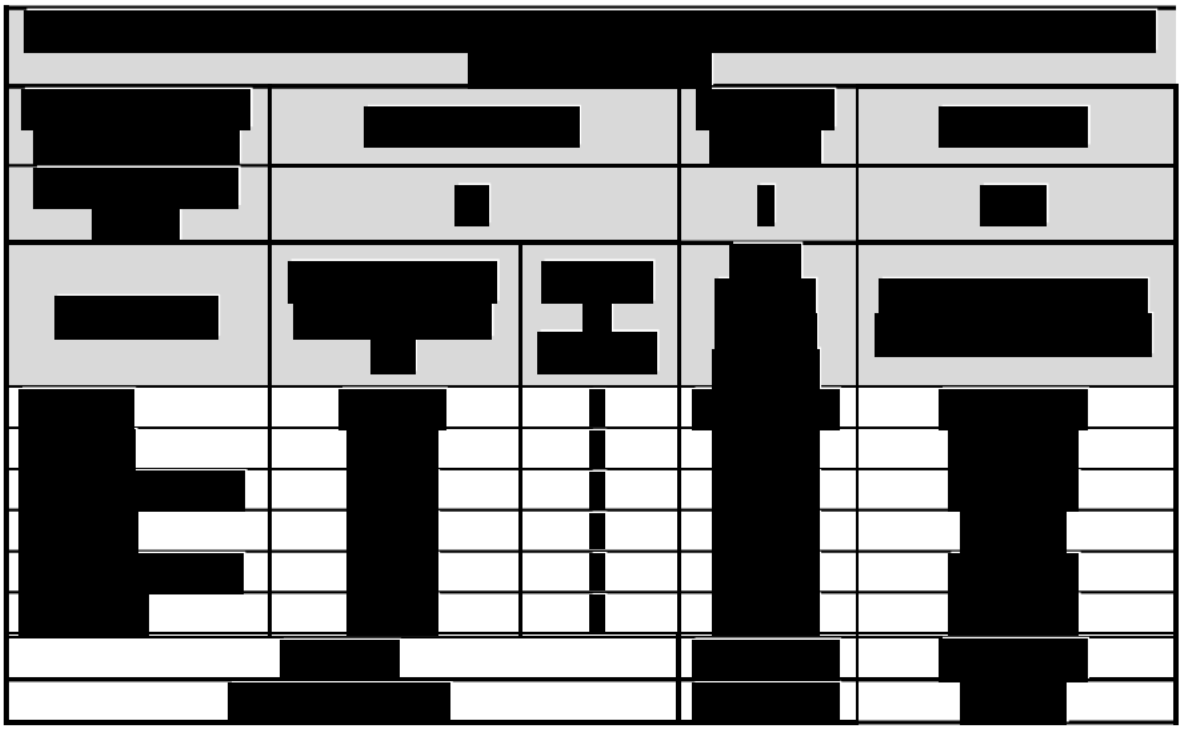
It is Hiyacars aim to provide the developments with self-supporting car club schemes at the end of a 3-year contract. Therefore, Hiyacar would suggest that the developer supports the scheme by covering 80% of the costs of the service for the first year, 50% for the second and 10% for the third year, delivering a financially self-supporting car club at the end of the contract period. The spreadsheets below detail the costs of Hiyacar providing a fully CoMoUK accredited Electric Vehicle car club service for [redacted] the Bexhill developments, as requested:

Costs for providing Fully Serviced EV car club service with 7 vehicles for 3 years at Fryatts Way				
Address or Name of Development	How Many Units		Number of Vehicles	Occupation
Fryatts Way, Bexhill	210		7	2025
Component	**Estimated cost per month per car**	**Number of Vehicles**	**Total Annual Cost to Hiyacar**	**Total 3 year cost to Gladman/Developer**
Car (EV)	£475.00	7	£39,900.00	£59,850.00
Cleaning	£35.00	7	£2,940.00	£4,410.00
Software License	£40.00	7	£3,360.00	£5,040.00
Branding	£20.00	7	£1,680.00	£2,520.00
Installation Costs	£30.00	7	£2,520.00	£3,780.00
Marketing	£40.00	7	£3,360.00	£5,040.00
Total Cost			£53,760.00	**£80,640.00**

Total Cost per Unit	£67,620.00	**£384.00**







Hiyacar would provide you with everything you need to get your car club up and running and would include:

- Supplying a medium sized hybrid vehicle.
- Installing 'Quickstart' keyless technology into the car.
- List the car on the state of the art hiyacar booking platform.
- Provide free membership to all new residents of your new development.
- Complete all membership security & driver verification checks.
- Provide all back office administrative & accounting functions.
- Provide industry leading car sharing insurance (charged against each booking).
- Provide the most secure vehicle access through facial recognition.
- Detailed management information on the use of the cars.
- 24/7 driver support delivered by Hiyacar customer support team.
- Complete management of the car delivered by Hiyacar's fleet support team.
- Cleaning the vehicles twice monthly.
- Marketing the service to the residents in the development.

There would be no requirement for the developer to be involved in any aspect of the day-to-day running of the car club service as this would be taken care of by the Hiyacar team.

I hope that this is of interest to you and please do not hesitate to come back to me if you have any questions.

Many Thanks,

Keith

Appendix E

hiyacar

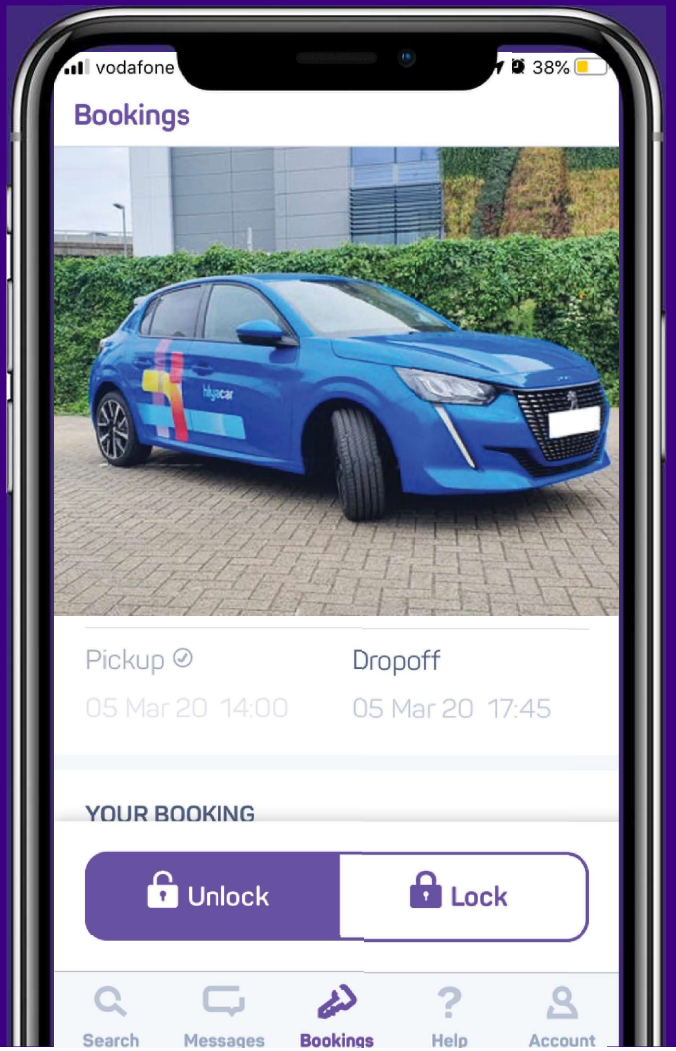
The hiyacar solution for property developers

Our Purpose:

"hiya cars by connecting drivers to cars when and where they want them"

Why should developers incorporate a car club into their travel plans ?

- Car Clubs offer clear benefits for individuals, with cost savings and access to a range of low carbon, well-maintained, flexible use vehicles.
- Car clubs also support policies to cut congestion, reduce emissions, improve air quality, reduce parking pressure and increase take-up of sustainable travel modes.
- Used in the right locations, car clubs can be a very effective measure to promote sustainable development.

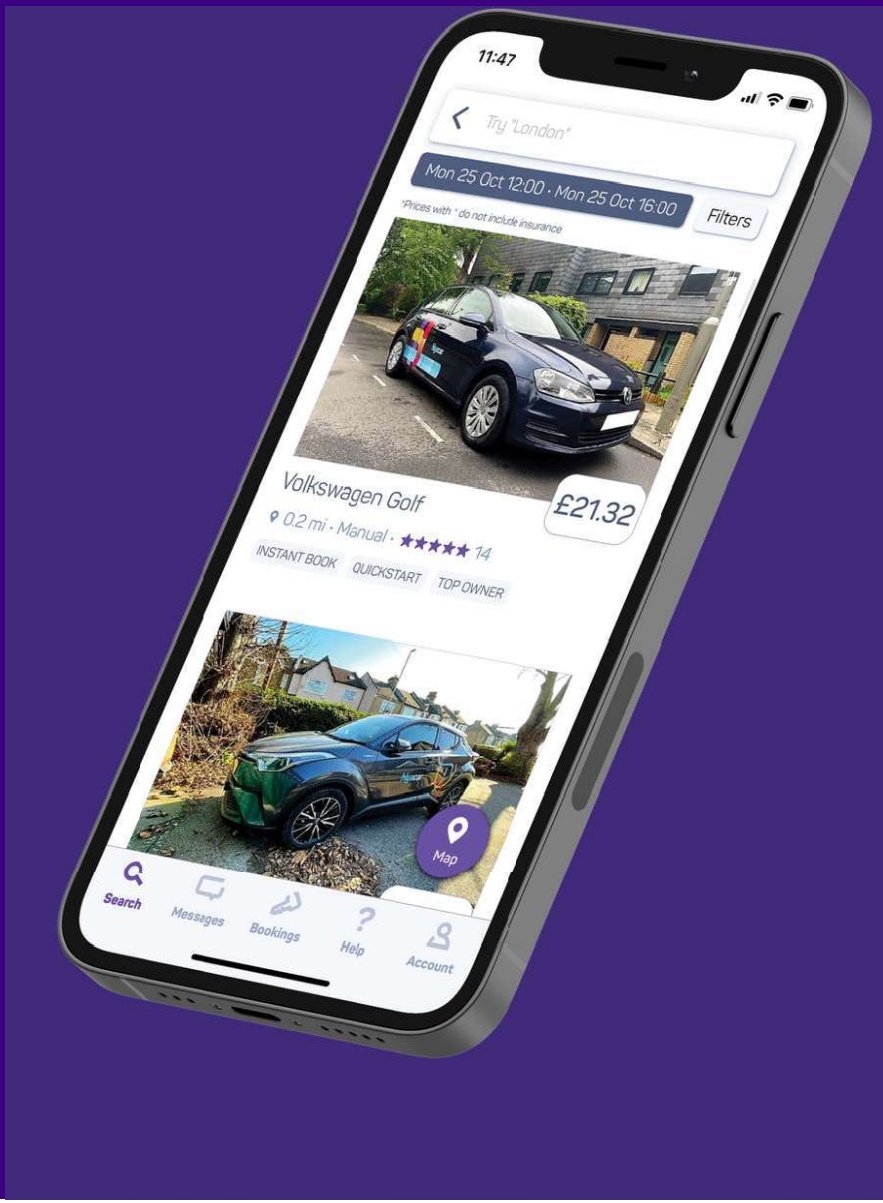


What is a car club ?

- A car club provides cars for short term hire on a pay per trip basis.

What does it do?

- It allows individuals and businesses affordable access to a vehicle without the need for ownership

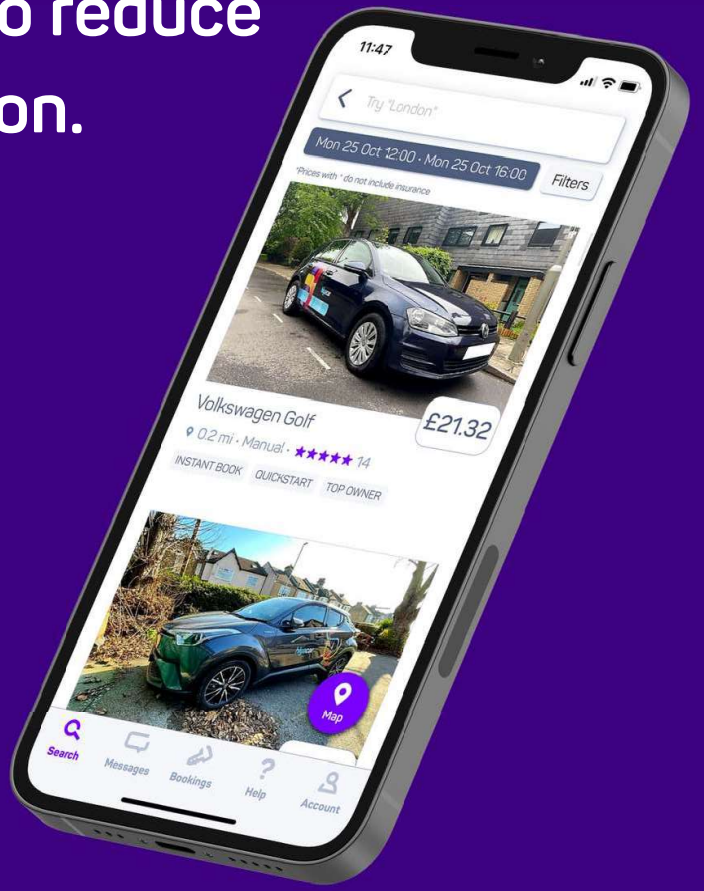


Benefits of car clubs to developers

- Car clubs allow cars and therefore parking spaces to be shared and the number needed and cost of providing them to be reduced.
- Developers benefit from being able to work on sites with a limited parking area which may previously have been impractical.
- By reducing the amount of parking, car clubs allow an increase in the number of units or amenity space on the site, increasing the profitability of the site.
- Car clubs are a popular alternative to private car ownership as they offer convenience without the responsibilities and capital outlay of ownership.
- Car clubs have added value to housing developments as residents perceive the vehicles as an extra service.
- Electric Vehicle car clubs provide low emission, affordable transport solutions for households
- Hiyacar can turn your planning obligation into a positive benefit for both the developer and the new residents.

Whether it is to satisfy planning obligations or to reduce the environmental impact - Hiyacar has a solution.

- Hiyacar is a fully accredited CoMoUK car club operator and can provide a bespoke car sharing solution.
- Hiyacar has the most versatile booking platform in the car sharing industry.
- Hiyacar has the most secure driver verification & access technology.
- Hiyacar's pick-up and drop off protocols help control damage to the vehicles.
- Hiyacar can turn your planning obligation into a positive benefit for both the developer and the new residents.



Why hiyacar?

hiyacar is a tech company as opposed to a car hire company.

We provide the building blocks for the developer to design & build their own bespoke car club which suits them and their development.

Vehicle ownership decision

Choose to own vehicles and receive up to 80% of the revenue of the vehicles making a return on their S106/S75 investment

Pre-planning support

hiyacar can help with pre-planning applications and help advise the developer or transport consultants on S106/S75 obligations

Choose vehicle type

Choose the type of vehicles. Whether to use EVs, Hybrids, low emission petrol vehicles or a combination of all of them. Take advantage of hiyacar's fleet provider partnerships

Open or closed network

Developer can choose whether they would like the vehicles to be for the exclusive use of their residents

Marketing to residents

hiyacar can work with the developer to market and sell the car club to new residents.

hiyacar can 'white label' the car club for the developer. Wrapping the cars in the developments branding

hiyacar engages with the local community to promote sharing of existing cars, thereby reducing parking pressures and mobility costs.

hiyacar

	STANDARD	BESPOKE	BESPOKE + HIYACAR INSURANCE	FULLY MANAGED
QuickStart Tech	✓	✓	✓	✓
Booking Platform	✓	✓	✓	✓
hiyacar Support	✓	✓	✓	✓
Whitelabel [1]		✓	✓	✓
hiyacar insurance [A]			✓	✓
hiyacar fleet cars [B]				✓
EV Charging infrastructure [C]				✓
Open or Closed market				✓

1 Replace hiyacar with your logo
A If not selected: Vehicles insured by you
B If not selected: Vehicles provided by you e.g. company / staff cars
C Optional Extra: We can facilitate the installation of EV chargers

Provide the vehicles and offset the costs of the car club

Provide your own cars on the hiyacar public market - you keep 80% of the revenue from all bookings

hiyacar

Why would a Developer want to include a hiyacar in a development?

Freeing up parking spaces

CoMoUK estimates for each new car club car, 4 parking spaces are no longer required which allows more space to build more units or unlock planning potential when planning permission otherwise may not be granted

Reduced costs of living

The true costs of owning a car are under-estimated by owners. Car club users can make significant savings when switching from private ownership allowing them to spend more on their property

Attractive to residents

People living in urban areas often don't want the hassle of owning a car. Car clubs can be a valuable sales tools for the development.

Environmental benefits

Improved air quality, reduced particulate & CO2 emissions through the use of hybrid or electric vehicles

Health Benefits

According to CoMoUK 2019 survey, members walked 16% more, cycled 10% more and used their cars 26% less

hiyacar

What is QuickStart™

Turns your phone into your car key

Encrypted virtual keys and plug in box
(No invasive wiring)

GPS tracking, Facial recognition & Liveness detection for additional security

Plug & Play installation that does not void vehicle warranty

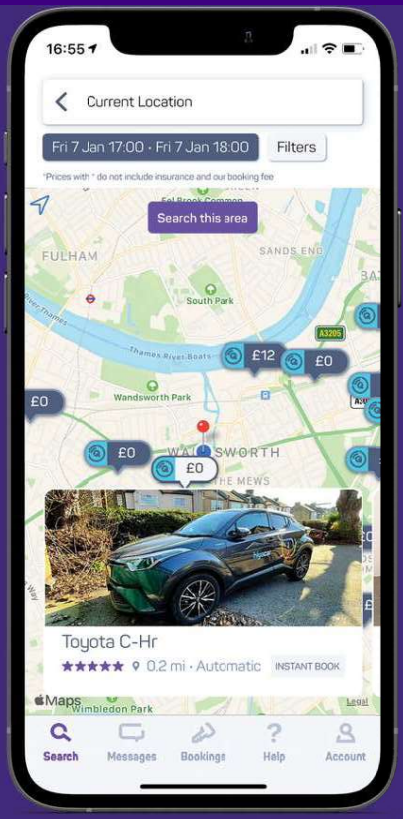
Remotely unlock, lock and disarm the immobiliser.

Damage Control Before and after photos on pick-up and return to attribute damage accurately

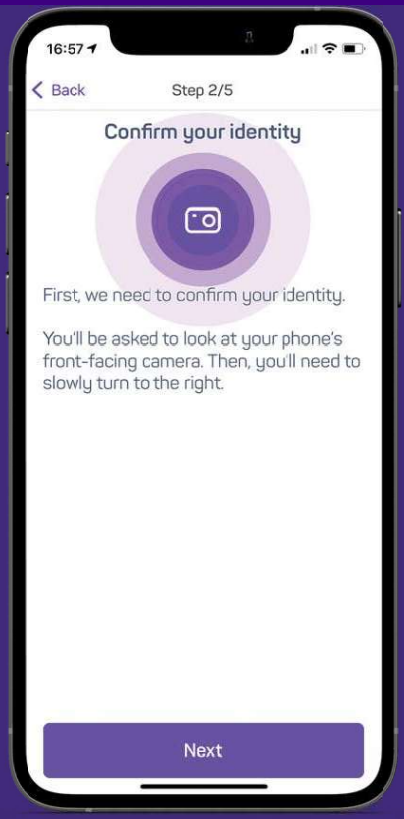
QuickStart™ is the enabler for sharing your fleet with staff and the public

How it works

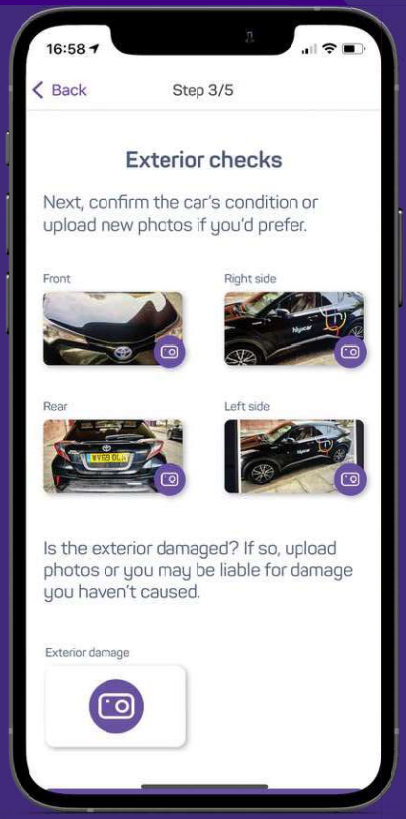
Drivers complete all aspects of car hire in one simple to use app



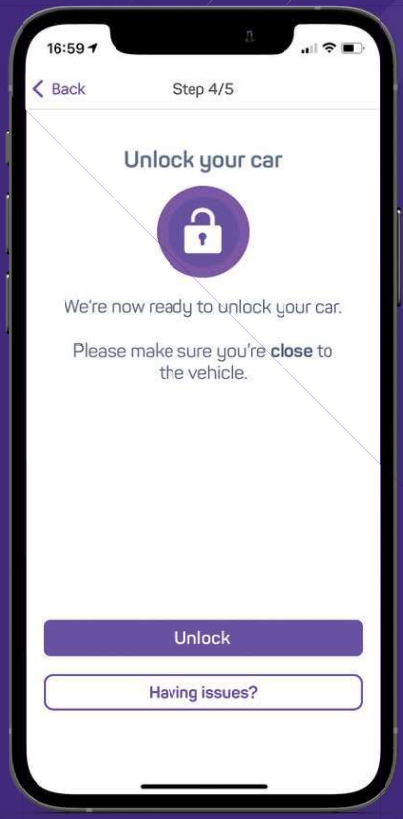
Search



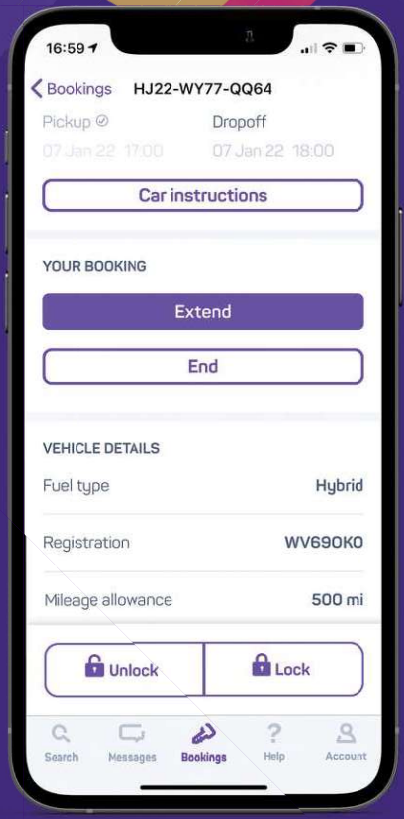
Automated facial verification



In app damage inspection



Unlock via the app



The drivers phone is the key

Summary

Build a bespoke car sharing solution

- Understand the developers requirements
- Build a bespoke car sharing solution to the developers specific requirements while ensuring that it conforms to all planning stipulations

Environmental benefits to new residents

- Delivering environmental benefits to the new residents and the surrounding community through more efficient use of cleaner cars

Improve resident health & wellbeing

- Improve the health and wellbeing of residents as members walk & cycle more and use cars less

Versatile & secure

- Most versatile car sharing platform and most secure keyless car entry

Trusted by customers

- Hiyacar 4.7 star trustpilot ratings

Trustpilot

hiyacar

Keith Stark

Business Development Lead

Keith.Stark@hiyacar.co.uk
www.hiyacar.co.uk
0749 818 4070

Appendix F

www.como.org.uk February 2022

New developments and shared transport: cutting car dependency

SHARE North
Interreg North Sea Region SHARE-North European Regional Development Fund
EUROPEAN UNION
Interreg 2 Seas Mers Zeeën MOBI-MIX
TRANSPORT SCOTLAND CÒMHDHAIL ALBA
comouk supporting shared transport

1. Executive summary & recommendations

Across the UK, new developments are being designed, consented and built out with underpowered and inconsistent approaches to the important role shared transport can play in delivering sustainability.

There is widespread planning approval of schemes that lock in car dependency. Shared transport is often not included within scheme design at all, and elsewhere it is only included at a very small scale (e.g. a single car club vehicle). However, there are numerous developments which are being planned around the ability of sustainable transport, including shared options, to cut the need for parking spaces, improve place and air quality and deliver 'gentle density'.

Unfortunately, the National Planning Policy Framework (NPPF) makes it difficult for councils to refuse applications that don't go far enough on shared transport proposals. The NPPF (paragraph 109) states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The 'Decision-Making in the UK Transport System' report by the Government Office for Science (2019) explicitly identifies this: "...were Government to provide more support for mobility substitution and sharing by prioritising low-carbon and active travel alternatives to car use and car share schemes in planning decision-making, this would help reduce the degree of (perceived and actual) lock-in to car dependence and ultimately improve the wellbeing of the UK population."

Despite the challenging policy environment, an increasing number of schemes are building in the sustainable transport options (e.g. car club, bike share, public transport, active travel routes) that support significantly lower levels of private car ownership.

> CoMoUK research indicates that each car club vehicle can on average replace 18 private cars

The Government's legally binding commitments on emissions reduction signposts the need to favour decarbonising options such as shared transport in spatial planning design in order to achieve behaviour change and in particular a shift away from low occupancy private car use. While shared transport isn't new, its applicability and viability are strengthening as the development planning sector looks to respond to the climate crisis, planning reforms, consumer demand and new mobility business models.

In this study, Collaborative Mobility UK (CoMoUK), the UK's national charity dedicated to the public benefit of shared transport, has identified the current uncertainty and ambiguity surrounding the scope and planning of shared transport in the context of new developments, and through this work, are seeking to unlock the full potential to deliver sustainable housing.

Recommendations

- **Redefine planning policy around people and place rather than cars:**
  Develop a bold vision for the creation of people centric neighbourhoods, placing shared transport at the heart of new policy. This policy should also deliver access via sustainable transport modes to key amenities such as shops, healthcare and green space. The revised approach should be formalised through Supplementary Planning Guidance.

- **Coordination of planning and transport:**
  There is a need for planning authorities to work hand in glove with other public authorities, highway authorities in particular, to ensure this ambitious approach is successful.

- **Limit parking provision for privately owned cars:**
  Limit average car parking provision to one private car per dwelling or less. The lower the ratios the greater the chance of breaking dependency on the private car and supporting the switch to sustainable modes. This allows the intensification of housing and will support the 20-minute neighbourhood policy objective.

- **Rethink the driveway:**
  Separate parking from the driveway to break the automatic link between private car ownership and make parking spaces less convenient than sustainable modes and more flexible to convert to other purposes. Make private car parking spaces chargeable.

- **Avoid 1:1 conversion to electric:**
  Without integrating a strategy for shared transport there is a risk that providing electric vehicle charging infrastructure, for privately owned EVs only risks further entrenching private car ownership and thus higher emissions. Shared cars should have priority access to electric charge points.

- **Invest in portfolio of sustainable transport options:**
  There is a need to invest in a package of alternatives to car travel including high quality public transport, integrated with cycling infrastructure, and a pool of shared cars and bikes, housed within mobility hubs. It is also important to ensure there is a range of amenities in walking distance.

- **Build in meaningful developer contributions:**
  Use developer contributions to boost transport sustainability. Ensure contributions begin at the point of the first residents moving in. Ensure planners, developers and landowners are fully engaged with the operators to co-design the shared transport solutions for the area. Create a fund of contributions to support car club development across the city which will ensure the wider scheme flourishes for the benefit of all.

- **Engage with shared transport operators early in the process:**
  Planners, landowners, and developers should review latest best practice of deploying shared transport. They should make contact with operators from the start of the process to draw upon their expertise for site specific advice.

2. Study methodology

The scope of this study has been:

1. Exploring how shared transport is currently considered within the development planning process by different stakeholders and identifying potential opportunities for improvement in the process.
2. Engaging with representatives from across the public and private sectors to validate pain points and areas of uncertainty.
3. Researching exemplar schemes or development proposals that seek to embed shared transport, and uncovering the methods for arriving upon or quantifying the shared transport service provision as part of sustainable development.
4. Conversely, identifying the key barriers to successful implementation of shared transport; and
5. Developing recommendations and guidance for all stakeholders

During 2021, CoMoUK undertook 15 interviews with: developers; landowners; consultants; shared transport operators; planning and highways authorities.

The work was carried out with the support of the consultants WSP.

3. Key considerations

Redefine planning policy around people and place rather than cars

The perception of a supportive environment was found to be imperative to the successful implementation of shared transport, with ambitious policy providing a strong foundation for increased delivery potential for shared transport.

> "A sea-change of policy is needed" (Developer)

As an example, Transport for the Southeast have set out a 30-year transport strategy for the Southeast of England with the sub-national policy supporting a shift away from planning for vehicles, to planning for people and places.

Whilst recognising that many parts of the region are still within the planning for vehicles stage, this bold progressive policy at a regional scale presents an opportunity for development planning stakeholders and mobility operators to interpret at a local level.

As it stands, there are no standards on the minimum provision of shared transport in new developments. The NPPF only recognises walking, cycling and public transport. Shared transport, especially shared cars are vital in order to enable people to break their dependency on the private car and their importance in this process should be recognised in NPPF.

Critical factors for success of low-car developments

While we have found restricted parking provision for private cars to be the single most important determinant of success or failure, these aspects are also vital:

- Access to reliable, frequent public transport and safe cycling infrastructure. Digital Demand Responsive Transport is a flexible complement or alternative to traditional bus in areas away from busy transport corridors.
- Access to key amenities such as shops, doctors, schools and green space by foot, cycle or public transport, akin to the 20-minute neighbourhood strategy
- Access to wider amenities via strong connectivity to local high streets.
- Need for supportive funding structures such as developer contributions for capital costs or private parking charges for revenue costs.
- Development scale of sufficient size to support sustainable transport modes in the development or surrounding area.

CASE STUDY: Exeter Planning Guidance

Exeter Supplementary Planning Document provides policy on car clubs, detailing that car-free and larger developments will be considered on their proposals of measures to reduce car use.

> Operators call for a "build in, not bolt on approach"

More explicitly, "occupiers will be excluded from residents' parking schemes, and a contribution will be sought towards the enhancement of facilities for public transport, cyclists and pedestrians. Similar considerations may apply to justify a car free development in other locations well served by public transport" (Exeter City Council Sustainable Transport SPD, 2013, 44).

In this SPD, Exeter City Council recognises car clubs as part of an overall package with potential for improved integration with bike hire schemes and bus tickets, for developers to consider. This SPD supported these developments:

- Albatross Road, Newcourt in Exeter developed by David Wilson Homes. The SPD led to the inclusion of a Co Cars electric car club car with a dual EV charging unit.
- Peppercombe Avenue, Hill Barton, Exeter with Barratt homes. Similarly, a Co Cars electric car club and charging unit were funded.

CASE STUDY: Leodis Square & CITU, Leeds

Leeds City Council developed Supplementary Planning Guidance which requests that developers provide funding for car club memberships at new developments. One example is Leodis Square, a 744 unit apartment block in Hunslet, south Leeds, which has only 263 parking spaces, a ratio of 0.3 spaces to units. Car access for residents is instead supplemented with the provision of two car club bays. A contribution was made to the car club operator.

The Leodis Square car club was launched in October 2020 in challenging circumstances. Regardless, 61 residents have already joined to use the vehicles at the development, elsewhere in Leeds City Centre and across the UK. Residents are offered 1 year's free membership of Enterprise Car Club (value £60 inc VAT) and £150 drive time.

A second example is CITU, an innovative eco-friendly development on the edge of Leeds city centre. Two vehicles are being provided. Developer funding is providing residents with 2 years membership and £50 driving credit to encourage people to try the scheme.

> "As people who walk to work and therefore don't need to commute, we really weren't using our car that much at all. We decided to sell our car, which was quite old and not environmentally friendly..." (Resident)

Rethinking the role of the car

All stakeholders identified that the status quo for local policy, scheme design and to lesser extent developer aspirations were a key blocker to successful shared transport deployment. The short-term focus within the planning process is typically on 'doing what is needed to secure planning permission', with shared transport operators only brought to the table post-planning consent. This presents difficulties for operators as there is a lack of understanding of shared transport business models.

Commercial viability for operators is hindered by scheme designs which lock in barriers to successful shared transport uptake. It also precludes discussion about how shared transport and sustainable transport options more broadly can deliver developments that are both more pleasant and denser – thus delivering more housing – while cutting transport emissions and boosting activity levels and public transport use. Finally, residents are likely to have already made their transport choices at the crucial life-changing moment of moving into a home.

Car parking

There is a critical correlation between parking provision for private cars in new developments and the opportunities for sustainable transport generally and shared transport particularly. Where ratios of private car parking to dwellings are low, residents are much more likely to adopt other mobility options. It will also create a more pleasant environment for walking and cycling.

Car club operators actively scope suitable sites based on the baseline provision of private car parking.

A rule of thumb stated in interviews was that 1 car per dwelling or less is required for car sharing to be feasible. When quantifying the amount of shared transport to provide, critical mass must be considered.

There are limitations to offering only one shared vehicle, or too few shared bikes in a development, as residents will have concerns about availability and may not sign up. Where there are concerns about the viability of additional car club vehicles, the cars could be opened up for use by local residents outside the new development, including being placed in adjoining streets to tap into the wider market.

Integration of services through a single mobility hub or network of mini hubs increases connectivity, convenience and viability of sustainable modes.

An alternative approach is the provision of a peer-to-peer online platform for sharing residents' cars between themselves. It would be difficult to plan with any certainty for likely rates of sharing although significant incentives could be offered to encourage participation. A hybrid is emerging where the developer provides the car and pays the peer-to-peer platform to make it shareable with users.

Mobility hubs

Mobility hubs are highly visible, safe and accessible spaces where public, shared and active travel modes are co-located alongside improvements to public realm and community facilities where relevant. The redesign and reallocation of space from the private car, enhances the experience for travellers and create a more pleasant environment for everyone.

Rules of thumb on shared transport provision

The table below sets out a range of examples to draw upon when planning shared transport provision in new developments. The figures should not be taken as fixed allocations as the scale will depend on many factors. Early engagement with operators is encouraged.

	Scottish city	Outer London	Edge of English town
No of units	150	200	500
Current average parking ratio ranges	1.2	1	1.2
Proposed parking ratios	0.9	0.5	1
Reduction in parking spaces	45	100	100
Average cars displaced by car clubs vehicles from CoMoUK research	10	24	9
No of car club vehicles required	4-5	3-4	10-11
No of shared bikes required based on 1 bike to 10 units	15	20	50

Notes

The figures used to calculate the number of car club vehicles per dwelling are based upon number of cars displaced by each car club from CoMoUK research. They illustrate the numbers of cars displaced by each car club vehicle which can be translated into car parking spaces displaced. NB these numbers vary depending on how favourable the conditions are for living without a private car.

Parking barns

A system increasingly adopted by forward-thinking developers is to shift whatever parking space is provided for private cars to the edge of a development in a "parking barn" or off-site plot. This raises the inconvenience factor of using private cars while signalling that the active modes, public transport and shared modes that should be located closer to people's front doors are more convenient.

This approach also frees space close to homes for shared green space and play areas. Such space can be developed in a flexible way to allow parking to be reduced and allocated to other purposes. The parking barn also offers greater potential for charging for parking or at least for the parking of multiple private car spaces per household. Charging is ideally done on a monthly basis to offer regular opportunities away from privately owned car, annual charges risk occupants taking the "safe" option each year and locking themselves in for 12 months.

Higher parking provision is sometimes justified as a means to avoid residents of the new development parking in surrounding streets. However, there should be no need for this if the car club and other alternatives to the car are done well. The use of chargeable parking permits in surrounding streets can have the double benefit of eliminating spill over parking and creating the conditions for the expansion of the car club across the neighbourhood.

Existing standards for cycling parking are 1 space per 2 residents. It is recommended that the guidance is updated to include the provision of shared bikes which can reduce the need for cycling parking as each shared bike can service around 10 dwellings.

There are a few different models for providing shared bikes/e-bikes including:

- App based self-service shared bikes, often part of an area wide scheme
- A pool of bikes stored in secure shelter, bookable via online platform
- Leasing of bikes on long term loan to residents
- A bike library for a mix of "try before you buy" loans and hires

4. Successful implementation

The planning process includes a range of public sector authorities (at different scales and across different disciplines), often with contrasting views and agendas. For example, a council's Highways team can take road capacity for cars as a starting point and run on a 'predict and provide' basis. This sees it assume that historic travel behaviour is an accurate predictor of future behaviour, and can be done regardless of the legal need to decarbonise. Conversely, Planning departments often take more visionary outcome-led approaches focusing on place-based solutions however they can sometimes ignore transport completely.

Local authority departments for both highways and planning are typically resource-constrained and have to respond in the most systematic and efficient manner to multiple development planning applications. There is therefore a capability gap (in both time available and technical understanding) for how officers within these departments can consider and support more progressive approaches (that may be a slight deviation from traditional policy).

The need for improved advice and communication

With regards to the existing Development Planning Control Process, stakeholders unanimously cited a lack of guidance and limited communication between parties within the system as a barrier limiting stronger deployment of shared mobility.

> "The current process is very rigid and there is an overall lack of initial guidance" (Developer)

> "We require support on things like the people to talk to, the expected development density. There is a need for a formula-based tool." (Developer)

CoMoUK has a CPD course that is being updated to incorporate lessons and case studies from this project.

See more:
learning.como.org.uk

Developer Contributions: Section 106/ Section 75 and Planning Conditions

There is an opportunity for improvements in how the existing development control process might achieve better outcomes, through well-implemented planning conditions, or the use of Section 106/Section 75, (the former applies to England and Wales and the latter to Scotland), agreements with greater co-design.

Stakeholders stated that Section 106 agreements, whilst intended to secure much needed funds to mitigate development impacts and support sustainable measures, have sometimes resulted in less ambitious and appropriate "tick box" provision of shared mobility.

They can result in too little funding being allocated, too late in the process to create a robust shared transport offer. Using planning conditions as a mechanism for funding can address this.

Drawbacks observed with the implementation of Section 106/Section 75 are:

- Legal wording being outdated and/or influenced by local authority needs by aggregating shared transport into public transport contributions.
- Lack of understanding in mobility business model planning – Section 106/Section 75 contributions are often too small or arrive too late in the process resulting in a bare minimum shared mobility offer that doesn't recognise commercial viability.
- Involving the operators from the early stages will help to inform the choice of modes, scale of operation, locations and marketing approach. Planning conditions can be co-designed to ensure funded incentives for residents are aligned with developer objectives, fitting the wider marketing offer.