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To: Head of Planning
Strategy & Planning Service
Rother District Council
Town Hall, Bexhill on Sea
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FAO: Matthew Worsley**Date:** 21/09/22**Ref:** RR/2022/1584/P**Applicant:** Gladman Developments**Location:** Land at Mayo Lane, Bexhill

Development: Outline planning application for up to 130 residential dwellings (including 30% affordable housing), with public open space, landscaping, sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of access.

Road Name or Number		Consultation Date	7 July 2022
National Grid Reference	573275109777	Contact Officer Details:	Ben Lenton 01273 336114 ben.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 proposal is an outline planning application for the erection of up to 130 residential dwellings (including 30% affordable housing), with public open space, landscaping,

sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of 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. The roads leading to the site are also narrow in places with no footways available along some stretches of the carriageway. Although a new footway on Watermill Lane is proposed this would not be sufficient to provide a safe and convenient pedestrian route to the site or 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 proposed development site is located in Sidley, which is to the north of Bexhill. It is bound by Watermill Lane to the east and Ninfield Road to the southwest. To the southeast the site is bounded by Mayo Lane.

The site is allocated for residential development within the Rother District Council Local Plan Core Strategy under BEX3b. The development of the site, therefore, is already accepted.

Policy BEX3: Land at North Bexhill – Infrastructure states that the development of sites which are the subject of policies BEX3a, BEX3b and BEX3c shall contribute to shared infrastructure by:

- Having regard to the transport requirements and impacts of the combined allocations and make proportionate financial contributions to off-site highway and cycleway/footpath improvements.
- As part of (iii) above, all developments off Watermill Lane should provide an integrated approach to ensuring safe and convenient movement for pedestrians and cyclists, as well as vehicles.
- Ensuring an integrated approach to establishing a multi-functional 'green corridor' along the Combe Haven stream, extending from the A269 to the planned Enterprise Park (and beyond);
- The above shared infrastructure requirements shall be implemented by a combination of direct provision and legal (s106) agreements attached to the respective development proposals

Policy BEX3b also states:

- Some 130 dwellings will be provided within the residential area as indicated on the Detail Map, of which 30% should be affordable.
- Access is from Watermill Lane, the details of which will be subject to a finding of a Transport Assessment, with the expectation that:
 - A single access will be provided where appropriate sight lines can be achieved;
 - Provision is made for a new footway/cycleway along most of the length of the Lane from the Mayo Lane junction to the stream (to dovetail with requirements under Policy BEX3c);
 - The development will incorporate a convenient route for pedestrians and cyclists to Ninfield Road, via Mayo Rise.
- The infrastructure requirements set out in Policy BEX3 are met.

Watermill Lane is a two-way single carriageway subject to a 30mph speed limit. The road is street lit and has partial stretches of footways. The road used to extend between Henley's Down in the north and a junction with Ninfield Road in the south. Due to the construction of the A2691 (NBAR), Watermill Lane has been bisected and stopped up on the site side of the new bypass.

Mayo Lane is a two-way single carriageway subject to a 30mph speed limit. The road is lit on both sides of the road and extends between Ninfield Road and Watermill Lane.

Ninfield Road (A269) is a two-way single carriageway subject to a 30mph speed limit. The road has street lighting and footways on both sides of the carriageway. The road provides routes into the town centre and out of town whilst being easily accessed from the site.

The A2691 (also known as Haven Brook Avenue and the NBAR) extends between the A269 in the west and the A2690 in the east. The road acts as a bypass across northern Bexhill. A 3m foot/cycleway is present along the whole length of the road on the northern road edge. At the point where the road bisects Watermill Lane, there is a crossing with provision for pedestrians, cyclists and equestrians.

Site Accessibility

Walking- The nearest amenities available are located approximately 2km walk to the south of the site. The facilities available include a medical centre, a community centre, allotments, a supermarket, places of worship, convenience stores, public houses, takeaways, a post office, primary schools, a secondary school, parks, sports facilities, a playground and employment sites.

In order to improve pedestrian access to these facilities a new footway with a width of between 1.2 and 2.0m is proposed on Watermill Lane to link the site access with Mayo Lane and the existing pedestrian facilities which lead to the wider area to the south.

For the footway linking south to Mayo Lane a 1.2m width is considered to be inadequate. Also, whilst the submitted plans indicate that the proposed footway and road widening can be accommodated within the highway, this would require further investigations as the hedge/tree line appears to be located on the highway boundary and whilst this isn't unusual there are a number of mature trees in this case and sections of the verges are also quite steep. As a result, cutting into these verges would, most likely, damage the tree routes and could destabilise the trees.

With this in mind detailed plans are required to demonstrate that a wider footway could be provided as the issues relating to the steep banks and loss of trees are likely to be significant and so would need to be addressed before progressing to s278 stage.

The provision of a new footway on Watermill Lane would improve the pedestrian link to the south; however, it is noted that Mayo Lane, which provides the most direct route through to the bus stops available on Ninfield Road, lacks footways for its entire length. There may be scope to improve the route for pedestrians by extending the footways from Watermill Lane and also Ninfield Road as far along Mayo Lane as possible; however, this would only be achievable for a short distance at either end of the road and the remaining stretch of the carriageway would therefore have to remain as a shared surface.

With this in mind and in order to ascertain its suitability for an increase in pedestrian activity a Non-Motorised User (NMU) assessment of Mayo Lane was carried out in support of the neighbouring development proposal (RR/2021/2545) to demonstrate that it is a minor road that functions satisfactorily as a shared surface. However, whilst the NMU of Mayo Lane that was submitted in a Technical Note indicates that the road is relatively lightly trafficked, this is unlikely to be the case once the residential developments proposed on Watermill Lane come forward. Therefore, whilst the road may function satisfactorily as a shared surface currently, this may change once traffic flows and footfall inevitably increase significantly.

Whilst not currently put forward as part of the development proposal, the provision of a pedestrian link to the north of the site and through to Haven Brook Avenue should also be investigated. As the development sites off Haven Brook Avenue come forward there will be more need to travel this way and there may also be scope to provide new bus stops off this road too, as discussed below.

Overall, the walking distance to the bus stops on Ninfield Road which provide a frequent service is considered to be excessive, the distances being 450m from the site entrance, and approximately a further 200m to a number of the proposed dwellings. Also, the route to Ninfield Road via Mayo Lane is considered far from ideal due to the lack of footways, especially when considering the inevitable increase in traffic using this route that is likely to occur as a result of this and other developments coming forward in the area. It is also unclear whether there is scope to improve pedestrian facilities sufficiently between the site access and Mayo Lane.

With the above in mind, it may be preferable to provide an internal pedestrian link through the site which would then join Watermill Lane a short distance to the north of the Mayo Lane junction. This would only require a short section of footway on the west side of Watermill Lane to link with the existing pedestrian facilities to the south of the Mayo Lane junction. A more direct and shorter link to the bus stops on Ninfield Road could be provided if the internal pedestrian route was able to join with Mayo Rise; however, this is a private street and therefore providing a pedestrian route through here to Ninfield Road may not be feasible. Nonetheless, it should be explored further.

There may also be scope to provide a pedestrian link north of the site to Haven Brook Avenue; however, it is unclear at this stage whether the provision of new bus stops on this road would be feasible.

Cycling - To demonstrate the site's accessibility by cycle, a 5km cycle catchment has been included within the submitted Transport Assessment. It can be seen that the entirety of Bexhill is located within the 5km catchment including the additional areas of Lunsford's Cross, Watermill, Sidley, Pebsham.

National Cycle Route 2, which is a coastal route, passes through the site's 5km cycle catchment. The route consists of a mixture of on and off-road cycle lanes/paths which pass through the residential areas of Cooden, Bexhill and Pebsham.

It is acknowledged that there are a large number of services and facilities within cycling distance of the site; however, there is a need to provide safe cycle provision to the site along Watermill Lane which would then tie into the pedestrian/cycle links within the site and it is unclear whether this is achievable.

Bus - The closest bus stops to the site are located on Ninfield Road, Mount Idle View and Morgan Close, with the closest being approximately 450m from the site access, and approximately a further 200 metres to a number of the proposed dwellings. As the maximum walking distance for residents to public transport services is 400m it is therefore considered that there are no bus stops within easy walking distance of the site that provide a frequent service to the local area.

As part of the development, it is suggested that there may be scope to provide two new bus stops on the A2691 Haven Brooke Avenue (NBAR) to the north of the site to facilitate improved public transport accessibility.

A light controlled crossing point is in place and a pair of bus stops could be created immediately to the east. The new bus stops would require linking by way of good pedestrian access to the proposed development; however, the walking distances for residents would remain in excess of the maximum 400 metres.

ESCC's new Bus Service Improvement Plan (BSIP) proposes in future to re-route an improved bus service 98 between Eastbourne, Hailsham, Ninfield and Bexhill so that it runs via Haven Brooke Avenue and the Ashdown Business Centre, instead of Sidley. A different service would link Sidley, Bexhill, Pebsham and Hastings. Though these bus

re-routings and bus service improvements (including a new evening and Sunday service) will be dependent on new funding being available.

We therefore would require a bus funding contribution of 1,100 per dwelling towards establishing the new bus service along Haven Brooke Avenue. Other forthcoming developments in the area would also be expected to contribute a similar amount per dwelling (eg. BEX3 and BEX3b).

The pair of new bus stops on Haven Brooke Avenue (one in each direction) will each require a raised kerb, bus shelter, lighting, seating and real time information display. The bus stop on the north side of the road will need an accessible pedestrian route from the crossing. The bus stop on the south side may need to be accommodated within a new bus stop layby, with the pedestrian/cycle route adjusted accordingly to allow for this.

It should be noted that the provision of new bus stops on NBAR has been proposed in the submitted technical note for planning application RR/2021/2545. However, further work is required to determine where or if new bus stops could be provided on this stretch of NBAR as there may be issues with visibility due to the vertical alignment of the carriageway.

The provision of a new bus service routing and bus stops along Haven Brook Avenue, would provide a much-improved bus access option for this development site as well as the neighbouring allocated sites BEX3a and BEX3c by unlocking business and residential development along this corridor. However, at this stage the provision of the bus stops on this road is likely to be difficult as Haven Brook Avenue (NBAR) remains privately owned and a section 38 Legal Agreement with ESCC to adopt the road is not yet in place and unlikely to be so in the near future. This being the case it is difficult to determine when or even if the road will ultimately be adopted.

Therefore, as the road is still privately owned the developer/consultant would need to contact SeaChange Sussex to seek their view on installing bus stops on 'their' road.

In addition to the above we would also expect the site travel plan to include measures such as a month's free bus travel to new residents, followed by 3 months of discounted travel.

Rail - Bexhill Rail Station is located approximately 3.2km and so could conceivably be reached by cycle as well as public transport, if bus services can be reached conveniently

Cooden Beach and Collington Rail Stations are located approximately 3.9km and 5km from the site to the southwest.

Conclusion - The measures proposed as part of the planning application to improve the accessibility of the site are insufficient and do not provide new residents with alternative means of travel to the private car. This is largely down to the sub-standard

pedestrian links available to pedestrians and the excessive walking distance to the nearest bus stops and other local services and facilities.

In order to address this and mitigate the cumulative impact of this and other developments proposed in this area, consideration should be given to the provision of an improved pedestrian link to the south, which would ideally be routed through the site, and through to Mayo Rise, or at least to a point just north of the Mayo Lane junction.

Nonetheless, the distance from the proposed dwellings to the nearest existing bus stops to the south remains excessive and without the provision of a direct pedestrian link through to Ninfield Road the need for pedestrians to negotiate Mayo Lane also remains a problem. Further work would also be required to determine whether there is scope to provide new bus stops on NBAR and this should take into the account the visibility requirements for the bus stops, the provision of suitable pedestrian link and also whether a new bus service is likely to be provided in time to serve residents of the sites.

The Development Proposal

The proposed development site is located on land to the west of Watermill Lane.

The proposals comprise up to 130 dwellings (including 30% affordable housing), planting, landscaping, sustainable drainage system and children's play area.

Site Access

Vehicular access to the site is proposed via a priority-controlled junction on Watermill Lane, approximately 110m northwest of the Watermill Lane/Mayo Lane junction.

The site access road will be 5.5m wide with 6.0m kerb radii.

Pedestrian footways are proposed on both sides of the new access. The footway on the southern edge of the access would extend along Watermill Lane to the south to the junction with Mayo Lane. A section of footway is also proposed on Watermill Lane adjacent to the northern end of Mayo Lane, this will tie into the existing footway provision. Additionally, pedestrian footway provision is proposed along Watermill Lane to facilitate improved pedestrian connectivity to the North Bexhill Access Road and the proposed stops located there.

Dropped kerbs and tactile paving are required on either side of the access for the benefit of pedestrians walking on the southwest side of Watermill Lane.

The submitted drawing indicates that visibility splays measuring 2.4m x 40m along Watermill Lane 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 refuse vehicle manoeuvring in and out of the site from Watermill Lane.

The tracking drawings show that the refuse 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 Watermill Lane is relatively lightly trafficked, this is considered to be acceptable. However, it is noted that the vehicle tracked measures only 10.7m in length and therefore the RDC Waste Collection team should be consulted to determine whether this is the largest vehicle likely to serve the site.

Overall, I have no major concerns regarding the proposed access off Watermill Lane in principle as adequate visibility is available in each direction whilst the access width and radii proposed are also considered to be appropriate for a development of this type. However, a Road Safety Audit of the access and the associated off-site works is required, and this should be carried out and submitted as part of the planning application.

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.

Highway Impact

ESCC's Saturn Model for Bexhill and Hastings - The ESCC SATURN model of the Bexhill and Hastings highway network was designed with the purpose of assessing the traffic impacts of the Development and Site Allocations (DaSA) for the Rother District Local Plan.

The '2028 with development', AM and PM peak hour SATURN outputs have been obtained from the model. The '2028 with development' includes all forecast traffic associated with the land allocations within the Local Plan, thus the model includes the traffic associated with the proposals subject to this assessment.

In addition to the data extracted from the model, junction turning counts have been extracted for the following junctions.

- A269 Ninfield Road / Watermill Lane
- A269 Ninfield Road / Turkey Road

The flows from the ESCC SATURN model for Bexhill and Hastings are the Baseline traffic flows for the assessments in this assessment.

Trip Generation and Distribution - The TRICS Database has been utilised to estimate the level of traffic likely to be generated by the development proposal.

Using TRICS it is estimated that a 130-dwelling proposal could generate approximately 74 two-way vehicular trips in the weekday AM and PM peak hours.

Trip distributions for the AM and PM peak hours have been derived based on the 2011 Census 'Journey to Work'. That dataset contains information on the location of

employment and the method of travel. It contains origin destination data at the MSOA level.

The most likely route (or routes) between the development site and employment areas has been identified using Google Maps traffic routing for the roads included in the SATURN model.

The number of trips estimated to be generated by the proposed development have been assigned onto the local highway network using the distribution as determined using the above methodology.

The development traffic generation has been added to the derived baseline flows to create the 2028 Assessment flows.

Saturn Modelling Results - A review of the Saturn Modelling results for the '2028 with development', AM and PM peak hour scenario indicates that in the peak hours, all nodes (including junctions) in the vicinity of the site are forecast to operate with spare capacity on all approaches, with a majority of nodes forecast to operate with at least 15% spare capacity on all approaches.

In addition to reviewing the SATURN Model Outputs, three junctions have been identified for further assessment. Those junctions are.

- J1: Watermill Lane / Site Access Priority Junction
- J2: Ninfield Road/Watermill Lane – Priority Controlled Junction
- J3: Ninfield Road/Turkey Road – Mini Roundabout Junction

The results are presented for two scenarios, 2028 Baseline (i.e. directly from SATURN output) and 2028 Assessment (i.e. Baseline + manually assigned proposed development).

As the Baseline flows comprise the '2028 with development' ESCC Saturn flows, the baseline includes the development traffic. Therefore, the manual assignment of the development traffic generation on top of the Baseline flows in the Assessment scenario means that the development traffic is double counted. On that basis, the assessment is considered to be robust.

The junction capacity assessments demonstrate that in the peak hours both of the assessed junctions would operate within capacity following addition of the development in the 2028 assessment year. The assessment also demonstrates that the increase in queuing and delay at this junction caused by the development traffic is relatively minor.

Watermill Lane is a dead end and beyond the site access the road solely provides access to a small number of residential dwellings. Therefore, as the road is relatively lightly trafficked no assessment of the site access has been carried out. However, as there would be very little through traffic on Watermill Lane for which the development

traffic could conflict with when egressing the site, I am satisfied that the site access will operate within capacity.

Traffic Impact Summary - I am satisfied that the above assessment demonstrates that development traffic would not have a detrimental impact on the surrounding highway network from a capacity perspective with all local junctions continuing to operate satisfactorily in the future year, with development scenario. However, the proposal would result in a material increase in traffic on Watermill Lane and Mayo Lane and I have some concern that this has not been assessed fully.

Watermill Lane is relatively narrow and whilst improvements are proposed to provide a footway and widen the carriageway, I have concerns, as detailed above, that the works required could not be provided without an overall improvement scheme and that this would be difficult to achieve given the constraints along this stretch of road.

Mayo Lane is also relatively narrow with on-street parking restricting the carriageway width further on some stretches of the road. The developments impact on this road has not been assessed and it has been assumed that all development traffic would join and leave Ninfield Road via the Watermill Lane junction; however, this is unlikely to be the case with some residents, especially those travelling to and from the west of the site, choosing to use the Mayo Lane route instead.

I do not necessarily have any concerns regarding the increase in use of Mayo Lane from a capacity perspective as I am satisfied that a majority of development traffic would use the Watermill Lane/Ninfield Road junction; however, I would wish for an assessment to be carried out to determine the likely impact on this road. This assessment should determine the level of additional traffic likely to travel via this route and also the roads suitability to accommodate this increase in use. Also, given that there are no footways available, the impact this would have on pedestrian safety should also be considered, as mentioned previously.

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.

- A 6m manoeuvring space is required behind all parking spaces. This distance should be provided, or the parking space should be widened.
- 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

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 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.

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 a month’s free bus travel to new residents, followed by 3 months of discounted travel. 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

I am satisfied that a suitable access into the site can be provided.

The capacity assessments undertaken as part of the development proposal demonstrate that development traffic would not have a detrimental impact on the highway from a capacity perspective with junctions nearest the site continuing to function satisfactorily in the future year scenarios. However, the proposal would result in a material increase in vehicular and pedestrian traffic on Watermill Lane and also Mayo Lane and I am not satisfied that this impact has been assessed or mitigated fully.

Watermill Lane is relatively narrow and lacks pedestrian facilities in the vicinity of the site access and whilst a new footway and road widening is proposed it has not been demonstrated that a suitable scheme can be put in place that would improve access to the site sufficiently, particularly for non-car modes of travel.

Mayo Lane is also narrow and lacks pedestrian facilities and whilst capacity is unlikely to be an issue its use by development traffic and increased footfall has not been considered in the assessments carried out as part of proposal. With this in mind there remains a need to provide an improved pedestrian link to the south, which would ideally be routed through the site and through to Mayo Rise, or at least to a point just north of the Mayo Lane junction.

I also have concerns regarding the accessibility of the site as a whole. The site is located a considerable distance away from the nearest 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 and it has not been demonstrated that a suitable pedestrian/cycle link to the site could be provided, as detailed above.

Further work would also be required to determine whether there is scope to provide new bus stops on NBAR and this should take into the account the visibility requirements for the bus stops, the provision of suitable pedestrian link and also whether a new bus service is likely to be provided in time to serve residents of the sites.

Based on these observations the site is considered to be poorly located from an accessibility perspective and as the 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.

In order to address this issue suitable measures will need to be provided 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.

It is also considered necessary to assess the proposed scheme against the relevant DaSA policies for the allocated sites in this area. With this in mind, Policy BEX3 (North Bexhill Infrastructure) requires development of the sites to:

- (iii) having regard to the transport requirements and impacts of the combined allocations and make proportionate financial contributions to off-site highway and cycleway/footpath improvements; and
- (iv) as part of (iii) above, all developments off Watermill Lane should provide an integrated approach to ensuring safe and convenient movement for pedestrians and cyclists, as well as vehicles.

These requirements largely mirror those listed previously; however, due to the scale of the works required and also the lack of highway land and land within the applicants control a combined approach with all developers/landowners for this, and the adjacent sites is the most realistic and only way of delivering a suitable scheme to improve pedestrian and vehicular access to this area.

Due to the lack of a combined approach, it is not known at this stage whether a suitable improvement scheme to Watermill Lane is achievable and therefore a condition to secure appropriate highway/accessibility improvements could not be put in place.

With this in mind I object to the development proposal on accessibility grounds. It should also be noted that the developments impact on Mayo Lane also requires consideration with appropriate mitigation being put in place as is necessary.

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 Watermill Lane.
- The provision of dropped kerbs and tactile paving either side of the new access.
- Footway provision on Watermill Lane to the south and possibly north of the site access.
- The possible provision of a pair of new bus stops on Haven Brooke Avenue (one in each direction) each requiring a raised kerb, bus shelter, lighting, seating and real time information display. The bus stop on the north side of the road will need an accessible pedestrian route from the crossing. The bus stop on the south side

may need to be accommodated within a new bus stop layby, with the pedestrian/cycle route adjusted accordingly to allow for this.

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

- A bus funding contribution of £1,100 per dwelling towards establishing the new bus service along Haven Brooke Avenue.
- 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 areas 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 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 (sent by email)

HRObject