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

FAO: Ms C Gibbons

Date: 29/09/22

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	

Updated Response 29/09/22 – A Technical Note (TN2) was submitted in response to ESCC's highway objection to planning application RR/2021/1656/P which related to the following matters:

- Frequency of existing accessible bus services and concerns that any

improvements to a DRT service would not be sufficient and once funding ceases would mean residents would be 'reliant solely on travel by private car'.

- Pedestrian infrastructure in the vicinity of the site, in particular relating to a short section to the north of the site on Eilerslie Way which does not have footway provision and historical pedestrian safety concerns in the area due to the lack of footway
- Walking distances to the local services and bus stops.

The Technical Note addresses each of these issues under the following headers:

- Matters 1 – Frequency of bus services
- Matters 2 – Pedestrian Infrastructure
- Matters 3 – Walking distance to bus stops.

In response to the points raised in the submitted Technical Note the following comments were forwarded to the applicant:

Matter 1 – Frequency of Bus Services

The modal split has been established from 2011 census data using the lower super output area Rother 009F which is considered to be the most representative existing residential area.

A review of journey to work census data has found that the mode share for bus is 0.7% in the Rother 009F which is considered to be the most representative existing residential area. The total sustainable travel share is 19.4% and the travel by bus therefore represents 3.6% of the total sustainable travel in the area.

The two conclusions that the TN draws from the data are as follows:

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

The TN suggest, based on this evidence, that buses are not a panacea of sustainable travel and that other options for sustainable travel are available, accessible, and promoted to new residents 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 both existing and new residents travel by bus is not a realistic alternative means of transport to the private car. It also confirms that the infrequent bus service that is currently available is not generally utilised by existing residents in the area.

Therefore, given the lack alternative means of travel available in the area, 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 stated that the submitted plan shows that continuous footways / footpaths are provided to the south to connect with the bus stops, Bexhill Town Centre and the Little

Common Shopping Area. It is accepted that the pedestrian route to the north via Ellerslie Way is less than ideal, however it should be noted that this section of road has not experienced any pedestrian related accidents between 2016 and 2020 inclusive.

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 TN states that the closest bus stops are 600m from the site and whilst this exceeds the recommended 400m walking distance, at a walking speed of 1.4 m/s, the walk to these bus stops is only 7 minutes and 9 seconds.

The TN also acknowledges that a walking distance to the bus stop of 2km (i.e. a 24-minute walk) would be significantly in excess of the recommended walking distance to a bus stop

However, the applicant is willing to fund the DRT service for 3 years as suggested to further improve sustainable travel choice for residents.

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 (600m+ from the site) and the excessive walking distance to the more frequent services available at Little Common.

Funding the DRT service for a 3-year period 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, it was recommended that the information within the County Council's Local Cycling and Walking Infrastructure Plan (LCWIP) be investigated as this may identify a more direct route for residents between the site and the bus services and facilities available at Little Common.

Of particular relevance to this site are routes 296.2 and 3 identified in the LCWIP 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.

It was suggested that this may provide a more desirable route for cyclist and pedestrians if it could be improved sufficiently as part of the development proposal; however, to take this forward, further discussions would be required between the developer and ESCC to determine how to secure the improvement works as part of the development proposal.

In response to the above comments further correspondence was received from the

applicant on the 28th of June 2022 in the form of a second Technical Note.

The second TN put forward measures for consideration to address the points raised by ESCC Highways in terms of the application site constituting a sustainable location:

As part of the development proposal the following has been offered to address the concerns raised by ESCC in the points raised above and those included in the original highway response:

1. A financial contribution (at a level to be agreed) towards the increased cost for the Demand Responsive Transport Service to allow its expansion to cover the application site and allow users to access a to-the-door sustainable transport system; or
2. 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; and
3. 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.

It was proposed that items (1) and (2) are interchangeable whereas item (3) was offered alongside the preferred option. These would be secured through a s.106 legal agreement.

Having reviewed the second Technical Note it was considered that insufficient information has been provided to determine whether the provision of a Demand Responsive Transport Service and a car club scheme would be effective in terms of improving sustainable travel choice for new residents as it is unclear how they would operate, particularly the DRT service.

Also, consideration could not be given to the provision of a car club in place of a Demand Responsive Transport as this would leave residents unable to drive without a usable travel option.

With the above in mind, concern remains that the proposed measures would not provide a useful alternative mode of travel and residents would therefore still be forced to rely on travel by private car.

Also, having investigated further the specific route identified in LCWIP which would benefit the site, it has become apparent that there has been no feasibility work undertaken on this route by ESCC and therefore it is not possible to estimate the likely costs of the works that would be required or the timescale for the delivery of the improvement scheme. With this in mind, it is considered very unlikely that the cycle/pedestrian link west of the site to Little Common could be improved sufficiently for it to be made an attractive option for residents of this development site. Given this uncertainty, the provision of this route cannot at this stage be considered as a realistic mitigation measure for the development proposal.

Conclusion

The bus service available closest to the proposed development's site entrance 11/11A, only provides a very limited service with just two return journeys on Mondays to Saturdays running to and from Bexhill town centre. There is no peak time, evening or Sunday service. Therefore, due to walking distances and the level of service provision the 11/11A is considered to be inappropriate as a useful travel option for residents.

The walking distance from parts of the development to the service 97 bus stop on Turkey Road is approximately 1.2 kms and this stop is only served by one return journey a day. The service 97 bus stops on Ellerslie Lane are also about 1.2 km distant and served by four return journeys a day (Monday to Saturdays daytime off-peak only). These levels of bus service provision, along with the excessive walking distances, make use of existing services highly unlikely to be a viable or attractive option for residents of the new development. They are therefore considered wholly inadequate in terms of being a sustainable transport option without significant interventions.

It is acknowledged that the provision of a financial contribution towards the DRT service and/or car club scheme would go some way to improving sustainable travel choice for new residents; however, there remains significant doubt that either would provide a usable alternative means of travel for most journey types and with this in mind residents would in the main remain highly reliant on travel by private car.

I therefore remain concerned regarding the accessibility of the site and as result the highway objection is maintained.

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

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