GDL-02-P

Land off Fryatts Way, Bexhill, East Sussex

Proof of Evidence of Luke David Regan MSc MCIHT CMILT

on Highways and Transportation Matters

Volume 1 - Text

LPA Ref: RR/2021/1656/P

PINS Ref: APP/U1430/W/22/3304805

A115791

November 2022
Revision 03

Document prepared on behalf of Gladman Developments Ltd

Tetra Tech Manchester, Quay West at MediaCityUK, Trafford Wharf Road, Trafford Park, Manchester, United Kingdom, M17 1HH

Tetra Tech Environment Planning Transport Limited. Registered in England number: 03050297
tetratecheurope.com
Registered Office: 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

Document Control

Document:	**Volume 1 (Text) Proof of Evidence** Volume 2 (Appendices) Luke David Regan MSc MCIHT CMILT
Project:	Land off Fryatts Way, Bexhill, East Sussex
Client:	Gladman Developments Ltd
Project Number:	A115791
File Origin:	J:\2019\A115791 Bexhill, Fryatts Way\Docs\Reports\PoE

Revision:	01	
Date:	12.10.2022	
Prepared by: L Regan	**Checked by:**	**Approved By:**

Revision:	02	
Date:	02.11.2022	
Prepared by: L Regan	**Checked by:** M Thompson	**Approved By:** L Regan

Revision:	03	
Date:	04.11.2022	
Prepared by: L Regan	**Checked by:** M Thompson	**Approved By:** L Regan

Volume 1: Text - Contents

Volume 2: Plans [Bound Separately]

Plan LDR1	Facilities and Amenities Accessible with a 1km and 2km Journey on Foot
Plan LDR2	Excerpt from Plan LDR1 showing Little Common Area
Plan LDR3	Excerpt from Plan LDR1 showing area around the A259/A269 signalised junction

Volume 2: Appendices [Bound Separately]

Appendix LDR1	ESCC Press Release – Bus Improvements
Appendix LDR2	Plan 4 from the Transport Assessment
Appendix LDR3	List of facilities, retail and amenities and the walk distances
Appendix LDR4	Bus routes in the vicinity of the site
Appendix LDR5	Census Area Boundaries
Appendix LDR6	TN3 – 2nd Response to National Highways
Appendix LDR7	TN4 – 3rd Response to National Highways

1.0 Introduction

1.1 Qualifications and Experience

1.1.1 My name is Luke David Regan. I hold a Master of Science (MSc) degree in Transport Engineering and Planning and a Higher National Certificate (HNC) in Civil Engineering. I am a Member of the Chartered Institution of Highways and Transportation (MCHIT) and a Chartered Member of the Institute of Logistics and Transport (CMILT).

1.1.2 I am an Associate Director of the transportation team at Tetra Tech, based in their Manchester office. I have over twenty years of transport planning and highway design experience, undertaken within a consultancy environment, primarily acting on private developer projects.

1.1.3 I regularly provide transport advice across a wide spectrum of development types, including retail, residential, retail, leisure, education, employment and mixed-use proposals.

1.1.4 I have acted as an Expert Witness advising on transport planning, traffic and highway matters in Land Tribunal, Local Plan Hearing and Public Inquiry settings.

1.2 Appointment

1.2.1 My team has advised on the highway and transportation elements related to the delivery of residential development on the appeal site since November 2019. I confirm that I am familiar with the site, the surroundings and local traffic conditions.

1.2.2 The evidence which I have prepared for this Appeal Inquiry is given in accordance with the requirements of my professional body. I can confirm that the opinions expressed are my true and professional opinions.

1.3 Scope of Evidence

1.3.1 There are no highways or transport points in dispute between the applicant, the local highway authority or indeed the planning authority technical officers with respect to access provision, traffic generation and highway impact.

1.3.2 The LHA has raised issues with respect to sustainable transport modes based on the walk distances involved to access bus services and the level of footway / pedestrian provision on some stretches of road near to the site.

1.3.3 The planning authority Statement of Case offers two reasons for refusal to which my Evidence responds. Reason 2 states that:

> *"The site lies outside any development boundary and at the fringe of Bexhill in an area with inadequate pedestrian routes and poorly served by public transport as well as being some distance from local services or facilities. Due to its location, form and scale the proposed development would result in a reliance on the private motor vehicle to be able to access a sufficient range of services, facilities and employment and more sustainable modes of transport would not be readily available. The reliance on the private motor vehicle and only one access into and out of the site would have an adverse impact on the amenity of neighbouring residential occupiers, particularly no. 11 and 15 Fryatts Way and raise issues of conflict between different users. Therefore, the development would result in identified environmental harm and not constitute sustainable development as defined within the National Planning Policy Framework. This environmental harm outweighs the economic and social benefits of providing proposed housing in this location. Accordingly, the proposal fails to comply with policies OSS2, OSS3, RA3, SRM1, TR2 and TR3 of the Core Strategy, policies DIM2 of the DaSA and paragraphs 85, 104 and 105 of the National Planning Policy Framework."*

1.3.4 Reason 3 relates to traffic impacts of the strategic highway network. It states that:

> *Insufficient information has been submitted to determine or agree the impact of the proposed development on the strategic road network. The proposal is*

therefore unable to demonstrate compliance with policies TR2 and TR3 and paragraphs 110 and 111 of the National Planning Policy Framework 2021.

1.3.5 The LHA have also prepared a Statement of Case which confirms that the LHA consider the development site to be poorly placed in terms of supporting the use of sustainable transport modes and access to local services. The contributing factors to this LHA position are summarised as:-

- The walk distances to local shops and services, including bus stops that provide a regular service, far exceed best practice technical guidelines, but also the quality and safety environment of some of these routes would also fail in terms of viability and usability, again reducing the ability for active travel modes to be properly utilised to and from the site.
- Pedestrian connectivity to the site is also less than ideal and whilst there is scope for pedestrians travelling south of the development site to avoid the narrow stretches of carriageway which lack footways; the route north to Turkey Road is absent of any pedestrian facilities.
- The pedestrian connectivity of the site and particularly the excessive walking distance to bus stops providing a frequents service will therefore lead of a higher propensity to use the car, including use of motor vehicles for shorter trips within the urban area that would normally be made by sustainable modes. With this increase in trip generation comes further pressure on local roads over and beyond those traffic levels that would be generated had the site been better located from an accessibility perspective.

1.3.6 Across all other areas, highways and transport considerations (e.g. local highway matters with respect to congestion, delay, road safety, site access provision etc) there are no points of contention between the main parties, before the Inquiry. I have therefore limited the scope of my evidence to address the sustainable accessibility credentials of the site and traffic impacts on the strategic road network to assist the Inspector in reaching a balanced view.

1.3.7 It should also be noted that at the time of writing there is an unresolved issue with respect to National Highways (NH) and the development traffic impact on the A259

between the Little Common Roundabout and King Offa Way signal controlled junction on the A259 c. 1.2km south west and 1.6km to the south east of the site respectively. The National Highway comments on the appeal (7/10/2022) also make reference to an additional junction, the A259 / Knebworth priority junction. The first time this was mentioned was in the 'Comments on Case' submitted to the Planning Inspectorate on 7 October 2022.

1.3.8 At the time of writing we are continuing to work through matters with NH and the current position is as set out at Section 5 of my evidence.

1.4 Case Outline

1.4.1 With respect to sustainable accessibility, I have assessed that the development will have a good level of sustainable accessibility. The site location is next to an established residential area and there is a wide range of day-to-day facilities and amenities (including community facilities) which are accessible on foot (and cycle) within Bexhill.

1.4.2 The Local Highway Authority has raised issues with respect to sustainable transport modes on the basis of access to bus services and the level of footway / pedestrian provision on some stretches of road near to the site. With respect to footway provision, my evidence finds that there are alternative safe and suitable routes available for pedestrians which demonstrably meets the needs of the existing community. I see no reason why that would not be the case for future residents on the site.

1.4.3 I also note that in the most recent LHA consultation response (CD 8.02, dated 29 September 2022) 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."*

1.4.4 With respect to walking distances I assess that the site is not isolated and would form a logical extension to an existing residential community. Moreover, residents would be entirely use other sustainable transport modes, including the most sustainable - walking. The site is demonstrably located within walking distance of many local services and facilities as I have assessed elsewhere in my evidence.

1.4.5 With respect to bus services, I find that there are also opportunities for journeys to be made by bus, although I accept that those are more limited than would be the case in some residential areas across the country. That said, they offer a comparable level of service to adjacent residential areas in Bexhill and the applicant is willing to provide funding for a Demand Responsive Transport (DRT) service which would serve the site and aligns with wider implementation of such services as proposed in the East Sussex County Council, Bus Service Improvement Plan (BSIP)' which identifies a new town wide Bexhill DRT proposal that would also serve the site and replace several existing bus routes (96/97).

1.4.6 Notwithstanding the above, there are existing services which are accessible and provide opportunities for other journey purposes to be fulfilled via public transport.

1.4.7 Furthermore, the development site is accessible by all the five NPPF identified sustainable travel modes (on foot, cycle, public transport, by low emission/zero emission vehicles and through car sharing). Whilst it is recognised that bus accessibility has some limitations, it remains a valid travel choice and it forms only one strand of sustainable travel.

1.4.8 My evidence shows that buses are not the only sustainable travel mode and that other options for sustainable travel are all available, accessible, and promoted via the Travel Plan (CD 1.19). I have interrogated the National Census, Journey to Work information and find that bus usage across the whole of Bexhill is c. 2.5% including areas with a greater service provision.

1.4.9 I consider it important to note that bus services and their accessibility are an important part of sustainable travel choice. However, the importance of bus services most logically be measured against what over alternatives are available and to what degree other sustainable travel choices can be taken up. E.g. it must be the case that

bus accessibility should weigh more in the context of a residential proposal in an isolated location, with no/little access to existing services, retail and community via other sustainable transport modes, such as importantly, on foot. My evidence finds that this development would form part of an existing residential area and benefit from the locational characteristics and local facilities etc which serve the existing community.

1.4.10 The locational accessibility to a large range of facilities is further enhanced by the increasing trends for home working, internet shopping, video conferencing and use of multiple convenient IT platforms for social contact and professional services (including health / GP services).

1.4.11 Other sustainable travel modes including ultra-low and zero emission vehicles (defined as sustainable transport modes in the National Planning Policy Framework, (ref: Glossary, page 73) , cycling and 'car sharing' will provide additional opportunity for future residents of the development to travel sustainably. Sustainable travel will also be promoted via a Residential Travel Plan (CD 1.19). With respect to low emission vehicles, the applicant has offered a Section 106 contribution (c. £80k) for an EV car club on the site. This will offer further sustainable travel choice for future residents on the site and existing residents in the area.

1.4.12 My evidence also demonstrates that even when commuting to employment by car, then the future residents of the site are likely to have to travel less distance than the Rother District car commuter average. The site can be considered to be more sustainable (due to shorter journey lengths) than existing average commuter lengths in Rother.

1.4.13 In summary, my evidence demonstrates that the proposals would result in development where the residents will be able to access a wide range of services and facilities by sustainable travel modes, including on foot. The development proposals therefore accord with the transport sustainable accessibility requirements of the NPPF.

1.4.14 With respect to the impact of the development on the relevant junctions along the A259 corridor between King Offa Way and Little Common roundabout and National

Highways concerns in that regard, my evidence shows that there would be no cumulative impacts on the road network that could be considered to be severe (or contrary to the requirements of Paragraph 111 of the National Planning Policy Framework.

2.0 Planning Policy

2.1 Background

2.1.1 The relevant local policies in terms of transport / accessibility issues cited in the Council's Statement of Case along with the relevant sections of the NPPF stipulated in the local highway authority consultation response dated 26/10/21 (CD 3.06) are set out below.

2.2 Relevant Local Policy Content

2.2.1 I have provided a review with respect to the transport specific Rother Local Plan, Core Strategy policies identified in the Reasons for Refusal.

2.2.2 Policy TR2 relates to the provision of integrated transport improvements and with respect development sites, seeks to locate those whereby those are sustainably accessible and can contribute towards a sustainable public transport network.

2.2.3 Policy TR3 relates to access and new development. It seeks to prioritise the needs of pedestrians and cyclists in the layout, secure funding for highway capacity / public transport accessibility and ensure that electric vehicle charging infrastructure is adequately provided.

2.3 National Planning Policy Framework

2.3.1 The LHA consultation response states:

> *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.*

2.3.2 Paragraph 104 of the NPPF states:

> *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
>
> *a) the potential impacts of development on transport networks can be addressed;*

b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places".*

2.3.3 Paragraph 106 of the NPPF confirms:

"Planning policies should:

a) *support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment,*
b) *shopping, leisure, education and other activities;*
c) *be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
d) *identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
e) *provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*
f) *provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider*

economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

g) *recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy."*

2.3.4 Further to the above, there are additional paragraphs within the NPPF which are relevant to the appeal site, including Para 105, 110 and 111. Those are set out below.

2.3.5 Paragraph 105 states:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

2.3.6 Paragraph 110 states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

b) *safe and suitable access to the site can be achieved for all users;*

c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and*

d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

2.3.7 Paragraph 111 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."

2.4 Policy Compliance

2.4.1 As demonstrated by my evidence I find no conflict between the development proposals and the requirements of the Development Plan and National Planning Policy Framework.

2.4.2 I find that the development would be accessible by a range of sustainable travel modes as I evidence. Regarding bus service provision, that will be improved via a contribution to provide a Demand Responsive Transport (DRT) service to the site for which a Section 106 contribution of £300k has been offered.

2.4.3 With respect to the particular requirements of point 6 at Paragraph 106 of the NPPF, I find that investment in DRT aligns well with the East Sussex County Council borough wide proposals which seeks to introduce such measures at a large scale.

2.4.4 A contribution is also offered to establish a low / zero emission car club which would benefit both future residents and the existing community. Appropriate electric vehicle charging infrastructure across the wider residential development would also be provided and could be secured by planning condition.

3.0 Planning Application Context

3.1.1 I have set out below the key relevant background with respect to highway and transportation matters in the context of the planning applications which are the subject of this appeal.

3.2 Local Highway Authority Position

3.2.1 The LHA provided consultation responses with respect to the highway and transport considerations of the development proposals dated 27 October 2021, which was updated on 26 October 2022 (CD 3.06 and CD 8.02).

3.2.2 Whilst the LHA confirmed that the proposals were acceptable with respect to access and traffic impacts, it objected to the proposals for the following reason:

> *"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"*

3.2.3 I have fully considered the LHA responses and conclude that their concerns raised during the planning application can be summarised as below.

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

3.2.4 The LHA confirmed that if planning consent was granted then the following items should be secured by Section 106 or 278 agreement:

- 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. These could be used by the Bexhill Community Bus Service (#11, see my Table LDR4.1). I note that a resident residential approval (RR/2020/565/P) (refer to my Section 4.2.6) on the corner of Fryatts / Way and Ellerslie Lane is required by condition to provide these in any event.

3.2.5 The specific financial contributions stipulated by the LHA were:

- A sum of £300,000 to fund a (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 £6,000.

3.3 Applicant Response

3.3.1 A full response was made to the local highway authority proposed objection in a technical note (TN2) (CD 2.04) submitted to the planning authority during the consideration of the application.

3.3.2 The Technical Note found that:-

- It has been demonstrated that the proposals are accessible on foot. A range of destinations are readily accessible on foot. Furthermore, there is

no evidence of any existing highway safety issue with respect to pedestrians on the existing highway network.

- There are also opportunities for future residents to access local bus services and the applicant is willing to fund improvements to the DRT service to further enhance provision.
- Notwithstanding the above, bus accessibility is only one strand of sustainable travel opportunity. In that regard it has been demonstrated that all other sustainable travel modes will be readily accessible.
- The applicant is willing to commit to a robust Travel Plan in order to maximise the use of sustainable travel modes.

3.3.3 TN2 concluded that, the site is accessible by all the five NPPF identified sustainable travel modes (on foot, cycle, public transport, by low emission/zero emission vehicles and through car sharing). Whilst it is recognised that bus accessibility has some limitations, it remains a valid travel choice and it forms only one option of sustainable travel.

3.3.4 TN2 also confirmed that the applicant has agreed that should planning permission be granted they are willing to implement the dropped kerbs and tactile paving works on Ellerslie Lane at a suitable location north of the Summer Hill Road.

3.3.5 Additionally, the applicant is willing to further improve public transport connectivity and fund an extension to the DRT service. This was confirmed in correspondence to Rother District Council on 30 May 2022.

3.3.6 Notwithstanding this, in my opinion the provision of an on-site based car club (low / zero emission vehicles) as offered by the applicant to RDC on 28 June 2022, would also be an appropriate and beneficial sustainable transport intervention. This is because:

- After an initial 3-year funding period the car club should be a self-funding (financially) sustainable service
- It would directly benefit the future residents as it would be, by default, more readily accessible on site

- It would be flexible as to the destinations that could be accessed and at what times

3.3.7 However, I find that, logically both the car club and DRT would offer additional sustainable travel choice for future residents on the site. The former would additionally benefit those who cannot drive.

3.3.8 With respect to the funding for the car club, the applicant has received a costing from a car club operator (hiyacar.com) that funding of £81,640 would be sufficient to support a 7 vehicle fully serviced car club for a three year period on the site which would support new residents and also the existing local community. In terms of viability, I note that this is not a binary question. If take up and usage levels are lower than necessary to support a 7 vehicle scheme, then less vehicles could be provided whilst still maintaining the service. Equally, if take up levels are higher than can be supported by 7 vehicles then additional vehicles could be added to the fleet. I believe the ability to change the number of vehicles in the scheme in response to demand levels provides operational flexibility which mitigates against the scheme being unviable.

3.3.9 With respect to the funding for the DRT, ESCC confirmed in their consultation response (26 October 2021) that £300,000 'would be sufficient to fund a DRT service for 3 years'. Beyond that period, the service will have had time to establish and added to that it will increasingly align with ESCC overarching bus strategy which commits to launching DRT services across the whole borough, including in place of existing local services.

3.3.10 I note that East Sussex County Council have already committed to implementing this widely across East Sussex and set out plans to introduce 13 Digital Demand Responsive Transport (DDRT) schemes covering the whole of the County (outside of Eastbourne and Hastings, with two separate schemes serving areas of those towns). This was set out in detail in the 2021 'Bus Service Improvement Plan (BSIP)' (East Sussex County Council) (CD 8.03). One of the DDRT schemes relates specifically to Bexhill (including the appeal site) and is proposed in place of existing Bexhill Town bus services 96 and 97.

3.3.11 Additionally, East Sussex County Council has confirmed in a press release (21 September 2022, included at **Appendix LDR1**) that the Government will provide c. £41m towards the implementation of the BSIP. From this I conclude that there is a commitment from ESCC, along with funding from the Government (and potentially the appeal site) which provides some certainty as to DRT / DDRT being viable (and indeed the preferred way to serve resident bus service need) in the long term across Bexhill.

4.0 Sustainable Site Accessibility

4.1 Preamble

4.1.1 On the basis that sustainable access is a central issue, I have set out in detail my assessment with respect to that in the remainder of this section. It also directly considers that specific matters referred to in the LPA / LHA SoC regarding walk distances to bus stop and local facilities/ services, bus frequencies and the prevailing pedestrian infrastructure in the local area.

4.2 My Interpretation of Sustainable Site Accessibility

Pedestrian Infrastructure and Routes

4.2.1 The LHA accept that the pedestrian facilities in the immediate vicinity of the site are considered to be adequate and request that a dropped kerb crossing point is provided at the Concord Close / Fryatts Way junction. The requested dropped kerb crossing point can be included as a condition should the Inspector seek to grant planning approval.

4.2.2 The LHA then proceed to describe the pedestrian infrastructure in the wider area. They state that it is sub standard although agree that alternative routes are available.

4.2.3 I have reviewed the local pedestrian routes available given the LHA concern with respect to the short section of Ellerslie Way which does not have footway provision, the specific alternatives available routes available include Gunters Lane, the residential estates to the east of Ellerslie Lane (Glenleigh Avenue etc) and the footpath network which connects through these residential roads and connects to Turkey Road to the north via Bexhill Academy. These do not involve any significant additional walking distances.

4.2.4 Having regard to the content of TN2 (CD 2.04), I have presented and refreshed the most relevant content in response to the adequacy of the pedestrian infrastructure in the remainder of this section.

4.2.5 Plan 4 from the TA shows that continuous footways / footpaths are provided to the south to connect with the bus stops, Bexhill Town Centre and the Little Common

Shopping Area. It is accepted that the pedestrian route to the north via Ellerslie Way does not have a continuous segregated footway, however it should be noted that this section of road has not experienced any pedestrian related accidents between 2016 and 2020 inclusive. That plan is included as an **Appendix LDR2** to my evidence for ease of reference. It shows that there are alternative routes to the east of Ellerslie Lane which do not involve any substantial additional lengths as I have confirmed.

4.2.6 To the south of the site there is a c. 100m length of Broadoak Lane which also does not have any footway provision. However, again alternative routes of a similar length are available (via Blackfields Ave and Courthope Drive).

4.2.7 Moreover, it is relevant to note that the planning application referred to in TN2, (RR/2020/565/P) which seeks permission for 26-dwellings adjacent to the proposed development on land between Fryatts Way and Ellerslie Lane was approved (Approved Conditional) on 6 April 2022. Importantly a highway authority consultation response date 22nd January 2021 confirmed that whilst the site has limitations with regard to accessibility:

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

4.2.8 It most follow that these conclusions must be applicable to the appeal site which is also located in the vicinity and which future residents would use the same pedestrian routes and bus stops etc.

4.2.9 Furthermore, it should be noted that development is required by the LHA to provide two new bus stops, placed off-site, either on the new section of route in Summer Hill Road, or on the existing section of route near the top of Knebworth Road. Added to this the development is required to provide improvements to the pedestrian route between the development and the bus stops and provide dropped kerbs and tactile paving on either side of Ellerslie Lane close to the junction with Summer Hill Road.

This is secured by planning condition 8, part c and part d respectively. I note that both of these requests correspond with those identified in the LHA consultation response for the appeal scheme. Clearly therefore, these will also benefit and improve public transport accessibility for any future resents on the appeal site.

Walk Catchments to Facilities

4.2.10 Plan 3 in TN2 (CD 2.04) has been reproduced to exclude the links to the north via Ellerslie Way and to the south via Broadoak Lane (which does not have a segregated pedestrian footway) and the updated Plan 3 shows that a wide range of facilities and amenities are still accessible on foot (including retail, employment and leisure destinations). I have updated the walk distance plan to include current facilities, retail and amenities etc to assist the Inspector. That is attached to my evidence as **Plans LDR1 – 3** and the facilities, retail and amenities are tabulated along with the associated walk distances in **Appendix LDR3**.

4.2.11 Manual for Streets sets out that walking has the most potential for replacing car journeys made under 2km (Paragraph 4.4.1). Within this walk distance, there is a wide range of retail, education, employment and local services within a 2km walk. These include:-

- Convenience stores
- Public parks / open space
- Employment
- Leisure destinations
- Bexhill Academy (secondary school)
- King Offa Primary Academy

4.2.12 In total, there are approximately 100 local destinations, services and retail opportunities which are accessible on foot and provide opportunities for a range of day-to-day needs to be met.

4.2.13 It should be noted that Manual for Streets also identifies a walkable neighbourhood as one which has a range of facilities within 10 minutes (up to about 800m). However, it goes on to confirm that is not an upper limit. I consider that this is aspirational and

relates to all environments including city centres and urban areas etc and therefore consider 2km to be a more appropriate distance to consider given the suburban location of the appeal site.

Walk Distance to Bus Stops

4.2.14 The LHA have raised concerns that the walk distance to the nearest bus stops are excessive. Details of the locations of the nearest bus stops was provided within the TA.

4.2.15 I am mindful that ESCC identified a 'recommended' walking distance of 400m in their consultation response dated 21 October 2021. I am aware that distance is recommended in the 'Guidelines for Planning for Public Transport in Developments' (March 1999, The Institution of Highways & Transportation). There are various other walk distances to bus stops which are referred to which indicate that 400m is not an upper limit either in terms of planning or a person's willingness / ability to walk.

4.2.16 In that regard the ESCC Bus Service Implementation Plan (BSIP) identifies as the first objective "……to help ensure no resident is further than 800 metres from an available bus service".

4.2.17 The closest bus stops are 770m from the site on Courthope Drive (service 11) and there are other services available further away on Gunters Lane, Turkey Road, Birkdale and Collington Avenue. The most frequent services are the 98 (Eastbourne, Bexhill, Hastings) and 99 (Eastbourne, Bexhill, Silverhill via Hastings) which are accessible a 1.75km and 1.8km walk from the site respectively.

Access to Bus Services

4.2.18 The TA set out in Section 4.4 bus service provision at the time of writing. That stated that the nearest bus stops to the site were on Courthope Drive (c. 770m from the site). It also confirmed that additional services were accessible at stops on Gunters Lane and Turkey Road (c. 1.1km from the site) and also on Birkdale (1.8km) and Collington Way (2km).

4.2.19 In the interests of completeness, I have reviewed current public transport bus services in the area and set out below in **Table LDR 4.1** the existing service provision.

Table LDR 4.1: Local Bus Services

Service	Route	Start and End Time of Service	Average One-Way Frequency					
			Weekday				Sat.	Sun.
			AM Peak	Inter Peak	PM Peak	Eve.		
Services available from Broadoak Ln, Courthope Dr, Warwick Rd (approx. 770m walk)								
11	Bexhill – Little Common – Bexhill	-	Two services daily at 11:19 and 15:49					-
Services available from Gunter's Ln (approx. 1,100m walk) or Turkey Rd (approx. 1,200m via footpaths, or 900m via Ellerslie Ln)								
97	Bexhill – Sidley – Hooe	-	Three services daily at c.10:20, 12:10 and 13:50				Four services daily at c. 8:50, 10:20, 12:10 and 14:25	-
Services available from Bexhill Academy (approx. 1,400m walk)								
95	Little Common - Bexhill - Sidley - Battle - Conquest Hospital	-	1 service daily from Little Common (adjacent to Cowdray Close) at 7:30am				-	-
98	Hastings - Bexhill - Sidley - Hailsham - Polegate - Eastbourne	-	1 service daily from Glenleigh Park, opposite Bexhill Academy at 08:17				-	-
Services available from Turkey Road / Southlands Road junction (approx. 1,750m walk)								
95	Little Common - Bexhill - Sidley - Battle - Conquest Hospital	08:30-18:30	1 bus every 2 hours				Five services daily at c. 0900, 1030, 1200, 1430 and 1600	-
98	Hastings - Bexhill - Sidley - Hailsham - Polegate - Eastbourne	07:00-20:00	2 buses per hour				2 buses per hour	Hourly (between 1045 and 1740)
Services available from Birkdale (approx. 1,800m walk)								
99	Silverhill - Hastings - Bexhill – Pevensey Bay – Eastbourne	Monday - Saturday Start: 06:47 End: 21:35 Sunday Start: 09:05 End: 19:05	2 Services	20min-25min	3 services	20min-40min	Every 20min-40min	60min
Services available from Collington Avenue (approx. 2,000m walk)								
96	Little Common - Bexhill	-	Three services daily at c. 10:00, 11:30, 13:30				Four Services Daily at c. 8:30, 10:00, 11:30 and 14:00	-

4.2.20 Collectively these services accessible in the vicinity of the site offer services between the Town Centre, Eastbourne and Hastings. I conclude that they would provide opportunity to access these places for certain journey purposes. Although I recognise that the lack of any proximate regular service will reduce the ability for the services to provide viable alternatives for many specific journeys.

4.2.21 I attach plans which show the routing and local bus stops in the vicinity of the site in my **Appendix LDR4**.

4.2.22 However, clearly the ESCC Bus Service Implementation Plan sets out proposals (which have already received Government funding) to provide DDRT services which will benefit the site and will replace the existing 96/97 bus routes. Added to that, the applicant has offered funding to provide a specific DRT service which would focus on serving the site. This will provide additional provision future residents on the site and facilitate connections to specific destinations and onward rail / bus services.

Access to Rail

4.2.23 The site is c. 2km north of Collington Rail Station. That offers c. 6 services during the AM and PM peak hours to destinations which include London Victoria, Ore (via Hastings), Brighton, Ashford International and Eastbourne. These destinations are generally served by at least hourly frequency connections.

4.2.24 There are regular services between c. 6am and 11pm, including regular weekend services.

4.2.25 The station includes secure cycle parking and also includes a taxi rank which facilitates multi-modal journeys which could include a short taxi component. Added to that it is a distance that some people would be willing to walk and connections would also be available via DRT / DDRT services in the future as the ESCC BSIP is implemented.

4.2.26 I conclude that future residents on the site would be a short distance away from a very good level of regional rail services, which are equally accessible via sustainable travel modes to the station.

Consideration of Cycling

4.2.27 The site is well located for future residentials to choose to cycle to and from a range of destinations including employment, retail and leisure destinations. Plan 4 within the TA was produced to show the accessible locations within a 5km cycle catchment.

4.2.28 That includes the entire Bexhill area, including all of the employment, educational offers, residential, retail and services located therein. There are generally no

significant gradients, street lighting and opportunities to cycle across the town on roads which do not have excessive or high speed traffic.

4.2.29 It should also be noted that as confirmed in the previous section, Collington Rail Station is c. 2km south of the site and therefore readily accessible via cycle.

Journey Length Context

4.2.30 I am mindful that in addition to non-car travel opportunity, there are additional considerations which weigh in the sustainable travel agenda. With reference to para 103 of the NPPF, limiting the need to travel does not just relate to local destinations accessible on foot and public transport etc. It also logically relates to the distance that residents would have to travel by car to local jobs and services etc. or indeed remove the need to travel entirely (working from home, internet shopping etc.).

4.2.31 I find that future residents of the site would positively benefit from access to broadband therefore enabling home working as a viable option. I also have regard to the National Census 2011, that provides information with respect to commuter distances. I have tabulated below the average commuter distances for Rother District and Bexhill Built Up Area.

Table LDR 4.2: Average Commuter Distances

Area	Average Commuter Distance (km)
Rother District	19.9
Bexhill BUA	16.3

4.2.32 I include the area boundaries in my **Appendix LDR5**. The site is located immediately to the west of the Bexhill BUA. I find that average commuter lengths are demonstrably likely to be less than the Rother average. This means that even when commuting is car based, the site can be considered to be more sustainable (due to shorter journey lengths) than the Rother average.

4.2.33 The local highway authority raised no issues with respect to traffic impacts on the highway network and is it clear that there are employment and other destinations

which can be reached by non-car modes or relatively short car journeys without giving rise to unacceptable highway conditions.

Other Sustainable Transport Considerations

4.2.34 Other sustainable travel modes including ultra-low and zero emission vehicles (defined as sustainable transport modes in the National Planning Policy Framework, (ref: Glossary, page 73) , cycling and 'car sharing' will provide additional opportunity for future residents of the development to travel sustainably. Sustainable travel will also be promoted via a Residential Travel Plan (CD 1.19). With respect to low emission vehicles, the applicant has offered a Section 106 contribution (c. £80k) for an EV car club on the site. There is also a Section 106 offer to cover the implementation of a DRT service should that be deemed necessary. This will offer further sustainable travel choice for future residents on the site and existing residents in the area.

4.2.35 I also find that ongoing technological developments and internet use further reduces the need to travel. Increasing trends for home working, internet shopping, video conferencing and use of multiple convenient IT platforms for social contact and professional services (including health / GP services).

Consideration of Bus Service Provision in Bexhill

4.2.36 I have interrogated the 2011 census data to understand the existing levels of bus use in Bexhill. In terms of census areas, Bexhill is covered by Super Output Areas: Rother 007, 008, 009, 010 and 011. The method of travel for work statistics for those 5 areas combined (i.e. Bexhill) are shown in **Table LDR 4.3**.

Table LDR 4.3: Residential Modal Split: Bexhill and Rother

Mode	Bexhill	Rother
WFH	14.3%	19.7%
Train	4.5%	3.2%
Bus, minibus or coach	2.5%	1.9%
Motorcycle, scooter or	0.4%	0.3%
Driving a car or van	55.6%	56.6%
Taxi	0.8%	0.8%
Passenger in a car or van	5.6%	5.1%
Bicycle	1.9%	1.4%
On foot	13.9%	10.4%
Other Method	0.4%	0.5%
Total	**100%**	**100%**

4.2.37 The table show that only 2.5% of the residents in Bexhill currently Travel to Work by bus. Furthermore, only 1.9% of residents in Rother travel to work via bus. Whilst, bus usage might be higher for other journey purposes, I consider that bus usage across Rother is generally low.

4.2.38 I make the comparison above not because I do not consider buses to be an important part of sustainable travel choice. It is, and particularly so in isolated locations which do not have other sustainable travel choices available. However, in the context of the application site, it is simply one strand of sustainable transport opportunities that are readily available. Even in instances elsewhere in Bexhill its contribution towards sustainable transport use is low.

4.2.39 The site and indeed many other residential areas in Bexhill are well placed to use other sustainable transport modes, including cycling and walking. The site is demonstrably located within walking distance of many local services and facilities as I have assessed elsewhere in my evidence.

4.2.40 Even when cars are used, an increasing number of these will fall into the sustainable transport category and moreover, journey lengths can be expected to be low on the basis of average commuter lengths I have provided. With respect to other journey

purposes, the large range of services and facilities located in Bexhill means that any associated journey lengths are also likely to be relatively short.

4.3 Summary

4.3.1 I conclude that the development is suitably accessible by a range of sustainable transport modes currently available. There are clear opportunities for a wide range of journeys to be undertaken on foot, by cycle in addition to the private car (including those defined by the NPPF as sustainable transport modes) as I have evidenced. There is also some opportunity for certain journeys to be fulfilled by bus services.

4.3.2 The Appellant has also offered a Travel Plan (CD 1.19) which would promote car sharing and raise general awareness about travel choice to further improve sustainable accessibility.

4.3.3 With respect to low emission vehicles, the applicant has offered a Section 106 contribution (c. £80k) for an EV car club on the site or £300k to cover the implementation of a DRT service. This will offer further sustainable travel choice for future residents on the site and existing residents in the area.

4.3.4 Added to that it should be noted that the development would become increasingly more sustainably accessible in the future if technological improvements lead to increased home working etc. (reducing the need to travel) and car technology continues to improve resulting in an increased proportion of private cars falling within the low or ultra-low emission category in the future.

5.0 Traffic Impacts on the A259 Trunk Road

5.1.1 Tetra Tech provided National Highways (NH) with Scoping information in January 2020 agree on the assessment of development impact on the trunk road network, namely the A259.

5.1.2 Initial comments from NH, related to the consideration of three junctions on the A259 as follows:

- A259 / Broadoak Lane simple priority junction – 34 additional vehicles an hour (AM & PM)
- Little Common roundabout junction – 33 (AM peak) and 32 (PM peak) additional vehicles an hour
- A259 / A269 (King Offa Way) signalised junction – 42 (AM peak) and 41 (PM peak) additional vehicles an hour

5.1.3 Since the application was lodged, there has been provision of various pieces of supplementary information provided in response to NH requests. Those notably comprise Tetra Tech Technical Note 1 (TN1) (CD 2.03) which responded to issues raised by NH in their first consultation response (dated 18 October 2021). That provided clarifications with respect to policy, personal injury accident assessment, trip generation and distribution, future assessment year and assessment of traffic impacts (model validation and geometry etc).

5.1.4 Within TN1 the modelling associated with the A259 / A269 (King Offa Way) signalised junction was also updated so that it entirely replicated that which was submitted in support of a planning application relating to Bexhill Leisure Centre which was found sound and accepted by NH.

5.1.5 NH provided a second response (21st March 2022), which updated their comments based on TN1. They again provided comments on the submitted capacity assessments.

5.1.6 Tetra Tech produced and issued TN3 (17th June 2022) (CD 2.06) to address the NH second response. TN3 included updated junction modelling assessments at the 3 junctions assessed in the TA.

5.1.7 There have been subsequent exchanges in information dealing with maintained concerns and also new matters such as the identification of an additional junction on the A259 (Knebworth Road) as recently as 7 October 2022.

5.1.8 At the time of writing, my team and I continue to engage with NH to seek to agree on matters in advance of the Inquiry. There are currently five junctions which NH have provided a response on (including the last 2 which were raised after scoping stage and as recently as October 7th with respect to Knebworth Road). They are:-

- Junction 5: Little Common roundabout junction
- Junction 6: A259 / Broadoak Lane simple priority junction
- Junction 7: A259 / A269 (King Offa Way) signalised junction
- Junction 8: A259 / West Down Road, and
- Junction 9: A259 / Knebworth Road

5.1.9 With respect to the current position, regarding Junctions 5 and 6, NH have accepted the assessment results as presented in the Tt response TN3. I have set out these results for ease of reference in my evidence (full TN3 included as my **Appendix LDR6**). With respect to Junction 7, my team are currently updating the assessments to seek to address the technical review which was received on 10th October 2022.

5.1.10 The current position with respect to Junctions 8 and 9 is that a response has been produce and issued by Tt (TN4) (CD 8.04) which is currently under consideration by NH. That is attached as **Appendix LDR7**.

5.2 Assessment Years

5.2.1 Appropriate assessment years have been discussed and agreed with NH. In NH consultation response 1, they stated:

'Suitable flows will be required for the following scenarios:

- *Base Year*

- *Opening Year + Committed Development*
- *Opening Year + Committed + Proposed Development*
- *Review Year + Committed Development*
- *Review Year + Committed + Local Plan + Proposed Development'*

5.2.2 Tt TN3 includes updated traffic flow diagrams with:

- A Base Year of 2022
- An Opening Year of 2025
- A Review Year of 2031

5.2.3 In their response dated 18th July 2022, NH responded:

'We are now in a position to set out several areas of agreement as follows:

- *Expected opening year assessment of 2025 is accepted*
- *Methodology for factoring 2028 traffic flows down to 2025 is accepted*
- *2022 baseline traffic flows are accepted'*

5.2.4 In their response dated 16th August 2022, NH responded:

"You have undertaken a future year assessment for 2031, this being 10 years after submission of the planning application for the proposals. This accords with the requirements of Dft Circular 02/2013 and is considered acceptable.

This matter of future assessment year selection is therefore now resolved."

5.2.5 The assessment years as set out in TN3 and paragraph 5.2.2 of this Proof are therefore agreed.

5.2.6 Department for Transport Circular 02/2013 and NH Planning Guide both confirm that mitigation should be based on traffic impact of the full development at the year of opening. This corresponds to an assessment year of 2025. It should be noted that an additional assessment year of 2031 has been provided as the review year, e.g., 10 years after the submission of the planning application so that NH can ascertain any level of future risks, as set out in Para 101 in the NH Planning Guide. On this

basis, I have provided my opinion and key performance indicators with respect to the junctions on the A259 for a future year of 2025.

5.3 Development Traffic Impacts

5.3.1 In order to assist the Inquiry, I have set out in this section, the quantum of development traffic that is anticipated could route via the five junctions identified by NH. I have also summarised the key changes in performance with respect to queue lengths and vehicular delay.

Summary of Impacts at J5: Little Common Roundabout

5.3.2 The development impacts at J5 set out in detail in TN3 and are summarised as follows:-

- Development traffic amounts to 33 and 32 additional vehicle per hour in the AM and PM peak hours respectively
- In the 2025 assessment, the largest increase in queue lengths as a result of the inclusion of the development traffic is an additional 2 PCU queuing on the Barnhorn Road Arm approach during in the PM peak hour.
- In the 2025 assessment, the largest increase in average vehicle delays as a result of the inclusion of the development traffic is an 8 seconds per PCU on the Chestnut Walk arm during in the PM peak hour.
- The junction is forecast to operate within capacity in the 2025 with development scenario.
- I do not consider the development impacts at this junction to be significant and certainly not severe.

Summary of Impacts at J6: A259 / Broadoak Lane

5.3.3 The development impacts at J6 set out in detail in TN3 and are summarised as follows:-

- Development traffic amounts to 34 additional vehicles per hour in both the AM and PM peak hours.

- In the 2025 with development scenario, the junction operates within capacity in both the AM and PM peak hour.
- For those on the A259 seeking to turn right onto Broadoak Lane, the 2025 AM peak hour assessment forecasts an average delay of 10 seconds per PCU and a queue of 0 PCU in both the without and with development scenarios.
- For those on the A259 seeking to turn right onto Broadoak Lane, the 2025 PM peak hour assessment, forecasts an average delay of 14 seconds per PCU and a queue of 1 PCU in both the without and with development scenarios.
- Therefore, the additional traffic associated with the development has no impact on queues or delays on the A259 major arms of this junction.
- For those on Broadoak Lane turning onto the A259, the 2025 AM peak hour assessment forecasts an average delay increase of 71 seconds per PCU and an average queue increase of 5 PCUs as a result of the additional traffic associated with the development.
- For those on Broadoak Lane turning onto the A259, the 2025 PM peak hour assessment forecasts an average delay increase of 21 seconds per PCU and an average queue increase of 1 pcu as a result of the additional traffic associated with the development.
- I do not consider the development impacts at this junction to be significant and certainly not severe.

Summary of Impacts at J7: A259 / A269 Signalised Junction

5.3.4 As noted earlier in this section, at the time of writing this proof, we are still to reach an agreed position with NH in relation to the modelling inputs at Junction 7.

5.3.5 The LinSig model used in the production of TN01 was a replica of the approved LinSig model for the proposed Bexhill Leisure Centre development (app. ref. RR/2019/430/P).

5.3.6 NH then requested that the LinSig model is updated to include slope and intercept values extracted from PICADY for the three minor roadside arms, namely Down

Road, Beeching Road and London Road. That exercise was carried out and the updated LinSig was provided in TN3 (dated 17.06.2022).

5.3.7 Subsequently, NH have provided further comments (dated 26.10.2022) on the LinSig models that were not provided in their review of assessment of this junction for the Bexhill Leisure Centre development (app. ref. RR/2019/430/P).

5.3.8 We will seek to address the most recent NH comments to reach an agreed position prior to the Inquiry, however at the time of writing this proof, the most up to date results are contained within TN3 and a summary of traffic impacts from that document is provided below:

- Development traffic amounts to 42 and 41 additional vehicle per hour in the AM and PM peak hours respectively.
- In the 2025 assessment, the largest increase in queue lengths as a result of the inclusion of the development traffic is an additional 4 vehicles queuing on the A259 Little Common Road (W) ahead / right lane (AM peak hour).
- In the 2025 assessment, the largest increase in average vehicle delays as a result of the inclusion of the development traffic is a 17 seconds per vehicle on the A269 Combe Valley Way Right turn movement (AM peak hour).
- The junction is forecast to operate within capacity in the 2025 with development scenario.
- I do not consider these development impacts at this junction to be significant and certainly not severe.

Junction 8: A259 / Knebworth Road Junction

5.3.9 With respect to the late request to assess impacts at the Knebworth Road / A259 junction, I note that this junction had not been raised as an issue until 7 October 2022. Moreover, due to it being a minor junction it is not included in the Bexhill and Hastings SATURN model which has been created to assess the impacts of local plan development and forms the basis of the traffic assessments presented in the Transport Assessment (and supplementary information) for this development.

5.3.10 The junction has been assessed and the full details and results are contained within TN04. Tetra Tech provided TN04 to NH on 28.10.2022 and we are awaiting their response. The results in TN04 are summarised as follows:

- Development traffic amounts to 42 and 41 additional vehicle per hour in the AM and PM peak hours respectively.
- In the 2025 AM peak hour Assessment for those on the A259 turning right onto Knebworth Road, both the without and with development scenarios forecast an average delay of 9 seconds per PCU and a queue of 0 PCU.
- In the 2025 PM peak hour Assessment for those on the A259 turning right onto Broadoak Lane, the without development is forecast to operate with an average delay of 10 seconds per PCU and the with development is forecast to operate with an average delay of 11 seconds per PCU. The traffic impact on this movement is therefore an increase in average delay of 1 second. In both the with and without development scenarios, a queue of 0 PCU is forecast.
- Therefore, the additional traffic associated with the development has an entirely negligible impact on delays and no impact on queues on the A259 major arms of this junction.
- The junction is forecast to operate with 66% and 78% spare capacity in the 2025 with development scenario AM and PM peak hours respectively.
- For those on Knebworth Road seeking to turn onto the A259, the 2025 AM peak hour assessment forecasts an average delay increase of 1 seconds per PCU and an average queue increase of 1 as a result of the additional traffic associated with the development.
- For those on Knebworth Road seeking turning onto the A259, the 2025 PM peak hour assessment forecasts an average delay increase of 1 seconds per PCU and no increase in the average queue length as a result of the additional traffic associated with the development.
- I consider the development impacts at this junction entirely immaterial and certainly not significant, let alone severe.

Junction 9: A259 / West Down Road

5.3.11 This junction appeared to be erroneously included in a NH in place of the A259 / Broadoak Lane junction. Nonetheless, NH continued to request that this junction is considered and that was provided in TN4.

5.3.12 The full details can be found in TN04 and my summary is as follows:

- No traffic will route via West Down Road to access the A259 from the site or vice versa. This is because there are shorter and more timely routes available. Therefore:
  - there are no additional turning movements at this junction associated with the proposed development
  - the additional trips that do occur will not cause any additional queues or delay on the A259.
- I consider the development impacts at this junction entirely immaterial and certainly not significant, let alone severe.

6.0 Conclusions

6.1.1 I am content for this section of my Proof to be read as my "Summary Proof of Evidence".

6.1.2 My name is Luke David Regan. I hold a Master of Science (MSc) degree in Transport Engineering and Planning and a Higher National Certificate (HNC) in Civil Engineering. I am a Member of the Chartered Institution of Highways and Transportation and a Chartered Member of the Institute of Logistics and Transport.

6.1.3 I am an Associate Director of the transportation team at Tetra Tech based in their Manchester office. I have over twenty years of transport planning and highway design experience, undertaken within a consultancy environment, for both private and Local authority clients, predominantly acting on development and regeneration projects.

6.1.4 My team has advised on the highway and transportation elements related to the delivery of residential development on the appeal site since November 2019.

6.1.5 This Proof of Evidence has been prepared to inform the Inspector of my findings and conclusions on the transport aspects of the proposals and specifically if the site is sustainably located. It also responds to the National Highways concerns with respect to development impacts on the A259 corridor between King Offa Way and Little Common roundabout.

6.1.6 Across all other areas, highways and transport considerations (e.g. congestion and delay on the local highway network, road safety, site access provision etc) there are no points of contention against the proposals between the main parties, before the Inquiry.

6.1.7 The Local Highway Authority has raised issues with respect to sustainable transport modes on the basis of access to bus services, the level of footway / pedestrian provision on some stretches of road near to the site and walking distances to local facilities. With respect to footway provision, my evidence finds that there are alternative safe and suitable routes available for pedestrians which demonstrably

meet the needs of the existing community. I see no reason why those would not similarly serve future residents on the proposed site.

6.1.8 With respect to bus services, I demonstrate that there are also opportunities for journeys to be made by bus, although I accept that opportunities are more limited than would be the case in some residential areas across the country. That said, the applicant is willing to provide funding (£300k) for a Demand Responsive Transport service for the site. That would further enhance the accessibility of the site and aligns closely with the East Sussex County Council Bus Service Improvement Plan, which has proposed a Bexhill Town wide (Digital) Demand Responsive Transport service to replace several existing services (96/97) and improve bus provision across the town.

6.1.9 In summary, my evidence demonstrates that the proposals would result in development where the residents will be able to access a wide range of services and facilities by a range of sustainable travel modes, including on foot.

6.1.10 Present day bus usage across Rother for commuting is low and even elsewhere in Bexhill, its contribution towards sustainable transport use is low. Buses can be an important part of sustainable travel choice, particularly so in isolated locations which do not have other sustainable travel choices available. In the context of the application site, buses are just one of various sustainable transport opportunities that are realistic and readily available sustainable travel choices.

6.1.11 The site and indeed many other residential areas in Bexhill are very well placed to use other more appealing sustainable transport modes, including the most sustainable - walking. The site is demonstrably located within walking distance of many local services and facilities as I have detailed elsewhere in my evidence.

6.1.12 The adequate locational proximity and accessibility to a large range of facilities is further enhanced by the increasing trends for home working, internet shopping, video conferencing and use of multiple convenient IT platforms for social contact and professional services (including health / GP services).

6.1.13 Other sustainable travel modes including zero emission vehicles (defined as a sustainable transport mode in the National Planning Policy Framework, (ref: Glossary, page 73) , cycling and 'car sharing' will provide additional opportunity for future residents of the development to travel sustainably. Sustainable travel will also be promoted via a Residential Travel Plan (CD 1.19). With respect to low emission vehicles, the applicant has offered a Section 106 contribution (c. £80k) for an EV car club on the site. This will offer further sustainable travel choice for future residents on the site and existing residents in the area.

6.1.14 The site is also c. 2km from Collington Rail Station which offers comprehensive regional rail connections to destinations which include London Victoria, Ore (via Hastings), Brighton, Ashford International and Eastbourne. The rail station is accessible via a short multi-stage journey including by cycle etc.

6.1.15 My evidence also shows that even when commuting to employment by car, then the future residents on the site are likely to have to travel a shorter distance than the Rother average. The site can be considered to be more sustainable (due to shorter journey lengths) than existing average commuter lengths in Rother.

6.1.16 In conclusion, my evidence demonstrates that with respect to sustainable accessibility, the proposals would result in development where the residents will be able to access a wide range of services and facilities by a range of sustainable travel modes, including on foot. I consider that the proposals are accessible by sustainable modes.

6.1.17 With respect to the impact of the development on the relevant junctions along the A259 corridor between King Offa Way and Little Common roundabout and National Highways concerns in that regard, my evidence shows that there would be no cumulative impacts on the road network that could be considered to be severe (or contrary to the requirements of Paragraph 111 of the National Planning Policy Framework.