

Land off Fryatts Way, Bexhill, East Sussex

Rebuttal Proof of Evidence of Luke David Regan MSc MCIHT CMILT on Highways and Transportation Matters

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1.0 Introduction

1.1 Scope

1.1.1 This rebuttal proof of evidence has been provided in response to the walk distances and routes to schools in the vicinity of the site as Mr Richardson sets out at Table 3.1 of his evidence.

2.0 Walk Distances and Routes to Local Schools

2.1 Background

- 2.1.1 Mr Richardson states at Section 3.2.1 of his Evidence that "The ESCC Road Safety team has expressed concern about the routes where footways are absent.......".
- 2.1.2 He then sets out in his Table 3.1 distances along a described walking route to each school. Mr Richardson has outlined different routes (of the same distance) to Glenleigh Park Primary Academy and Bexhill Academy when they are co-located on the same site.
- 2.1.3 Furthermore, the route to the Primary Academy he outlines is via some sections of the local road network which do not have continuous footway provision and the route to the Bexhill Academy proposes a route with no such footway gaps. There are other instances where Mr Richardson has identified routes without continuous pedestrian provision.
- 2.1.4 It should also be noted that the Local Highway Authority has confirmed in their updated consultation response (29.9.22, CD8.02), that there are alternative routes for pedestrians available which avoid the sections which lack footways. I include the relevant paragraph below.

"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."

- 2.1.5 To assist the Inquiry, I present Table LDR2.1 below which includes Mr Richardson's distances and routes against those included in my evidence which have continuous pedestrian provision. I also attach at my Appendix LDR8 plans of the specific measured routes which I have used.
- 2.1.6 In the interests of completeness and ease of reference, I have measured the distances of the routes Mr Richardson has suggested, these can be seen in Appendix LDR9.

	ESCC PoE		LDR PoE			
School	Walk distance from Fryatts Way	Route	Walk distance from Fryatts Way	Route	Route the Same (yes / no)	Difference in distance
Glenleigh Park Primary Academy	1.4km	As Bexhill Academy or Ellerslie Lane (limited width and unlit, no footway for 1/2 mile), Turkey Road	1.44km	Via Roselands, footpath through Primrose Hill and Broad View, Footpath leading to Glenleigh Avenue, Glenleigh Avenue, Glenleigh Park Road, Gunters Lane	No	40m
All Saints C of E Primary	2.1km	Ellerslie Lane (limited width and unit, no footway for 0.8km), Turkey Road	2.16km	Via Roselands, footpath through Primrose Hill and Broad View, Footpath leading to Glenleigh Avenue, Glenleigh Avenue, Glenleigh Park Road, Gunters Lane, Bidwell Avenue, Pembury Grove, Whitehouse Avenue, Turkey Road, All Saints Lane	No	60m

Table LDR 2.1 – Comparison of ESCC and LDR Distances and Routes



King Offa Primary Academy	1.5km	Primrose Hill, Broadoak Lane (footway on one side only, some short sections without footway), Down Road	1.85km (1.73km – Appendix LDR3)	Via Roselands, footpath through Primrose Hill and Broad View, Footpath leading to Glenleigh Avenue, Glenleigh Avenue, Glenleigh Park Road, Gunters Lane, Woodsgate Park, Down Road	No	350m
Chantry Community Primary School	2.0km	Primrose Hill, Broadoak Lane (footway on one side only, some short sections without footway), Woodsgate Park, St. George's Road	2.3km (2.14km – Appendix LDR3)	Via Roselands, footpath through Primrose Hill and Broad View, The Fairway, Footpath leading to Glenleigh Avenue, Glenleigh Avenue, Gunters Lane Woodsgate Park, St George's Rd, Crownmere Avenue, Barrack Road	No	300m
Little Common Primary School	2.5km	Broadoak Lane (no footpath), Deerswood Lane, A259 Little Common Road, Church Hill Avenue. Footpath between school and Church Hill Avenue shortens route	2.04km	Via Ellerslie Lane (section to the south of Fryatts Way which includes a footway on both sides), Blackfields Avenue, Courthope Dr, Broadoak Lane, Little Common Road (A259), Church Hill Avenue, Footpath between the school and Church Hill Avenue	No	-460m
Bexhill Academy (secondary)	1.4km	Roselands, footpath to Broad View, Glenleigh Avenue, Gunters Lane	1.6km	Via Roselands, footpath through Primrose Hill and Broad View, Footpath leading to Glenleigh Avenue, Glenleigh Avenue, Glenleigh Park Road, Gunters Lane	Yes	200m

2.1.7 Table LDR 2.1 provides updated measurements for King Offa Primary Academy and Chantry Community Primary School. This is because there is a 50-metre section of Broadoak Lane (on the approach to West Down Road) without a footway. In my previous Proof of Evidence, this route had been used as it is short and lightly trafficked (to/from King Offa Primary Academy and Chantry Community Primary



School). However, even if that section is excluded comparable length routes are available as shown in Table LDR 2.1.

- 2.1.8 I draw the following conclusions from the above comparison:
 - Glenleigh Park Primary Academy There is a minimal difference (40m) between the distances recorded with continuous footway provisions compared to those without, such as travelling along Ellerslie Lane, as Mr Richardson has suggested.
 - All Saints C of E Primary There is a minimal difference (60m) between the distance recorded with continuous footway provisions compared to those without, such as Travelling along Ellerslie Lane, like Mr Richardson has suggested.
 - King Offa Primary Academy There is a section of Broadoak Lane which Mr Richardson has used within the route he stipulates which does not have a footway, however, a continuous pedestrian route is available which adds an addditional c.350m.
 - Chantry Community Primary School There is a section of Broadoak Lane which Mr Richardson has used which does not have a footway, however, a continuous pedestrian route is available which adds an additional c.300m.
 - Little Common School There appears to be a discrepancy in the distance Mr Richardson has stipulated (2.5km) and the route he describes (which I find to be circa 2.2km when measured). His route also uses sections of road (Broadoak Lane) which have no pedestrian provision. However, a shorter continuous pedestrian route is available by c. 460m than that stipulated (2.5km).
 - Bexhill Academy Mr Richardson and I identify the same route however, he states it is a 1.4km distance, when measured, I find that to be 1.6km.



3.0 Conclusions

- 3.1.1 When compared to the walk distances in Mr Richardson's evidence, the maximum additional distance to local schools using routes which have continuous pedestrian provision is 350m. This equates to a walk time of c. 4 minutes (assuming a walking speed of 1.4 metres / second). I do not consider this to be a barrier which would prevent walking to / from any of the schools which have been assessed.
- 3.1.2 The schools are all located within a maximum walk distance of 2.3km (c. 1.4 miles) from the site. I note that the Government has a statutory thresholds which relate to the provision of free school transport. That is only provided if the schools are more than 2 miles (3.2km) away for children under 8 years old and 3 miles (4.8km) for children over 8 years old.
- 3.1.3 The schools considered are all well within this distance and therefore plainly accessible on foot.



Appendices



Appendix LDR8 – Specific Measured Routes taken by LDR

Glenleigh Park Primary Academy (circa 1.44km)



All Saints C of E Primary (circa 2.16km)





King Offa Primary Academy (circa 1.85km)



Chantry Community Primary School (circa 2.3km)





Little Common School (circa 2.04km)



Bexhill Academy (circa 1.6km)





Appendix LDR9 – Specific Measured Routes taken by ESCC

Glenleigh Park Primary Academy (circa 1.61km)



All Saints C of E Primary (circa 2.23km)





King Offa Primary Academy (circa 1.73km)



Chantry Community Primary School (circa 2.14km)





Little Common School (circa 2.21km)



Bexhill Academy (circa 1.6km)

