



Active
Travel
England

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Your Ref: LW/24/0820
Our Ref: ATE/25/00049/OUT
Date: 03 February 2025

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Lewes District Council

Application Ref: LW/24/0820

Site Address: LAND WEST OF, SOUTH ROAD, WIVELSFIELD GREEN,
RH17 7QS

Description of development: Outline application for the erection of up to 150 dwellings, with associated works, parking, landscaping, publicly accessible open space, land for education or community use, with access from Green Road and Eastern Road

Notice is hereby given that Active Travel England's formal recommendation is as follows:

- a. ~~**No Objection:** ATE has undertaken a detailed assessment of this application and is content with the submission.~~
- b. ~~**Conditional approval:** ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.~~
- c. **Deferral:** ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.
- d. ~~**Refusal:** ATE recommends that the application be refused for the reasons set out in this response.~~

1.0 Background

Active Travel England (ATE) welcomes the opportunity to comment on this outline planning application for the erection of 150 dwellings and associated works with access. It is understood that the site is not allocated in the adopted Local Plan.

This is ATEs first involvement with the site.

2.0 Summary

ATE has reviewed the application against the criteria in the updated planning assessment toolkit, national planning policy and active travel design guidance.

Following our review, the following key issues require further consideration:

1. Trip generation and travel plan targets
2. Route Audit
3. Accessibility
4. Off-site infrastructure improvements
5. Placemaking and permeability
6. Cycle parking

These issues have informed a deferral response. ATE requests further information and analysis is provided to address these deficiencies. These matters are elaborated on further below.

3.0 Areas of Concern

1. Trip generation and Travel Plan Targets

Trip generation:

ATE welcomes the modal split share for AM, PM peak and all-day trips being provided, however, the Transport Assessment (TA) relies on 2011 census data to establish estimates. While limitations exist with alternative data sources, 2011 data reflects travel behaviours from 14 years ago and offers reduced relevance for setting an ambitious baseline. To address this, a vision-led approach is recommended to establish robust and forward-looking targets for sustainable transport, as outlined in the updated NPPF and committed to in the 'Transport Vision' of the TA.

Travel Plan targets:

Paragraph 6.4 of the Travel Plan states it is premature to provide mode share targets for this site. It is recognised that targets at this stage would be provisional and have potential to be adjusted, however this approach is suboptimal. Providing modal shift targets will give an indication as to whether the site objectives listed in 6.1 of the Travel Plan are being fulfilled and provide an insight as to whether this location is sustainable for development in terms of active travel and delivering transport choice. Setting robust targets from the outset ensures ambition for active travel can be easily assessed and supports a vision-led approach. Steps can then be taken to address short falls if active travel targets are not being met.

2. Active Travel Route Audit

An accessibility assessment has been completed and presented in Section 3 of the TA.

Walking route audit:

Facilities have been identified in the TA solely by walking distance without critical assessments of the routes to them in terms of their safety, directness and accessibility in accordance with:

- The National Design Guide; and
- Inclusive Mobility Guidance

This assessment should be revisited and supported by maps, photographs and comments on deficiencies to inform potential areas of improvement.

Cycling route audit

Similarly, the TA and Travel Plan identifies surrounding facilities which are within cycling distance, however, limited analysis is provided. Indeed, the Travel Plan states that the route to Wivelsfield Station is likely to be suitable for confident cyclists only. Many people will therefore be excluded from accessing facilities beyond Wivelsfield Green and even the most confident cyclists could encounter dangerous conditions given the nature of the surrounding road network. More analysis of this route and routes to other key services would be beneficial. Again, this assessment should be supported by maps, photographs and comments on deficiencies to inform potential areas of improvement, taking into account the five core design principles outlined within LTN 1/20.

3. Accessibility

Proximity to services:

The National Design Guide paragraph 74 refers to 800m as being an acceptable walking distance. The site is within 800m of a local shop, primary school and village hall which will provide services for residents.

Developments should ideally be within 400m of a high frequency bus stop to be considered well located for accessing public transport or 800m from a rail station, as specified in ATE standing advice note 2.9. The nearest bus stop is 560m from the site which provides an infrequent service. It is noted that Ote Hall bus stop is located 1.1km away and the route may not be accessible for all. This stop is served by a more frequent service and to larger urban areas such as Brighton and Crawley.

A train station cannot easily be reached safely by active modes by the majority of future residents, meaning the site may not deliver genuine transport choice as identified in NPPF Paragraph 110. Core Policy 13- Sustainable Travel of the Lewes Adopted Local Plan 2010-2030 also includes an objective of promoting a sustainable system of transport for everyone in the district.

Quality of routes:

In assessing access to public services, it is also necessary to consider the quality of existing routes to inform potential offsite improvements. The surrounding active travel infrastructure appears limited. The footway on Green Road is unlikely to comply with

Inclusive Mobility Guidance and appears to measure just 0.9m between the shop and public house, however this should be clarified by the applicant.

Eastern Road currently has poor quality infrastructure however it is understood a 2m footway is being proposed along this road, which is discussed more in the following section.

4. Off-site infrastructure improvements

Eastern Road:

It is understood a shared use footway/cycleway will connect the site to Eastern Road where cyclists will join the carriageway and pedestrians will use the new footway. A dropped kerb and tactile paving will provide access to the proposed footway on the western side of the road as the footway terminates on the eastern side. The footway will continue along Eastern Rd providing dropped kerbs with tactile paving at side roads. At the end of Eastern Rd pedestrians will then connect to existing provision.

This footway is welcome, however treatment at side roads could be considered, for example as a raised table, as well as low level lighting given the secluded nature of this access. It is noted this could be dealt with at reserved matters.

Public transport improvements:

It is understood a contribution will be provided to bus services. This could include:

- Increasing the frequency of services stopping at Green Road.
- Improving accessibility to bus stops should also be explored including crossing points, tactile paving and widening footways where pinch points occur.

It is disappointing that more improvements are not proposed given the size of this proposal and the limited surrounding infrastructure particularly on Green Rd. A thorough route audit accompanied by critical analysis will likely highlight where improvements are needed.

Improvements are expected to be provided as per Core Policy 7- Infrastructure of the Lewes Adopted Local Plan 2010-2030, to create and support sustainable communities.

Signage:

Appropriate signage needs to be considered along Green Road to make drivers aware there are junctions along this stretch of road. The pedestrian and cyclist access may be less visible given the narrower access and lack of vehicles. Signage should be implemented to ensure the safety of the site is not compromised. A signage scheme should also be included throughout the site to aid wayfinding to and from Eastern Road.

5. Placemaking and Permeability

Permeability:

Pedestrian and Cyclists route:

The pedestrian/ cycle route to Green Road within the site will ensure pedestrians and cyclists are separated from motorists increasing the attractiveness of this route. This will reduce conflict between pedestrians and cyclists which the transport vision sets out to do

(TA 1.11). To ensure this route is attractive to all users, the following should be considered.

- The surface used should be bound to ensure all year-round use.
- LTN 1/20 core principles should be considered, ensuring there is a direct and coherent route on to the Eastern Road connection.
- As the route connects to Green Road there is no onward provision for cyclists. Cyclists travelling eastbound will need to cross the carriageway with no crossing provision. As vehicles on Green Road may not be aware there is a connection here, steps should be taken to improve safety. This could include:
 - A lighting scheme illuminating the junction helping to increase driver awareness of cyclists and pedestrians
 - Signage
 - A dropped kerb, road markings and safe connection to the shared use facility
 - A site wide lighting scheme will also be needed to aid sense of safety in the development and along the shared use route given the lack of natural surveillance in this part of the site.

The illustrative layout includes multiple cul-de-sacs, which can manage through-vehicle traffic when designed effectively. However, they must include active travel connections, which help reduce journey times for active modes.

A link into Wivelsfield Primary School or 100 Acre Lane through the open space on site should be explored to reduce journey times. A connection here would avoid the need for children to walk along the Green Road and improve access to South Road bus stops.

Further thought on how the site will connect to the multiple existing Public Rights of Way (PRoWs) in the area should be considered. PRoWs can facilitate access to locations such as Ditchling Common, which offers employment opportunities. As well as transport nodes and services. Whilst these routes may not be suitable for all users at all times of the day and year, improvements should be considered which could include:

- Widening
- Improved surfacing to provide all weather access and increase the accessibility of them.
- Lighting

These improvements should align with 4.116 of Lewes District Local Plan Part 2 which recognises the importance of enhancing the footpath, cycle and bridleway network to ensure its convenience, safety and attractiveness for users. Ultimately improvements should be agreed with the relevant authority.

Placemaking

Site frontage:

The development will not create a active frontage onto Green Road, which can:

- Remind drivers they are in a residential area where pedestrian and cyclist activity is expected. Active travel users are likely to emerge from concealed entrances such as from the proposed pedestrian and cyclist route to Green Rd.
- Improve natural surveillance and feelings of safety.

Main access:

A raised table should be provided at the site access to assist pedestrians crossing, particularly those using mobility aids and pushchairs.

Density:

This site is low density which will limit the passive surveillance across large parts of the site. This may be a particular issue on the pedestrian/cycle route to Green Road given its secluded location. Providing houses on the eastern parcel may decrease journey times, incentivise active travel and reduce perceptions of distance to surrounding services, as the current dwellings are set some 300-400m back from Green Road. This would align with NPPF paragraph 129. C, which expects development to make efficient use of land taking into account the scope to promote sustainable travel modes

A traffic calming strategy will be required on the access road and other roads within the site to keep vehicle speeds below 20mph, this could include build outs and pedestrian priority crossings. Features will also be needed to mitigate pavement parking.

6. Cycle parking

Parking for cycles align with East Sussex County Council cycle parking standards as per Travel Plan 7.15. There is also merit in considering LTN 1/20 standards. The location of parking should be as convenient as car parking spaces and routes from cycle parking to the road must not be obstructed.

4.0 Next Steps

ATE requests that the Local Planning Authority shares this response with the applicant's agent. We would welcome additional details and amendments in line with the above comments, with a view to providing a further response/appropriate wording for conditions as required.