

Communities Economy and Transport

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To: **RPS Consulting**

F.A.O: Matthew Brown

Date: **16th October 2024**

Our Ref: PRE/LW/2024/2109

District Ref: TRP-00048

Applicant: Matthew Brown (Associate Director)

Location: The site comprises two parcels of land located to the south of Green Road, Wivelsfield Green and separated by a bridleway. Collectively, the two parcels of land and bridleway extend to approximately 21.2ha. The eastern parcel measures circa 8.7ha, the western parcel circa 11.9ha and the bridleway circa 0.6ha.

A site location plan is provided at Appendix 1 of the enclosed Transport Sustainability and Access report to be used as a discussion document. In addition, an initial masterplan for the site is provided for context.

Development: The development proposal is for circa 150 dwellings (LAA Site Refs: 03WV,28WV,29WV and 31WV).

The vehicle access is proposed via a simple priority junction with Green Road to the north of the site. This accords with the LAA Ref: 31WV preferred access strategy. There is also the potential to provide vehicle access via Eastern Road to the west of the site.

Pedestrian and cycle access will be via the proposed vehicle access with Green Road at the northern boundary and via Eastern Road at the western site boundary.

The full details of the proposed residential development are detailed within the enclosed Transport Sustainability and Access report. Section 3 of the report details the development proposal and the proposed access arrangement.

Road Name or Number:	C6	Consultation Date:	15 May 2024
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National Grid Reference:	534966120024	Contact Officer Details:	Teresa Ford 01273 482254 developmentcontrol.transport@eas tsussex.gov.uk
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Thank you for your correspondence and supporting Transport Scoping Note, seeking pre-application highway advice on the above site and development proposal for up to 150 (reduced from 170) dwellings. I acknowledge receipt of your pre application fee.

These comments are issued following a Teams meeting held on 25th July 2024 and further documentation received on 9th, 11th and 15th October 2024.

The new access is shown to be onto Green Road, Wivelsfield which is the C6 classified road. In the vicinity of the site the road is approximately 5.5m wide, with a continuous footway on the southern side of the carriageway of varying widths (1m to 1.5m). A footway is present on the northern side of Green Road from the B2112 in the west terminating at Slugwash Lane, approximately 240m from the western boundary of the site.

This stretch of the C6 is subject to the 30mph local speed limit through the village.

Local facilities are available in Wivelsfield village including a primary school, public house, shops, and church. Further facilities are available in the town of Lewes which include primary schools, college, leisure centre, hotels, a cinema, main supermarkets and railway station. There are railway stations at Plumpton and Wivelsfield both of which are outside suitable walking distance and are without footway connections along unlit roads.

The nearest bus stops are on Green Road known as Playing Fields stops (east and west bound) to the west and on South Road (known as Coppards Close stops) to the east and are approximately 700m from centre of site. The desirable walking distance is 400 metres. Compass travel currently operate:-

- Service 166 – 2 hourly Monday to Saturday daytime. Linking Wivelsfield Green with Princess Royal Hospital, Haywards Heath, Plumpton Green and Lewes.
- Service 167 – Monday to Friday peak journeys linking Wivelsfield Green with Burgess Hill, Plumpton Green and Lewes. Two daytime return journeys are also provided on Tuesdays and Thursdays.
- Service 168 – Three journeys on Mondays, Wednesdays and Fridays linking Wivelsfield Green with Burgess Hill.

In addition, there is a demand responsive ‘Flexibus’ service currently available between 7am and 7pm Mondays to Saturdays.

There are also bus stops (known as Ote Hall Chapel stops) north and southbound on the B2112 (Ditchling Road) which has a regular service, provided by Metro Bus, which extends to Haywards

Heath railway station which provides onward connections to London. These stops are approximately 1200m from all parts of the site.

The site is currently agricultural land with access to this site currently from an existing field gate onto Green Road (C6) and onto Eastern Road and from surrounding fields. Your proposal is for up to 150 dwellings with a new access shown to be created onto the C6 (Green Road) with an option onto Eastern Road.

I consider the main issues to consider and requirements that would need to be met are:

1. Suitable vehicle, pedestrian and cycle access, to include sufficient width, gradient and visibility splays.

The submitted plans indicate a new access onto the C6, Green Road, (shown as option 2) which is shown in the form of a priority junction. It would need to be demonstrated that a right turn lane facility (or other means of access) is not required once the final trip generation and traffic flow on Green Road is known.

Visibility splays of 2.4m x 62.3m to the east and 59.1m to the west is shown to be provided which the applicant states is a result of a speed survey carried out recently. The speed survey should be independent and presented within any TA/planning application in order to verify the appropriate visibility splays.

From a site visit it is noted that, due to the proposed access position being on a slight bend, forward visibility would likely be restricted for vehicles waiting to turn right into the access and for those travelling along Green Road.

No Road Safety Audit (RSA) has been submitted with this scoping note therefore the access and associated visibility at the proposed access has not been accepted at this stage as further information is required for a full assessment.

The indicative initial vehicle access onto Green Road is stated as being 5.5m wide with 6m junction radii and 2m wide footway provision on both sides around the bellmouth, this is considered to be appropriate for a development of this type and size. However, tracking drawings would be required to demonstrate that all turning movements by the largest refuse vehicle likely to serve the site could be accommodated (12m length).

It is noted that vehicular access, option 1, onto Eastern Road near the southwestern corner of the site is not now proposed for vehicles and is to be for pedestrians and cyclists with possibly as an emergency access. However, it has not been demonstrated why an emergency access is required and no details are given on how this access would be achieved.

If the access onto Eastern Road is to accommodate both pedestrians and cyclists it would still require relevant visibility splays for the speed on Eastern Road. Given the increase in footfall and cyclists using this route Eastern Road would also require improvements to widen to 5 metres together with new pedestrian and cycle provisions. Further information is required before any access onto Eastern Road can be fully assessed.

The accesses (vehicular or otherwise) would need to be subject to Road Safety Audits and any issues raised would need to be addressed in a satisfactory manner. The RSA's should be carried out and submitted at pre-app stage or as part of any planning application submission. No RSA is submitted with this current pre application.

The access arrangements would also need to be tested for capacity as part of any future Transport Assessment.

2. Appropriate on-site vehicle and cycle parking

The number of vehicle parking spaces should be in accordance with ESCC parking demand calculator. It is generally expected that the calculation will be based on larger dwellings (3 bed+) being allocated a minimum of 2 parking spaces and smaller dwelling dwellings and flats 1 space. The current parking guidelines and calculator dated March 2024 can be found on the ESCC website.

The final parking provision will be confirmed at a later stage once the housing mix is known; however, it should be noted that parking spaces would also need to meet the required minimum dimensions to be counted towards the overall provision. The minimum sizes are as follows:-

- Parking Space – 5m x 2.5m (A minimum additional 0.5m will need to be added to either or both dimensions where the space is adjacent to a wall(s) or fence(s) or hedge(s). Spaces in front of garages must be a minimum of 6m long to maintain access to the garage)
- Disabled Parking Space - 5m x 3.6m
- Car Ports - 5m x 2.8m
- Garages - 3m x 6m or 3m x 7m if cycle storage is included.

Regardless of size garages remain less likely to be used for parking and therefore a garage only counts as 1/3 of a parking space.

Electric Vehicle charging provision should be considered as NPPF requires sites to be EV ready and should be provided in accordance with building regulations part s.

Safe, secure and covered cycle parking facilities need to be provided at new developments and are equally important as car parking, as cycling has the potential to replace shorter car journeys. The level of cycle parking will need to meet the requirements of the East Sussex County Council (ESCC) standards (March 2024) which are 1 space per bedroom irrespective of type of dwelling.

Consideration should be given to allow cycle access to any rear garden cycle storage with separate pathways and if necessary, widening of driveways to accommodate both parked cars and cycle passage.

The size of cycle storage space should be in line with LTN 1/20 whereby cycles are longer than 2 metres.

3. Internal Layout.

ESCC supports the approach to development set out in Manual for Streets and Manual for Streets 2, which has been adopted guidance for residential street design since their introduction in 2007

and 2010. Within these documents there are references to visibility splays, turning circles and car parking layouts.

Also, our Local Design Guide can be found at the web link below. It provides further advice on how MfS is to be interpreted and applied within East Sussex.

ESCC guidance documents relating to highway construction can also be found here.

[Road adoptions, and representations on highway works | East Sussex County Council](#)

Our general requirements are as follows:

- A 6m manoeuvring space is generally required behind all parking spaces to enable vehicles to manoeuvre in and out of position in a safe and convenient manner.
- Clarification would be required regarding the extent to which the internal layout will be put forward for adoption.
- A minimum width of 5.5m is generally required for the main 'spine road'. A minimum width of 4.8m is required for the secondary roads.
- With regards to waste collection, it should be noted that residents should not be required to carry waste more than 30m whilst waste collection vehicles should be able to get within 25m of the storage point.
- The Highway Authority would wish to see the roads within the site that are not to be offered for adoption laid out and constructed to standards at, or at least close to, adoption standards.
- Tracking drawings are required to demonstrate that the largest refuse vehicles likely to serve the development can manoeuvre and turn within the site.
- Any disabled parking bays should provide adjacent dropped kerbs to enable appropriate accessibility between the vehicle and footway.
- Considerations should be given to how electric vehicle charging points (including passively if demand is not currently there) will be accommodated particularly for on-road visitor parking or allocated parking away from properties.
- We would not wish to adopt the car parking areas.
- Information would be required regarding the surfacing, drainage and lighting within the site.
- Additional pedestrian access points are available via Public Right of Ways that run through or border the sites. The ESCC Rights of Way team will be consulted on this aspect of the development proposal as detailed later in this report.
- Road adoption would be secured through a s38 agreement with ESCC. The extent of the highway adoption would have to be agreed and would depend on the emerging layout at

reserved matters stage. A full safety audit on the internal road layout should also be completed along with agreed lighting and highway drainage proposals.

4.Appropriate on-site vehicle turning

Turning space for vehicles would need to be provided in accordance with Manual for Streets, together with vehicle tracking showing the swept path for a private motor car and refuse vehicle. Vehicle tracking needs to be provided for the largest refuse vehicle of 12m in length. Swept path analysis would need to be provided for all turning areas within the site as well as all movements at the access junction with Green Road (C6).

5. Appropriate improvements to the local network to ensure safe access, and accessibility by all modes of transport.

Given the scale of development Active Travel England will be a statutory consultee and their guidance should be taken into account when preparing the Transport Assessment.

We would also wish to ensure that the Transport Assessment robustly looks at opportunities for active travel movements to/from the site.

In doing so, it should put together a package of appropriate infrastructure improvements that can be delivered in association with the development, which should ensure there are appropriate routes to the primary school, new bus stops and shop and also to the existing bus stops to the west on the B2112.

There should be good opportunities to promote walking, cycling (and wheeling) trips to and from the site rather than car borne trips.

Appropriate improvements to the local network to ensure safe access, and accessibility by all modes of transport. Any application should be supported with a quality audit to assess non-motorised modes (NMT audit) of travel to key destinations.

In order to enable/encourage non car modes of transport the following would likely need to be provided (but is not exhaustive):-

- A pair of new bus stops required on Green Road in the location of the access/existing bridleway to include hardstanding areas, high-rise kerbing, flagpole signs, seating (and bus shelters to be agreed with parish council for ongoing maintenance).
- Footway improvements to include new/widening existing to 2m (with pinch points) along the length of Green Road from the B2112 in the west and pass the site to link to the new bus stops on Green Road; village shop to the east of South Road and extending to the primary school in South Road including any associated dropped kerbs/tactile paving necessary.
- Consideration would need to be given to provision of new crossing point/s on Green Road in order for pedestrians/cyclists to cross the C6 to reach schools, bus stops and facilities in the village.
- Improvements to Eastern Road to include road widening and facilities for pedestrians and cyclists.

- Improvements/upgrading of public rights of way across the site including the bridleway running north to south through the middle of the site
- Contribution of £1,350 per dwelling ($150 \times £1350 = £202,500$) would be sought towards improvements to the existing/new Bus Services serving the site/Wivelsfield.
- A robust Travel Plan should also be provided to manage and influence travel behaviour of residents and should include at least a £200 voucher for each dwelling upon occupation.
- A Travel Plan Audit fee of £6,000.
- Direct pedestrian link from the development into the adjacent primary school should be explored.

Furthermore, a significant issue is catering for school transport demand to Chailey School, the nearest appropriate secondary school for pupils living in Wivelsfield Green. Chailey School is over 3 miles distance, so it is the statutory responsibility for ESCC to provide free school transport for these pupils. There are currently transport capacity issues from Wivelsfield Green. Thus a contribution would be sought in accordance with policy to cater for this additional demand.

6. The likely trip generation of the existing and proposed development

Modelling

A Transport Assessment would need to be submitted with any planning application. This would need to assess the traffic impact of the development on the highway network. Further information on the existing and proposed uses and trip generation on the site would therefore be required. The original TRICS data supplied with the Scoping Note is not acceptable as it includes several sites with good transport connections that are not comparable.

Further updated TRICS based on mixed private housing was supplied on 15th October 2024 which is more comparable to this site in terms of public transport and noted that it makes a slight difference to the trip numbers.

It is noted that the overall number of units may reduce and the type and split of housing is not known at this stage which will affect the trip generation.

Once the trip generation is agreed the trip distribution on the surrounding highway network would need to be determined.

Modelling work will be required on the access onto the public highway and surrounding highway junctions to include (but not exhaustive):

- Mini roundabout B2112 (Green Road/Ditchling Road)
- Slugwash lane/Green Road/Eastern Road staggered crossroads
- South Road/North Common Road/Green Road
- South Road/Hundred Acre Lane mini-roundabout

The applicant may be required to carry out mitigation works/improvements to these and other surrounding junctions.

Depending on the actual access position/s it may also be prudent to consider existing parking on Eastern Road and also Downsvie Drive as an alternative to reach South Road for trips southeast which may be more attractive during the adjacent primary school drop off/pick up times.

Whilst this site was put forward for inclusion in the Lewes Local Plan under reference 31WV it is not clear if this is to be included at this stage by Lewes District Council.

The Highway Authority is aware that LDC are looking to commission use of the ESCC county wide Model to test scenarios of development which will result in background growth of the transport network throughout Lewes District and neighbouring areas. Whilst this pre app was submitted before the County Model was live you are still advised to contact Lewes District Council in this regard to determine if this site should be included in the scenarios for Wivelsfield area before submitting any planning application.

In order to determine the employment areas and trip distribution the 2011 census has been used. However, the 2021 census should also be reviewed particularly as employment areas may have changed. East Sussex has higher percentage of homeworkers post covid which the 2021 census may reflect more accurately.

Employment in Mid Sussex Area should be reviewed as it should not be assumed that all would go north on B2112 as Mid Sussex covers Burgess Hill etc; thus some trips may go south instead on the B2112 and then via Janes Lane/Folders Lane.

Whilst this may be a small percentage it could still have impact on traffic through the mini roundabout Green Road/B2112 so does need to be included in the assessment.

Furthermore, the impact on Ditchling would need to be addressed within the TA.

Thus whilst the modelling as submitted appears to be acceptable the Highway Authority would need to see all the associated details (such as ARCADY outputs; RSA's; speed surveys referred to etc) and any additional technical work as explained above in order to fully consider such a proposal and the effects on the highway network.

7.Additional Comments

The recording of traffic flows for the B2112/Green Road mini-roundabout, supplied on 15th October 2024, was undertaken on 13th June 2024. Whilst this is somewhat useful, due to the position of the camera and hedging, you cannot see more than 4 vehicles at a time on the Green Road arm. Thus you cannot determine the actual length of the queue. It is recommended that a further survey conducted in a different location would be more beneficial.

It noted that Table 3 of the Transport Sustainability and Access document refers to a couple of schools which are not within East Sussex. There is also mention of Oakwood Farm Lifestyle Market being 1.4km away, please could you clarify where this is located. The table should also include the Morrisons Daily shop on Ditchling Road.

It is noted that ESCC Rights of Way and Landscape team have already commented on your recent PRE- application direct with Lewes District Council. Their comments also need to be addressed within any future planning application submission.

Additional information which may be useful can be found at:

[Transport Development Control | East Sussex County Council](#)

The link above will also direct you to a lot of the basic information needed to assist in the highway and transport consideration of many proposals.

ESCC will expect the following to be submitted as part of any future application:

- A site location plan scale (1:1250) with site boundary indicated
- Schedule of existing uses including planning history
- Description, including site layout plans, of the proposed development/uses
- Reference to supporting national, regional, and local planning documents and policies
- Summary to support the site access/highways works proposals, including plan (scale 1:250 or similar) with achievable visibility splays (including forward visibility), access widths and gradients indicated
- Stage 1 Road Safety Audit of proposed accesses and highway works and designers response, including amended plans
- A 'Transport Assessment', including location of key services, availability of sustainable modes of transport and existing/future vehicular traffic generation
- Parking strategy, including provision of parking for all modes of transport
- Relevant data collected to date
- Proposed trip rates supported with TRICS outputs and site selection methodology
- WCHAR (or NMU) Audit to take into account walking, cycling and connections to key regular destinations and enhancements to the highway network already secured by other schemes.
- Active Travel England checklist should be provided.
- Documentation relating to speed surveys undertaken (referred to in the scoping note or any new ones undertaken)
- Any videos undertaken to support existing traffic flows
- Full ARCADY INPUTS and OUPUTS for relevant junctions/mini-roundabout as described in text above.
- Proposals for off site highway improvements/works.

Please note any advice is provided on the understanding that, if a highways scheme is subsequently delivered by the Developer via the Section 278 or Section 38 Agreements process, the Developer agrees to undertake all the obligations of a “client” for the purposes of the CDM Regulations (SI 2015/51). A copy of the obligations the Developer will be required to adhere to through any Section 278 or Section 38 Agreement is available on request. It is recommended that Developers discuss these obligations with their solicitors if they are unsure as to the CDM requirements.

The above comments are for guidance only and shall not prejudice any further comments ESCC wishes to make at any next stage, recognising that policy and material considerations can change. They should however be regarded as highway requirements that would need to be satisfactorily met as part of any formal proposal. The final decision to grant planning permission is made by elected members of the local planning authority.

If you wish to request further detailed pre-application advice, please complete the application form, which can be found on our website, confirm your agreements to the stated fees and send it to: developmentcontrol.transport@eastsussex.gov.uk. A member of the Transport Development Control Team will contact you.

On behalf of the Highway Authority

For Director of Communities, Economy and Transport

(Sent by email)

HRPre-App