



## LEAD MEMBER FOR TRANSPORT AND ENVIRONMENT

**DECISIONS** to be made by the Lead Member for Transport and Environment,  
Councillor Nick Bennett

**MONDAY, 17 SEPTEMBER 2018 AT 10.00 AM**

**COMMITTEE ROOM - COUNTY HALL, LEWES**

### **AGENDA**

- 1 Decisions made by the Lead Cabinet Member on 16 July 2018 (*Pages 3 - 6*)
- 2 Disclosure of Interests  
Disclosure by all Members present of personal interests in matters on the agenda, the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- 3 Urgent items  
Notification of any items which the Lead Member considers urgent and proposes to take at the appropriate part of the agenda.
- 4 Ghyll Road, and Sheepsetting Lane, Heathfield traffic calming scheme (*Pages 7 - 26*)  
Report by the Director of Communities, Economy and Transport
- 5 Wealden Local Plan - Proposed Submission Consultation (*Pages 27 - 36*)
- 6 Any urgent items previously notified under agenda item 3

PHILIP BAKER  
Assistant Chief Executive  
County Hall, St Anne's Crescent  
LEWES BN7 1UE

7 September 2018

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## LEAD MEMBER FOR TRANSPORT AND ENVIRONMENT

DECISIONS made by the Lead Member for Transport and Environment, Councillor Nick Bennett, on 16 July 2018 at County Hall, Lewes

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Councillor Kathryn Field spoke on item 4 (see minute 15)  
Councillor Carolyn Lambert spoke on item 5 (see minute 16)

### 13 DECISIONS MADE BY THE LEAD CABINET MEMBER ON 18 JUNE 2018

13.1 The Lead Member approved as a correct record the minutes of the meeting held on 18 June 2018.

### 14 REPORTS

14.1 Reports referred to in the minutes below are contained in the minute book.

### 15 PETITION REQUESTING THE INTRODUCTION OF A PEDESTRIAN CROSSING ON BATTLE HILL, BATTLE IN THE VICINITY OF TESCO EXPRESS

15.1 The Lead Member considered a report by the Director of Communities, Economy and Transport.

15.2 Maya Andrew and Ollie Tomasetti, students at Claverham Community College and Mr Leighton Morgan, a member of staff, spoke in support of the petition.

#### DECISION

15.3 RESOLVED to advise the petitioners that (1) the request for a pedestrian crossing was previously assessed using the scheme prioritisation process for local transport improvements; and

(2) due to a recent crash involving a pedestrian within the vicinity, the County Council have commissioned a feasibility study through the 2018/19 capital programme for local transport improvements to ascertain whether a pedestrian facility should be delivered along Battle Hill.

#### Reasons

15.4 The scheme was previously not ranked sufficiently highly for inclusion onto the capital programme for transport improvements. However, due to the severity of a recent pedestrian-related crash, the County Council has commissioned a feasibility study to ascertain whether a pedestrian crossing facility and any other speed reducing measures should be delivered. The study will be funded through the 2018/19 capital programme.

### 16 PEDESTRIAN CROSSING IN BELGRAVE ROAD, SEAFORD

16.1 The Lead Member considered a report by the Director of Communities, Economy and Transport.

16.2 Mrs Elizabeth Weinberg, Secretary of Seaford and Blatchington Tennis Club and Mr Chris Davey, Headteacher of Seaford Primary School, spoke about the proposal.

#### DECISION

16.3 RESOLVED to (1) note the comments from the local consultation; and

(2) approve the proposal for the pedestrian crossing in Belgrave Road as set out in the report to be taken forward to construction as part of the 2018/19 capital programme for local transport improvements.

#### Reasons

16.4 There are currently no dedicated pedestrian crossing facilities in Belgrave Road, and the County Council has received request for such a facility to be introduced which have been considered through the scheme prioritisation process. Survey and design work has identified the most appropriate location for a zebra crossing to be introduced on Belgrave Road is between the junctions with Kingsmead and Wilkinson Way. The local consultation identified both support for the scheme and objections.

16.5 It is acknowledged that the loss of seven parking spaces will have some impact locally it is considered that these are outweighed by the road safety and accessibility improvements the crossing will bring to the local community.

### 17 COUNTRYSIDE ACCESS STRATEGIC COMMISSIONING STRATEGY: PROGRESS UPDATE

17.1 The Lead Member considered a report by the Director of Communities, Economy and Transport.

#### DECISION

17.2 RESOLVED to (1) note the progress and options available for the future management of the eight countryside sites; and

(2) approve the approach set out in the report for assessing options, decision making and completion of the project.

#### Reasons

17.3 There are a number of options available to the County Council and a detailed phase of analysis and continued discussion with external organisations, the Place Scrutiny Committee and key interested parties is required.

17.4 The analysis will result in the development of a business case, which will form the basis of a recommendation to be presented to Lead Member at a future meeting.

### 18 WELL-MANAGED HIGHWAY INFRASTRUCTURE: CODE OF PRACTICE

18.1 The Lead Member considered a report by the Director of Communities, Economy and Transport.

#### DECISION

- 18.2 RESOLVED to (1) adopt the Well Managed Highway Infrastructure Code of Practice;
- (2) endorse the progress and actions in place to ensure the authority will comply with the Code;  
and
- (3) recognize the implications of the new Code of Practice on the County Council.

Reasons

18.3 The implementation of the Code is well underway with actions in place to ensure compliance by October 2018. Of the 36 recommendations of the Code, the County Council is fully compliant with 21. The remaining 15 have actions underway to ensure full compliance.

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**Report to:** Lead Cabinet Member for Transport and Environment

**Date of meeting:** 17 September 2018

**By:** Director of Communities, Economy and Transport

**Title:** Ghyll Road and Sheepsetting Lane Traffic Calming Scheme, Heathfield

**Purpose:** To consider objections received to the advertisement of the Notice for the introduction of speed cushions and raised tables associated with the scheme

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**RECOMMENDATIONS: The Lead Member is recommended to:**

- (1) Note the objections received to the Notice to introduce vertical traffic calming features (speed cushions and raised tables) along Ghyll Road and Sheepsetting Lane, Heathfield; and**
  - (2) Agree that the vertical traffic calming features along Ghyll Road and Sheepsetting Lane, as set out in the Notice, should be taken forward to construction with a modification to the set of speed cushions (reference 06) which shall be repositioned 2.5 metres further north along Ghyll Road**
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## **1. Background Information**

1.1 In 2008 East Sussex County Council (ESCC) introduced a traffic management scheme along Sheepsetting Lane, Tilsmore Road and Mill Road in Heathfield to encourage slower vehicle speeds and to improve road safety.

1.2 In May 2011, a petition from residents was received requesting the introduction of speed reducing features and parking improvements in Ghyll Road, Heathfield. The petition was considered at the Lead Member for Transport and Environment decision making meeting in July 2011 at which it was resolved that a scheme to introduce speed reducing measures in Ghyll Road should be considered for inclusion in a future year's Capital Programme for Local Transport Improvements.

1.3 A comprehensive traffic calming scheme has been developed in partnership with residents' representatives from Ghyll Road. The proposed scheme extends the length of Ghyll Road between the existing priority working build-out north of Tilsmore Road and the junction of Ghyll Road and the B2203 (Theobalds Green) to the south. The proposed scheme comprises a series of speed cushions (17 sets in total) along the length of Ghyll Road and two raised tables; at the junction with Geers Wood and at the existing toucan crossing to the north of Treetops Way junction.

1.4 A public consultation exercise to seek views on the proposed scheme was held during June and July 2017. The results showed significant support for the proposed traffic calming scheme with 73% of respondents either supporting or strongly supporting the introduction of traffic calming features, speed cushions and raised tables along Ghyll Road. Of the feedback received from the key stakeholder groups, East Sussex Fire and Rescue Service were concerned that the proposed traffic calming features may impact their emergency response times. However, they also acknowledged that there is currently a risk to residents through speeding vehicles on Ghyll Road so advised that they will not be opposed to the implementation of the scheme which aims to improve road safety in this area.

1.5 At the Lead Member for Transport and Environment decision making meeting in October 2017, at which the results of the public consultation were considered, it was resolved to progress with the scheme and advertise the Notice associated with the vertical traffic calming features (speed cushions and raised tables) on Ghyll Road. The Lead Member also agreed to the provision of additional traffic calming features in Sheepsetting Lane between Cross in Hand Primary School and the A267, to augment the scheme implemented in 2008, if these were considered technically viable. As a result of this investigation three sets of speed cushions are proposed on Sheepsetting Lane.

1.6 On 4 July 2018, a letter setting out the County Council's intentions to advertise the Notice to introduce the vertical traffic calming features on Ghyll Road and Sheepsetting Lane was delivered to approximately 1,000 households in Ghyll Road, Sheepsetting Lane and adjoining side roads. On 6 July 2018, the County Council gave Notice under the powers contained in Section 90A-F of the Highways Act

1980, as amended, to propose to construct vertical traffic calming features on Ghyll Road and Sheepsetting Lane. The Notice was advertised in the local press, statutory bodies were notified and the Notice was displayed along Ghyll Road and Sheepsetting Lane. A copy of the Notice and plans showing the location of the speed cushions and raised tables were on deposit for examination at County Hall in Lewes, Heathfield Library and Heathfield and Waldron Parish Council offices. A copy of the Notice and plans were available for examination on the East Sussex Highways website. A period of three weeks was allowed for any comments to be received. This period ended on 27 July 2018. A copy of the Notice and plans are included in Appendix 1.

## **2. Supporting Information**

2.1 During the advertisement period, in total, eleven separate representations were received to the Notice. These consisted of seven in support of the scheme and four objecting to the scheme. Full copies of the representations are available in the Members' Room.

2.2 The four representations objecting to the traffic calming scheme contained 10 grounds for objection. Each objection has been considered individually and a summary of the objections and the officer comments on each of these is set out in Appendix 2. A summary of the representations objecting to the scheme are set out below:

- The set of speed cushions at location reference 06 (as shown on the Notice plans at Appendix 1) will conflict with the future extension of a private driveway;
- The proposed traffic calming will transfer traffic to other roads, some less suitable;
- The proposed traffic calming will increase local pollution and noise;
- The proposed traffic calming is not locally supported;
- The proposed traffic calming is too excessive;
- Speeding is not an issue along Ghyll Road.

2.3 It is considered that all these objections should not be upheld apart from the one requesting that the set of speed cushions at location reference 06 be repositioned 2.5m further north along Ghyll Road. The repositioning of this set of cushions would avoid future conflict with a proposed driveway extension that the resident has had approval to implement. Officers have consulted with the resident who made the objection and the owners of the two adjacent properties. All three property owners would have no objection to the modification to reposition this set of speed cushions.

2.4 A summary of the seven representations made in support of the scheme and the officer comments on each of these is set out in Appendix 3. All of the representations received in support of the traffic calming scheme came from residents living on Ghyll Road or Sheepsetting Lane.

## **3 Conclusion and Reason for Recommendation**

3.1 The results of the 2017 public consultation exercise showed significant support for the proposed traffic calming scheme with 73% of respondents either supporting or strongly supporting the introduction of traffic calming features, speed cushions and raised tables along Ghyll Road. The consultation also demonstrated there was support for extending the scheme to include Sheepsetting Lane. The aim of the Ghyll Road and Sheepsetting Lane traffic calming scheme is to slow driver speeds and provide a safer environment for all road users.

3.2 The Lead Member for Transport and Environment is therefore recommended, for the reasons set out in this report, not to uphold the objections to the Notice as advertised, but to include a modification whereby the set of speed cushions at location reference 06 are repositioned 2.5m further north along Ghyll Road, and to agree that the remainder of the scheme is constructed as advertised.

RUPERT CLUBB

Director of Communities, Economy and Transport

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Email: [james.vaks@eastsussexhighways.com](mailto:james.vaks@eastsussexhighways.com) & [Chris.Tree@eastsussex.gov.uk](mailto:Chris.Tree@eastsussex.gov.uk)

### LOCAL MEMBERS

Councillor Rupert Simmons

### BACKGROUND DOCUMENTS

Transcript of responses

**Appendix 1 – Public Notice and Supporting Drawings**

EAST SUSSEX COUNTY COUNCIL

HIGHWAYS ACT 1980

**The East Sussex (Ghyll Road, Sheepsetting Lane & Geers Wood, Heathfield)  
(Traffic Calming)**

**Notice** is hereby given that East Sussex County Council, propose to construct under the powers contained in Section 90A-F of the Highways Act 1980, as amended, speed cushions and flat topped raised tables, the purpose of which is to help reduce the speed of traffic and contribute to road safety as described below: -

**Speed Cushions**

75mm high x 1700mm wide x 3000mm long over part width in both lanes  
(unless stated otherwise)

**Ghyll Road;**

- Ref. 01 From a point 1.5 metres north of the boundary between Ghyll Rise and Spring Hill, northwards for a distance of 3 metres (southbound lane only).
- Ref. 02 From a point 15 metres south of the southern kerb line of Tilsmore Road, southwards for a distance of 3 metres.
- Ref. 03 From a point 16 metres north of the northern kerb line of Wayside Walk, northwards for a distance of 3 metres.
- Ref. 04 From a point 27.5 metres north of the northern kerb line of Pook Reed Lane, northwards for a distance of 3 metres.
- Ref. 05 From a point 16 metres north of the northern kerb line of Leeves Way, northwards for a distance of 3 metres.
- Ref. 06 From a point 1 metre south of the boundary between Lilacs and Little Foxes, southwards for a distance of 3 metres.
- Ref. 07 From a point 0.5 metres north of the boundary between 3 Beech Villas and The Geerines, southwards for a distance of 3 metres.
- Ref. 08 From a point 4 metres south of the boundary between No.3 and No.4 Geerswood Cottages, southwards for a distance of 3 metres.
- Ref. 09 From a point 33 metres north of the northern kerb line of Swaines Way, northwards for a distance of 3 metres.
- Ref. 10 From a point 13 metres south of the southern kerb line of Swaines Way, southwards for a distance of 3 metres.
- Ref. 11 From a point 25 metres north of the northern kerb line of Old Ghyll Road, northwards for a distance of 3 metres.
- Ref. 12 From a point 18 metres south of the southern kerb line of Old Ghyll Road, southwards for a distance of 3 metres.
- Ref. 13 From a point 69 metres south of the southern kerb line of Old Ghyll Road, southwards for a distance of 3 metres.
- Ref. 14 From a point 125 metres south of the southern kerb line of Old Ghyll Road, southwards for a distance of 3 metres.

- Ref. 15 From a point 85 metres north of the northern kerb line of Treetops Way, northwards for a distance of 3 metres.
- Ref. 16 From a point 17 metres west of the western kerb line of Frenches Farm Drive, westwards for a distance of 3 metres.
- Ref. 17 From a point 35 metres west of its junction with Theobalds Green, westwards for a distance of 3 metres.

**Sheepsetting Lane;**

- Ref. 18 From a point 37 metres east of its junction with the A267, eastwards for a distance of 3 metres.
- Ref. 19 From a point 1.5 metres east of the boundary between The Holt and Rose Villa, westwards for a distance of 3 metres.
- Ref. 20 From a point 25 metres west of the western kerb line of Wealdview Road, westwards for a distance of 3 metres.

**Raised Tables**

75mm high flat top, extending across both lanes

**Ghyll Road;**

- Ref. 21 From a point 11.5 metres north of the northern kerb line of Geers Wood, southwards for a distance of 26 metres (plateau length 24 metres).

**Geers Wood;**

- Ref. 22 From its junction with Ghyll Road, westwards for a distance of 8 metres (plateau length 7 metres).

**Ghyll Road;**

- Ref. 23 From a point 16 metres north of the northern kerb line of Treetops Way, northwards for a distance of 8 metres (plateau length 6 metres).

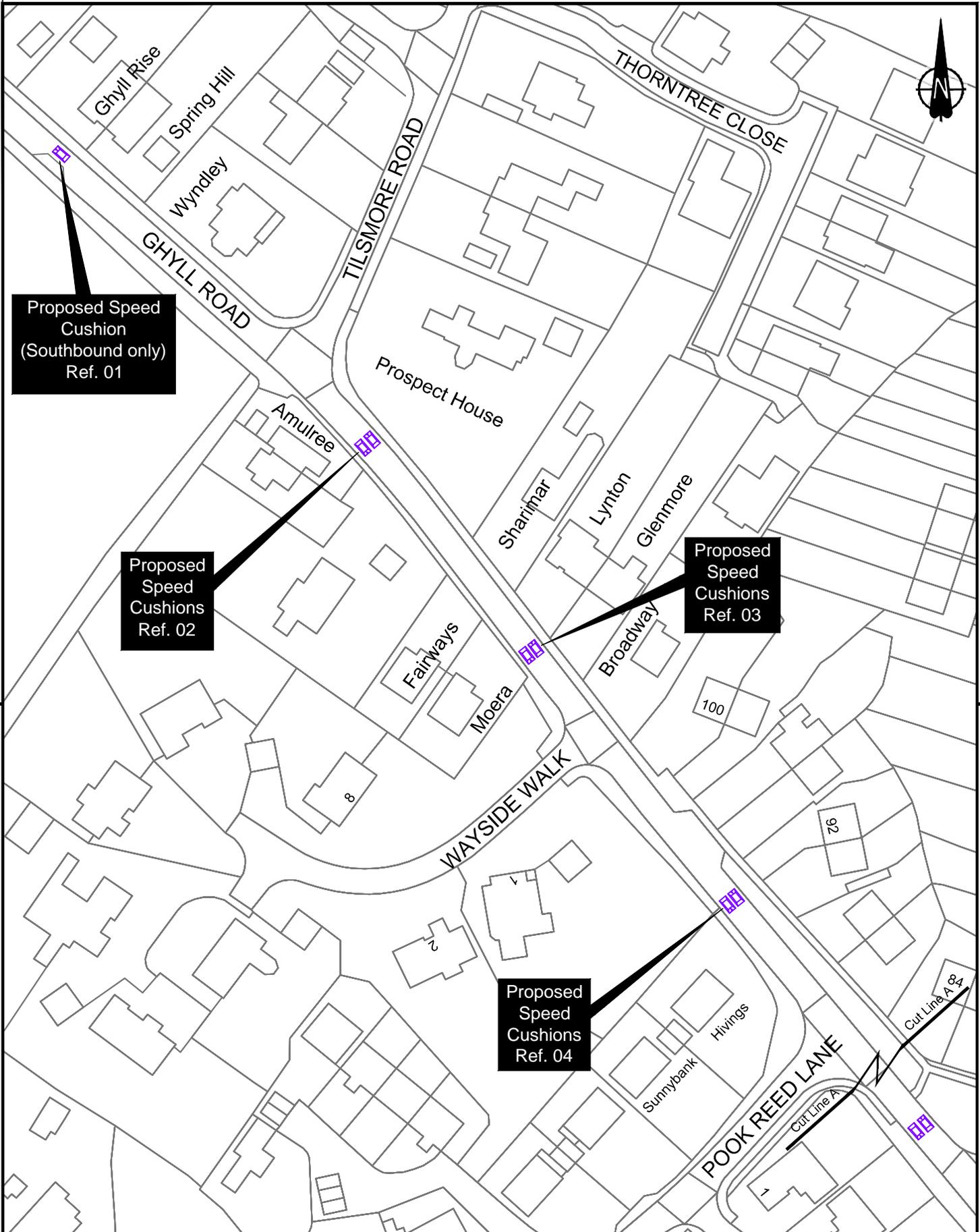
A copy of the notice and plans may be examined in Reception, County Hall, East Sussex County Council, St Anne's Crescent, Lewes on Monday to Friday 9am - 4pm; at Heathfield Library, 21 High Street, Heathfield TN21 8LU Monday and Saturday 10am - 1pm, Tuesday 10am – 5pm, Thursday 2pm - 6pm, Friday 10am - 4pm; at Heathfield & Waldron Parish Council, 73 High Street, Heathfield TN21 8HU Monday to Friday 9.30am to 3pm; or online at [www.eastsussexhighways.com/consultation/ghyll-road](http://www.eastsussexhighways.com/consultation/ghyll-road)

Any person wishing to make a representation concerning this proposal must do so in writing, to Communities Economy & Transport, Parking, B Floor, East Sussex County Council, County Hall, St. Anne's Crescent, Lewes, East Sussex BN7 1UE or email [TROs@eastsussex.gov.uk](mailto:TROs@eastsussex.gov.uk) by 27 July 2018 quoting ref HW/422.

If you require further information telephone Infrastructure Enhancement, East Sussex Highways on 0345 60 80 193.

**Philip Baker, Assistant Chief Executive,  
Governance Services Department, County Hall, Lewes, East Sussex BN7 1UE**

6 July 2018



Proposed Speed Cushion  
(Southbound only)  
Ref. 01

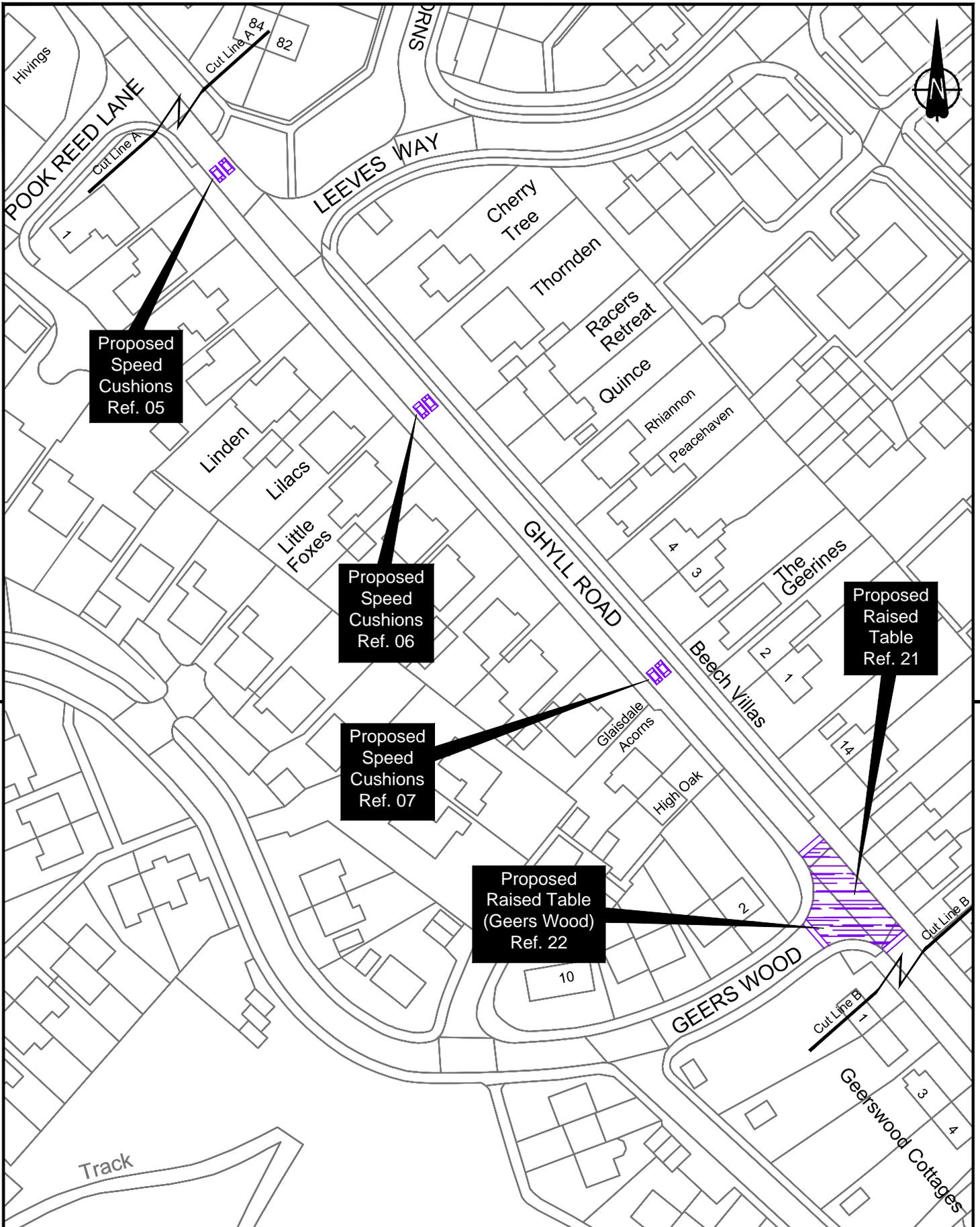
Proposed Speed Cushions  
Ref. 02

Proposed Speed Cushions  
Ref. 03

Proposed Speed Cushions  
Ref. 04

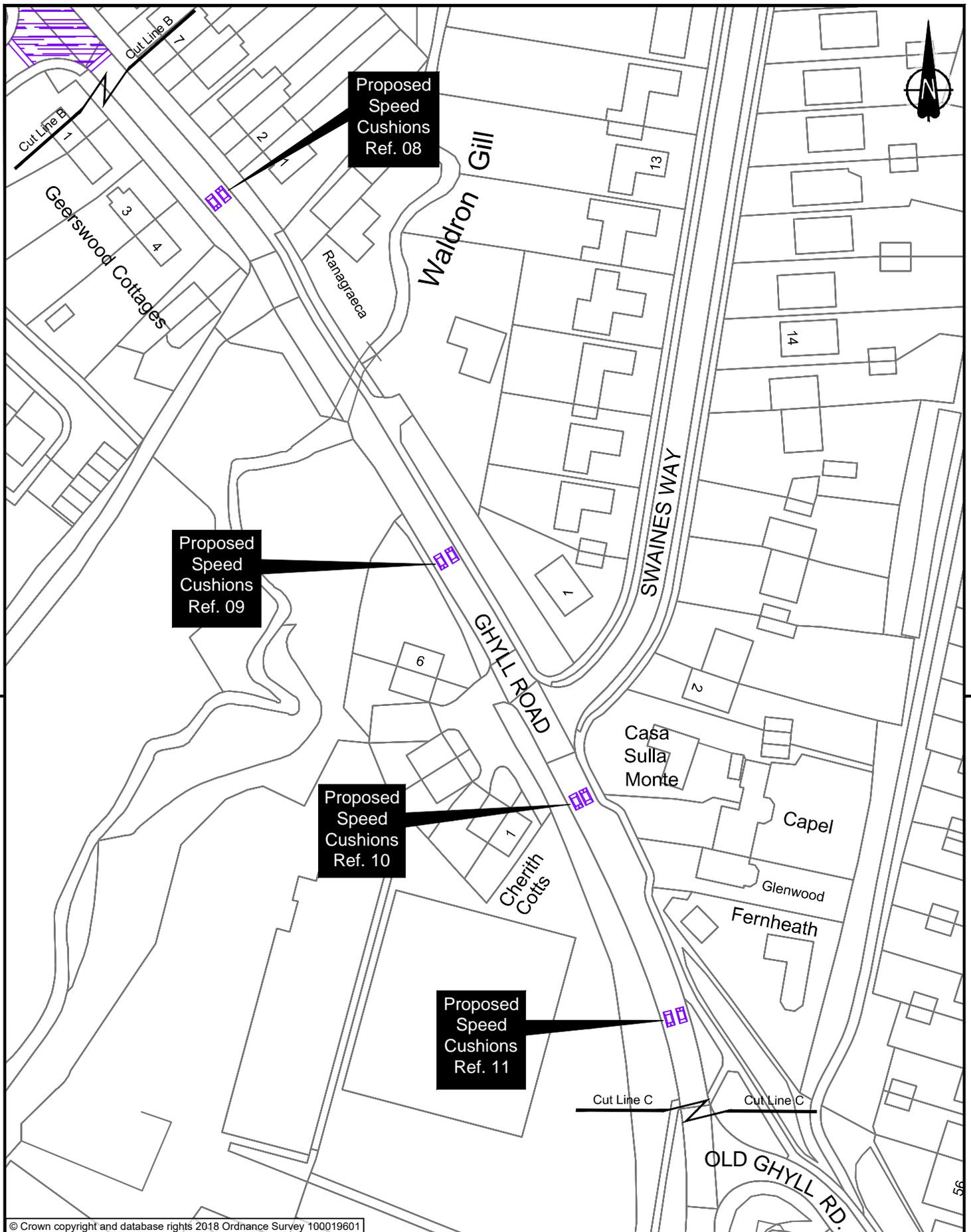
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 <p><b>East Sussex Highways</b> A partnership between: COSTAIN CH2M         </p> <p>EAST SUSSEX HIGHWAYS RINGMER DEPOT, THE BROYLE RINGMER, EAST SUSSEX, BN8 5NP Tel. 0345 60 80 193 www.eastsussexhighways.com</p>	Project	SCH0056 SHEEPSETTING LANE AND GHYLL ROAD TRAFFIC CALMING	Status	FOR INFORMATION	Revision	P01	
	Drawing title	Traffic Calming Measures on Ghyll Road Sheet 1 of 5	Scale	1:1000	Date	01/06/2018	
			Drawn By	S Beale			
			Checked By	J Vaks			
			Approved By	J Vaks			
		Project No.   Originator   Volume   Design Alt.   Type   Role   Number	3520000   ESH   HGN-SCH0056-DR-CH-0101				
		Original Size	A4				



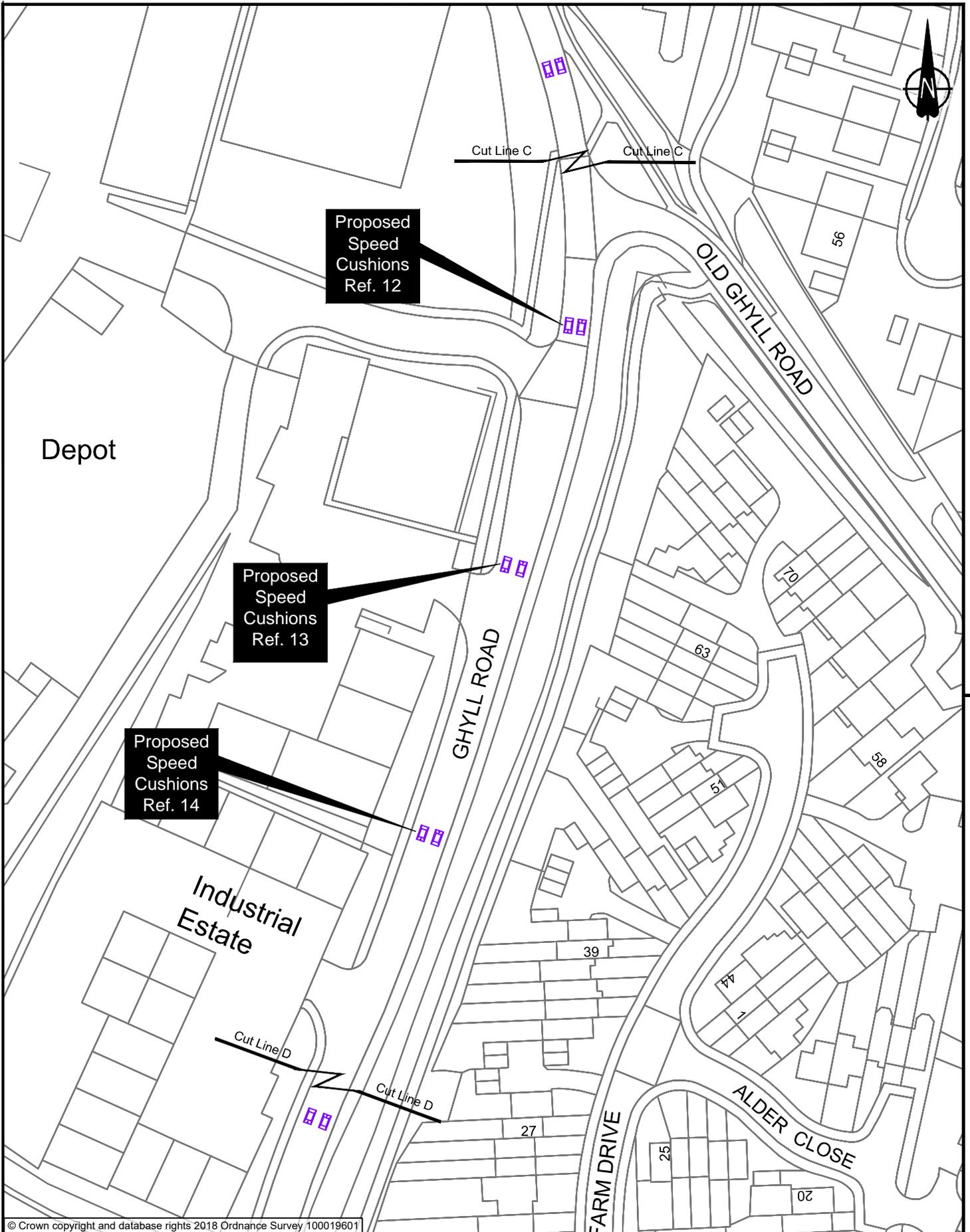
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	Drawing title	Traffic Calming Measures on Ghyll Road Sheet 2 of 5	Scale	1:1000	Date	01/06/2018											
			Drawn By	S Beale													
			Checked By	J Vaks													
			Approved By	J Vaks													
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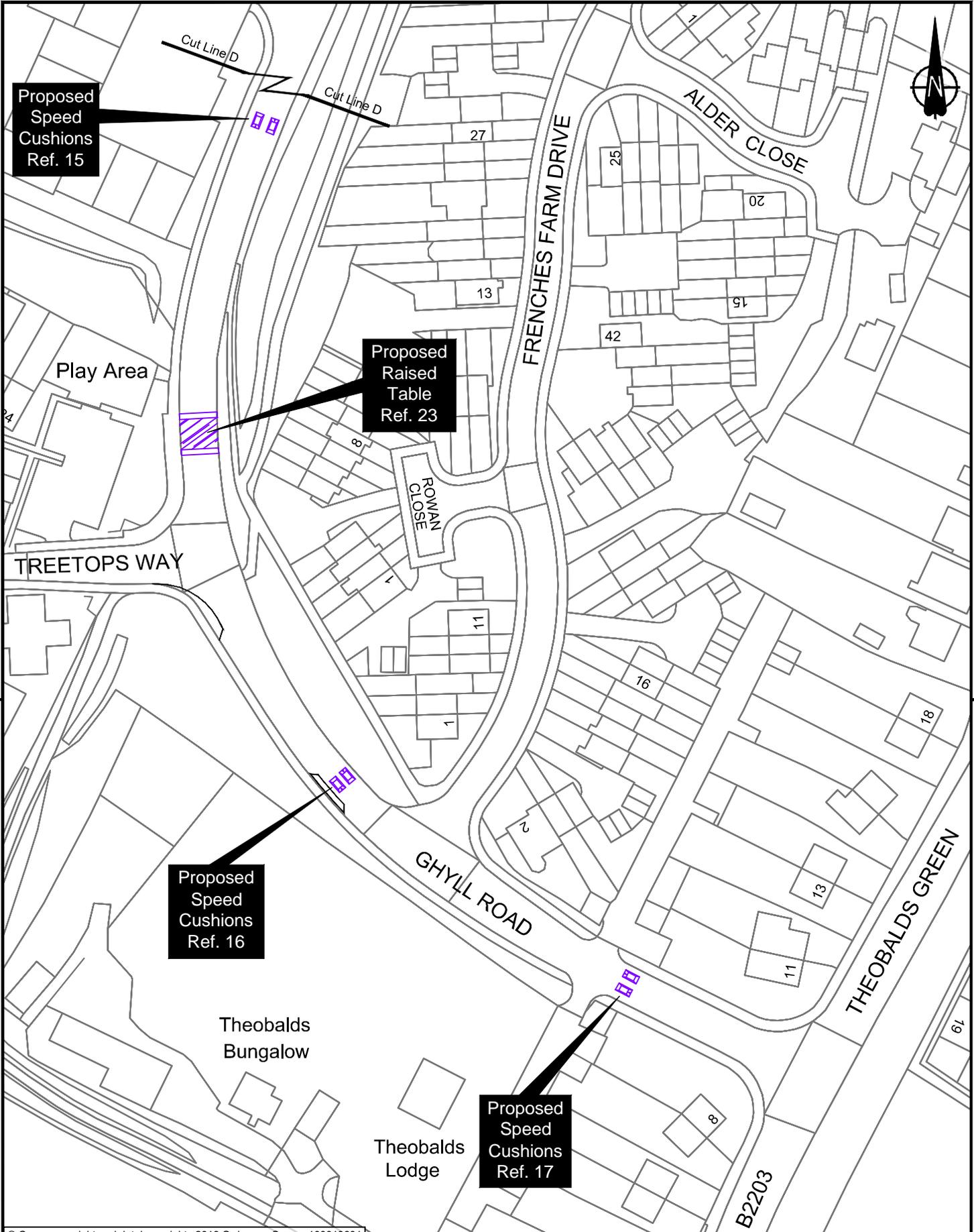
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	Drawing title	Traffic Calming Measures on Ghyll Road Sheet 3 of 5	Scale	1:1000	Date	01/06/2018	
			Drawn By	S Beale			
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		Project No.   Originator   Volume   Design Alt.   Type   Role   Number	3520000   ESH   HGN-SCH0056-DR-CH-0103				
		Original Size	A4				



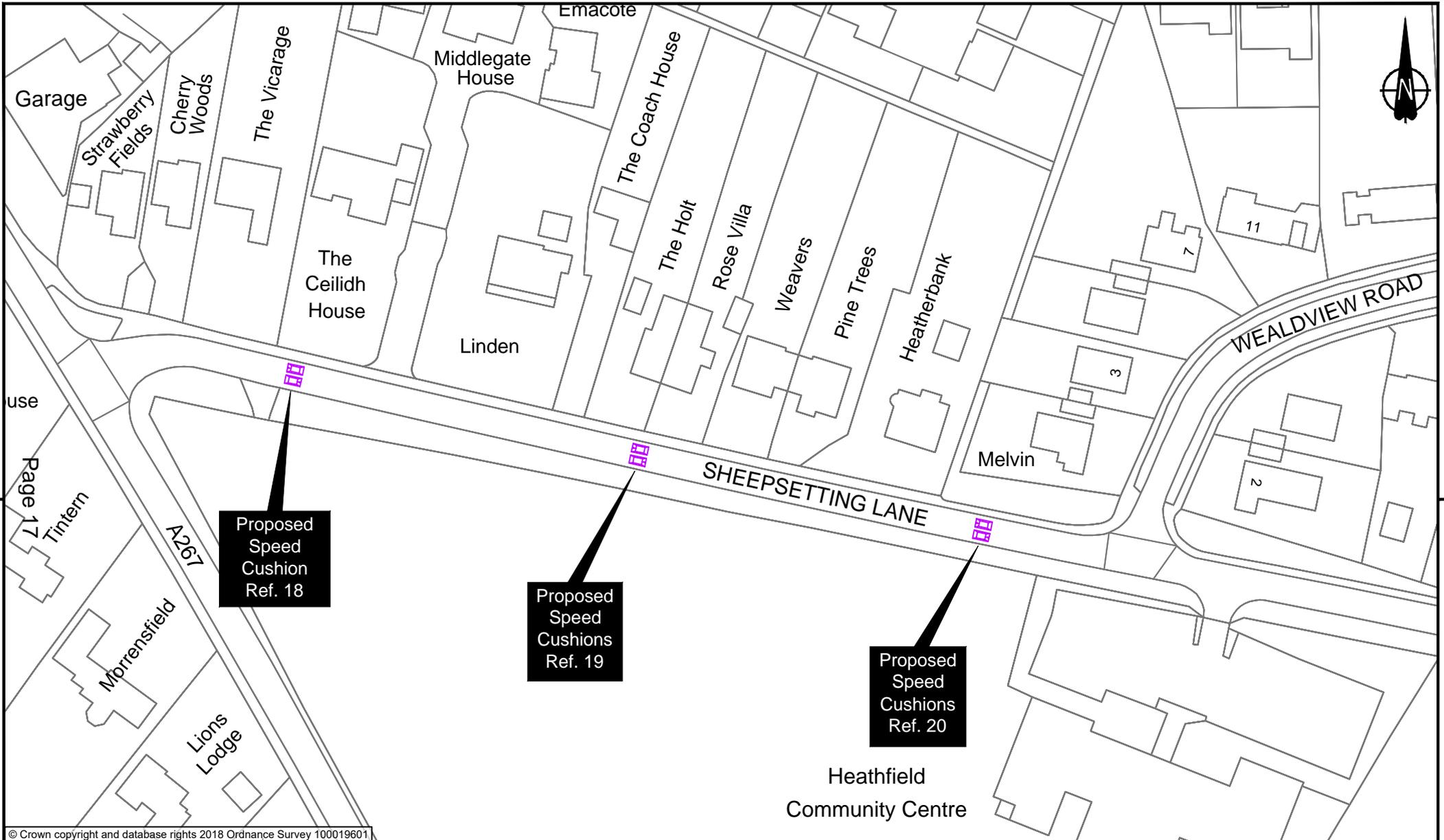
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 <p>A partnership between:</p>    <p>EAST SUSSEX HIGHWAYS RINGMER DEPOT, THE BROYLE RINGMER, EAST SUSSEX, BN8 5NP Tel. 0345 60 80 193 www.eastsussexhighways.com</p>	Project	SCH0056 SHEEPSETTING LANE AND GHYLL ROAD TRAFFIC CALMING	Status	FOR INFORMATION	Revision	P02				
	Drawing title	Traffic Calming Measures on Ghyll Road Sheet 4 of 5	Scale	1:1000	Date	01/06/2018				
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			Checked By	J Vaks						
			Approved By	J Vaks						
		Project No.	3520000	Originator	ESH	Volume	HGN-SCH0056-DR-CH-0104			
				Design Alt.		Type	Role	Number	Original Size	A4



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	Drawing title	Traffic Calming Measures on Ghyll Road Sheet 5 of 5	Scale	1:1000	Date	01/06/2018	
			Drawn By	S Beale			
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		Project No.   Originator   Volume   Design Alt.   Type   Role   Number	3520000   ESH   HGN-SCH0056-DR-CH-0105				
		Original Size	A4				



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 A partnership between:  EAST SUSSEX HIGHWAYS RINGMER DEPOT, THE BROYLE RINGMER, EAST SUSSEX, BN8 5NP Tel. 0345 60 80 193 www.eastsussexhighways.com	Project	SCH0056 SHEEPSETTING LANE AND GHYLL ROAD TRAFFIC CALMING		Status	FOR INFORMATION	Revision	P02
	Drawing title	Traffic Calming Measures on Sheepsetting Lane Sheet 1 of 1 TRO Plan		Scale	1 : 1000	Date	01/06/2018
				Drawn By	S Beale		
				Checked By	J Vaks		
				Approved By	J Vaks		
				Project No.   Originator   Volume   Design Alt.   Type   Role   Number	3520000   ESH   HGN-SCH0056-DR-CH-0106	Original Size	A4

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## Appendix 2 – Summary of the objections received

Objection	Officer Comments	Recommendation
<p>Objection Number 1</p> <p>Objection to the position of the set of speed cushions at location reference 06 on Ghyll Road. The proposed position of this set of cushions will conflict with the future extension of a vehicle crossover for a private driveway. The resident has recently obtained permission to extend their vehicle cross over.</p>	<p>Repositioning the set of speed cushions would avoid future conflict with a proposed driveway extension that the resident has had approval to implement. Officers have consulted with the resident who made the objection and the owners of the two adjacent properties. All three property owners would have no objection to the modification to reposition this set of speed cushions.</p>	<p>To uphold the objection and reposition the set of speed cushions 2.5m further north along Ghyll Road.</p>
<p>Objection Number 2</p> <p>Object to the proposed traffic calming measures as it will increase traffic using Pook Reed Lane, and Waldron Thorns as “Rat-runs” to avoid as many humps as possible. These roads are not suitable for anything other than very light traffic, and are extremely narrow.</p>	<p>There may be changes in traffic behaviour as the proposed measures may make Ghyll Road and adjoining streets less attractive to vehicles that currently use these roads as a through route. Should the scheme proceed, post construction traffic monitoring surveys will be undertaken.</p>	<p>Not to uphold the objection.</p>
<p>Objection Number 3</p> <p>Object to the proposed traffic calming measures on the grounds that in August 2016, the UK government actively encouraged local councils to reduce the number of speed humps due to the increase in local pollutants as a result of vehicles speeding up and slowing down between humps.</p>	<p>Low speeds are generally associated with high rates of exhaust emission because they usually involve a high proportion of acceleration and deceleration. However, smooth, low speed driving, in as high a gear as possible, will result in relatively low emissions. The effect on emissions will depend on how the scheme influences both the average speed of traffic and the amount of speed variation.</p> <p>By proposing speed cushions at regular intervals along Ghyll Road and Sheepsetting Lane the intention is to ensure low traffic speeds are maintained throughout with motorists encouraged to adopt a passive style of driving, at a lower but constant speed as opposed to an aggressive style, with excessive braking and acceleration between speed cushions.</p>	<p>Not to uphold the objection.</p>

Objection	Officer Comments	Recommendation
	<p>Although some traffic management measures can result in increased emissions per vehicle, they may also result in a reduction in the volume of traffic. Even though emissions per vehicle may increase, this can be offset by the reduction in traffic. The amount of traffic in residential areas is relatively small, and traffic diverted to other roads is unlikely to have a significant effect on emissions.</p>	
<p>Objection Number 4</p> <p>Object to the proposed traffic calming measures on the grounds that they do not know of anyone who wants this traffic calming scheme along Ghyll Road and if there is problem with speeding put up cameras. We don't want your obstacle course.</p>	<p>In May 2011 a petition from residents was received requesting the introduction of speed reducing features and parking improvements in Ghyll Road and this was later considered at the Lead Member for Transport and Environment decision making meeting in July 2011. The Lead Member resolved for the County Council to consider this request for inclusion in a future year's Capital Programme for Local Transport Improvements.</p> <p>During the public consultation exercise seeking views on proposals to introduce a traffic calming scheme along Ghyll Road carried out in June and July 2017, of the 319 responses received 73% of respondents either supported or strongly supported the proposed introduction of traffic calming on Ghyll Road and 23% either opposing or strongly opposing the proposals.</p> <p>At the Lead Member for Transport and Environment decision making meeting in October 2017 to consider the results of the public consultation, it was resolved for the County Council to progress with the Ghyll Road and Sheepsetting Lane traffic calming scheme and advertise the Notices associated with the speed cushions and raised tables.</p> <p>Speed cameras are the responsibility of the Sussex Safer Roads Partnership (SSRP). The latest three year crash record would not meet the base criteria for the provision of a fixed camera. As fixed speed cameras would only be positioned at single locations along Ghyll Road they would not offer the same level of coverage than a series of traffic calming features being proposed.</p>	<p>Not to uphold the objection.</p>

Objection	Officer Comments	Recommendation
<p>Objection Number 5</p> <p>Object to the proposed traffic calming measures on the grounds that the number of speed cushions being proposed are too onerous. The speed cushions are far too close together.</p>	<p>To encourage slower traffic speeds a package of traffic calming measures are considered throughout Ghyll Road and Sheepsetting Lane. Vertical deflection calming measures, such as speed cushions and raised tables are an effective means of encouraging slow speeds when compared to horizontal calming measures such as priority working or pinch points.</p> <p>During the development of this scheme the design team have endeavoured to minimise the extent of traffic calming being proposed but it has been considered necessary to introduce the measures as presented to ensure lower traffic speeds are maintained throughout the length of Ghyll Road and Sheepsetting Lane. Government advice (Local Transport Note 1/07) sets out that calming features should be introduced at intervals between 60m to 70m to ensure low traffic speeds are maintained throughout with motorists encouraged to adopt a smooth style of driving.</p>	<p>Not to uphold the objection.</p>
<p>Objection Number 6</p> <p>Object to the proposed traffic calming measures on the grounds that they do not consider speeding is excessive along Ghyll Road and Sheepsetting Lane.</p>	<p>In November 2016 traffic speeds recorded along Ghyll Road (in the vicinity of Old Ghyll Road junction) have seen 85<sup>th</sup> %ile speeds of 35 mph and 40 mph for northbound and southbound traffic respectively.</p> <p>During the public consultation exercise seeking views on proposals to introduce a traffic calming scheme along Ghyll Road carried out in June and July 2017 of the 319 responses received 82% of respondents either agreed or strongly agreed that speeding is an issue on Ghyll Road with 15% either disagreeing or strongly disagreeing that speeding is an issue on Ghyll Road.</p> <p>At the Lead Member for Transport and Environment decision making meeting in October 2017 to consider the results of the public consultation, it was resolved for the County Council to progress with the Ghyll Road and Sheepsetting Lane scheme and advertise the Notices associated with the speed cushions and raised tables.</p>	<p>Not to uphold the objection.</p>

Objection	Officer Comments	Recommendation
Objection Number 7		
Object to the proposed traffic calming measures on the grounds that the speed cushions will create more noise.	It is acknowledged that speed cushions may give rise to vehicle body noise (body rattles, suspension noise etc.). However, lowering the speed of vehicles may mean that vehicle noise levels are reduced. In addition, after the measures are installed, traffic flows may be reduced, leading to further reductions in noise levels. Vehicle noise may also depend upon the way vehicles are driven. By proposing speed cushions at regular intervals along Ghyll Road and Sheepsetting Lane the intention is to ensure low traffic speeds are maintained throughout with motorists encouraged to adopt a passive style of driving, at a lower but constant speed as opposed to an aggressive style, with excessive braking and acceleration between speed cushions which can lead to a highly fluctuating noise level.	Not to uphold the objection.
Objection Number 8		
Object to the proposed traffic calming measures on the grounds that more vehicles will use the High Street.	There may be changes in traffic behaviour as the proposed measures may make Ghyll Road and adjoining streets less attractive to vehicles that currently use these roads as a through route. Should the scheme proceed, post construction traffic monitoring surveys will be undertaken.	Not to uphold the objection.
Objection Number 9		
Object to the proposed traffic calming measures on the grounds that they do not understand why a speed cushion is required next to the road narrows in Ghyll Road.	Refer to response to objection number 5.	Not to uphold the objection.
Objection Number 10		
Object to the proposed traffic calming measures on the grounds that they disagree with all the speed cushions especially nos. 16 and 17.	Refer to response to objection number 5.	Not to uphold the objection.



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### Appendix 3 – Summary of the representations received in support of the scheme

Representation	Comment	ESCC Response
1	Additional consideration be made to the junction with Wayside Walk near Tilsmore Road. Implementation of parking restrictions in the form of road markings (double yellows) around this area would be a sensible solution to make the area safe.	Whilst the introduction of parking restrictions sits outside of this current scope of works, the request for double yellow lines in the vicinity of Wayside Walk junction has been passed on to ESCC Traffic and Safety team for consideration as part of an area wide parking review.
2	Wholehearted approval of the proposals for traffic calming speed cushions in Sheepsetting Lane.	Acknowledged.
3	Wonderful news! I thoroughly agree with the proposed traffic calming. Please pass on my thanks to all the team, hopefully bringing this to fruition.	Acknowledged.
4	We are pleased to see that there has been significant support for the proposed traffic calming scheme along Ghyll Road and Sheepsetting Lane, Heathfield. We would add our approval for this scheme.	Acknowledged.
5	<p>1. The consistent parking of vans opposite the end of Wayside Walk which makes egressing Wayside Walk a danger, with oncoming cars driving on the wrong side of the road to avoid these vans. Might it be possible to have double yellow lines opposite the junction, as at the end of Pook Reed Lane?</p> <p>2. The potential building of 103 new houses with access off Ghyll Road on a corner will make this</p>	<p>1. Whilst the introduction of parking restrictions sits outside of this current scope of works, the request for double yellow lines in the vicinity of Wayside Walk junction has been passed on to ESCC Traffic and Safety team for consideration as part of an area wide parking review.</p> <p>2. Acknowledged. Whilst future development on Ghyll Road is a matter for the local planning authority, Wealden District Council, East Sussex County Council will be consulted on the</p>

Representation	Comment	ESCC Response
	<p>road even more dangerous, so I hope East Sussex Highways will object to this plan which as you will be aware is in the current local plan under HEA2</p> <p>3. The surface of Ghyll Road by the industrial estate and up to the junction with the Horam Road is a disgrace. As a cyclist I find it dangerous, and cannot understand why certain potholes have been repaired, surrounded by a host of others which have not.</p>	<p>proposed development and will consider the implications this may have on the existing infrastructure.</p> <p>3. As part of the proposed works this section of carriageway will be resurfaced.</p>
6	<p>1. Fully support the proposals for traffic calming along Ghyll Road and the additional traffic calming proposed for Sheepsetting Road.</p> <p>2. Has any consideration been given through these traffic calming proposals to future traffic generation from the potential housing development (site HE2) on Ghyll Road Wealden Proposed Submission Draft Local Plan – June 2018 and the impact of traffic calming in the immediate location, in particular speed cushions Ref 01 and 02 and the junction of Ghyll Road with Tilsmore Road.</p>	<p>1. Acknowledged.</p> <p>2. Acknowledged. Whilst future development on Ghyll Road is a matter for the local planning authority, Wealden District Council, East Sussex County Council will be consulted on the proposed development and will consider the implications this may have on the existing infrastructure.</p>
7	<p>I write to confirm my support for the above traffic calming scheme due to commence in October 2018.</p>	<p>Acknowledged.</p>

<b>Report to:</b>	<b>Lead Cabinet Member for Transport and Environment</b>
<b>Date of meeting:</b>	<b>17 September 2018</b>
<b>By:</b>	<b>Director of Communities, Economy and Transport</b>
<b>Title:</b>	<b>Wealden Local Plan Proposed Submission Consultation</b>
<b>Purpose:</b>	<b>To agree the principles set out in this report as the basis for the County Council representations on the Wealden Local Plan</b>

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## **RECOMMENDATIONS:**

- (1) Agree the views on the Local Plan summarised in paragraph 2.1 below, and set out more fully in the Appendix as the basis for representations on the Wealden Local Plan Proposed Submission; and**
  - (2) Authorise the Director of Communities, Economy and Transport to elaborate upon and add to these views as necessary for submission to Wealden District Council.**
- 

## **1. Background Information**

1.1. Wealden District Council (WDC) has published the Proposed Submission Wealden Local Plan (WLP), under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, so that representations can be made prior to its submission to the Secretary of State for examination. All representations received by the 8 October will be considered alongside the submitted document when it is examined by an independent Planning Inspector.

1.2 The current Wealden Core Strategy Local Plan was adopted in February 2013 covering the period between 2006 and 2027 and allocates 9,440 dwellings (450 per annum) over the Plan period. Levels of housing growth in this Plan were constrained by the need for additional Wastewater Treatment Works capacity in the Hailsham area. Policy WCS1 therefore required the Core Strategy to be reviewed in 2015 to ensure an adequate supply of development land and for it to include an assessment of future levels of need and demand for housing. The Proposed Submission WLP incorporates the Core Strategy review and includes strategic and local policies and also site allocations. When the Plan is adopted it will supersede the 2013 Core Strategy and the 1998 Local Plan.

1.3 A key focus for the WLP is the level and distribution of housing growth to be planned for. Earlier iterations of the plan put forward proposed housing targets of 19,950 dwellings between 2013 and 2037, and subsequently 11,456 dwellings between 2013 and 2028. One of the key factors that has influenced the WLP, and in particular the quantum and location of planned housing growth, is the evidence gathered by WDC in relation to the Plan's impact upon the Ashdown Forest Special Area of Conservation (SAC).

1.4 WDC has prepared evidence to assess the level of development which can be allowed without damage to the SAC. Using this evidence, WDC has now investigated and is proposing a range of mitigation measures for the SAC, which will allow development to proceed up to the level of the objectively assessed housing need in Wealden District of 950 per annum, which equates to a total figure of 14,228 dwellings over the plan period of 2013 to 2028. A draft of an Interim Air Quality Mitigation Strategy has been shared with the County Council and other neighbouring and nearby planning authorities and we will respond separately to this given that WDC are looking to implement this imminently.

1.5 County Council officers have had substantial input and influence on the WLP through its development, particularly providing advice on the transport and education requirements to support the growth options, and on a range of policies within the Proposed Submission Plan covering our services and interests.

1.6 However, the decision by WDC to increase the overall figure from 11,456 to 14,228 dwellings was made at a very late stage and as a consequence County Council officers have not had the

opportunity to undertake the modelling and forecasting work in order to further consider the impact on County Council infrastructure requirements before the WLP and the supporting Infrastructure Delivery Plan (IDP) were published on 13 August. This work is currently being undertaken and the update to infrastructure requirements will need to form a key part of the County Council's representations.

## **2 Proposed Representations on the WLP**

2.1 The Proposed Submission WLP has been published to allow representations to be made; these are confined to issues of 'soundness' and legal compliance. It is proposed that the County Council representations should be submitted based on the following issues which are focused on the key areas of County Council interest and are further elaborated on in the Appendix:

- We will provide updates to County Council infrastructure requirements (particularly schools and transport) to support the latest growth levels. We will seek any necessary changes to WLP policies to reflect these requirements. The representation will also state that WDC will need to continue to liaise with the County Council on updates required to the Infrastructure Delivery Plan before it is submitted to the Planning Inspectorate with the WLP. This will ensure that the impacts on, and need for County Council infrastructure to support proposed growth are fully considered during the Plan's examination.
- The representation will emphasise the huge challenge of securing the necessary supporting infrastructure funding. The County Council is committed to exploring all opportunities, working with WDC and other key partners, to secure this funding including through the Accelerating Wealden Delivery bid to the Housing Infrastructure Fund for education provision in Hailsham and a package of transport improvements in the Eastbourne/South Wealden to support the growth in the area. However, there remains great uncertainty over securing this and other funding which will enable the delivery of necessary infrastructure.
- Development contributions will be important in helping to fund critical infrastructure including transport and education provision. It is proposed that the County Council will make a strong case to urge WDC to review their approach to the Community Infrastructure Levy and Section 106/278 agreements to enable the County Council to secure the timely provision of infrastructure and ensuring that the proposed housing growth in the WLP is delivered in a timely manner. Without such a review there could be an increased need for the County Council to cover the cost of critical infrastructure at a time of severe and well-documented budget pressures.
- Certain WLP policies go a long way to ensure that development does not come forward without the necessary infrastructure and are to be supported. However, clarity on specific site policy criteria including that it may be necessary to use appropriate planning conditions to prevent dwellings being occupied until specific improvements are in place will further strengthen these.
- To mitigate the impact of development on Special Areas of Conservation, including the Ashdown Forest, WDC is proposing a range of measures through a low emission strategy and will introduce a mitigation tariff. Many of the measures involve or could have an impact on the highway network. Therefore, it is critical that the County Council is fully engaged in this process as a key partner and that any measures taken forward do not place any unreasonable burden on the County Council. Our comments on the mitigation measures and Strategy will be articulated in the County Council's representation. In commenting upon this aspect of the plan and the Air Quality Mitigation Strategy, it will be made clear that the County Council has not scrutinised the evidence that WDC has prepared to support their approach to the Habitats Regulations. Therefore, the County Council is neither endorsing, or disagreeing with the evidence prepared and policy approach taken. Instead, we would wish to be assured that the Planning Inspector, who eventually conducts the Examination into the WDC Local Plan, is satisfied that a proportionate approach has been taken to satisfying the Habitats Regulations, particularly when the cost of mitigating the plans impact on the SAC's is going to reduce the potential development contributions that could be secured for critical infrastructure, such as schools and transport improvements.

- In some instances, detailed comments will be provided on particular policies, including proposed allocations. This will include raising any concerns over any particular policies and to suggest minor modifications to policy wording in order to ensure that matters of interest to the County Council are clearly articulated and addressed in the policies and/or their supporting text.

### **3 Conclusion and Reasons for Recommendations**

3.1 The County Council needs to agree the basis for representations being submitted on the WLP Proposed Submission. The levels of growth that is planned will require substantial County Council infrastructure. The County Council as a key stakeholder has been fully engaged with WDC throughout the development of the Plan and officers have significantly influenced its development. However to protect County Council interests and to ensure the timely delivery of infrastructure to support the proposed development it is recommended that the points outlined in 2.1 and elaborated in the Appendix are agreed as the basis for representations.

RUPERT CLUBB

Director of Communities, Economy and Transport

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#### LOCAL MEMBERS

Councillors: Bennett, Bentley, Bowdler, Dowling, Dowling, Fox, Galley, Shing, Shing, Standley, Stogdon, Tidy and Whetstone.

#### BACKGROUND DOCUMENTS

Wealden Local Plan Proposed Submission August 2018

Infrastructure Delivery Plan

Wealden Local Plan Transport Study

## **APPENDIX**

### **1. Overview of the Plan Process**

1.1 The Proposed Submission is the final version of the Wealden Local Plan (WLP) which has been prepared by Wealden District Council (WDC) and which it intends to submit for Public Examination. The document is the result of a significant amount of research, assessment and consultation. An Issues, Options and Recommendation document was published for consultation in October 2015. County Council officer comments were submitted in response to the consultation.

1.2 The WLP sets out the spatial strategy and policy framework for Wealden District from 2013 to 2028. It covers the areas of Wealden District excluding the area of the District which is within the South Downs National Park.

1.3 The WLP has been through several iterations during the plan making process. A draft Proposed Submission document was reported to WDC Full Council in March 2017. The strategic direction of the WLP was supported however it was agreed that due to key evidence documents not being available that the Plan could not be approved for publishing for examination representations at that stage. The evidence documents have now been completed and the WLP was approved by WDC Full Council on 18 July 2018.

1.4 As well as responding to formal consultations, County Council officers have been involved in technical work to support the plan and have provided informal advice and comments on drafts of parts of the Proposed Submission document to ensure the WLP is aligned with County Council plans and work. Especially this has focused on our infrastructure and service areas as outlined in the sections below but officers have also provided advice on environmental issues.

1.5 At this stage in the plan's preparation the County Council needs to submit representations on issues of 'soundness' or legal compliance. To be 'sound' the WLP should be positively prepared, justified, effective and consistent with national policy. Representations are required by 8 October 2018.

1.6 WDC intends to submit the WLP by the end of the year with an Examination in Public expected to take place in spring 2019.

1.7 The WLP contains:

- Vision and Spatial Objectives;
- Strategic Growth Policies including: housing, the economy, infrastructure and the environment;
- Settlement Strategies and Site Allocations including the housing distribution amongst settlements and town centre development;
- Development Policies including housing, rural and countryside policies, the natural and historic environment, health and wellbeing.

### **2. Amount of Development and Distribution**

2.1 The WLP proposes the delivery of 14,228 dwellings between 2013 and 2028; this is equivalent to approximately 950 additional dwellings per annum. This would meet the objectively assessed housing need for Wealden District, as calculated by WDC. The delivery of the total dwellings can be broken down as follows:

- 2,421 dwellings already completed in the plan period
- 5,279 dwellings with planning permission
- 4,012 dwellings allocated within the plan
- 2,516 dwellings through windfalls

2.2 This total is an increase of 2,772 dwellings on what was proposed in the WLP Proposed Submission, March 2017 document, which had a total of 11,456. Most of this increase is to be delivered through windfall development across the whole district. Windfall developments are where specific sites have not been identified however the WLP indicates the level of development which could be delivered within development boundaries and core areas. All sustainable settlements have been allocated

development boundaries; within these boundaries the principle of development is acceptable subject to other Plan Policies. Some smaller settlements have been given a Core Area where within and adjacent to these Core Areas limited, small scale development may be acceptable subject to other Plan Policies.

2.3 The focus of development remains in the South Wealden Growth area which encompasses the Parish of Hailsham and areas within the Parishes of Hellingly, Polegate, Willington and Jevington and Westham.

2.4 Land is allocated for the delivery of 22,500 net additional square metres of office, industrial and warehousing floorspace (B1, B2 and B8) in the A22 employment corridor site at Lower Dicker. Land is also allocated to deliver 4,350 square metres of retail floorspace, within Uckfield and Hailsham. In order to support the future development of smaller scale employment land in other locations across the District the WLP also includes a policy which identifies the amount of employment provision which will be supported up to the maximum capacity for each area.

2.5 County Council officers have provided advice on site options throughout the plan process, specific site policies generally have incorporated this advice which has included matters relating to landscape, ecology, archaeology and transport requirements.

### **3. Habitats Regulations Assessment**

3.1 A key factor in determining growth levels and locations in the WLP has been the potential impact of growth on the Ashdown Forest Special Area of Conservation (SAC). WDC has undertaken significant work to monitor nitrogen deposition, other pollutants and the ecology of the designated site. Undertaking modelling of traffic flows, air quality and nitrogen deposition has been used to identify the consequential ecological impact of proposed development numbers and distribution. County Council officers have not contributed to, or provided a view on any part of this work.

3.2 The Habitats Regulations Assessment (HRA) undertaken by WDC has concluded that the impact from vehicle trips across the Ashdown Forest SAC is significant with high levels of nitrogen deposition recorded and consequent ecological damage. The evidence has indicated that further pollutants from growth identified from the Plan alone and in combination with other plans and projects will exacerbate this impact and as a result the conservation objectives of the SAC will not be met. WDC's HRA evidence has also identified an impact on the integrity of the protected areas of Lewes Downs SAC and the Pevensey Levels SAC and Ramsar Site.

3.3 The County Council is at an early stage in the HRA work for the Waste and Minerals Plan therefore officers do not currently have the evidence, knowledge or expertise to comment on the methodology used by WDC in its HRA or the conclusions reached. It is however recommended that a proportionate approach is adopted to ensure that the right balance is struck between protecting the key environmental assets in and around the district and meeting growth targets with the appropriate levels of infrastructure provision.

#### *Air Quality Mitigation*

3.4 WDC has investigated and is proposing a range of mitigation measures which will allow development to proceed up to the level proposed in the Plan but not beyond.

3.5 Development which would result in the net increase in traffic movements across roads in, or adjacent to Ashdown Forest SAC or Lewes Downs SAC will be required to contribute towards a package of mitigation measures. So far, WDC has only published a paper setting out a number of options for such mitigation measures. These options include many which involves or would have an impact on the highway. It is therefore critical that the County Council is fully engaged in this process and that any mitigation measures pursued, which impact upon the County Council's interests, are done so with our support.

### **4. County Council Infrastructure Requirements to Support Development**

#### *Overall Impact*

4.1 The level of development proposed will have a significant impact on County Council infrastructure and services particularly transport and education provision. County Council officers have been advising WDC throughout the production of the WLP on the impact and additional infrastructure measures and interventions which would be required to support proposed levels of development. During the plan making process WDC has altered the level of planned growth and it has therefore been necessary for

County Council officers to review forecasts, modelling work and strategies to provide advice on infrastructure impacts and requirements. Throughout this process the two councils have had regular dialogue and engagement, both at an officer and member level on key infrastructure issues and requirements. This has included regular officer and member 'Infrastructure Provision and Delivery Road Map' meetings.

4.2 County Council officers have provided advice and comments on WLP infrastructure policies and have had significant input into the Infrastructure Delivery Plan (IDP) which outlines the infrastructure required to support the Plan's proposed growth. This has covered all areas of County Council infrastructure and services: libraries, waste and minerals, local flood risk management, telecommunications, transport and education. This advice and input is reflected in the latest version of the IDP which was published with the WLP on 13 August 2018.

4.3 Despite the above, WDC made the decision to increase the overall housing figure from 11,456 to 14,228 dwellings at a very late stage and as a consequence County Council officers have not had the opportunity to consider the impact of this increase and comment comprehensively on the implications and the revisions necessary to both the WLP and the IDP. The main service areas which may be affected by these changes, and will need to have their infrastructure needs reviewed, are transport and education provision, albeit other areas may also be required to provide updates to the IDP.

4.4 Our representations will need to include an update on County Council infrastructure requirements to support the latest development levels in the WLP including any necessary changes to the Plan's policies. It will also need to be stated that WDC will need to liaise with the County Council on updates required to the IDP before it is submitted with the WLP. This will ensure that the impact to County Council infrastructure and additional requirements to support the WLP are fully considered during the Plan's examination.

#### *Education*

4.5 County Council officers have undertaken various rounds of education forecasting throughout the development of the WLP. This has led to changes in the overall strategy for school places and County Council officers have provided WDC with advice on infrastructure requirements accordingly including land for potential new schools. The last advice provided was based on development levels in the WLP Proposed Submission, March 2017 and is reflected in the Education Commissioning Plan 2017-2021 and the IDP published in August 2018.

4.6 The current position is that additional primary school places and additional secondary school places are required in Hailsham and Polegate/Willingdon. Land for a new primary school is allocated within Hailsham North 1A for a 2 form entry primary school and early years education provision. A mixed use development including the land for a new school has been granted planning permission. Land is also allocated in the WLP for education provision in South Hailsham.

4.7 Further education forecasting is being undertaken to take into account the latest increase in the housing figures. A verbal update on this work will be provided at the Lead Member meeting. Any changes in the current position on education requirements identified through this work will need to be included in our representations and incorporated into the updates to the IDP before submission.

4.8 Policy SWGA 5 of the WLP acknowledges that education provision is required to support development across the whole South Wealden Growth area and therefore sites for education provision should be able to be released ahead of development where considered necessary by the County Council. This will help with the timely delivery of education infrastructure and should be strongly supported.

#### *Transport*

4.9 In order to test the impact on the road network of the proposed development in the South Wealden Growth Area, the focus of development in the WLP, the County Council and WDC jointly commissioned the Wealden Local Plan Transport Study (WLTS) 2017. The study was completed in 2017 and was published on WDC's website in January 2018 along with a summary and FAQs. The study was based on proposed development levels and locations consistent with those in the 14 March 2017 WLP.

4.10 The study concluded that:

- the additional development with general background traffic growth would result in a degradation of highway operating conditions over time;
- identified highway network improvements will ease and in some cases even resolve issues however they cannot be expected to maintain the status quo;
- the package of highway improvements identified for the delivery of the Wealden Core Strategy are still required;
- delivery of Local Plan development is subject to the following necessary additional highway improvements;
  - A27 Station Road and Alfriston Road (Drusillas Roundabout): roundabout improvements;
  - A27 and The Street: junction improvements to improve minor approach operations;
  - A27 and Common Lane: junction improvements to improve minor approach operations;
  - A22, A267 and A271 Boship Roundabout: re-built and signalised roundabout;
  - A22 and A295 South Road: junction improvements; and
  - A22 Golden Jubilee Way and B2247 Dittons Road Roundabout: junction improvements in addition to the Core Strategy scheme.
- highway improvements would need to be combined with a 'step change' in the use of public transport, cycling and walking.

4.11 The study also highlighted that beyond the end of the plan period of 2028, the proposed A27 Comprehensive Offline Solution between Lewes (Beddingham) – Polegate (Cophall) and the grade-separation of Cophall Roundabout should also be considered. The conclusions and requirements from this study have been incorporated into the WLP policies and the supporting IDP.

4.12 In order to consider the impact of the higher growth figures in the latest Proposed Submission WLP a further Transport Study has been commissioned. Initial findings from this study show that additional growth will put increased pressure on the strategic corridors particularly the A22. This may require changes to junction schemes previously identified and to their timing and is likely to require more significant interventions. The 'step change' in the use of sustainable transport is also still a critical part of the wider strategy for mitigating the impact of growth. Whilst an A27 Comprehensive Offline Solution has been assessed as part of this study, further work will be undertaken to evaluate when this may be required.

4.13 Details on the conclusions from the study will be provided through a verbal update at the Lead Member meeting and any necessary changes to the WLP, which are recommended to include in our representations.

4.14 Further scheme and corridor studies also need to be undertaken to take forward the design of the package of junction improvements and to identify further transport infrastructure improvements at a more localised level to support and enable a 'step change' in use of public transport, cycling and walking. A study on Polegate Station is also being undertaken to assess the impact of the growth. The WLP reference these studies within the overall infrastructure policy and relevant site policies. Work on these studies and design work, which the County Council is leading on, has commenced and is programmed to be undertaken in 2018/19 and 2019/20. The results from these studies and further design work will need to be incorporated into future reviews of the IDP and will be used to inform the infrastructure requirements for future planning application decisions.

## **5. Infrastructure Funding and Delivery**

### *Securing Funding*

5.1 As outlined in Section 4 the level of development proposed over a relatively short period will require the funding and delivery of substantial amounts of County Council infrastructure, particularly transport and education provision.

5.2 County Council officers in liaison with WDC officers are exploring all opportunities to secure the necessary funding however at this stage there is uncertainty over how the magnitude of funding will be achieved, this in turn impacts on the overall uncertainty with delivering the necessary infrastructure to support growth. Though the WLP does acknowledge that the proposed development, particularly in the

South Wealden Growth area, will require significant investment in new infrastructure, the importance of levering in significant funding from a range of sources should be stressed in the representations.

### *External Funding*

5.3 The success of the 'Accelerating Wealden Delivery' (AWD) Housing and Infrastructure Fund Forward Funding bid is likely to be critical in ensuring a significant element of the necessary infrastructure funding is secured. The County Council and WDC submitted an Expression of Interest (EOI) to the Housing Infrastructure Fund last year, and following the announcement it had been successful with its EOI earlier this year, both councils are now working with the Ministry of Housing, Communities and Local Government (MHCLG) and Homes England to develop a full business case for submission in March 2019. The bid is currently valued at £48m. It includes three key elements to unlock and accelerate housing growth in the Wealden area, these are:

- mitigation of nitrogen deposition in Ashdown Forest;
- delivering a new Primary school in Hailsham; and
- transport infrastructure improvements in the Eastbourne/South Wealden area.

5.4 Representations should acknowledge the huge challenge of securing the necessary infrastructure funding to support development. That the County Council is committed to exploring all opportunities to secure this funding, including the AWD bid, and to working with WDC and other partners such as Highways England to ensure sufficient funding is secured and appropriate forward planning is in place. However there remains great uncertainty that this funding will be secured to enable the delivery of the necessary infrastructure which development is dependent on.

### *Development Contributions*

5.5 Development contributions will not be able to fund all the necessary infrastructure requirements, as acknowledged in the WLP; however they have the potential to provide an important part in the mix of funding sources required. Therefore it is important that all opportunities to secure the maximum levels of contributions without affecting overall development viability are not missed, and that the spending of monies is allocated to help fund critical infrastructure.

5.6 WDC introduced a Community Infrastructure Levy (CIL) in April 2016, which was based on Core Strategy development figures and site. Therefore the charging schedule and particularly the Regulation 123 list, which sets out the projects which could potentially be funded wholly or partly by CIL, are out of date and need reviewing. From a County Council perspective, the need for a review of the Regulation 123 list has been exacerbated by the current approach to CIL undermining our ability to secure proportionate off-site highway works, which would ordinarily be secured through a Section 278/106 agreement. As a key infrastructure provider it is essential that the County Council is part of the review into the overall approach to development contributions and can explore with WDC the full potential for securing and maximising development contributions both through CIL and S106 obligations.

5.7 WDC has not yet allocated any CIL monies. As there is a lack of funding for critical infrastructure it is important that WDC confirms that the spending of limited CIL monies will be prioritised on critical infrastructure and that this includes transport and education provision.

5.8 Representations should stress the importance of development contributions in helping to fund critical infrastructure including transport and education provision. The representations should also highlight the necessity for WDC to review the CIL Charging Schedule as soon as possible and the urgent need to revise the Regulation 123 list.

## *Timely Delivery*

5.9 As the funding of necessary infrastructure is so uncertain there is concern that infrastructure will not be delivered in a timely manner to support development.

5.10 The WLP does include strong policies which will help with ensuring that infrastructure is delivered with development. Policy INF 1 – ‘Effective Provision of Infrastructure’ states that:

‘where development would create the need to provide additional or improved facilities, services and infrastructure to mitigate its impact, a programme of delivery must be agreed with the relevant infrastructure providers which will ensure that these improvements are provided at the time they are needed’

and Policy SWGA 8 – ‘Release of development’ states that:

‘The release of land for development is conditional upon there being capacity within the strategic transport network. Any development will need to show that the impact of the additional traffic created by new development, including cumulative impact, could be accommodated on the existing network or that strategic transport interventions will be delivered to the satisfaction of the relevant highway authorities’.

These policies go a long way to ensure that development does not come forward without the necessary infrastructure and are to be supported; however they could be further strengthened.

5.11 Clarity on specific Strategic Infrastructure Requirement site policy criteria will further help to ensure that the timing of development is linked with the delivery of dependent infrastructure. Specifically in certain circumstances occupation of developments should be prevented until necessary infrastructure has been provided. Representations should therefore recommend that policies indicate that it may be necessary to use ‘Grampian’ planning conditions to prevent unacceptable effects on the highway, such as preventing new dwellings from being occupied until specific transport infrastructure improvements are in place. Current transport evidence supports this approach however further work will be undertaken to clarify specifically where this needs to be applied.

## **6. Conclusion**

6.1 County Council officers have been advising WDC throughout the development of the WLP. This has led to a Plan which has policies that generally protect County Council interests and ensures that particularly infrastructure requirements have been taken into account. However, the increase of the overall housing figure by WDC at a late stage has meant the implications were not considered by County Council officers before the WLP and IDP were published in August. Representations therefore need to include an update to infrastructure requirements and any changes necessary to the Plan.

6.2 There is also concern over the amount of funding which needs to be secured and therefore the uncertainty over the delivery of supporting infrastructure. The success of the AWD Housing Infrastructure Fund bid will be critical in achieving a significant element of the funding to deliver this supporting infrastructure.

6.3 Policies already provide some measures for ensuring that development does not come forward without the necessary infrastructure, however further changes are recommended to strengthen these. Development contributions also will play a key part in enabling infrastructure to be provided in a timely manner, the current CIL Charging Schedule is out of date therefore WDC needs to review this as soon as possible and urgently needs to revise the Regulation 123 list.

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