

Appendix 2

18 March 2026 – Planning Committee

BSIP A259 The Drove and Seaford Road, Newhaven – Traffic Regulation Order 520/539/540

Local Members: Councillor James MacCleary

Local Member was contacted on 26 January 2026. No representation received.

Proposals where objections are recommended to not be upheld and are recommended to be implemented as advertised

1. Introduction

1.1 Of the **76** objections received, **18** related to the specific traffic orders proposed in the TROs. These 18 objections have been split into themes:

2. Impact of the Bus Lanes

2.1 **Fourteen** objections raised concerns around the perceived negative impact of the bus lanes.

2.2 Objections to the proposed bus lane on the northern side of Denton Roundabout expressed concerns that it would reduce capacity for general traffic and increase risk of collisions on the roundabout due to potential lane confusion.

2.3 This short section of bus lane enables buses from the A259 The Drove to use the lefthand lane, normally left turn only for general traffic, to continue directly ahead into the new bus interchange and bus stop. It provides a clear, direct route for buses and supports the efficient operation of the interchange. Marking this area as bus only also reinforces correct lane discipline for general traffic, helping to prevent cars from using the wrong lane on the roundabout, which has been a source of conflict in the past. The measure is intended to improve clarity for all road users while ensuring buses can access the interchange safely and smoothly.

2.4 Objections to the proposed bus lane on the southern side of the A259 Seaford Road centred on the perceived reduction of two general traffic lanes to one, and the potential impact this could have on congestion, journey times and vehicle emissions.

2.5 The bus lane has been designed to end before the approach to Denton Roundabout, thereby maintaining the existing two-lane entry to the roundabout. Microsimulation (VISSIM) modelling has been undertaken and indicates that the network will continue to operate effectively with the introduction of the westbound bus lane, while delivering more reliable and consistent journey times for buses. The intention is to support improved bus performance and make services more dependable, helping to encourage sustainable travel along this corridor.

2.6 Objections to the proposed bus lane within the new bus interchange suggested that general traffic may use the interchange to bypass congestion during busy periods. Concerns were also raised that buses may find it difficult to safely emerge from the interchange onto the A259 Seaford Road due to fast-moving traffic, potentially increasing the risk of collisions. It was further suggested that this could impede the flow of buses and lead to the bus stop area becoming blocked if buses are required to wait for longer periods before joining the A259 Seaford Road.

2.7 Access and circulation within the interchange will be restricted to buses only and enforced through camera monitoring. The layout provides buses with a more direct route from Denton Roundabout and Mount Road, removing the previous longer diversion. This supports the relocation of the Denton Corner bus stops and enables additional services, including express routes, to serve the area more efficiently.

2.8 Having considered the objections, officers are satisfied that there are not sufficient grounds for the proposals to be withdrawn.

2.9 **Recommendation:** To not uphold the objections and install the proposals as advertised.

3. Proposed One-way Workings

3.1 **Three** objections related to the proposed one-way workings within the new bus interchange.

3.2 Objections raised concerns that it would be difficult for buses to safely emerge from the bus interchange onto the A259 Seaford Road due to fast-moving traffic, which could increase the risk of collisions. It was also suggested that this could impede the flow of buses and potentially lead to blocking of the bus stop area if buses are required to wait for longer periods before joining the A259 Seaford Road.

3.3 The scheme design has considered existing traffic conditions on the A259 and ensures that buses have appropriate visibility, markings, and give way arrangements to merge safely. While it is recognised that this section of the A259

can be busy at peak times of the day, the proposed layout has been developed to operate safely and effectively within those conditions.

3.4 Safety has been a fundamental consideration throughout the development of the project. Road Safety Audits (RSAs) have been undertaken at the appropriate stages of the design process. These audits are carried out by independent specialists who are not involved in the preparation of the scheme design, ensuring an impartial assessment.

3.5 Having considered the objections, officers are satisfied that there are not sufficient grounds for the proposals to be withdrawn.

3.6 **Recommendation:** To not uphold the objections and install the proposals as advertised.

4 No Waiting At Any Time restrictions

4.1 **Four** objections related to the No Waiting At Any Time restrictions on Mount Road and Station Road.

4.2 Objections raised concerns that the restrictions would result in the loss of existing uncontrolled on-street parking on Mount Road and Station Road, and would therefore push parking further up Station Road and onto Beresford Road.

4.3 It is recognised that some parking and brief stopping currently takes place in these locations, and that some displacement may occur. However, while waiting will not be permitted where restrictions are introduced, passengers can continue to be set down or collected in nearby areas where stopping is allowed. The proposed restrictions are required to ensure that buses can safely travel without obstruction in locations where the road is narrower or visibility is restricted. Parked vehicles in these areas can create conflict, force vehicles to cross the centre line, and cause delay. The proposed measures are intended to provide a more consistent and reliable operating environment as part of the wider Bus Service Improvement Plan (BSIP).

Having considered the objections, officers are satisfied that there are not sufficient grounds for the proposals to be withdrawn.

4.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

5 Proposed Bus Stops

5.1 Of the **76** objections received, **30** related to the proposed bus stops, which were advertised alongside the TRO proposals for transparency, but are not themselves part of the TRO. Of these 30 objections:

5.2 **28** objections raised concerns about the purpose of suitability of proposed bus stop locations.

5.3 **Fourteen** objections related to safety at proposed bus stops.

5.4 **Seven** objections related to potential flooding near the proposed bus stops on B2019Avis Road

5.5 **Recommendation:** Not required. These objections fall outside the scope of the TRO proposals. Objections recorded for transparency only.

6 Congestion

6.1 **43** objections suggested that the TRO proposals would worsen congestion or would have no effect on existing congestion levels.

6.2 While congestion levels fall outside the scope of the TRO process, traffic conditions have been assessed as part of the wider scheme design. Comprehensive traffic surveys were undertaken across the area, including queue length observations, classified turning counts and signal timing data, with detailed analysis of peak-period conditions. This data informed microsimulation modelling using VISSIM to understand how the proposals interact with traffic flows and junction performance.

6.3 This modelling shows that the scheme is not expected to result in a significant increase in congestion. The design has been developed as part of the East Sussex Bus Service Improvement Plan (BSIP), with the aim of improving bus journey time reliability while avoiding unnecessary detriment to general traffic. The modelling work has supported this approach by testing performance under the busiest conditions.

6.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

7 Bus Journey Times

7.1 **18** objections suggested that the TRO proposals would have no, or only minimal, impact on bus journey times.

7.2 The scheme forms part of the BSIP, which is specifically intended to improve bus journey time reliability and overall service performance along key corridors. Development of the proposals has been informed by comprehensive traffic and

operational surveys, along with microsimulation modelling, to understand how buses operate through the network during peak periods

7.3 This assessment work demonstrates that the scheme will deliver meaningful improvements for bus services. In particular, the revised layout at Denton Corner will remove the need for westbound buses to undertake the current diversion through Mount Road in order to serve the stop, reducing delay and improving journey time consistency. Relocating the Denton Corner stops to the A259 will also allow express services to serve the area without diversion, increasing frequency and convenience for passengers. These improvements are supported by local bus operators, who have indicated that the measures will help deliver more reliable and efficient services.

7.4 The proposals have therefore been designed to achieve clear bus priority benefits in line with BSIP objectives and the purpose of the scheme's funding.

7.5 **Recommendation:** To not uphold the objections and install the proposals as advertised.

8 Proposals as a waste of money

8.1 **Twenty-four** objections suggested that the TRO proposals were a waste of money or that funding would be better spent on other priorities.

8.2 The County Council received £41.4 million from the Department for Transport (DfT) to deliver the BSIP. Of this, £18.5 million is specifically allocated for bus priority measures. This funding is ring-fenced by the DfT and cannot be used for other purposes, such as general highway maintenance or unrelated transport projects. The proposals have therefore been developed to ensure that this funding is used for its intended purpose and delivers the improvements required under the BSIP programme.

8.3 **Recommendation:** To not uphold the objections and install the proposals as advertised.

9 Disruption

9.1 **Six** objections suggested that the TRO proposals would lead to significant disruption in the area during construction.

9.2 The County Council will work closely with its primary contractor, Balfour Beatty Living Places (BBLP), to carefully plan and coordinate the construction programme. This approach is intended to minimise disruption wherever possible by reducing the need for road closures, maintaining access for vehicles and pedestrians where feasible, and phasing works to limit local impact. Where temporary restrictions

are unavoidable for safety reasons, these will be communicated in advance and managed to minimise disruption to the community.

9.3 **Recommendation:** To not uphold the objections and install the proposals as advertised.

10 Local Voices

10.1 **Nine** objections suggested that the TRO proposals were against local opinion or that local voices had been ignored.

10.2 ESCC has undertaken several stages of public engagement on this scheme, including a full public consultation in 2023 and an informal TRO pre-consultation in late 2024. Officers acknowledge that some respondents feel their views have not been reflected in the current proposals. All feedback received, both supportive and opposing, has been reviewed and has informed the development of the scheme where feasible. In some cases, competing priorities, safety requirements or national funding conditions mean that not every suggestion can be taken forward, however, this does not mean that local views have been disregarded. ESCC remains committed to considering community feedback as the project progresses.

10.3 **Recommendation:** To not uphold the objections and install the proposals as advertised.

11 Impact on local businesses

11.1 **Five** objections suggested that the TRO proposals would have a negative impact on local businesses.

11.2 Throughout the development of this scheme, ESCC has actively engaged with local businesses and provided multiple opportunities for them to comment on the proposals. Nearby businesses were contacted directly during the 2023 public consultation, which included in-person engagement events on 14 September 2023 where business representatives had the opportunity to speak directly with the project team. Further opportunities for feedback were provided during the informal TRO pre-consultation in late 2024, and all business comments have been considered in refining the design.

11.3 While officers recognise that some businesses have concerns, the scheme aims to improve accessibility, enhance bus service reliability, and support the overall movement of people in the area, which can help sustain local footfall and economic activity in the longer term. ESCC will continue to work with businesses during delivery to minimise disruption and maintain access wherever possible.

11.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

12 The Wider Scheme Consultation

12.1 **Six** objections suggested that the TRO proposals and the wider scheme had not been properly consulted upon.

12.2 ESCC has undertaken extensive engagement throughout the development of this scheme, and local feedback has played an important role in shaping the proposals. A full public consultation took place between 31 July and 25 September 2023, with information hosted on the ESCC Consultation Hub and in-person events where residents and businesses could speak directly with the project team. Consultation postcards were delivered to nearby homes and businesses, supported by press activity to ensure broad awareness.

12.3 An informal TRO pre-consultation was carried out between 16 December 2024 and 16 January 2025, setting out the updated design and outlining the proposed traffic regulation measures. Feedback from both consultation stages has been reviewed and has informed the development of the detailed design and the TRO proposals now being formally considered. ESCC recognises that views differ within the community and remains committed to ensuring that local voices are heard and considered as part of a transparent decision-making process.

12.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

13 Clarity of context

13.1 **Eleven** objections fed back that the parts of the TRO consultation were unclear or that additional context would have been helpful.

13.2 As this consultation focused specifically on the Traffic Regulation Order (TRO) proposals, the materials were centred on explaining the legal restrictions that the TROs would introduce rather than outlining the wider bus priority scheme. ESCC acknowledges this feedback and recognises the importance of providing clear and comprehensive information. Comments regarding the clarity and presentation of TRO materials, both online and in physical formats, will be taken into account to help improve how future proposals are communicated.

13.3 **Recommendation:** To not uphold the objections and install the proposals as advertised.

14 Surveys and Modelling

14.1 **Five** objections questioned the extent of the surveys and modelling used to inform the TRO proposals.

14.2 To inform development of the scheme, a comprehensive set of traffic surveys was undertaken across the full scheme area, including queue length surveys, signal timing surveys and classified turning counts. At each location, 12 hours of video footage were collected, with detailed analysis focused on the morning and afternoon peak periods (typically 7am–10am and 3pm–7pm). This approach follows standard industry practice, as peak periods provide the most robust indication of how the network performs under its busiest and most constrained conditions.

14.3 Survey data was used to build a VISSIM microsimulation model of the scheme, enabling detailed assessment of the dynamic interactions between vehicles, junctions and redesigned road layouts. Whole-day modelling is not normally undertaken, as peak period analysis provides the clearest and most representative understanding of the conditions the scheme is intended to address. The survey and modelling methodology adopted is therefore consistent with established industry standards and appropriate for assessing the impacts of the proposals.

14.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

15 Cyclists

15.1 **Two** objections suggested that the TRO proposals had not fully considered cyclists or provided appropriate design provision for them, including requests for measures such as converting existing signalised pedestrian crossings to toucan crossings.

15.2 While this scheme forms part of the Bus Service Improvement Plan (BSIP) and is therefore primarily focused on improving bus reliability and the operation of services through the Denton Roundabout area, ESCC recognises the importance of accommodating cyclists and ensuring appropriate integration with the wider cycle network.

15.3 Within the constraints of available space and the operational requirements of the interchange, the scheme maintains cycle access where feasible and provides connections to the existing A259 cycle facilities. However, the interchange itself functions as a dedicated bus operational environment, which limits opportunities for additional cycle-specific infrastructure within its internal layout.

15.4 Regarding crossing facilities, the scheme does not include changes to the existing signalised pedestrian crossings or their conversion to toucan crossings. This reflects the outcomes of VISSIM modelling, which has been used to ensure that the intended bus journey time and reliability benefits can be delivered without introducing significant delays to the wider network. Altering signal phasing or upgrading to toucan operation would increase traffic and bus delays and would not support the

objectives of the BSIP programme. For these reasons, the existing crossing types and staging are being retained.

15.5 **Recommendation:** To not uphold the objections and install the proposals as advertised.

16 Pedestrian Crossing Points and Desire Lines

16.1 **Three** objections suggested that the TRO proposals had not properly considered pedestrian crossing points or pedestrian desire lines.

16.2 Officers note concerns that indirect routes may encourage informal shortcuts and could create potential conflict with vehicle movements. As this scheme forms part of the Bus Service Improvement Plan (BSIP), the interchange layout has been developed primarily to support safe and efficient bus operations. Within these operational constraints, pedestrian routes have been designed to provide safe and clearly defined connections that minimise interaction between pedestrians and buses. The alignment of footways and crossing points also reflects site gradients and level changes to ensure routes remain accessible for all users.

16.3 The designated paths have therefore been planned to guide pedestrians along safe, step-free routes while maintaining the space required for bus manoeuvring. These considerations will continue to be reviewed as the scheme progresses.

16.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

17 Tree Loss

17.1 **Six** objections raised concerns over the proposed loss of trees or greenery that would be required to implement the TRO proposals.

17.2 As part of the scheme's development, detailed arboricultural assessments have been undertaken, including an Arboricultural Constraints Report and an Arboricultural Impact Assessment. These studies identify existing trees and vegetation, assess their condition, and determine how they may be affected by the proposed works.

17.3 For the A259 Newhaven Denton Roundabout (Phase 1) scheme, this includes some tree and shrub loss at Mount Road, as well as vegetation cutback along sections of the eastern side of the A259 Seaford Road.

17.4 Any trees that require removal will be replaced at a 3:1 ratio, and where appropriate the project team will work with landscape designers to identify suitable

replacement or alternative planting options as part of the landscaping and planting plan. This approach ensures the scheme complies with relevant arboricultural guidance and British design standards, while supporting the long-term enhancement of local green infrastructure.

17.5 A dedicated tree consultation will also be held in 2026, focusing specifically on the proposed vegetation and tree loss associated with this scheme.

17.6 **Recommendation:** To not uphold the objections and install the proposals as advertised.

18 Wildlife

18.1 **Two** objections suggested that the TRO proposals represented a potential threat to wildlife.

18.2 As part of the scheme's design process, extensive ecological surveys have been undertaken, including a *Preliminary Ecological Appraisal* and an *Environmental Risk Assessment*. These assessments covered all relevant protected and priority species and habitats within the study area. Their findings have informed the scheme's development to ensure that both the design and construction phases comply fully with statutory environmental requirements, and that appropriate measures are in place to avoid or minimise any potential impacts on wildlife and their habitats.

18.3 **Recommendation:** To not uphold the objections and install the proposals as advertised.

19 Vehicle Emissions

19.1 **Nine** objections suggested that the TRO proposals would lead to an increase in vehicle emissions and therefore air pollution.

19.2 The Government's Design Manual for Roads and Bridges (DMRB) guidance has been reviewed, noting the triggers for an air quality assessment. Currently, the proposed scheme for Newhaven Denton Roundabout is not expected to significantly alter the volume of traffic in the area to require an air quality assessment.

19.3 Under the Climate Change Act (2008), the UK aims to achieve net zero greenhouse gas emissions by 2050. In East Sussex, transport contributes 35% of CO₂ emissions; hence, decarbonising transport is crucial for reaching net zero. Local authorities in East Sussex, including the County Council and Lewes District Council, are working towards net-zero emissions by 2050 and 2030 respectively.

19.4 Additionally, the East Sussex Local Transport Plan 4 (LTP4) focuses on planning for people and places, enhancing capacity, resilience, reliability, and connectivity through public transport interventions by increasing buses' ability to capture a greater share of short, medium and longer distance trips, reducing the number of private car trips taken, limiting carbon emissions from transport and improving air quality.

19.5 Policy B5 in the East Sussex LTP4 addresses air quality by promoting less polluting forms of travel, such as buses, active travel, and electric vehicles. This includes implementing infrastructure like bus lanes and leveraging advancements in vehicle technology, including ultra-low and zero emission vehicles. In summary, developing bus priority infrastructure for urban and rural areas will support decarbonisation and improve air quality.

19.6 **Recommendation:** To not uphold the objections and install the proposals as advertised.

20 Safety Risks

20.1 **Nineteen** objections suggested that the TRO proposals would present safety risks.

20.2 Safety has been a fundamental consideration throughout the development of the project. Road Safety Audits (RSAs) have been undertaken at the appropriate stages of the design process. These audits are carried out by independent specialists who are not involved in the preparation of the scheme design, ensuring an impartial assessment.

20.3 The purpose of an RSA is to identify any potential safety issues and recommend measures to mitigate or remove risk where necessary. Feedback which has been provided forms part of the considerations assessed through this process. Where issues have been identified, they have either been addressed through amendments to the design or appropriate mitigation measures have been incorporated.

20.4 All Road Safety Audit recommendations are formally reviewed and responded to by the design team, and the process is signed off at the relevant stages of the scheme to ensure that the proposals meet the required highway safety standards before progressing further.

20.5 The potential effects of the wider scheme proposals on protected groups are being assessed through the scheme's ongoing Equality Impact Assessment (EqIA). This examines how different groups may be affected by the proposals. The concerns raised will form part of that assessment and will be taken into account as the design and implementation progress.

20.6 **Recommendation:** To not uphold the objections and install the proposals as advertised.

21 Other Schemes

21.1 The following concerns were raised during the consultation but fall outside the scope of the Traffic Regulation Order (TRO) proposals. These either relate to separate schemes or to elements that have been removed from the current scheme design.

21.2 **Twelve** objections related to the one-way system on the Newhaven Ring Road (separate scheme).

21.3 Officers acknowledge concerns about the operation of the Newhaven Ring Road and the town-centre one-way system. These issues are being addressed through the Newhaven Virtual Bus priority scheme, which includes new bus priority measures and signals in the town centre to improve journey-time reliability and reduce delays for buses.

21.4 This scheme is already under construction and is expected to improve congestion and bus movements once complete. As this work forms part of a different BSIP project, it is not part of the Newhaven Denton Roundabout TRO proposals. However, together the schemes contribute to wider improvements across Newhaven's transport network.

21.5 **Recommendation:** To not uphold the objections and install the proposals as advertised.

22 Eastbound Bus Lane

22.1 **Twelve** objections referred to an eastbound bus lane that formed part of an earlier design but is no longer included in the current proposals (descope item).

22.2 Following the Cabinet decision to re direct £11.128m of grant funding from the Newhaven and Peacehaven bus priority schemes to the Exceat Bridge Replacement Project, the County Council committed to using part of the 2025/26 BSIP allocation to deliver the Newhaven bus priority scheme. To meet Department for Transport programme requirements, the original scheme was divided into:

- Phase 1 – Denton Roundabout (current TRO)
- Phase 2 – The Drove (paused)

22.3 The eastbound bus lane on A259 The Drove appeared in early informal consultation drawings (Dec 2024–Jan 2025), but is not part of Phase 1, which the current TROs cover. Phase 2 is paused pending further funding.

22.4 **Recommendation:** To not uphold the objections and install the proposals as advertised.

23 Out of Scope Tree Loss

23.1 **Three** objections related to out of scope tree loss which does not form part of these TRO proposals.

23.2 Earlier design drawings indicated that tree removal along the south side of A259 The Drove would be required to support the eastbound bus lane in Phase 2. As Phase 2 is not included in the current TROs, no tree removal on A259 The Drove is required as part of these proposals.

23.3 **Recommendation:** To not uphold the objections and install the proposals as advertised.

24 Exceat Bridge

24.1 **One** objection suggested that Exceat Bridge should be looked at instead, this is a separate project, and not part of the TRO proposals.

As the Exceat Bridge project is a separate programme of work, it is not part of the current TRO proposals.

24.2 **Recommendation:** To not uphold the objection and install the proposals as advertised.