LAND SOUTH OF HOREBEECH LANE, HORAM

Residential Development

Technical Note

Prepared on behalf of

Chailey Homes

CHHO/17/3547s

September 2018

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1 INTRODUCTION

1.1.1 This Technical Note (TN) has been prepared to address the items raised within East Sussex County Council's (ESCC) Highways Consultation Response dated 15th August 2018. The consultation response is attached at **Appendix A** for reference. This TN has been prepared to review the items raised by ESCC and provide further information.

1.1.2 ESCC's highway officer identified the following highway elements that require review and further information: -

(i) Visibility sightlines at the access

(ii) Details of Cuckoo Trail connection

(iii) Junction modelling A267/Horebeech Lane mini-roundabout

(iv) Trip rate verification

(v) Travel Plan statement

(vi) Amend shared-space areas

(vii) Car parking details

(viii) Off-site highway works

2 SITE ACCESS

2.1 Speeds on Horebeech Lane

2.1.1 The ESCC Consultation Response cites the following regarding the speed limit on Horebeech Lane:

> *"The site frontage is partly within a 30mph limit, and thereafter Horebeech Lane has speeds that are derestricted towards the east. As part of the previously consented development at Rosemead Farm, a highway scheme was sought to extend the 30 mph speed limit, enable the mini-roundabout to be installed to serve that site and suitable speed reducing measures, a gateway feature, in addition to signage would need to be in place to ensure appropriate vehicle speeds can be self enforced. The highway scheme for Rosemead Farm development of 123 houses is yet to be finalised, including the extent of the proposed 30 mph speed limit extension.*
>
> *In considering this application, off-site highway works in order to compliment the emerging road proposals, or in the event Rosemead Farm development is not delivered an appropriate scheme commensurate to the scale of development shall be sought. It is recommended that the proposed development itself should have visual frontage to maintain continuity from the existing village edge on west side of bridge to the cluster of detached houses at Laundry Lane junction to assist self-enforcement of a 30 mph speed limit. A change to the speed limit would need to be authorised by a Traffic Regulation Order and have support from Sussex Police, the enforcing body."*

2.1.2 The process of agreeing a Traffic Regulation Order (TRO) is outside the planning process and as such the application can not be dependent on a successful TRO application.

2.1.3 RGP could make a TRO application in the event that the Rosemead Farm development is not implemented, but there would be no guarantee that it would succeed. It is therefore suggested that the planning application is conditioned, if the LPA is minded to approve it, such that a TRO is sought, but that its success should not constrain building or occupation of the development.

2.2 Main Access

2.2.1 The ESCC Consultation Response cites the following regarding the proposed access:

"Main access - The proposal for a priority junction as type of access is acceptable in principle for the scale of the development, but given the proposed network layout it may not be appropriate for the first entry point for residential development in the village on the approach from the east. The actual recorded vehicle speeds on Horebeech Lane have been taken into account when determining the driver sightline requirement at the access. The drawing 3278:01rev G indicates the sightlines but does not mark them out in full. From a desktop measurement to the east, the sightline is likely to be obstructed by neighbouring boundary vegetation; and to the west can be cleared of overhanging vegetation along the site frontage. This should be clarified and shown in full on a plan. An access to a development of this scale on a road that is subject to the exhibited vehicle speeds cannot be supported without speed reducing measures. Therefore, although it is claimed by the applicant that further highway works are not required to accommodate this development, my view is that a change in the local character and introduction of resident activity would certainly require a conducive highway environment to support sustainable modes of travel."

2.2.2 RGP have demonstrated visibility splays designed in accordance with the recorded 85th percentile design speeds on Horebeech Lane. The splays are demonstrated as achievable in **Drawing 2017/3547/001** submitted with RGP's original Transport Statement. The drawing referenced within ESCC's response is the architects drawing.

2.2.3 The splays shown are based on the recorded design speeds on Horebeech Lane and therefore are not dependent on traffic calming features on Horebeech Lane. Pedestrian visibility splays are similarly achievable at the proposed pedestrian crossing point as displayed on **Drawing 2017/3547/101**.

2.3 Stage 1 Road Safety Audit

2.3.1 The ESCC Consultation Response cites the following regarding the requirement for a Stage 1 Road Safety Audit at the site:

"Noted is that a RSA1 has been carried out for site access with both a preliminary highway scheme associated with Rosemead Farm development and without. As the highway scheme is yet to be finalised, it is likely that a further RSA1 will be required. Given that there will be the introduction of residential related activity; it is recommended that vehicle speeds are effectively reduced to 30 mph to accommodate pedestrian activity at the site entrance, particularly crossing the road to reach the footway to access the Cuckoo Trail or village centre. It is recommended that the 30mph speed limit extends to an agreed position to accommodate a further extension of the village."

2.3.2 The independent Stage 1 Road Safety Audit (RSA), which considered both the proposed scheme in isolation as well as in the context of the neighbouring development, did not raise any issues regarding the speeds at the proposed access. The RSA raised 4 other issues which were all agreed and implemented into the access design.

2.3.3 It is unreasonable to request further a Stage 1 RSA for the proposed site access in the event that the adjacent scheme is amended. A combined Stage 1 and RSA could be undertaken at detailed design stage to address any potential conflicts.

2.4 Highways Scheme

2.4.1 The ESCC Consultation Response cites the following regarding potential off-site highway works:

> *"Highway scheme – a scheme to accommodate this site is required and at this early stage consideration should be given to extending the 30 mph east of Laundry Lane and a mini-roundabout provided at the junction Horebeech Lane/Laundry Lane to define the start of the village, on the basis that the Rosemead Farm site access would no longer be the first point of entering the village extension. This would also require supplemental traffic calming features to compliment the Rosemead Farm highway scheme when finalised. It is recommended that the applicant enters into discussions with this authority so that 'access' can be discussed and appropriate measures can be secured for this site."*

2.4.2 As addressed in **paragraph 2.4**, visibility at the access achieves the necessary sightlines in accordance with the recorded design speeds on Horebeech Lane. Along with the independent Stage 1 RSA undertaken at the proposed access, this demonstrates that the proposal provides safe access to the development, regardless of traffic calming measures.

2.4.3 ESCC's suggestion of a mini-roundabout at the Horebeech Lane/ Laundry Lane junction is considered inappropriate based on the following guidance set out in DMRB TD 54/07 'Design of Mini-Roundabouts':

(i) Paragraph 2.5 (Mandatory Requirement) states: "*Mini-roundabouts must not be used: … at a junction where the forecast traffic flow on any arm is below 500 vehicles per day (2-way AADT).*"

(ii) Paragraph 2.13 states: "*When traffic flows are low, drivers may consider conflict with other road users to be unlikely with the result that they might approach the junction at inappropriate speeds. ... In order to make the junction work in a more predictable way, it is best to avoid installing miniroundabouts where traffic flows or turning proportions differ widely between arms, or where approach speeds are high.*"

2.4.4 It is unlikely that traffic on Laundry Lane would exceed AADT and would be significantly lower than the volume of vehicles on Horebeech Lane.

2.4.5 Redefining of the start of the village boundary also falls outside of the remit of the local highway authority. What is desirable from a highways perspective is not necessarily appropriate from a planning perspective. A number of sustainable infrastructure improvements would also be required to support such a redefinition (footways, crossings, lighting, new utilities etc.. that would be disproportionate to the development scale and present an inconsistency in the extent of mitigation required by other developments in the locale.

2.5 Footway on Horebeech Lane

2.5.1 The ESCC Consultation Response cites the following regarding the existing footway on Horebeech Lane:

> *"Footway – as part of the proposal, footway enhancement is being proposed along the site frontage, west side of access to linking into the site and to the opposite side of Horebeech Lane where there is an existing footway connecting to the Cuckoo Trail and westwards along Horebeech Lane towards the A267. An upgrade to the footway on the north side of Horebeech Lane is required for connectivity and travel choice and should connect to the works proposed as part of the Rosemead development access. The footway between the proposed crossing point outside the site access and the proposed mini-roundabout should be 2m in width which can be achieved by extending the hard surfacing closest to the carriageway."*

2.5.2 The existing footway on the northern side of Horebeech Lane has been widened to 2.0m as part of the proposed access arrangement and would connect seamlessly with the footways proposed as part of the Rosemead Farm development. The widened footway is shown in **Drawing 2017/3547/001** submitted with RGP's original Transport Statement. **Drawing 2017/3547/101** demonstrates how the footway would connect with the adjacent scheme.

2.6 Cuckoo Trail Link

2.6.1 The ESCC Consultation Response cites the following regarding the proposed link to the Cuckoo Trail:

> *"Within the site layout, a footpath link is shown in a southern direction towards the Cuckoo Trail. The route is through a private car park area which suggests that residents or Trail users would have to pass across private land. Will this be a publicly available route or with the link to the Cuckoo Trail be exclusively for residents of this development and be gated? The connecting path should be at a standard suitable for cycles, or minimum 2.75m wide. The details of the linkage between site and Cuckoo Trail should be provided. In principle this connection is supported."*

2.6.2 The link to The Cuckoo Trail would be open to public use and would not be gated. Access to the footway is served from a shared surface carriageway which is not allocated to any of the proposed dwellings.

2.6.3 The proposed link has been widened to 2.75m to accommodate cycles. The amended link is shown on the revised layout attached at **Appendix B**. Details of the proposed design, including surface finishes, would be designed in accordance with required design standards at the detailed design stage.

3 HIGHWAY IMPACT

3.1 Trip Rate

3.1.1 The ESCC Consultation Response cites the following regarding the trip rate used within RGP's report:

> *"A development of 58 dwellings has been used for trip assessment based on privately owned housing. The emerging trip rate for vehicles within the Transport statement is 4.09 which is much lower than the rate used for Rosemead Farm (5.5). After checking the sites used by the applicant from the TRICS database, from the 13 sites, 6 have a rail station and 7 are edge of town locations. As such I am of the view that this rate is too low and not appropriate in this case for consideration on the wider network and future forecast/growth."*

3.1.2 Whilst the trip rate proposed differs with that used for the neighbouring development this does not suggest that the trip rate used is unrealistic. The TRICS assessment included a range of search parameters used to establish comparable sites and is considered appropriate based on the following:

(i) Appropriate search parameters were applied to filter the TRICS database, establishing comparable sites;

(ii) The TRICS assessment assumed all dwellings were privately owned houses whereas the proposed development includes 1 bedroom flats and is c.35% affordable housing which typically exhibit lower trip rates;

(iii) The site is within a desirable walking distance of a local bus stop which provides frequent services to Eastbourne, Hailsham and Heathfield as well as school services to Heathfield College; and

(iv) The site provides a connection to the Cuckoo trail which provides convenient cycle access to local schools as well as to Heathfield and Hailsham.

3.2 Junction Modelling

3.2.1 The ESCC Consultation Response cites the following regarding junction modelling in the vicinity of the application site:

"It is expected that from the site, turning ratios would result in the majority of vehicle trips to connect to the A267 and B2033 (~95%). No junction assessments have been provided within the Transport Statement. On the basis that previous junction modelling as part of Rosemead Farm assessment looked at the junction A267/Horebeech Lane as a priority junction and mini-roundabout (at the time the mini-roundabout had not been installed), the model run for ARCADY deduced:

"this junction would operate with additional queuing without the proposed development (Rosemead Farm) in 2021 (around 9 vehicles) and does not reach capacity. With the development proposed, the queues increase in length to 13-14 vehicles and although the roundabout does not reach full capacity it reaches a level that could raise operational concerns."

The mini-roundabout has now been installed (October 2017) and it is recommended that this is modelled with and without the proposed development and including committed developments approved in the last 3 years and forecast using Tempro 7.2 to end of local plan period.

To be included in the localised junction model are the following approved developments:

WD/17/2952 – 58 dwellings

WD/16/2071 – 123 dwellings

WD/17/0022 – 20 dwellings

WD/16/2533 – crematorium

WD/16/1560 – 21 dwellings"

3.2.2 The site's peak trip rate (26 movements during the PM peak hour) falls below the typical threshold at which junction capacity modelling are required and has not been a requisite for other developments in the locale. However, at the request of ESCC, RGP have modelled the mini roundabout junction to assess its operation.

GTA Civils ARCADY Assessment 2021

3.2.3 ESCC referenced the results from GTA Civils' junction capacity assessment of the A267/Horebeech Lane mini roundabout which was undertaken using ARCADY 6. The assessment identified that *"this junction would operate with additional queuing without the proposed development (Rosemead Farm) in 2021 (around 9 vehicles) and does not reach capacity. With the development proposed, the queues increase in length to 13-14 vehicles and although the roundabout does not reach full capacity it reaches a level that could raise operational concerns."*.

3.2.4 To validate these findings, RGP replicated the assessment undertaken by GTA Civils', including identical traffic flows and junction geometries, using the updated version of ARCADY contained within Junctions 8. RGP replicated the assessment of the 2021 with the proposed Rosemead Farm development as the worst-case scenario. The full results of GTA Civils' assessment and RGP's assessment are attached at **Appendix C** and a comparison of the results from GTA Civils' assessment and RGP's assessment are provided in **Figure 3.1** below.

	Maximum RFC		Maximum Queue		Maximum Average Delay per Arriving Vehicle	
Assessment	**Value**	**Arm**	**PCUs**	**Arm**	**Seconds**	**Arm**
GTA Civils Assessment	0.945	A267 North	13.6	A267 North	52.74 sec (0.879 min)	A267 North
RGP Assessment	1.02	A267 North	29.25	A267 North	94.85 sec	A267 North

Figure 3.1: Comparison of GTA Civils and RGP Junction Capacity Assessment

3.2.5 Whilst GTA Civils' assessment identified that the roundabout *"reaches a level that could raise operational concerns."*, RGP's assessment, using updated modelling software, revealed that the roundabout would exceed capacity in the year 2021, including traffic from the Rosemead Farm development. RGP's assessment revealed longer queue lengths and a larger maximum average delay for arriving vehicle.

RGP Junction Capacity Assessments

3.2.6 Notwithstanding the fact that the roundabout would exceed capacity in the year 2021, ESCC's request to model the A267/Horebeech Lane mini roundabout junction during the AM and PM peak hours for a future year of 2028 (end of local plan period). Traffic generated by the committed developments listed by ESCC have been obtained from the respective transport reports associated with each of the developments.

3.2.7 The Transport Statement associated with the proposed Crematorium states; *"the site proposals for the service times would not result in any arrivals in the AM peak hour or departures in the PM peak hour"*. As such, the assessment assumes no trips would be generated by the crematorium during either the AM or PM peak hours.

3.2.8 For robustness and to conform with ESCC's consultation response requirements, the trips generated by the proposed development have been based on the trip rate proposed within the Rosemead Farm Transport Assessment. Traffic associated with both the application site and the committed developments has been distributed on the local network based on a traffic assignment model as detailed below.

Traffic Assignment Model

3.2.9 To determine the traffic distribution to/from the development sites, commuting patterns for existing residents in the vicinity of the site have been applied to trips arising from the proposed developments.

3.2.10 To establish the routes used by future residents, data has been gathered from the 2011 census 'Location of usual residence and place of work' dataset which identifies the workplace destinations for residents of a particular area (ward or lower output level). For the purposes of this assessment, data has been gathered from the Wealden 011D and Wealden 011E super output lower layers. The census data is attached at **Appendix D**.

3.2.11 Using the census data, trips to/from the site have been assigned to key traffic routes based on typical journey times as calculated using Geographic Information System (GIS) algorithms. The anticipated distribution of traffic from each development has been demonstrated as a percentage in **Appendix E**.

3.2.12 To determine the quantum of additional vehicle trips on the key routes, the percentage distribution for each site has been applied to the site's anticipated trip generation. The number of movements have then summed to establish the total flows arising from the developments. The traffic assignment model is attached at **Appendix F**.

A267/Horebeech Lane Mini Roundabout – Modelling Results

3.2.13 At the request of ESCC, the assessment includes 2028 traffic flow including committed development, both with and without the proposed development. The full ARCADY report is attached at **Appendix G** and a summary of the results is provided in **Figure 3.2** below.

		Maximum RFC		Maximum Queue		Maximum Delay	
Peak Hour	**Scenario**	**Value**	**Arm**	**PCUs**	**Arm**	**Seconds**	**Arm**
AM	**2028 Without Development**	1.04	A267 South	31.41	A267 South	126.82	A267 South
	2028 With Development	1.06	A267 (S)	35.82	A267 South	142.16	A267 South
PM	**2028 Without Development**	1.18	A267 North	107.93	A267 North	355.42	A267 North
	2028 With Development	1.20	1, A267 (N)	119.53	A267 North	404.08	A267 North

Figure 3.2: Summary of ARCADY Assessment

3.2.14 The assessment revealed that the 2028 growthed traffic including the committed developments in the local area would exceed the operational capacity of the mini roundabout in both the AM and PM peak traffic hours. However, the proposed development traffic flows result in a negligible increase in the maximum RFC values in both the AM and PM peak hours.

3.2.15 During the AM peak hour, the development flows would result in an increase in the maximum queue length from 31.41 PCUs to 35.82 PCUs (increase of 4.41 PCUs) on the A267 (south), resulting in an increase in the maximum delay from 126.82 seconds to 142.16 seconds (increase of 15.34 seconds).

3.2.16 During the PM peak hour, the development flows would result in an increase in the maximum queue length from 107.93 PCUs to 119.53 PCUs (increase of 11.6 PCUs) on the A267 (north), resulting in an increase in the maximum delay from 355.42 seconds to 404.08 seconds (increase of 48.66 seconds).

A267/Horebeech Lane Priority Junction – Modelling Results

3.2.17 To address the capacity constraints of the existing mini roundabout, the junction has been redesigned to a priority junction with a right turn lane facility. It is understood that the roundabout was originally proposed to calm traffic on the A267. As such, the proposed design includes chevrons on either side of the A267 on approach to the junction to infer a narrower carriageway width and reducing traffic speeds. The proposed junction design is shown in **Drawing 2018/3547/105**.

3.2.18 To assess the operation of the proposed junction, a PICADY capacity modelling assessment has been undertaken for a future year of 2028 including committed developments, both with and without the proposed development. The full PICADY report is attached at **Appendix H** and a summary of the PICADY results is provided in **Figure 3.3** below.

		Maximum RFC		Maximum Queue		Maximum Delay	
Peak Hour	**Scenario**	**Value**	**Arm**	**PCUs**	**Arm**	**Seconds**	**Arm**
AM	**2028 Without Development**	0.81	Horebeech Lane	3.74	Horebeech Lane	67.69	Horebeech Lane
	2028 With Development	0.87	Horebeech Lane	5.09	Horebeech Lane	87.53	Horebeech Lane
PM	**2028 Without Development**	0.72	Horebeech Lane	2.22	Horebeech Lane	86.65	Horebeech Lane
	2028 With Development	0.81	Horebeech Lane	3.20	Horebeech Lane	117.62	Horebeech Lane

Figure 3.3: Summary of PICADY Assessment

3.2.19 As shown in **Figure 3.2** above, the proposed priority junction would operate more efficiently than the existing mini roundabout and can accommodate traffic growth to the year 2028 as well as the committed development flows and the proposed development. The new junction would experience negligible queueing on the A267 which is of benefit to consistent traffic flow on a distributer road.

4 PARKING/SERVICING

4.1 Parking Provision

4.1.1 The ESCC Consultation Response cites the following regarding the proposed parking provision:

> *"The proposed development is laid out as shown in dwg 3278:01revG and has two points of access; a vehicular access onto Horebeech Lane and a footpath link to the Cuckoo Trail south of the site. For consideration from a highway perspective is whether the parking and servicing needs of the quantum of housing proposed can be delivered as part of the proposed layout. In particular, parking should be sufficient so that there is no risk of overspill onto the proposed estate roads or onto Horebeech Lane. The schedule of parking is provided within the TS as 139 spaces. It is important that these are a minimum of 2.4m x 4.8m and should be noted that garages only count for 0.3 of a space, on the basis that they are not commonly used for parking. It is recommended that a parking accommodation schedule is provided to assess the number of open spaces that are available. It is recommended that for units with 2 bedrooms and less 1 space is allocated and larger units have 2 spaces allocated, these being open spaces. This allows for the parking demand calculator to work out the number of unallocated spaces that should be made available for both residents and visitors."*

4.1.2 All spaces have dimensions of 2.5 x 5m in accordance with ESCC parking guidance.

4.1.3 To address the concerns regarding the under-provision of spaces resulting from the use of garages, the proposed car parking provision has been revised. As requested by ESCC, the revised layout allocates 1 open space per 1 and 2 bedroom unit, and 2 open spaces, or car ports per 3 and 4 bedroom units. To ensure ESCC's Residential Car Parking Demand Calculator tool works as intended, garages have not been included within the provision. A summary of the required and proposed parking provision is shown in **Figure 4.1** and the full calculator output is attached at **Appendix I**.

	ESCC's Residential Parking Demand Calculator	Proposed Parking Provision
Allocated	94	94
Unallocated for Residents	14	17
Unallocated for Visitors	12	16

Figure 4.1: Car Parking Provision

4.2 Parking Layout

4.2.1 The ESCC Consultation Response cites the following regarding the parking layout:

"In terms of the parking layout shown, I have a number of concerns regarding:

1) south of plots 38-41 – there is insufficient turning provision for the 2 end spaces, leaving drivers having to reverse into or out of the whole courtyard area if spaces are occupied. There is little forward visibility for more than one vehicle needing access.

2) north of plots 42-45 – this indicates an awkward entry angle and likely to cut across the frontage of the landscaped area. Parking positions would require onerous turning manoeuvres to access spaces, particularly for those adjacent to plot 46.

3) Open spaces fronting plots 31/32 – there appears to be insufficient distance to manoeuvre into these spaces.

4) courtyard between plot 24 and 25 – spaces are difficult to access, and turning area being irregular, creates a difficult area for parking which may result in parking on spine road.

5) south of plot 10 – the 2 end spaces have no turning area and would have to reverse back to turning head.

6) courtyard for plots 17,18,19,20 – arrangement is tight and could be perpendicular instead.

7) spaces between plots 35/36; at plots 55, 29 or any open spaces flanked by a hard boundary feature or building elevation– these should be a minimum width of 2.75, or 3m preferably"

4.2.2 All parking spaces are manoeuvrable and have minimum dimensions of 2.5m x 5.0m. Revised vehicle swept path analysis has been provided in **Drawing 2017/3547/103** demonstrating car parking manoeuvres to/from spaces in the new layout.

4.3 Servicing

4.3.1 The ESCC Consultation Response cites the following regarding the servicing:

"Swept path analysis should be provided for a 12m long service vehicle to future proof the site, the vehicle type is:

Vulture 3025(N) Scania P94GB 8x4 NB300 Chassis

Overall length: 11.997m

Bin/recycling stores should be conveniently accessible for deposit by residents and collection by the refuse collection services. Refuse collection points are not shown on the layout drawing, especially where dwellings are positioned distanced from the spine road or areas where there is a suitable turning head (i.e plots 1,2,58,38-42,32,33). Please provide a waste collection strategy and refer to guidance from WDC waste team."

4.3.2 Revised tracking drawings have been prepared demonstrating access and turning manoeuvres by the refuse vehicle referenced by ESCC. Access and turning manoeuvres are shown in **Drawing 2017/3547/102**, **2017/3547/103** and **2017/3547/104**.

4.3.3 Bin carry distances for residents and collectors are within the maximum thresholds set out in Manual for Streets. Bin collection points for dwellings outside of this range have been shown on the layout attached at **Appendix B** of this report.

4.4 Cycle Parking

"Parking and storage for cycles should be safe and convenient. Where there is no garage a shed or communal secure store should be provided."

4.4.1 Cycle parking will be provided for dwellings within secure cycle sheds located in the gardens of the proposed dwellings. Communal cycle stores for the flats have been provided within the parking courts adjacent to the buildings. These are shown on the layout attached at **Appendix B**.

5 SHARED SURFACES

5.1.1 The ESCC Consultation Response cites the following regarding the servicing:

> *"I note that the applicant proposes shared use of internal roads i.e. with no separation of road space between pedestrians and vehicles. ESCC has generally been supportive of such layouts where appropriate, but notes that DfT has temporarily suspended LTN 1/11 and published a strategy document on the suitability of shared space in relation to its use by mobility impaired users "The Inclusive Transport Strategy" July 2018*
>
> *https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728547/inclusive-transport-strategy.pdf*
>
> *DfT is recommending that shared spaces are not taken forward at this time until the Department has completed a thorough review of such layouts/schemes. I recommend therefore that the applicant considers the site layout in light of this report and justifies their approach and amend plans as necessary."*

5.1.2 The DfT guidance was released post submission of the proposed layout design and as such was not considered when developing the layout.

5.1.3 To address these concerns, footways have been provided where shared surfaces were originally proposed. These provide access to plots 8 – 15 as well as to the proposed flats. The new footways are shown on the layout attached at **Appendix B**.

6 TRAVEL PLAN

6.1.1 The ESCC Consultation Response cites the following regarding the Travel Plan: -

> *"A travel plan statement is required for development that is between 50 and 80 housing units. The applicant should refer to the guidance on the ESCC website:*
>
> *https://eastsussexgovuk.blob.core.windows.net/media/1764/travel_plan_guidance.pdf*
>
> *There should be incentives to use alternative modes of travel other than the private car through a residents' information pack, cycle vouchers, bus taster tickets, shopping delivery vouchers through a selected retailer, and biannual visits from a bike doctor, for example. This can be secured through an appropriate legal agreement and surveys will be expected to be submitted at baseline stage (min occupancy of 40 units) and year 1, 3 and 5."*

6.1.2 A Framework Travel Plan has been provided and is attached at **Appendix J** of this Technical Note.