



LTP 4 CONSULTATION RESPONSE ON BEHALF OF RINGMER PARISH COUNCIL

Comments on Consultation

Ringmer Parish Council welcomes the opportunity to comment on East Sussex County Council's Local Transport Plan 4 (LTP4). We broadly agree with the overall vision, however we have some issues about the form and format of the document. It would have been easier to follow and more transparent if the document had set out your current policies, progress on delivery and implementation of those, then state what is different about the new policies and how you plan to deliver them. As drafted there was reference to only a handful of policies.

Throughout the document there was little reference to how residents of the County will be involved in the implementation of whatever policies emerge from the consultation. The accompanying draft implementation plan makes no reference to Parish Councils for example. Parish Councils could provide a good source of data to inform various aspects of the plan, having more granular information about the travel habits and needs of residents.

Going forward, we would like to see more active consultation with Parish Councils. This is particularly relevant at a time when both Lewes and Wealden District Councils are updating their Local Development Plans and Ringmer Parish (in common with several others) will be updating our Neighbourhood Plans. Transport issues are key element of those plans.

Comments on specific objectives are as below.

Vision

An inclusive transport system that connects people and places, is decarbonised, safer, resilient, and supports our natural environment, communities, and businesses to be healthy, thrive and prosper.

Comment: We broadly agree with this vision but much is made of place and people but would like to see residents at the heart of delivery.

Objective 1: Deliver safer and accessible journeys

- Outcome 1.1: Create enhanced and inclusive transport networks for all users
- Outcome 1.2: Contribute to reducing the number of casualties and collisions on our transport networks
- Outcome 1.3: Contribute to improving personal safety for all journeys
- Outcome 1.4: Improve interchange between travel modes
- Outcome 1.5: Improve access to key local services by all modes

Comment:

The consultation acknowledges that fatalities in East Sussex are double the national average, yet there is not sufficient comment about the need to prevent road accidents and use local data to make the

roads safer. Ringmer Parish Council has mentioned several areas of the Parish where there are frequent near misses and where the design of the road and pavement are accidents waiting to happen. Each and every request to ESCC with suggestions for improvement has been turned down because there are not sufficient recorded deaths or serious injuries (KSIs). In order to encourage more people to get out of their cars and use bicycles or walk, these areas of concern need to be taken seriously and improvements considered. Even if there is no evidence of serious accidents improving peoples' perception that a road feels safer, will encourage active travel.

There is no acknowledgment of the impact of traffic speeds on people's confidence to cycle or use pavements to walk. At best high speeds in residential areas make for an unpleasant space and at worst a dangerous one.

Speed limits should NOT be set by drivers, which appears to be ESCC current policy, eg para 6.71 which opposes a 20mph and lower speed limits generally unless they are "reasonable to drivers and reflective of the environment through which the road passes". Lower speed limits with signs only has been proven to work elsewhere and is a very cost effective way of making streets safer for active travel.

There is no mention in the consultation document of working with the Police to review speed limits on rural roads, yet ESCC insist of using the Police enforcement speed (ie 36mph) when surveying speeds on roads and looking at traffic calming measures. Ringmer Parish Council has made numerous representations to ESCC for calming measures, including enforcement cameras, on the B2192 where traffic is regularly measured as travelling in excess of 30mph. The Police have supported us in these requests but ESCC will not sanction any proposals that have been made to date.

To improve the interchange between transport modes there needs to be better links between bus and train services. If Ringmer residents wish to take a train then Lewes and Uckfield are the two nearest main stations (there is a station at Glynde but with a limited service). Whilst there are regular bus services to Lewes from Ringmer, the bus stops are not near to the train station, making it difficult to use for commuting to work. The bus station in Lewes has recently closed, providing an opportunity to look at relocating the bus "hub" closer to the station. In Uckfield the bus and train stations are near to each other, but Ringmer residents do not have a regular bus service to Uckfield. Meanwhile Glynde station is a similar distance from Ringmer as Lewes but there is no bus available to Glynde from Ringmer. Services from Glynde are limited and the promotion of faster services between Lewes and Eastbourne might threaten the viability of smaller stations in between the towns, such as Glynde.

Residents could be consulted about which bus routes would be most useful to them. The extension of the No28 service to Heathfield, Hailsham and Eastbourne is welcome but Ringmer still has no regular bus connection to Uckfield despite being closer and providing access to a train station.

Objective 2: Support healthier lifestyles and communities

- Outcome 2.1: Increase the proportion of walking, wheeling, and cycling journeys
- Outcome 2.2: Increase active travel and public transport journeys through education, training, travel behaviour change initiatives and information
- Outcome 2.3: Redesign road space to balance the needs of different road users, including encouraging people to walk, wheel, cycle and use the bus
- Outcome 2.4: Support reduction of emissions to improve air quality
- Outcome 2.5: Mitigate noise pollution through technology and design
- Outcome 2.6: Improve access to green spaces, public rights of way and leisure and health facilities

Comment:

The consultation discusses healthier lifestyles in the context of travel, but fails to acknowledge the impact existing road conditions have on health and wellbeing and quality of life. For example in Ringmer the B2192 is used by approximately 700 – 1,000 HGVs per day (according to ESCC's most recent survey of traffic through Earwig Corner). Nearly all of these vehicles are travelling through Ringmer from the A22. Many are travelling between construction sites in Wealden and the aggregate depot in Newhaven; or onto the A27 to travel west; or to/from the port at Newhaven. HGVs therefore account for around 6% of all traffic on the road in a typical 24 hour period, double the average for the County. As noted above, the 30mph limit is largely ignored whilst the road surface itself is in a very poor condition. Despite taking volumes of traffic akin to an 'A' road, it is constructed and repaired as according to a lower specification. As such the surface is rutted, crumbling and collapsing, whilst it is also victim to numerous investigations and consequent patching by the utility companies. The result is a bumpy, uneven and noisy road surface. When HGVs, articulated lorries, tractors and agricultural vehicles and trailers travel down the road at uncontrolled speeds the impact on residents of the road is significant. Residents regularly report to the Parish Council examples of noisy HGVs waking them up in the early hours of the morning and in some cases damage to their property due to the vibrations from the vehicles travelling over an uneven section of the road.

ESCC's criteria for repairing the road surface only takes account of the likelihood of damage to a vehicle or the potential for a pedestrian tripping, and is measured within strict parameters. Ringmer Parish Council would like to see a more "person centred" approach to road repairs, which considered the impact on residents health and wellbeing and quality of life of a poor road surface.

Health and Wellbeing can also be considered when looking at the impact of road conditions on the sense of "place". The B2192 dissects the Village Centre and noise from it goes much further than the road itself. Village Green sits beside the main road and is well used for sport and leisure (cricket pitch, walking, picnics, exercise classes etc). The volume, speed and noise of traffic is intrusive to these activities and threatens the retention of these characteristics of a Village.

Ringmer Parish Council calls for ESCC to undertake noise measurements and air quality measurements in key points around the Parish to inform a comprehensive survey of road conditions in Ringmer and an assessment of the impact on residents health and wellbeing and quality of life.

Pavements are not just for walking but also for elderly / disabled in wheelchairs and mobility scooters etc. If we really want to get people walking it is not just potholes that need repairing but also pavements. Many pavements need to be widened to achieve a 2m minimum width – in Ringmer many are significantly less than this, even along the main B2192. There are several roads where there are no pavements at all and yet the roads are often used by HGVs and speed limits are not controlled (eg Ham Lane). There are four residential care homes in Ringmer and none of them have a safe walking route to the shops, Doctor's surgery, Church, Village Hall, or Village Green. Three are located on the main B2192 where the pavements are narrow, uneven, in poor repair and in places are obstructed with road signs. The fourth is on Harvard Road where there are insufficient dropped curbs to be able to push a wheelchair comfortably and safely from the Care Home to the shops.

LTP 4 is silent on the matter of extending the cycleway through Ringmer, despite its overarching vision to deliver: "An inclusive transport system that connects people and places; that is decarbonised, safer, resilient, and supports our natural environment, communities, and businesses to be healthy, thrive and to prosper" and its objective to: "Support healthier lifestyles and communities". Ringmer Parish Council would like to see a follow-up of the Sustrans work in 2020 which proposed a cycle route to connect the Broyleside with the Village centre.

In order to help improve access to green spaces ESCC should reconsider its refusal to allow the adoption of “Quiet Lanes”. There are at least two areas of Ringmer that fit the national criteria as “Quiet Lanes” (Norlington Lane and Potato Lane), being in rural parts of the Parish, they are narrow, with no pavements and widely used for horse riding, cycling and walking. Ringmer Parish Council has sought to formally designate Norlington Lane and Potato Lane as “Quiet Lanes” but ESCC has, to date, refused to consider applications because it is not the County’s policy to recognise them. This seems to be totally at odds with the stated policy aim of increasing access to green space and encouraging more cycling and walking.

Objective 3: Decarbonise transport and travel

- Outcome 3.1: Increase the proportion of people travelling by walking, wheeling, cycling, public and shared transport
- Outcome 3.2: Facilitate the uptake of ultra-low and zero-emission vehicles for journeys, through the delivery of supporting infrastructure
- Outcome 3.3: Work with partners to decarbonise transport and tackle climate change
- Outcome 3.4: Support clean technologies and fuels that contributes towards the decarbonisation of transport

Comment:

These objectives are very vague and lack measurable targets and thus do not seem to be very ambitious. There should be additional outcomes around a reduced number of private car journeys undertaken. As part of this there needs to be a better understanding of the purpose of journeys, whether that be for commuting to work, or for leisure/tourism, shopping etc. There should be further research undertaken of the different patterns of car use in rural / semi-rural areas and within towns.

Objective 4: Conserve and enhance our local environment

- Outcome 4.1: Conserve and enhance our local and natural environment by mitigating negative impacts of transport design and delivery
- Outcome 4.2: Enhance and create attractive connected communities and public spaces
- Outcome 4.3: Support habitat connectivity and increase in biodiversity through the delivery of enhanced and new transport infrastructure and public spaces

Comment:

The consultation document mentions the need to look after the historic town centres, such as of Lewes, yet makes no mention of Conservation Areas (CAs). Where they exist, CAs are important to the local residents, helping to define and enhance a sense of “place”, identifying a specific area for its unique characteristics. Ringmer has a CA which includes a Grade 1 listed Church as well as numerous other listed buildings, mostly private houses and a Village Green. The B2192 dissects the Conservation Area and a recent assessment of the CA by Lewes District Council acknowledged that the road was the biggest threat to its sustainability.

Ringmer Parish Council calls on ESCC to acknowledge the importance of Conservation Areas to local communities and to adopt and implement policies which will help preserve the characteristics of the CA and, where possible, to improve them.

Objective 5: Support sustainable economic growth

- Outcome 5.1: Facilitate the efficient movement of goods and people
- Outcome 5.2: Contribute to reducing deprivation and inequality through improved accessibility for all to employment, education, and training
- Outcome 5.3: Attract and retain businesses and a skilled workforce in the county
- Outcome 5.4: Enhance sustainable access to key visitor and cultural destinations
- Outcome 5.5: As a Local Highway Authority engage with our Local Planning Authorities to deliver sustainable and well-connected housing and employment growth identified in their Local Plans

Comment:

Ringmer Parish Council welcomes the promise of a Freight Strategy and hopes that ESCC will come into line with neighbouring West Sussex and Kent County Councils in publishing a strategic freight route which directs HGVs to use major roads and avoid 'rat-running' through residential areas and villages. As noted above, Ringmer suffers from large numbers of HGVs cutting through to the A27 from the A22, in preference to using the A26. Such volumes of heavy vehicles discourages cycling and walking as well as impacting negatively on peoples' quality of life, health and wellbeing and the built environment. An alternative, more suitable route is therefore available and could be promoted by the County through the use of freight-specific sat nav devices/software and liaison with local haulage companies.

At present, ESCC believes that HGVs should be able to use all of the 'A' and 'B' road network, due to the lack of trunk roads within the County. If ESCC is to continue with that policy there need to be accompanying mitigations, such as speed controls and pavement improvements where this means HGVs will be using built-up, residential roads to ensure that the safety and well-being of residents is prioritised. ESCC should consult with Town and Parish Councils, as well as with Districts and undertake regular traffic surveys to ensure that policies are based on up-to-date data.

The LTP4 promotes the possibility of improvements for freight handling at Newhaven port and the improvements to the A26 which links Newhaven to the A27. If a higher volume of freight traffic using this route is anticipated, the commensurate increase in HGV traffic on other roads needs to be considered with appropriate mitigations put in place. For example there are peak time delays at the roundabout at Southerham (linking A26 and A27) with traffic tailing back through the tunnel and into Lewes / up Malling Hill. What assessment has been undertaken of the capacity of the junctions and linking roads to cope with increased traffic which an expansion of Newhaven's port facilities would cause?

When considering the impact of housing developments on the road network, ESCC needs to look across District Council boundaries. For example, developers for sites in Ringmer are usually asked to consider traffic impacts on stress points in Lewes, eg Earwig Corner and Church Hill but are not asked to consider the impact on the junction of the B2192 with the A22 at Halland, nor the impact on the junction of the B2124 and A22 at the Golden Cross. Both of these junctions are within Wealden District, yet both are likely to witness increased traffic from additional housing in Ringmer. Similarly the impacts on B2192 of housing developments in Uckfield, Heathfield, Hailsham and surrounding areas should also be assessed.

Policy D5 (Parking) is another area of the consultation which ignores the role of Parish Councils (para 8.60). Parish Councils develop Neighbourhood Plans and in the case of Ringmer, has specified the off-street parking requirement for new houses (also applies to extensions of existing houses where additional bedrooms will be provided). This requirement is for more parking spaces than that required by ESCC's Parking Calculator. This is in recognition of the car dependency of village residents, where car ownership exceeds that of any other part of the District.

When commenting on planning applications for new housing developments ESCC should acknowledge policy 8.3 of Ringmer's Neighbourhood Plan and support the Parish Council in its implementation. Lack of parking is a major cause of neighbour disputes and when parking in the road can lead to significant damage to verges (eg Vicarage Way) and obstruction of pavements making it dangerous for those with pushchairs, wheelchairs, mobility scooters when pedestrians are forced onto the roadway.

Objective 6: Strengthen the resilience of our transport networks

- Outcome 6.1: Improve journey time reliability for people and businesses
- Outcome 6.2: Enable transport journeys to be resilient, flexible, and adaptable and recover quickly from emergencies and events
- Outcome 6.3: Improve the condition of highway and other transport infrastructure and assets

Ringmer Parish Council supports the objective to achieve a strong and resilient transport network and the stated aim to "Improve the condition of highway and other transport infrastructure and assets". However LTP 4 offers no practical reassurance that the condition of the roadways in Ringmer will be improved. The Parish Council would like to see further consultation on the criteria for road repairs so that, as noted above, repairs take place where the road surface impacts on residents' lives, not just drivers and their vehicles.

It is evident that many of the visible faults in the road occur around metal-work, ie manholes and drains. It would be interesting to know whether ESCC has ever undertaken an audit of the manholes in conjunction with the various utility companies to discover whether they are still required. In this day and age with remote cameras it is conceivable that many of these manholes could be removed, thus saving on repair costs.

There was no mention in the LTP4 of the effect of surface water flooding on the highway, which can lead to road closures and delays. ESCC needs to liaise with the appropriate water company to ensure that surface water drains are kept clear of obstructions and blockages and that there is sufficient capacity at the relevant treatment plants to prevent flooding of the highway.

Ringmer Parish Council
25th February 2025