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Local Transport Implementation Plan 2016/17 – 2020/21

Response to consultation from *Campaign for Better Transport – East Sussex*.

Dear ESCC

We agree with the objectives overall, and suggest some additions, and look forward to ongoing dialogue, since the process has to be iterative.

We attach our response to the above consultation and hope the comments are helpful. The comments follow the sequence of the document except where they relate to generalities.

2.2. Stated 'high level' objectives:

These are comprehensive but could be contradictory. There is no mention in the LTP document of '**demand management**' which would facilitate delivery of every one of the objectives. However, if poorly implemented, with primacy and emphasis of one over another, we could end up with more 'mobility' and less 'accessibility' driven by 'car based' developments and major road investment. This seems to be the emerging reality.

Without demand management measures, efficient operation of the transport system will never be realised. This can lead to permanent pressure on revenue budgets across departments, due to 'wrong' capital investment decisions on 'big infrastructure'.

We have learned the lesson that building roads to meet projected demand has had and will always have very serious negative consequences, recognised in government policy. We are in danger of forgetting that lesson. We are not aware that policy has been reversed. **Opportunity/cost** discipline should be applied

It might be helpful to have an explicit objective along the lines of:

'Maintaining transport infrastructure to meet the needs of individuals at all life stages'. This might be a sub-objective of bullet 2 (social inclusion) but if explicit, no-one would be forgotten. It might also lead to a situation where young people on the cusp of independence, or making a decision whether or not to buy a car, would already have experienced a high quality alternative and decide against buying one. This would (and does in some urban environments) lead to less traffic, better health and a more pleasant public realm. Those decisions made at a young age would have positive consequences over a lifetime.

It might also be relevant to have a further high level objective aimed at **securing integration of transport and land use policies**. That would avoid building things in the wrong places and thus preventing the implementation and operation of efficient and sustainable transport plans with a high level of accessibility for all groups in society.

3. Local Transport Plan Strategy

Small, cheap, numerous schemes based on walking, cycling and public transport infrastructure can make up a **mosaic** of interventions which taken together over the county can deliver major benefits and typically achieve **high 'value for money'** (vfm) returns, often many times higher than the 'big ticket' schemes which in some cases give a 'poor' rating. Too often, 'strategic' is unquestioningly taken to mean 'big'. In the case of the 'mosaic' approach, it *can* be 'cumulatively' big and rival the 'prestige' projects favoured by politicians in terms of the scale of benefits delivered.

To secure best 'value for (taxpayers') money', we suggest that the high vfm/low cost measures that often characterise packages of sustainable transport should be thoroughly explored in each of the defined 'growth corridors'. This must be necessarily accompanied by an analysis of any transport related problems and their causes, and followed by full consideration of all measures which would best deliver the high level objectives at 2. above. This does not always happen. Our suggested insertion of an objective to 'integrate transport and land use policies' would be more likely to lead to the kind of outcomes described above.

The key aim is to avoid a predisposition to any single measure before the analysis stage, lest better ways of delivering the objectives and solving the problem are overlooked. This would avoid wasting scarce or irreplaceable resources.

4. Policy

The content of the '**East Sussex Growth Strategy**' is given prominence so presumably informs the LTP 3 document and its direction. The extracts from that document (in italics) below prompt the following thoughts:

Improving the quality of the built environment

5.2 *Enhancing the built environment is a key way of making East Sussex an even more attractive place and investing in place-making initiatives will create the places that people want to visit and live in and attract inward investment. Many local authorities are already investing in their towns and villages, improving the public realm and environment, and this must continue in the future.*

To turn this positive vision into reality, the issue of the dominance and intrusion of the private car must be addressed. Loss of gardens to hard standing for vehicles, pavement parking, including on dropped kerbs, parking on bus stops, intimidating and inappropriate driver behaviour, worsening KSI statistics, lethal air pollution, dispersal of activities, increased mobility and reduced accessibility, noise, increased areas taken for large car parks – all of these reduce the quality of life and are due to an unquestioning commitment to perpetuate the primacy of the car. This most certainly does not enhance the environment.

Without demand management through pricing, and rationing of space, the aspirations for improvement of the walking and cycling environment, and a step change in the quality and comprehensiveness of public transport, cannot happen and the urban environment, already degraded by the presence and constant movement of too many vehicles, will worsen further. Where new developments replicate this primacy, the same situation will arise at both 'trip ends', the demand for road space will increase and the vicious circle will continue.

Enhancing and promoting the visitor offer

5.6 *East Sussex has much to offer as a visitor destination. It has natural assets that include the South Downs National Park, the High Weald Area of Outstanding Beauty (AONB), including the 6,500-acre Ashdown Forest, and 47 miles of beautiful coastline which includes six miles of 'Heritage Coast' which incorporates Beachy Head and the white cliffs of the Seven Sisters. It also has cultural sites of renown that include the De La Warr Pavilion at Bexhill-on-Sea, Glyndebourne International Opera House in Lewes District, the Towner in Eastbourne and the Jerwood Gallery at Hastings. There are also clear links to literary characters too including Henry James'*

'Lamb House' in Rye, Monks House in Rodmell (Virginia Woolf), Rudyard Kipling's 'Batemans' and Charleston Farmhouse, home of the Bloomsbury Group. It also has many historic monuments such as Bodiam Castle, which attracts 180,000 visitors a year, and the 1066 site at Battle.

In fact, visitor numbers at Bodiam Castle (on your front cover) and Batemans have each increased by over 16,000 in the last year. The total for Bodiam Castle was 176,000 and for Batemans 109,000. That's well over a quarter of a million visitors per year. Sunday is the busiest day for visitors, yet there is no public transport access to either, not even on a Sunday which falls in a Bank Holiday. There is an urgent need for a dialogue on this and to explore opportunities to restore or provide services.

Throughout the 'rural' county, there have been cuts to buses and threats of more to come: in the light of the above, opportunities have clearly been missed. The examples above could be improved to better serve a 'Tourist/Leisure' function but at the same time meet the various needs of residents to access shops, services, healthcare, employment, education, etc. That would be socially inclusive.

5.4 (LTP 3 p6) Supported services are poorly marketed. This is relevant to the situation described above.

A better connected county

Transport

5.16 *We want East Sussex to be a place that is easy to move around in, well served by road and rail infrastructure and sustainable travel which provide good access to all markets. The poor quality of the strategic transport network in East Sussex is identified by businesses as a constraint to growth.*

The county has only 11 miles of dual carriageway and no motorways. While everyone recognises the importance of transport connectivity, not all high tech businesses rely on it and of course parts of the county are able to offer good enough connections to London, Brighton and mainland Europe.

Nevertheless, we must continue to invest in the network where impact on jobs and growth is greatest and lobby government, the Highways Agency and Network Rail as appropriate to enhance connectivity.

The bus plays an important role on some corridors in the county, and the launch of the night bus between Hastings and Gatwick (2 return departures) shows what a more 'cross regional' bus could do if applied more widely. There are 'holes' in the county that could

benefit from this type of service, away from the Brighton and Hove 12/13 route and the Stagecoach 99/100/101 routes. The East Sussex Growth Strategy document fails to mention 'the bus' at all and therefore its unrealised potential.

The claim that 'poor quality of the strategic transport network in East Sussex is identified by business as a constraint to growth' is often cited as a sound basis for spending large sums on large projects. However, '*the dominance of private vehicles causing congestion in peak hours on short journeys, which are the most easily transferred to sustainable modes, is a constraint to growth*' might be a more accurate basis for doing something sensible. Businesses would probably agree with this

5.17 *There is no single solution to the transport challenges facing the county; a package of interventions is required to improve strategic connectivity, journey time reliability and access to key employment and housing areas. A part of the solution is to continue to enhance digital connectivity, ensuring that all parts of the county, including the rural communities, are served by fast and reliable internet access.*

A package that worked would have to incorporate 'demand management measures', but yes, the package approach is a good starting point to arrest and reverse a recent return to traffic growth.

We believe that the points made above would be helpful in meeting the aspirations of the East Sussex Growth Strategy.

Transport Measures

Given the inextricable relationship between Bexhill and Hastings usually reflected in ESCC discussions on transport in this 'travel to work area', we are not clear as to why the two tabulated lists of measures for each are not presented as a whole. We have had 20 years at least of deliberations on the Bexhill Hastings area and its problems and (some) opportunities.

Transport Measures

There is a variation in the level of detail associated with many measures throughout and that makes any meaningful comprehension quite difficult. There are also instances where the absence of ticks affirming support for high level objectives is surprising (e.g. Installation of cycle parking facilities at key destinations... doesn't support 'economic growth, quality of life, or social inclusion'). An LTP meeting for the public would help

understanding (as at the time of LTP1) and also help to build trust which is otherwise difficult to maintain. We hope that there will be public meetings for interested individuals and the public. There *must* be 'trust'.

Since no-one under 17 can drive, we hope that young people* will have their chance to be fully informed of the options open to create a 'humane' transport system in the county, and then listened to and their views taken into account. This plan is an 'advocacy tool' for the next generation and that should be borne in mind. Do we want to perpetuate 'car dependency'? We seem to be doing just that.

***Photo attached:** *This could never be part of a safe route to school. It is a not untypical scene.*

North Bexhill Access Road

We have objected to this planning application (**attached***). We note from the chart that it obstructs the 'Quality of Life' and 'Tackle Climate Change' objectives.

**NBAR objection by CBT E Sussex*

Quality Bus Partnership from Little Common to Ravenside/Ridge

This goes to The Ridge and should be described as doing so. A turning circle/point at Northeye could help. Neither you nor we can anticipate the levels of service that will eventually run but current patterns are poor in the evenings and at weekends and there seems to be no aspiration for improvement. This is a strategic matter and ESCC is the 'strategic transport authority': it should therefore express a view on levels of service required.

Greatly improved bus infrastructure is only half a measure: if the bus service is poor the vfm will be low. Encouraging people to use the services requires a step change in quality and service levels and some form of demand management – especially as motoring costs are becoming ever cheaper while public transport costs have risen above inflation levels.

Cycle measures look comprehensive: description of **walking measures** are very general. Both will suffer if the predominance and ubiquity of the car is not challenged and intimidating driver behaviour or selfish parking go unchallenged. An abiding problem is that of lack of pedestrian/cycle priority at side roads. A long standing approach to this is to encourage those activities and give

them the high status they deserve by prioritising pedestrians and cyclists across the side road. It is seen as good practice in some authorities but not in East Sussex. If adopted county wide, it would have an immediate positive effect on the take-up of those primary and healthy modes of transport, and begin to challenge thoughtless driver behaviour which at its worst is akin to bullying.

The above *can* be challenged by '**Travel behaviour change initiatives**' but their effectiveness can't be anticipated since there is no information about their form or distribution. 'Traffic demand management' is key to their success and would also give opportunities to enhance the public realm. This is not the same as 'traffic management'.

The cycle route (NCR 2) between Cooden and Pevensey passes through Pevensey Levels which includes sites designated as of national and international conservation importance. It is often an unpleasant ride however as the lane across the Levels attracts some motorcyclists and motorists who express through their driving/riding styles an indifference to the anxieties of those cycling or walking. A strategy aimed at ruling these intimidating conditions is required.

Queensway Gateway Road

We have objected to this road.

Movement and access package

In principle we support the 'Quality Bus Partnership' improvements though we cannot anticipate levels or quality of service. On that score we are not optimistic. Are you?

Routes to the Conquest must be tied in to the clinical need for East Sussex patients and their visitors whose journeys may begin in other towns. The needs of hospital staff should also be met through provision of appropriate services 7 days a week and into the evening. The recently introduced 21 service using the BHLR gives unacceptably poor connections to the ongoing Conquest service. (see below+)

The bus services and aspirations for their successful operation should be partly informed by the user groups who would find them useful. **Workplace Travel Plans (WTPs)** can form 'user groups' and do just that with successful operations around the UK. It would have been useful to include local examples, if any, of their

implementation and operation to point the way to their potential expansion.

Please may we have an audit (or information if one has been carried out) on the operation of WTPs in E Sussex 'travel to work areas'?

We maintain that a useful addition to transport infrastructure in Bexhill/Hastings would be a new railway station at Glyne Gap. We strongly suggest that, due to major flaws in the study carried out by ESCC/Rother DC into the viability of a station here, that study should be reviewed. That review should incorporate the findings of a further study funded by public contributions into the viability of that station, and we ***attach** that for your consideration.

**Glyne Gap station review JRC*

Glyne Gap station would be an addition to transport infrastructure and the whole range of 'demand management' measures required to offer a high quality alternative to the car. Together with the **bus priority** measures intended for the A259, it would help to **lock-in the benefits** which your authority claims will follow the BHLR. Your statistics show that traffic reduction will be about one third of present flows but also that from day 1, traffic levels will begin to grow back. This must not be allowed to happen and Glyne Gap station would be a good insurance against that. This would have an advantage of making 'wtp's attractive and effective across the piece.

Two questions arise:

What will be the level of service improvement to be expected of Stagecoach – frequency, services into evenings, weekend/Sunday/Bank Holiday services?

Why can we not enjoy an upgrade now, made possible by a drop in traffic volumes?

Hastings Cycle Network

We would like to see the East and West Hill lifts taken more seriously as part of the cycle/pedestrian infrastructure.

We would also like to see (we suggest) two modern funicular railway routes connecting 'sea level' locations with 'high level' locations. All of these should operate throughout the year and until a reasonable evening hour, post the p.m. peak. A new funicular has

been installed in Wales at Ebbw Vale to connect the low level railway station to the upper town and might be useful as an example of what is feasible. It would be 'flagship' scheme and would attract a visitor market as well as being a useful everyday facility, especially for elderly people. An installation at the White Rock would, we think, be very successful.

We have met with 'Greenway' representatives over the last 15 years and been rather discouraged at the slow pace of the development and implementation of the various schemes. The Hastings station – Ore route appears to be departing from the original 'off road' route and that concerns us.

Travel behaviour initiatives

It sounds encouraging but examples are needed.

Hailsham – Polegate – Eastbourne Sustainable Transport Corridor

The bus service improvements section of the proposals through bus priority measures, predict discernible improvements in passenger journey times. These would be enhanced if accompanied by 'demand management measures' including parking restraint and possibly 'business parking levy' which has worked in Nottingham with the cooperation of all sectors in the city. Have you tested this?

We **attach*** a graphic of 1997 (TRL Research for the Department of Transport) showing how parking policy can be a key determinant in a policy to reduce traffic in towns. We also **attach**** a presentation by an economist – John Siraut of Jacobs consulting (a consultancy with whom you have spent £millions of our money in connection with the BHLR). It questions the real costs of providing 'free parking' and reflects our concerns that 'transport' and 'land use' policies are out of alignment to the detriment of society as a whole. It complements the point made by the TRL research.

**TRL 5 Cities Graph*

***John Siraut, Jacobs economist presentation*

The list looks positive but without detail it's difficult to evaluate the measures or guess their potential. The town centre improvements to the pedestrian environment look encouraging but there are still examples where the needs of pedestrians have recently been ignored, as in the implementation of the new station car park entrance/exit arrangements where desire lines were not recognised,

and the function of the car park as a pedestrian route was also not recognised. Pedestrian/vehicle counts over one peak hour and one off peak hour found that pedestrians outnumbered cars by a factor of 15:1. Following that revelation and the identification of risk to all those on foot, measures were installed that made it 'less worse' but in our view, it's still not functioning safely.

At the Rodmill/Kings Drive roundabout, high entry/exit speeds are intimidating to pedestrians and cyclists. No parent would allow their child anywhere near this roundabout. Any measures there should have as an objective the removal of the conditions which facilitate that driver behaviour. It is in the interests of health providers and society in general to encourage active lifestyles through transport interventions. The roundabout (and others) is currently just one of many barriers to these aims.

The hospital (DGH) generates large volumes of traffic in its day to day operation. Staff, visitors, patients, maintenance services, all generate traffic. The FE college adjacent also generates significant vehicle movements. There is also an unrealised potential for non-car modes to play a bigger part in meeting accessibility needs which is one reason for the existence of the DGH/Conquest 'cross site' Transport Group (started in March 1999) which has attempted to explore and implement various schemes to reduce traffic around the two sites.

There is always an emphasis at meetings on 'healthy transport' in every sense of the term, but the car parking areas have still grown, as consequently, has traffic.

At the 'cross site' meetings, there has recently been interest expressed in providing a 'bus only' route through the site between the FE College (Sussex Downs) and the DGH. This would be controlled by a 'bus gate', triggered by the bus and permitting a bus service not only for the DGH and FE college, but for the new St Wilfrid's Hospice close by which itself is close to Sainsbury's and sports and entertainment venues. We hope that you can investigate the idea which could also incorporate a cycle route. It would be 'cheap' as there are few impedances to its installation.

+We are disappointed that across the east of the county, there has been a failure to secure good public transport access to the two major hospitals (DGH/Conquest) for communities needing the services of either to meet their clinical need. This need is more acute following the reorganisation of clinical services. We believe that it is the responsibility of the statutory transport authority – ESCC – and not as claimed, the Health Trust.

Walking/bus stop access suggestion:

Cherry Garden Road, Eastbourne is served by Brighton and Hove 12/13 buses with a good service 7 days a week. In comparison, the nearest Stagecoach service involves passengers in a walk up steep East Dean Road. The 12/13 service downhill to the town centre is accessible, but elderly people feel unsafe crossing back over the A259 on the way back from town as the bus drops them opposite Cherry Garden Road. A pedestrian crossing would solve that problem for residents on both sides of the road into and out of town as well as for passengers to and from the west, and I am suggesting installation of a crossing at this point or very close to it and the existing bus stops.

Traffic restraint through parking controls is required in Eastbourne to control the daily tide of traffic in peak hours, with special attention given to safe routes to school and 'school gate' driver behaviour. This will help secure a better walking, cycling environment, a higher quality public realm and better conditions for bus services which should attract more passengers.

A workplace parking levy should be introduced to control the proliferation of non-residential off street parking and help to fund sustainable transport measures. Again, there would be consequent opportunities for improvements in the public realm. Currently, we think there are too few traffic wardens in the county as a whole. They do very difficult job admirably.

The long period of drift towards car dependency has created a 'status' problem for public transport, walking and cycling. This dependency has frequently created (and continues to create) brutal environments where arrogant and inappropriate driving styles proliferate and are rarely challenged. The car is still King in East Sussex and its primacy has to be challenged to enable a rebalancing of transport away from the car. That sounds like a worthwhile and necessary objective to inject into this debate. It used to be a clear objective but has certainly been relegated in recent years.

On rail, we would favour provision of the Willingdon Chord – enabling some train services to move east-west without reversing in Eastbourne, provided that Eastbourne would at the very least not lose the current levels of service. Earlier government studies pointed out that installation of the chord would make a new station at Stone Cross viable, offering an opportunity to reduce traffic between Langney and Eastbourne town centre and also offering access to rail for 20,000 people in Stone Cross and a bus link to Hailsham. Please consider this.

At the same time, you may consider the advantages of HS1 reversing at Eastbourne rather than at Bexhill. There is capacity on the East Coastway to accommodate this option.

In the **Seahaven** section, we support the implementation of the bus corridor phase 2 and hope that journey times will be improved. The 12/13 services are excellent 7 days a week

The **Lewes SDNP** measures should include a safe walking/cycle route along the C7 (Egrets Way) corridor and this should be completed as soon as possible. That does not mean that the dangerous conditions along the C7 should be tolerated as walkers and cyclists will certainly be present even after the Egrets Way completion.

In **Alfriston** and along the **Cuckmere valley**, high volumes of traffic spoil the enjoyment of the special landscapes and obstruct walkers and cyclists and the buses. Alfriston is often jammed with vehicles and their fumes. Traffic management is proposed: we suggest there's a need for some form of demand management alongside that. It may be time for a review of the 'Tourism Without Traffic' strategies – county wide.

Completion of the cycle route from **Berwick station** to Alfriston would help cyclists and walkers, as originally envisaged in the 'Tourism Without Traffic' schemes of ten years ago. A better pattern and frequency of stopping services at Berwick would also help.

For **Uckfield/Heathfield** we welcome the anticipated 'RTPI' systems and hope that the 31 bus will feature on the signs. The vehicles are typically not the latest models (!) but provide a basic service. For residents of Heathfield, better rail connections at Uckfield and Etchingam could improve usage of this service, as well as marketing destinations such as Batemans – or any kind of marketing at all because there is none. Running through to Hawkhurst would also be useful.

On the subject of a different form of connection, we would welcome back a direct rail link between East Sussex coastal towns and London via Uckfield and Tunbridge Wells and urge you to do all you can to secure this link. Better services on the railway line east-west are not mentioned (why?) even though capacity now (with new signalling) could accommodate more train paths. Together with a reconnected Uckfield, these improvements should come way ahead of any schemes to increase **A27 road capacity** which would create

mayhem in the town centres and on the A26. No-one (bar the motor trade) would benefit.

In your conclusions on the Eastbourne – Polegate – Hailsham corridor scheme, please incorporate the advantages presented through migration of the benefits back to Heathfield (faster journey times to Eastbourne – Stagecoach 51) and similarly in respect of the Stagecoach 98 (faster journey times from Bexhill/Ninfield/Herstmonceux to Eastbourne.)

For **Rye and Battle** bus infrastructure is important and we support improvements.

We observe that parking on bus stops is the norm in Battle on north and southbound service stops. It should not be tolerated. Security in the long term of the 304/5 services is uncertain, now with no Sunday services through to Robertsbridge, Hurst Green and Hawkhurst. No tourists can reach the great walking country on summer Sundays, nor can residents have a day in the coastal towns. Sunday is now a retail and recreational day but for many people, the lack of a bus service that recognises this amounts to isolation and distinct lack of social equity.

Consideration should be given to a bus stop at Etchingham school, for some reason excluded from the new school and surrounding residential development.

We suggest that should the reinstatement of the heritage railway between Robertsbridge and Bodiam be achieved, the increase in visitors would justify reinstatement (or introduction) of Sunday bus services on the 304/5, 349 and 31 routes in the North Weald and Rother areas.

As we perceive the LTP 3 as a document listing ongoing plans with some acknowledged uncertainty, we think it would be helpful if ESCC were to host meetings at intervals with interested parties and members of the public. The document raises many questions and provides only some of the answers. There used to be such meetings and we found the dialogues useful at that time.

Sincerely

Derrick Coffee
(County Officer, Campaign for Better Transport – East Sussex.)

