
From: Nayan Gandhi [REDACTED]
Sent: 24 February 2023 16:09
To: planning
Cc: [REDACTED]
Subject: Objections to Proposed Cattle Market Relocation (Ref WD/2022/2878/MAO
Attachments: 1045 L 20230224_ Objection Ltr to Cattle Market
Relocation_Final_Complete_reduced.pdf

Categories: AOs

FAO: Miss Samantha Prior, Case Officer

Dear Miss Prior,

On behalf of Knockhatch Adventure Park, please find attached our objections to the planning application ref: WD/2022/2878/MAO. These have been uploaded to your portal, but they do not show as of yet. Please would you kindly confirm receipt, thank you.

Knockhatch Adventure Park believes that the proposals will threaten the viability of their business going forward if approved, in part due to the applicant's failure to consider Knockhatch Lane as being the Park's main access. There is also a risk of disease/contaminants spreading to our client's site, jeopardizing their operations.

You will read that we consider that we have identified that there are numerous policy conflicts on principle, transport, flood risk, landscape and design, natural environment, etc and other grounds. The applicant has not demonstrated why this site is necessary when other sites are more suitable, as identified by the LPA. You will also be aware that the community is strongly against these proposals for similar and other concerns.

We will share our objections with statutory consultees so they are aware of the concerns and can provide additional comments.

Mr Robins may recall that we previously submitted objections on the scheme, although this was prior to that application being validated. The objections remains the same.

We would be happy to discuss our client's concerns with the scheme after you have read the objections, if there are any queries. Given the strength of conflict with the Development Plan, we would kindly request that the scheme is refused under delegated powers as there is unlikely to be any material considerations that can clearly outweigh the conflicts identified. Please let us know if you agree.

We look forward to hearing from you.

Kind regards,

Nayan

Nayan Gandhi

Director



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MS S Prior
Case Officer, Planning Services
Wealden Council
Vicarage Lane,
Hailsham,
East Sussex
BN27 2AX

Sent via email only

24th February 2023

Dear Ms Prior,

Application Ref: WD/2022/2878/MAO for 'Relocation of the Hailsham Livestock Market with Associated Office, Café, Access, Parking and Circulation

Submitted On behalf of Knockhatch Adventure Park, Hailsham, BN27 3GD

We hereby submit this objection on behalf of our client, Knockhatch Adventure Park (KAV), regarding the planning application (Application Ref: WD/2022/2878/MAO) for the proposed relocation of the Hailsham Cattle Market to land to the west of the A22 at Diplock Way, which is shared with the main entrance to KAV. Our client currently holds a lease which permits the unfettered use of the access through the application site from the A22 to the visitor attraction, which lies to the west of the application site. This access is the main access to KAV.

Our client objects to the planning application as it conflicts with policies of the Development Plan, comprising the Wealden Local Plan 1998 (WLP98), The Wealden Local Plan 2013 (WLP13), as well as the National Planning Policy Framework (NPPF), on the following topic areas:

- principle of development;
- transport (traffic generation/highway safety, pedestrian safety and insufficient parking);
- flood risk;
- environment and pollution; and
- landscape and design.



We have identified conflicts with the following policies of the Development Plan. There are no material considerations that outweigh the conflicts given the harm identified. As such, in accordance with the Town and Country Planning Act 1990 Section 70(2) and the Planning and Compulsory Purchase Act 2004 Section 38(6), the proposals should therefore be refused.

There are conflicts with the following Development Plan policies:

- Policy GD2 (development outside development boundaries);
- Policy EN2 (development pattern);
- Policy BS6 (village business areas);
- Policy WCS4 (strategic development areas);
- Policy WCS6 (rural areas strategy);
- Policy TR3 (traffic impacts of new development);
- Policy TR10 (heavy goods vehicles in rural areas);
- Policy TR13 (footpaths and bridleways);
- Policy TR16 (car parking standards);
- Policy EN8 (low weald);
- Policy EN12 (protection of trees and woodlands);
- Policy EN13 (ancient semi-natural woodland); and
- Policy EN27 (layout and design of development).

We deal with each in turn below.

Principle of Development

KAV acknowledges that the current Hailsham Cattle Market's operations may need to evolve to reflect modern times, and a new facility might assist in this regard. However, if it is necessary to move, it is critical for both its success and to provide a benefit to the community that any relocation is acceptable in planning terms, and that it can adequately serve its customers' needs without causing harmful impacts on others.

We have concluded that the proposed development at the A22 Diplock Way roundabout is contrary to the Development Plan and represents inappropriate development, and the planning application should be refused. We explain how we have reached this conclusion below.

It is contrary to saved Policy GD2. This specifies that development outside of settlement boundaries will be resisted. The site falls outside of the settlement boundaries.



Saved Policy EN2 details the Development Pattern in the district, identifying that the existing settlement patterns are to be maintained. New major development generating significant travel movements ought to be located in 'efficient' locations. We contend that the proposal does not fall into this definition, as will be elaborated later in this letter.

Little justification of the necessity of the application location was provided with the planning application. Planning Statement Paragraphs 1.20 sets out that there was a search of alternative locations in and around Hailsham. It cites three locations as part of its search, and refers to 'other sites along the A22 were also considered' but then goes on to claim: *"all had issues that made them unsuitable and therefore did not merit serious consideration."* No evidence has been supplied as to which sites were considered, or what made each site unsuitable for the cattle market. We are aware that the applicant bought the application site, but that's not a reason for dismissing other sites. This information needs to be provided.

For example, there is no evidence that the 'suitable sites' identified in the January 2019 Strategic Economic Land Availability Assessment (SHELAA) were considered. It is noted that the application site was submitted as part of a wider site to the SHELAA (Ref: 692/1310). In that report, the LPA considered that the site was not suitable for either housing or employment purposes because the location was not sustainable. It stated: *"The site comprises several fields adjacent to the A22 which runs along the eastern boundary of the site. A proportion of the site is subject to flood risk which runs through the middle of the site and as a result creates two parcels of land severed by a band of fluvial flood risk. The site is severed from Hailsham by the A22. Despite the site's proximity to the A22, the site is particularly rural in nature and is isolated and remote from local services and facilities and public transport. Owing to its isolation and the severance caused by flood risk this site is unsuitable and development would be out of keeping with the surrounding land uses. However if a Local Plan proposes large scale development of this area and the site was submitted as part of a comprehensive redevelopment of the land connected to the A22 and SHELAA site 825/1310 it may be considered suitable for development with associated infrastructure and amenities. In these circumstances the developable area would be reduced to provide a suitable buffer to the ancient woodland located adjacent to the western boundary of the site, the areas of flood risk avoided and appropriate mitigation measures provided to reduce the level of noise from the adjacent A22."*

The Cattle Market relocation project is located within a small part of the wider site that was submitted as part of the SHELAA, where it was stated that it was not suitable unless it formed part of a much wider, more strategic land allocation for



development coming through a Local Plan review to accommodate a wider range of development types, and where consideration is given to the proposals against other, perhaps more suitable, sites. This conclusion was reached because of the site's flood risk issues, its contribution to the particularly rural character of the land to the west of the A22, because it was naturally severed from Hailsham by the same main road and to traffic considerations.

Its redevelopment for a more urbanised form of development, with a substantial, nondescript building comprising the new market, surrounded by significant areas of vehicle and HGV parking, manoeuvring areas, and other forms of hardstanding, is clearly unacceptable in principle. This conclusion is made stronger by the fact that the applicant has failed to carry out a proper assessment of other available sites or at least to share the details of its site search if it was indeed comprehensive. As the application stands, it provides little justification for why the cattle market must be sited on green field land which the LPA had only recently considered to be unsuitable for employment development.

Indeed, saved Policy BS6 identifies that business development in rural areas ought to be concentrated within village business areas, as identified by the Proposals Map. This is to ensure that the rural character of the area is preserved, and that existing business areas are the focus of employment activities as they are most appropriate locations for this, in accordance with the policy. The application site is not allocated in the Proposals Map as being part of a village business area, and no assessment has been undertaken as to whether there is availability within those centres for such development. It therefore fails to comply with Policy WCS6.

Policy WCS4 allocates various strategic locations for employment uses, including land in north Hailsham. There is no evidence in the application submission that this land was examined by the applicants as being a potential location. Given the strategic nature of the proposed use, and the LPA's desire to release land for employment uses in strategic locations which are most sustainable and benefit from the right amount of infrastructure, it is difficult to understand why the applicant concludes that other sites are not suitable. As stated above, we need to see the evidence. It could be argued that the proposals undermine the purpose of allocating strategic employment sites according to Policy WCS4.

The Council released an 'Employment and Economic Study – Eastbourne and Wealden 2022', which discusses various employment land uses in the District. It identifies a number of opportunities within it. For example, the Hackhurst Lane Industrial Estate and the Swallow Business Park are identified as areas for additional development or redevelopment. It is not clear why these have been



discounted by the applicants in favour of a greenfield site unrelated to employment or other uses.

There are various other sites in this area that could be suitable opportunities for business and employment uses. Indeed, this is particularly true for the Knight Farm development, which is actively being promoted by the Council (as landowner) for the purposes of employment. There is no suggestion that the cattle market could not be relocated to sites which have been identified as suitable.

It is also contrary to the National Planning Policy Framework (NPPF, 2021), which states in Paragraph 119 that the decisions should promote the effective use of land in meeting needs, whilst safeguarding and improving the environment. Paragraph 120 is clear that re-use of brownfield and underutilised within settlements should take place first.

It is clear that the proposals do not comply with policies pertaining to the principle of the development and should be refused on this ground alone, being contrary to Policies GD2, BS6, and WCS6, and the NPPF, as well as potentially undermining the provision proposed in Policy WCS4.

Transport and Highway Safety

The application includes a Transport Assessment which sets out details of the transport-related proposals for the relocation of the cattle market. KAV's transport consultant, RPS, has assessed the proposals and we enclose a Transport Note with this letter setting out KAV's concerns (see Enclosure 1). These can be summarised in four main topic areas: traffic generation; visibility and swept paths; pedestrians, cycles and the public right of way; and parking. Additionally, there are issues of contamination risk from vehicles, and this is discussed later in the letter.

In summary, the proposals will increase traffic congestion, fail to cater for its own traffic generation (let alone have any regard to the existing traffic levels on the Lane or at the A22 roundabout as generated by the Adventure Park today and in the future), ignores pedestrian usage of the Lane and creates unsafe walking and cycling areas, and does not provide safe routes and sufficient car parking. It is contrary to key policies TR3 and TR10 of the saved Local Plan and the NPPF, and it should be refused on these grounds.

Indeed, it is noted that the Core Strategy makes specific reference to the issue of congestion at the Diplocks Way roundabout, from which access to KAV and the proposed Cattle Market will be obtained, where it states: "*Congestion issues,*



created by additional development, at junctions between the town and the A22 including...the Diplocks Way roundabout, will need to be addressed.”. It has not been addressed with these proposals, and indeed, Local Highway Authority officers previously identified concerns regarding traffic and congestion matters with the proposals.

We briefly discuss our concerns with each topic below.

Traffic Generation

The transport assessment considers the existing highway network during weekday AM and PM peak hours, and considers the traffic flows along the A22 Diplocks roundabout. It fails to recognise that the peak time period for KAV is the morning before 11am.

The cattle market’s peak traffic generation is 159 vehicles (many of which are HGV), between 10:00–11:00am. It has had no regard to the fact that this is also the peak time period for KAV, particularly during school holidays when there is good weather. School holidays represent 25% of the year. On peak days, Knockhatch could have around 343 vehicles during the 10am–11am period, meaning that with the cattle market and Knockhatch together, there could be as many as 578 vehicle movements at peak periods. This has not been considered by the transport assessment as submitted.

It does not consider any traffic movements along Knockhatch Lane, and the subsequent congestion arising from the Knockhatch Adventure Park operations, including the congestion leading into the Park during busy periods, when congestion can stretch back to the A22 itself (including affecting the operations of the Diplocks roundabout).

Knockhatch Adventure Park currently attracts over 300,000 visitors, but its projected visitor numbers are anticipated to grow, to some 425,000 visitors, notwithstanding the impacts of Covid on the business in the most recent years. An allowance for this has not been considered in the transport assessment.

The proposed layout of the cattle market is that there will be additional internal vehicle movements as HGVs move from dropping cattle off at the market to the lorry park to the north, across the main access to KAV. These movements have not been factored into the assessment of cumulative impact. The impact on internal vehicle movements has not been assessed.

There is insufficient detail of how the vehicle wash will work, and the capacity to handle the predicted movement of vehicles, including the residual effects of the



proposed facility, and the effects of queuing by vehicles waiting to use the wash facility.

The alternative is that KAV will have to rely more often on its emergency access onto Hempstead Lane, which will potentially cause adverse impacts on the neighbours. This is most undesirable, and certainly not the wish of KAV, but there is a clear risk of this if the access way to the Park is blocked by vehicles travelling to the cattle market (from either the A22 or moving between the internal lorry parking areas).

Visibility and Swept Paths

We have looked into the swept paths of the vehicles through the site. The ones that have provided show HGVs crossing onto opposite sides of the carriageway. Highway safety issues arise with internal vehicle movements between the market and the lorry car park to the north, as they will be in direct conflict with through vehicles arriving and leaving KAV along the re-routed Knockhatch Lane.

In terms of visibility, there are issues with the visibility splay, particularly with slow moving HGVs pulling out on the fast dual carriageway. East Sussex County Council highways officers had already raised this concern in the pre-application advice.

The western access of the proposed cattle market road creates a blind spot with users leaving KAV, particularly noting that users from the Adventure Park will leave a bend as they arrive at the cattle market operation.

Pedestrians, Cycles and The Public Right of Way

Little consideration has been given to pedestrians and cyclists, including users of the public right of way through the site, as there are no significant pedestrian facilities being proposed.

The proposed crossing points to access along the cattle market entrance are very long, creating a pedestrian safety issue, contrary to guidance on the matter.

No regard has been given to pedestrians and cyclists who currently access KAV by foot or bicycle, who will have to manoeuvre very long access ways, a significant increase in traffic (particularly two-way HGV traffic) on a minimum sized road carriageway without pedestrian footways through the site, as well as substantial internal cross traffic movements – mainly from HGVs travelling between the buildings and the car parks – to gain access to KAV (as they would be able to do without such conflicts at present).



The public right of way crossing point or continue along the established public right of way.

No details have been provided regarding the 'overflow' car parking for HGVs at the western end of the site, creating a conflict with existing foot users of the Lane.

Parking

Insufficient vehicle parking is provided. The RPS Transport Note shows in Table 5 that a peak accumulation would be approximately 178 vehicles, and whilst supposedly 207 car parking spaces are to be provided on site with the proposals, details suggest that only 174 spaces are reported as available, creating a shortfall. Importantly, only 10 spaces for articulated HGVs and 3 parking spaces for large rigid HGVs are provided. There is no evidence that this is sufficient.

An additional 'overflow' parking area has been demarked on the layout plan, but no details of its operations have been provided. It is suggested that this would be retained as a grassed area, but no access details have been provided, and normally it is not suitable to park HGVs on grassed areas. This would also risk muddying the roadway, and creating liabilities for all users of Knockhatch Lane. This is particularly true as at least part of the site falls within flood zones 2 and/or 3.

It is therefore not possible to conclude if there would be a residual cumulative impact on the road network, which may be severe. As such, there may be significant highway safety issues, and without more evidence of a clearly thought through transport assessment, the proposals cannot be found to be in compliance with saved Policy TR3, which indicates permission should not be granted for proposals which perpetuate unacceptable traffic conditions, and saved Policy TR10, which indicates that an unsustainable increase in HGV movements on rural roads would not be supported.

It is also contrary to Policy TR13, which requires the safe and convenient provision of pedestrian routes in new development, as well as Policy TR16, which requires the provision of appropriate vehicle parking and servicing standards.

It is also contrary to Policy WCS7, which requires the effective provision of infrastructure, and states that the release of land for development is conditional on there being sufficient capacity in local infrastructure to meet the new demands. Accordingly, the already struggling transport links in the area would need expanding and improving before the relocated cattle market development could be considered, and with any proposals, pedestrian and cycle infrastructure would need to be fully incorporated into the scheme.



It is also not possible to say that it would comply with the following NPPF Paragraphs:

- 86 – whilst the NPPF recognises that sites in rural areas may be found outside of existing settlements, such sites should be well served by public transport, not in sensitive locations to its surroundings, and there should not be an unacceptable impact on local roads.
- 104 – the transport proposals fail to consider potential impacts of the development, create opportunities to walk cycle or use public transport, and avoid any environmental effects of transport and traffic.
- 105 – the proposals fail to manage active modes of transport, and direct significant development to locations which can be made sustainable.
- 110 – the cattle market proposals fail to a) take up any opportunities to promote sustainable modes of transport; b) provide safe and suitable access to the site for all users; c) provide road and transport elements which reflect current national guidance, and c) ensure that there is sufficient mitigation for impacts on the transport network or highway safety.
- 111 – this states: *“Development should only be prevented or refused on highways ground if there would be an unacceptable impact highway safety, or the residual cumulative impacts on the road network would be severe.”* KAV considers that the proposals fail in both regards, and should be refused on both unacceptable impact on highway safety and severe residual cumulative impacts on the road network.
- 113 – the proposals are not supported by a suitable transport assessment which adequately assesses the existing use of Knockhatch Lane by the Adventure Park users.

Flood Risk

Turning to flood risk, the application is accompanied by a Flood Risk Assessment (FRA). KAV’s technical advisors, RPS, conducted a review of the FRA, in a note dated 16th February 2023 (see Enclosure 2).

RPS has concluded that the FRA report does not contain sufficient evidence to support the report’s conclusion that the development is fully compliant with the NPPF and NPPG, nor will not increase flood risk. RPS also agrees with the position of the Pevensey and Cuckmere Water Level Management Board and Lead Local flood Authority (Letter dated 19th January), in that the applicant has failed to meet the requirements in relation to ascertaining acceptability in flood risk terms. It has identified the following deficiencies:



- The Environment Agency (EA) Flood Risk data relied on does not adequately assess the existing culvert on site. The proposed replacement culvert cannot be said to not exacerbate flood risk at the site or its surroundings, and as a result, this could change the developable area of the site (leading to layout changes).
- The approach adopted in the FRA is not best-practice and does not follow standard methodologies of the EA and Lead Local Flood Authority (LLFA). A bespoke modelling exercise should have been undertaken.
- Climate change has not been properly considered. Reliance on 1-in-1000 year flood levels is not standard practice, and reliance on 1-in-100 years level should be undertaken. An additional 19% climate change should be considered as a minimum, which has not been carried out.
- There is insufficient information on levels to demonstrate that there would be no loss to the existing floodplain storage capacity, or that required to address climate change.
- No modelling of the unnamed drainage channel on the western boundary was undertaken.
- Access and egress flood risk was not assessed, and safe egress cannot be demonstrated as achievable.
- A sequential approach has not been carried out assessing alternative sites. In this regard, the Swallow Business Park and Knights Farm are both sequentially preferable in flood risk terms, but this was not assessed by the applicants.
- The location of the proposed attenuation ponds are in the flood zone and it cannot be demonstrated that these could remain operational during fluvial flooding, especially once climate change allowances have been properly considered.
- The attenuation ponds will be used for treatment of surface water run-off. However, this could be difficult given the pollutants/contaminants of the operations, including from the livestock pens, cleaning of vehicles, etc. The use of the ponds for this would not be appropriate.
- Additional discharges into Knockhatch Stream will need to be agreed with the internal drainage board, but their consent is not likely based on their objection.

The proposals therefore fail to comply with various paragraphs of the NPPF, as follows:

- 159 – development should be directed away from the areas of highest risk of flooding, and only ‘necessary’ development in those areas should be



accepted, where development can be made safe during its lifetime without increasing flooding elsewhere. The development is therefore 'inappropriate' in flood risk terms.

- 162 – development should not be permitted in areas where reasonably available sites of lower flood risk are appropriate. A sequential approach should be used. There are at least two employment areas nearby which are appropriate and are subject to lower flood risk.
- 163 – the proposals fail the exception test, as it would not deliver wider sustainability benefits nor be safe during its lifetime taking into account the vulnerability of the users without increasing flood risk elsewhere.
- 167 – the proposals have not been demonstrated to not increase flood risk elsewhere; should be appropriately flood resilient, which this development would not be; should include sustainable drainage systems and where residential risk can be safely managed, which cannot be demonstrated and safe access and escape routes cannot be shown to exist.

Environment and Pollution

There are also concerns relating to contamination of the land arising from its operation as a cattle market, and the conflict of this contamination with the operation at KAV. Due to the nature of the business being conducted in the Cattle Market, contaminants from the HGVs and from the market itself will inevitably bleed onto the access road and into the surface water drainage system. Evidence of leakage already exists at the current cattle market location, where animal waste is released during transport onto the roadways around the market's location. This will lead to a release of contaminants into the Knockhatch Stream, as surface water is collected into the attenuation ponds and drained into the stream. It is noted that the site is at high risk of flooding and the ponds are within the flood zone, leaving them vulnerable to flood events which will also result in discharge of contaminants.

There is also concern about waste and pollutant spillage spreading to KAV, as the cattle market will share its access roads with the users of Knockhatch Lane heading to the Adventure Park. The tyres of vehicles travelling through to our site, or leaving our site to go onto the A22, will carry contamination far and wide, leaving the Adventure Park, and its animals, at risk of invasive contaminants. There is a risk to human health as well.

It has not been adequately demonstrated how this will be managed given the nature of the layout and operations proposed for the cattle market at the proposed new site. In the absence of information, a precautionary approach



needs to be adopted, in accordance with NPPF Paragraph 185 which clearly requires decision to ensure new development are appropriate for their location taking into account likely effects on health and the natural environment. Whilst Paragraph 188 states that the decision should be focused on acceptable land use matters and not stray into other control processes such as pollution control regimes, pollution caused by what is effectively an industrial type operation (albeit serving the agricultural industry), is a genuine land use consideration, particularly as there are direct interactions of the site with its neighbours and with watercourses that go beyond the site's own conditions with the proposed development. The risk of cross contamination between the two parties must therefore be considered.

Landscape and Design

Policy EN8 sets out that development within the Low Weald, where the proposals are located, will only be permitted if it conserves the low rolling agricultural character of the landscape having regard to the areas of unspoilt and remote countryside nature, the setting of settlements, the retention of woods and boundary trees, etc. Policy EN27 indicates that development will be permitted where it is of a scale, site coverage and design that respects the character of the adjoining development, and that it does not create any adverse impacts to neighbours by way of scale, form, noise and traffic generation, among other reasons.

The proposals are seeking to develop a particularly important rural area on the edge of Hailsham for a development which will include significant areas of hardstanding, including large lorry and car parks, access roads and manoeuvring areas. It is simply incompatible with the rural area of the Low Weald, and it will introduce uncharacteristic urban development across the A22. If the cattle market is granted planning permission to relocate, it will set a new characteristic of this part of Low Weald, contrary to its prevailing character of open agricultural fields intermixed with rural activities and sparse, small-scale communities. It is clearly contrary to Policies EN8 and EN27 by way of scale, form, and impact on the local character.

The proposals could have a significant detrimental impact on trees, contrary to Policy EN8(4). Whilst some information on tree protection has been provided to the south of the site, it is noted that the proposals also seek to introduce an informal overflow HGV park to the north-west, which seems to be difficult to achieve without encroaching on the necessary 15m buffer that should be afforded to the trees to the north-west. No details have been supplied as to how this could



be achieved. If they cannot be protected/preserved, then the proposals are contrary to saved Policies EN12(6) and EN13.

It is also contrary to Policy EN27 regarding traffic generation, as discussed above. Whilst the applicant argues that because the application is submitted in outline with various matters reserved, there are further opportunities to address matters of landscaping to minimise its impacts, this seems unlikely to present substantial opportunities given the need to provide extensive lorry parking, internal road routes, vehicle washing areas, etc on what is effectively a small site to accommodate the scale of development. The extent of development is more akin to the industrial development which is located across the A22 Diplock roundabout, and indeed, there are other employment areas which could better accommodate these proposals.

The NPPF is clear at Paragraph 130 that decisions should ensure development will function well and add to the quality of the area, are laid out appropriately with effective landscaping, are sympathetic to the local character, the built environment and the landscape setting, to create safe, accessible and places which promote health and wellbeing. None of these criteria are met. The NPPF goes on to state in Paragraph 134 that development which is not well design should be refused. We agree; the scheme seeks to shoehorn development of an industrial character is an important, particularly rural setting without regard to the features or its impact on that character. It should be refused.

Other Considerations

The applicant has put forward other considerations in Paragraphs 4.3 and 4.4 of the Planning Statement. None of these are relevant to the specific site; they relate to the relocation of the cattle market. There is no reason why any of these aims and benefits could not be achieved on a more suitable site. KAV agrees that the cattle market's historic location may no longer be appropriate, but it is obvious to us that the location being proposed is driven by financial requirements, and not due regard to planning policy or technical considerations. Indeed, the absence of any due regard to Knockhatch's own operations on the Lane, or the impact of the market on its guests, demonstrates clearly that site is simply not suitable.

We are aware that potentially some of the application site falls within land that is owned by KAV. No Article 13 Notice has been served, and we would kindly request that the applicant review its application boundary to ensure that it does not indeed cross into our client's land. If it does, and this requires works within Knockhatch's ownership, consent will not be forthcoming, as the applicant has



made no attempts to engage or discuss the proposals with our client, despite seeking to affect his primary access.

Furthermore, KAV has the benefit of an express right of way over land registered under title ESX401005. The rights of way granted to our client must be maintained and kept open at all times for the relevant access for which it is required; there must not be any obstruction to the use of the access at any time. This begs the question of how long construction will take, and what impact it would have on users arriving at KAV. As data in the RPS Transport Note shows, the Park had suffered significantly during the Covid pandemic, although through the hard work of the team of staff at the Park, its visitor numbers are starting to recover towards historic levels. With a long-term obstruction of its main access, it is not certain that such recovery and growth could be sustained. This could have a substantial effect on jobs, and direct and indirect spend, potentially altering the site's viability.

Indeed, if the cattle market were to be developed at the Park's entrance, it is possible that visitor numbers could drop dramatically, as the site would no longer be attractive on key cattle market days, especially if the likely traffic issues become well known by potential visitors. The business is highly weather and season dependent, where good weather days during school holidays make up the main parts of its business. The cattle market's effect on those days could result in a reduction in revenue to the point where the Park's viability could be threatened. The owners are so worried that they have commissioned Laister and RPS to prepare these objections.

The market's owners put forward that if they are unable to relocate, the market is not going to continue to be viable. There is no evidence submitted with the application to support this statement, and it cannot be considered as an 'other consideration' in this regard. Indeed, there is nothing to suggest that the market could not relocate to other, more suitable site, which enables it to deliver a bespoke new facility to upgrade the market's operations and bring it in line with modern practices. A proper site analysis of alternative sites would have demonstrated this.

We are aware that the market owners acquired the application site in 2015 potentially without regard to whether it might gain planning permission. It is believed that this is the reason why it has been pushing so hard to propose a scheme on the site, despite principle and technical objections.

The application site is not located within the Hailsham Town Council's boundaries (it is located within Arlington Parish). We are aware that there is a potential that the Town may lose its Royal Charter if the cattle market relocates, which would be



a significant cultural and economic loss to the town. This weighs against the proposals, especially where the applicant has not demonstrated that they have explored all potentials to remain within the town's boundaries.

We can confidently conclude that there are no material considerations that clearly outweigh the conflicts with the Development Plan, which are numerous.

It should be noted that KAV has publicly participated in the Hailsham Town Council and Arlington Parish Council meetings regarding this application, speaking against the application. Both Councils have agreed to oppose the proposals, as have many community members, as can be seen by the objection numbers.

KAV has offered to meet with the applicants to enable their views to be taken into account in the scheme and consider alternatives. The meeting had been declined by the Applicant, in an abrupt manner, so it was not worth pursuing further. It is our view that a basic level of engagement has not taken place with this application, with KAV or the community in general. This is a major reason why the application fails to take into account the effects on KAV.

Based on the information currently available, we assert that the proposals to relocate the cattle market to the entrance of Knockhatch Lane simply do not adhere to many parts of the Development Plan and the NPPF, and there are significant impacts on neighbours and the environment. They do not fit into the site that is proposed, hence the unsatisfactory arrangement with the development split on both sides of the access road, which will have severe effects on KAV. We reserve the right to add further representations on this application as more information comes to light.

Wealden Council's planning service will be aware that we previously wrote to them to draw their attention to the likely policy conflicts arising from a potential scheme that was proposed (an application was submitted, but it was not validated). Those comments (found in Enclosure 3 of this letter) were returned as there was no valid planning application made. The contents of this letter reflect the concerns raised in that letter, as it now relates to a specific scheme.

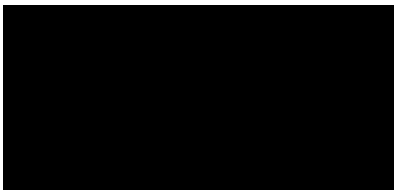
It is our position that the application should be refused, and this should be done via delegated powers as swiftly as possible. The applicant can then go back to



the drawing board and look at appropriate sites elsewhere near the town, and if a scheme is to be brought forward on this site, engage with KAV and others in developing a more considerate and less damaging scheme.

We would be happy to discuss the contents of our objections. We will forward specific objections on highways and flood risk matters to the statutory consultees.

Yours sincerely,



Nayan Gandhi
Director

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ENCLOSURES



ENCLOSURE 1 – RPS Transport Note



TECHNICAL NOTE

Project Title: Knockhatch Adventure Park

Report Reference: JNY11152-02A

Date: 23 February 2023

1 INTRODUCTION

- 1.1 This Note has been prepared on behalf of Knockhatch Adventure Park in relation to a planning application submitted to Wealden District Council (reference: WD/2022/2878/MAO) for the relocation of the Hailsham Livestock Market (the 'livestock market') to land adjacent to the A22 Hailsham Bypass, Hailsham.
- 1.2 The livestock market proposes access via Knockhatch Lane, which is the current access to Knockhatch Adventure Park. Knockhatch Adventure Park have concerns with this and this Note considers the transport aspects of the proposals and sets out Knockhatch Adventure Park's transport related objections to the planning application.
- 1.3 The documents submitted in support of the planning application have informed Knockhatch Adventure Park's transport related objections and this Note, in particular the following:
- Transport Assessment (GTA reference: 7473, June 2021) (the 'TA'); and
 - Design and Access Statement (AJA reference: DAS 21909/01-2, July 2021) (the 'DAS').
- 1.4 In addition, information has been provided by the operator of the Knockhatch Adventure Park on its daily visitor numbers to inform their objections and this Note.
- 1.5 Despite the proposals being located on the same access road (Knockhatch Lane), there has been no contact with Knockhatch Adventure Park, either formally or informally, to discuss how the proposals could be evolved around the existing conditions, their existing operations and their visitors. This has increased the concerns of Knockhatch Adventure Park with the proposals.
- 1.6 This Note sets out some brief information on Knockhatch Adventure Park to provide a context and then considers each of their transport related concerns on a themed basis.

2 KNOCKHATCH ADVENTURE PARK

- 2.1 Knockhatch Adventure Park is a major tourist attraction, with a large range of indoor and outdoor family activities. It is open between 10:00 and 17:30 seven days per week for 361 days of the year. Access is via Knockhatch Lane via the A22 Diplocks Roundabout.

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- 2.2 Data from the operators show that footfall at Knockhatch Adventure Park was 218,604 during 2017, 245,005 during 2018 and 284,444 during 2019.
 - 2.3 Knockhatch Lane is a private and unadopted narrow single carriageway road. Although narrow, it is just wide enough to allow oncoming cars to pass one-another along it, there is a posted 15mph speed restriction along it and there are no footways along it.
 - 2.4 As well as Knockhatch Adventure Park, Knockhatch Lane also provides access to Knockhatch Ski & Snowboard Centre (sports activity venue), Snow Lab (retail shop), East Sussex School of Circus Arts (an international school offering training courses) and First in Attendance Ltd (centre providing first aid training).

3 LIVESTOCK MARKET PROPOSALS

- 3.1 This Section considers each of Knockhatch Adventure Park's transport related concerns of the proposals on a themed basis.

Traffic Flows and Highway Capacity

- 3.2 Details of traffic flows and the impacts of the proposals upon the highway are set out in the TA with some reference and consideration with the DAS.

Concern: The Assessment Does Not Consider the Cumulative Impact With Knockhatch Adventure Park

- 3.3 The impact assessment within the TA focusses on the highway network weekday AM (07:30 to 08:30) and PM (16:30 to 17:30) peak hours and considers existing traffic flows at the A22 Diplocks roundabout.
 - 3.4 There is no assessment of any other periods nor is there any recognition or consideration of the cumulative traffic flows along Knockhatch Lane with Knockhatch Adventure Park.
 - 3.5 Because the TA only considers these peak hours, it has not identified the peak congestion that can occur on Knockhatch Lane, the effect this has upon the A22 and the subsequent congestion on the A22 and the A22 Diplocks Roundabout.
 - 3.6 Appendix A sets out some photos of the congestion that can occur along both Knockhatch Lane and the A22 together with some comments to visitors of Knockhatch Adventure Park. It shows that queuing can occur from Knockhatch Adventure Park extending onto the A22 and affects the operation of the A22 Diplocks roundabout. During busy periods marshals are employed by Knockhatch Adventure Park and in such instances of queuing they turn visitors away in attempts to maintain the free flow of traffic on the A22. This can be seen within Appendix A.
 - 3.7 Such queuing can occur, for example, during busy periods at Knockhatch Adventure Park when the inflow of vehicles exceeds the ability of cars to park in the car parks. The peak arrival times to Knockhatch Adventure Park are during the morning before 11:00.
 - 3.8 The TA uses TRICS to estimate its vehicle trip generation. However, as above, it only does this for the highway network weekday AM and PM peak hours (set out in Table 8.2 of the TA).
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- 3.9 The data provided within the TA can be used to expand its Table 8.2 and to calculate the estimated vehicle movements generated by the livestock market. This is therefore using the same calculations and criteria used by the applicant but is simply completing Table 8.2 of the TA for all hours of the day. This is set out in Table 1.

Table 1: Daily Vehicle Trip Generation of the Livestock Market

Time	Arrivals	Departures	Total Vehicle Movements
08:00-09:00	46	20	66
09:00-10:00	83	26	109
10:00-11:00	120	39	159
11:00-12:00	71	58	129
12:00-13:00	42	83	125
13:00-14:00	36	104	141
14:00-15:00	33	76	109
15:00-16:00	26	43	68
16:00-17:00	7	16	22
17:00-18:00	2	0	2

- 3.10 As Table 1 shows, and as set out in the TA, the livestock market is predicted to generate 66 vehicle movements during the weekday AM peak hour and two vehicle movements during the weekday PM peak hour.
- 3.11 However, as can be seen, these are not the peak periods of the livestock market. Table 1 shows that it would generate 159 vehicle movements between 10:00 and 11:00. This is the same peak time for vehicular movement as Knockhatch Adventure Park.
- 3.12 The impact of this has not been considered within the TA, thus its conclusions have not been derived correctly. In particular, given the congestion that can occur along both Knockhatch Lane and the A22, additional vehicles generated by the livestock market would increase the length and duration of such queuing on the A22, which is a high speed dual carriageway road and a highway safety concern that has not been assessed.
- 3.13 Vehicle movements at Knockhatch Adventure Park have been derived from data collected by the operator. In particular, 2019 vehicle movements have been derived for the full year.
- 3.14 A peak day at Knockhatch Adventure Park would typically occur when the schools are not open (a weekday or a weekend) and an absolute peak day would typically occur during this period when there is good weather.
- 3.15 The periods during which there are school holidays is approximately 25% of the year. This is a significant period of the year and essentially equates to 1 in every 4 livestock market days.
- 3.16 Thus, for 25% of the time, there is potential for peak days to occur at Knockhatch Adventure Park.
- 3.17 Consideration of the traffic flows generated by Knockhatch Adventure Park and ensuring an appropriate cumulative assessment is therefore essential for the TA supporting the livestock

market planning application. There is no such consideration and no such assessment has been undertaken.

3.18 Using the data derived from the operator, 2019 vehicle movements generated by Knockhatch Adventure Park are set out for three scenarios as follows:

- The peak day of 2019;
- An average weekday during the peak month of 2019 (i.e. ~10% of year);
- An average weekday during the peak 3 months of 2019 (i.e. 25% of year); and
- An average weekday during the peak 6 months of 2019 (i.e. 50% of year).

3.19 These are set out on an hourly basis throughout the day in Table 2 and on a 15 minute period basis for the morning and early afternoon period in Table 3.

Table 2: 2019 Weekday Total Vehicle Movements (Hour Periods)

Hour Beginning	Average Weekday (Peak 3 months, 25% of the Time)	Average Weekday (Peak 6 months, 50% of the Time)	Average Weekday (Peak month, ~10% of the Time)	Peak Day
09:00	131	104	180	294
10:00	186	148	257	419
11:00	152	121	210	343
12:00	34	27	47	76
13:00	51	40	70	114
14:00	122	97	168	274
15:00	137	109	188	307
16:00	80	64	111	181
17:00	64	51	89	144

Table 3: 2019 Weekday Total Vehicle Movements (15 Minute Periods)

15 Minute Period Beginning	Average Weekday (Peak 3 months, 25% of the Time)	Average Weekday (Peak 6 months, 50% of the Time)	Average Weekday (Peak month, ~10% of the Time)	Peak Day
09:00	49	39	68	110
09:15	26	21	36	58
09:30	20	16	27	44
09:45	36	29	50	82
10:00	43	34	59	97
10:15	45	36	62	101
10:30	44	35	61	100
10:45	54	43	74	121
11:00	55	44	76	125
11:15	68	54	94	153
11:30	13	10	18	29
11:45	16	13	22	36
12:00	9	8	13	21
12:15	8	6	11	18
12:30	11	8	14	24
12:45	6	5	9	14
13:00	6	5	8	13
13:15	10	8	14	23
13:30	17	13	23	37
13:45	18	14	25	40
14:00	28	22	39	63
14:15	29	23	40	66
14:30	24	19	33	53
14:45	41	32	56	91
15:00	41	33	56	92
15:15	36	29	50	82
15:30	25	20	34	56
15:45	35	27	48	78
16:00	46	36	63	102
16:15	11	9	16	26
16:30	12	10	17	27
16:45	11	9	16	25

3.20 As Tables 1, 2 and 3 show, the peak vehicle movements for the livestock market and Knockhatch Adventure Park all occur during the same periods. The cumulative effect of this has not been considered nor assessed within the TA.

3.21 As an initial consideration, Table 4 sets out the peak hourly and the peak 15 minute period vehicle movements generated by the livestock market and Knockhatch Adventure Park on an average weekday during the peak month (i.e. ~10% of the time) and a peak day.

Table 4: Weekday Cumulative Total Vehicle Movements

	Average Weekday (Peak month, ~10% of the time)			Peak Day		
Hour Period	Knockhatch Adventure Park	Livestock Market	Total Vehicle Movements	Knockhatch Adventure Park	Livestock Market	Total Vehicle Movements
09:00-10:00	180	109	289	294	109	403
10:00-11:00	257	159	416	419	159	578
11:00-12:00	210	129	339	343	129	472
15-minute Period						
10:45-11:00	74	40	114	121	40	161

3.22 During an average weekday of a peak month (~10% of the time), there are 74 vehicle movements generated by Knockhatch Adventure Park between 10:45 and 11:00 and there would be additional 40 generated by the livestock market to create a total of 114 vehicle movements. Between 10:00 and 11:00, there are 257 vehicle movements generated by Knockhatch Adventure Park and there would be additional 159 generated by the livestock market to create a total of 416 vehicle movements.

3.23 During a peak day, there are 121 vehicle movements generated by Knockhatch Adventure Park between 10:45 and 11:00 and there would be additional 40 generated by the livestock market to create a total of 161 vehicle movements. Between 10:00 and 11:00, there are 419 vehicle movements generated by Knockhatch Adventure Park and there would be additional 159 generated by the livestock market to create a total of 578 vehicle movements.

3.24 These cumulative vehicle movements have not been considered nor assessed within the TA.

3.25 It should also be noted that the below identifies that there are additional 'internal' vehicle movements travelling between the norther and southern parts of the site which result in additional vehicle movements along / across Knockhatch Lane. These have not been quantified within the TA and will add to the vehicle movements set out above.

3.26 As Appendix A shows, there are occurrences of vehicles blocking back along Knockhatch Lane onto the A22 Diplocks Roundabout and the A22 and the operators of Knockhatch Adventure Park deploy marshals to mitigate this.

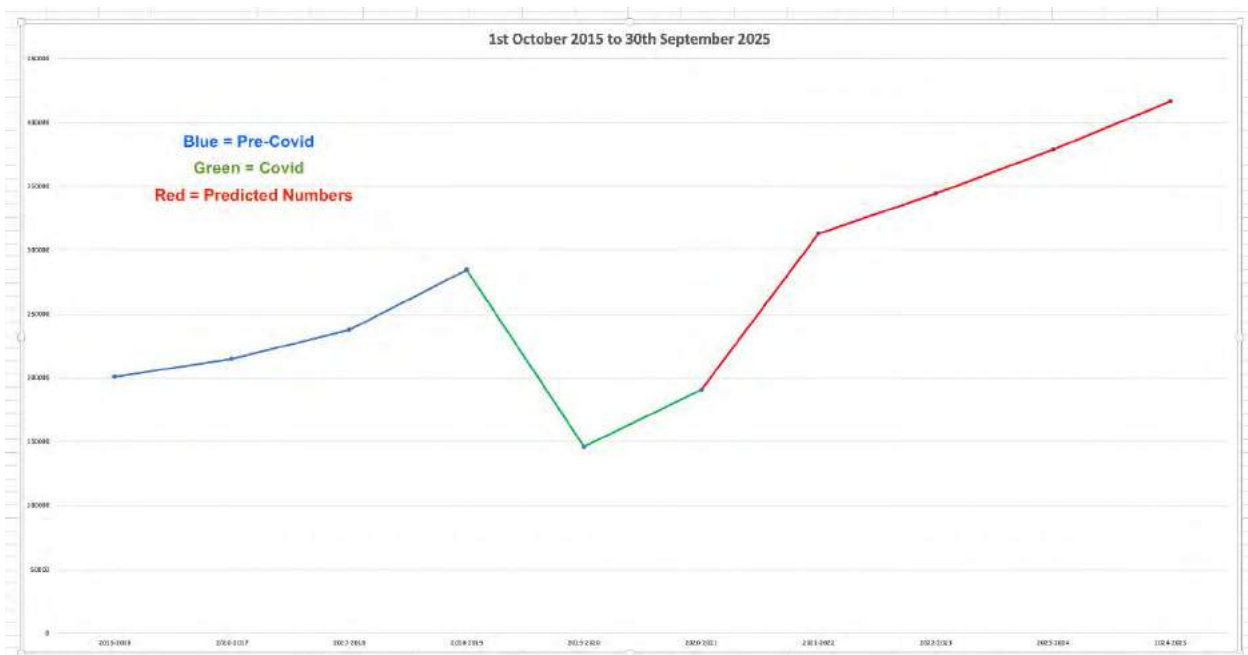
3.27 The additional traffic generated by the livestock market would add to this existing situation and deteriorate further these highway conditions.

3.28 This has not been acknowledged in the TA, nor has the impact of the livestock market been considered or assessed during such periods.

3.29 There are Appeal decisions on similar situations whereby traffic conditions that are not a daily occurrence but which do occur (for example, a route is used as a diversion due to an accident etc on an alternative route) are taken into account in the decision making process. This is one such scenario.

- 3.30 In the absence of a cumulative impact assessment and associated mitigation, it is not possible to demonstrate that the livestock market would not create a residual cumulative impact on the road network that is severe (NPPF test).
- 3.31 In addition to the above, and because there has been no contact with Knockhatch Adventure Park, the TA does not consider the year on year increase in annual visitor numbers at Knockhatch Adventure Park and thus the future traffic flow conditions.
- 3.32 Knockhatch Adventure Park have set out in Graph 1 their observed and their projected annual visitor numbers between 2015 and 2025. As can be seen, and consistent with the above, there has been a year on year increase in annual visitor numbers up to 2020 at which point covid restrictions resulted in a reduction.
- 3.33 However, visitor numbers have now returned and Knockhatch Adventure Park project annual visitor numbers to reach 425,000 by 2025. The traffic growth contained within the TA does not consider or recognise this. Such allowance needs to be made as part of future year traffic conditions to ensure the full impact of the livestock market would have is fully understood and appropriately assessed.

Graph 1: Observed and Projected Annual Visitor Numbers at Knockhatch Adventure Park 2015 to 2025

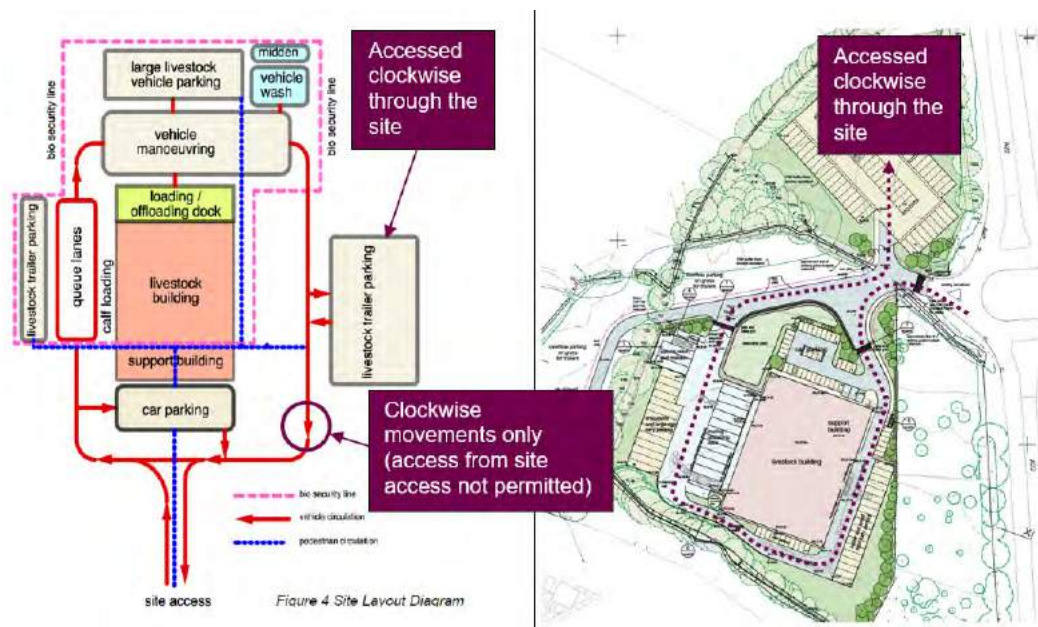


Concern: The Assessment Does Not Consider the Impact Upon Knockhatch Lane

- 3.34 The TA sets out the proposed traffic generation of the livestock market and assesses this upon the operation of the A22 Diplocks Roundabout. However, there will also be vehicles crossing Knockhatch Lane between the parking to its north and the main part of the site to its south.

- 3.35 These vehicle movements would not be generated onto the highway network (onto the A22 Diplocks Roundabout) but would be classed as 'internal' to the site, however, they would cross Knockhatch Lane.
- 3.36 These vehicle movements are not quantified and their impact upon Knockhatch Lane has not been assessed.
- 3.37 The access and egress to the trailer and small rigid HGV parking in the area to the north of Knockhatch Lane (85 spaces) is not clear in the TA. However, Figure 4 of the DAS sets out that this is accessed clockwise through the site.
- 3.38 An annotated extract of Figure 4 of the DAS and the resultant clockwise movement through the site to reach this parking area is shown on Figure 1.

Figure 1: Access to the HGV parking to the North of Knockhatch Lane



- 3.39 Based upon this, there is potential for the following to be generated:
- At the start of the day, 85 trailers / small rigid HGVs enter Knockhatch Lane westbound and travel clockwise through the site and back eastbound along Knockhatch Lane to access the car park to the north. This generates two movements along Knockhatch Lane.
 - At the end of the day, 85 trailers / small rigid HGVs exit the northern parking area travelling south-west bound along / across Knockhatch Lane, then circulate clockwise through the southern part of the site to the loading dock, then exit eastbound along Knockhatch Lane. This generates two movements along Knockhatch Lane.
- 3.40 This generates a total of four vehicle movements along and across Knockhatch Lane for each vehicle (i.e. 340 vehicle movements for 85 vehicle spaces).

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- 3.41 Table 4 sets out the cumulative vehicle movements generated by Knockhatch Adventure Park and by the livestock market. These do not include these additional 'internal' vehicle movements that would cross Knockhatch Lane.
- 3.42 Furthermore, given the existing blocking back onto the A22 that occurs, the ability of these 'internal' vehicle movements to cross Knockhatch Lane and circulate the livestock market has not been considered.
- 3.43 The impact of these 'internal' vehicle movements has not been quantified nor assessed within the TA and it is not therefore possible to conclude that there would not be a residual cumulative impact on the road network that is severe (NPPF test).
- 3.44 If access to the trailer and small rigid HGV parking in the area to the north of Knockhatch Lane (85 spaces) is not as set out in the DAS and as shown on Figure 1, then that means that these trailers and small rigid HGVs would turn right into this parking area. This would generate three vehicle movements along and across Knockhatch Lane (as opposed to four) and therefore the same principle exists and therefore the above consideration still exists (it is not therefore possible to conclude that there would not be a residual cumulative impact on the road network that is severe).
- 3.45 Furthermore, if this were the case, then a new highway safety consideration arises from right turning trailers and small rigid HGVs from Knockhatch Lane immediately to the west of the A22 Diplocks Roundabout (approximately 30m from the splitter island).
- 3.46 No swept paths have been undertaken of this movement, there is no assessment of the highway safety implications of such a movement and there is no assessment of the potential to result in blocking back or interfering with the flow of movement on Knockhatch Lane and the A22. On that basis, it is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test).
- 3.47 Paragraph 4.2 of the DAS sets out that space is needed for vehicles queuing to use the offloading docks during peak periods.
- 3.48 This is therefore a recognition that there would be queuing within the site. The above sets out that the full extent of vehicle movements through the site has not been quantified nor assessed.
- 3.49 Similarly, there is no quantification nor assessment of the extent of vehicles queuing within the site. The above sets out that there is queuing on Knockhatch Lane and the queuing that is recognised within the DAS could exacerbate this.
- 3.50 Linked to this is the vehicle wash and mitten. As vehicles egress onto Knockhatch Lane they would travel through this, however, there is no detail provided on the facility, in particular:
- How the facility would operate;
 - What length of time is required to fully clean each vehicle such that any deposits are fully removed;
 - How effective the facility is;
 - Is four spaces for cleaning egressing vehicles sufficient;
 - What its capacity is and how that relates to the movement and circulation of vehicles through the site;
-

- What the residual effects of the facility are; or
 - What the effects of queuing are within the site created by vehicles waiting to use the facility.
- 3.51 These details are not provided and thus the extent of queuing cannot be considered and the residual effects cannot be determined.
- 3.52 Because the full extent of vehicle movements through the site has not been quantified nor assessed and because there is no quantification nor assessment of the extent of vehicles queuing within the site, the extent of the impact upon Knockhatch Lane cannot be determined.
- 3.53 On that basis, it is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test).

Concern: The Assessment Does Not Adequately Consider the Impact Upon Highway Safety at the A22 Diplocks Roundabout

- 3.54 Section 5 of the TA considers injury accident records at the A22 Diplocks Roundabout.
- 3.55 Paragraph 5.2 of the TA states:
- 'The existing site access at the Diplocks Roundabout fully accords with DMRB CD116 requirements which. The site proposals would therefore not result in any material increased potential for accidents at the site access'.**
- 3.56 This sentence is incomplete, however, its key points are set out.
- 3.57 However, paragraph 5.6 of the TA contradicts this (the Diplocks Roundabout fully accords with DMRB CD116 requirements) by stating:
- 'At present, the achievable visibility to the south is around 60m. The existing foliage within the highway boundary could be cut back to achieve around 100m. It should be noted the highway boundary is limited by a fence that divides the highway boundary and private ownership'.**
- 3.58 Paragraph 5.5 of the TA refers to the advice of Highway Officers at East Sussex County Council who stated:
- 'By the very nature of the application, the proposal will lead to slow moving large HGVs and cars / vans with trailers pulling off into a fast-dual carriageway, albeit at a roundabout. Visibility should be checked to the south to ensure that it is adequate'.**
- 3.59 Given that there is a restriction to the visibility, this means that the proposals represent an intensification of use through a junction with sub-standard visibility. This intensification of use is amplified by it being formed by a large number of *'slow moving large HGVs and cars / vans with trailers pulling off into a fast-dual carriageway'* (as described by Highway Officers at East Sussex County Council).
- 3.60 There is a very limited consideration of this within the TA and a robust assessment to address the comment from Highway Officers at East Sussex County Council is not provided.

3.61 From the assessments contained within the TA, it is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety at the A22 Diplocks Roundabout (NPPF test).

Site Layout and Internal Site Arrangements

3.62 Details on the site layout and internal site arrangements are set out in the TA and the DAS.

Concern: Insufficient Vehicular Parking is Proposed

3.63 The TA considers vehicular parking at the livestock market by undertaking a simple comparison of parking that is provided at other similar facilities.

3.64 Table 1 sets out the vehicle movements generated by the livestock market throughout the day based upon the data and calculations contained within the TA. The vehicle arrivals and the vehicle departures contained therein can be used to calculate the vehicular parking accumulation on site.

3.65 The vehicular parking accumulation for the livestock market has been calculated using this data (as contained within the TA) and is set out in Table 5.

Table 5: Vehicular Parking Accumulation of the Livestock Market

Time	Arrivals	Departures	Vehicular Parking Accumulation
08:00-09:00	46	20	27
09:00-10:00	83	26	84
10:00-11:00	120	39	165
11:00-12:00	71	58	178
12:00-13:00	42	83	136
13:00-14:00	36	104	68
14:00-15:00	33	76	26
15:00-16:00	26	43	8
16:00-17:00	7	16	0
17:00-18:00	2	0	2

3.66 Table 5 sets out that, based upon the vehicle trip generation set out in the TA, a peak of 178 vehicle parking spaces are required on site.

3.67 The TA states that 'approximately 207 spaces' are proposed. More detailed information is set out on the site layout plan which shows and states:

- 45 public car parking spaces (including 3 disabled car parking spaces);
- 11 staff car parking spaces;
- 19 trailer and small rigid HGV parking in the area to the south of Knockhatch Lane;
- 85 trailer and small rigid HGV parking in the area to the north of Knockhatch Lane;
- 10 articulated HGV parking in the area to the south of Knockhatch Lane; and

- 4 large rigid HGV parking in the area to the south of Knockhatch Lane.
- 3.68 This creates a total of 174 vehicular parking spaces, 56 of which would be car parking spaces and 118 of which would be HGV parking spaces.
- 3.69 This is fewer than the 178 vehicular parking spaces that are required. Thus, insufficient vehicular parking is proposed.
- 3.70 The site layout plan also sets out that there is '*additional overflow parking for 50+ trailers on grassed areas if required during occasional peak markets*'. However, there is no access shown to these areas and no layout of spaces, aisles and turning / circulation to demonstrate whether any could be provided satisfactorily within the available area. Furthermore, there is a 15m buffer shown from the ancient woodland in this area, which exacerbates this issue.
- 3.71 These areas are located within flood zone 3 and there is no consideration on the implications of this for such use.
- 3.72 Furthermore, providing parking for HGVs on grass would not normally be acceptable to a Local Highway Authority, particularly given said grass is within an area of flood risk 3. In addition, it would not be normal for developers to provide such parking on grass, even if it is private land, due to the obvious implications of large vehicles parking on grass, the risk of mud and dirt being transferred onto Knockhatch Lane and the liabilities attached with members of the public doing so.
- 3.73 These liabilities would extend not only to members of the public, visitors and staff of the livestock market, but to all users of Knockhatch lane including Knockhatch Adventure Park, Knockhatch Ski & Snowboard Centre, Snow Lab, East Sussex School of Circus Arts and First in Attendance Ltd.
- 3.74 Notwithstanding the above, the calculated vehicular parking requirements set out in Table 5 are aggregated into all types of vehicles. Given the different types and sizes of vehicles that generate the parking demand, the TA needs to disaggregate this to demonstrate that there is sufficient parking provided for articulated HGVs, large rigid HGVs, small rigid HGVs, trailers, staff cars and public cars.
- 3.75 Of particular note, there are only 10 parking spaces for articulated HGVs and only 4 parking spaces for large rigid HGVs. There is no evidence provided to justify this being a sufficient number to provide.
- 3.76 Disaggregation of parking demand is not provided and it is not therefore possible to consider the individual vehicular parking requirements.
- 3.77 Notwithstanding, the above shows that there is insufficient vehicular parking proposed.

Concern: The Site Layout Creates a Highway Safety Issue Impacting Upon Visitors to Knockhatch Adventure Park

Eastern Accesses onto Knockhatch Lane

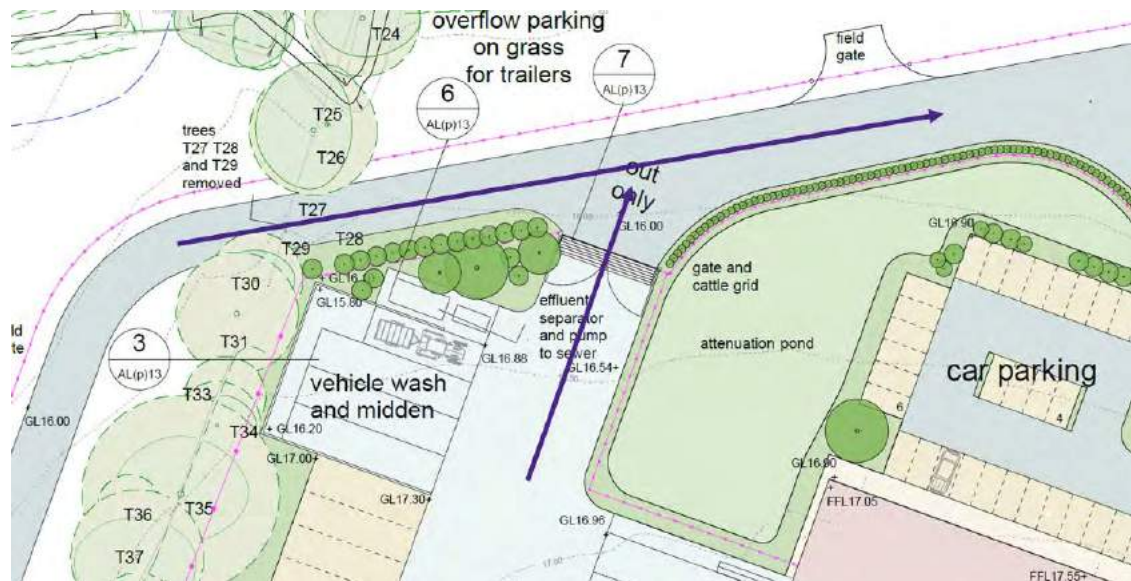
- 3.78 As set out above, trailers and small rigid HGVs parking in the area to the north of Knockhatch Lane (85 spaces) would need to travel along / across Knockhatch Lane multiple times. However, there is no assessment of the highway safety considerations of these movements. It

- is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test).
- 3.79 In particular, the site layout proposes two wide kerbed accesses (one to the north of Knockhatch Lane and one to the south of Knockhatch Lane) within an approximate 40m distance of the A22 Diplocks Roundabout and a pedestrian crossing in between which is approximately 12m long and forms the Public Right of Way (PRoW).
- 3.80 These accesses will be used by HGVs and there will be vehicular crossing movements as well as potential right turn movements all in proximity to and in conflict with an approximate 12m long pedestrian crossing forming a PRoW.
- 3.81 Crossing distances are typically no more than 10m without a pedestrian refuge island for highway safety reasons. The existing crossing distance for the PRoW is currently less than 10m.
- 3.82 As above, the number of vehicle movements that will travel over the PRoW crossing associated with the livestock market has not been quantified. Similarly, the cumulative number of vehicle movements (including Knockhatch Adventure Park) that will travel over the PRoW crossing has not been quantified. If an average vehicle occupancy rate of 2.0 is assumed for the trailer and small rigid HGV parking, then, based upon 85 spaces, there may be approximately 170 pedestrians crossing the access road in the period prior to auctions and at the same time that vehicles were travelling along the access road. There is potential for this to result in vehicles blocking back from the crossing onto the A22 Diplocks Roundabout. However, this has not been quantified or assessed.
- 3.83 No highway safety assessment has been undertaken of the above considerations. In particular, given the proximity to the A22 Diplocks Roundabout and the type of these HGV movements, it is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test).
- 3.84 Furthermore, the visibility splays from these two accesses have not been considered. New bio-security fencing is proposed around the site and it appears from the Sections and External Works Detail drawings that this fencing would be some 1.5m high.
- 3.85 The visibility splays from these two accesses in the context of the new fencing, existing and revised hedgerow, the realigned sections of Knockhatch Lane, the A22 Diplocks Roundabout and observed vehicle speeds to the east and to the west have not been considered. It is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test).
- 3.86 The location of the eastern accesses is congested in terms of there being two opposite access junctions with 40m separation and their bellmouths overlapping with one-another, a pedestrian crossing for a PRoW in between, the A22 Diplocks Roundabout immediately to the east and a mix of varying vehicle types and pedestrians.
- 3.87 Although this would be on private land, there remains a duty of care and associated liabilities connected with the users of the access road. Given these safety considerations and given the potential for such safety considerations to have consequential effects on the A22, a Stage 1 Road Safety Audit should be undertaken to provide some comfort to East Sussex County Council with regards to safety on the public highway.

Western Egress onto Knockhatch Lane

- 3.88 Once vehicles have circulated the southern part of the site they would egress onto Knockhatch Lane via a priority junction. However, these vehicles would approach Knockhatch Lane at an angle of approximately 55 to 60 degrees, as shown on Figure 2.

Figure 2: Angle of Approach at the Western Egress onto Knockhatch Lane



- 3.89 Guidance on approach angles to priority junctions is set out in the Design Manual for Roads and Bridges (DMRB) CD123 'Geometric Design of at-Grade Priority and Signal-Controlled Junctions'. Paragraph 5.4 of CD123 states:

'At new priority junctions, the angle of the minor road approach, measured over 15 metres from the edge of the major road carriageway, shall satisfy one of the following:

- 1) 90 degrees; or,**
- 2) a minimum of 70 degrees.**

The angle of the minor road approach should be in accordance with 1).

Where it is not feasible to provide the angle of the minor road approach fully in accordance with 1), the angle should be as close to 1) as practicable, but no less than 2).

NOTE Angles less than 70 degrees can result in drivers having to look excessively over their shoulders or the major road approach being in a vehicle blind spot'.

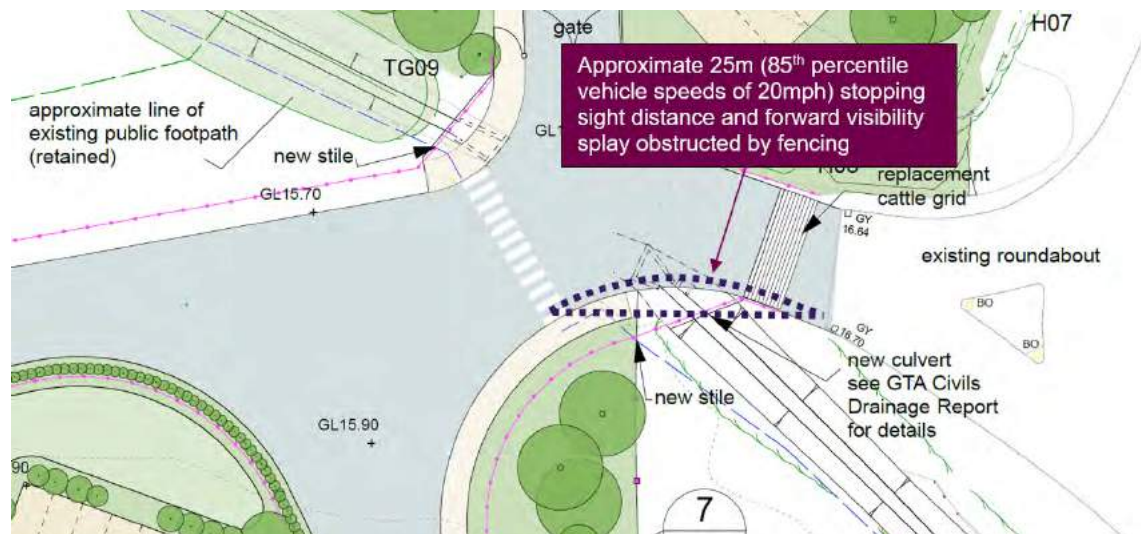
- 3.90 The layout of this western egress is within the approach range whereby the movement of eastbound vehicles along Knockhatch Lane could be in their blind spot.
- 3.91 This is exacerbated by these vehicles being HGVs which typically do not have windows to the rear of the front doors, thereby creating blind spots.

- 3.92 It is also noted that there is a bend in Knockhatch Lane to the west of the egress and approaching eastbound vehicles will be doing so from a point even further behind the driver, thus within a blind spot.
- 3.93 The highway safety considerations of this layout have not been considered within the TA. It is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test) as a result of this egress.

Forward Visibility Along Knockhatch Lane

- 3.94 As set out above, new bio-security fencing is proposed around the site and it appears from the Sections and External Works Detail drawings that this fencing would be some 1.5m high.
- 3.95 It appears that this may restrict forward visibility along Knockhatch Lane with highway safety considerations. In particular the westbound vehicle movement from the A22 Diplocks Roundabout to the pedestrian crossing (and around the bend in the road generally).
- 3.96 If an 85th percentile westbound vehicle speed of 20mph is assumed, the requisite 25m stopping sight distance and forward visibility splay is obstructed by the new bio-security fencing, as shown on Figure 3.

Figure 3: Forward Visibility Splay Obstructed Along Knockhatch Lane



- 3.97 If higher vehicle speeds are observed, then a larger stopping sight distance and forward visibility splay would be required.
- 3.98 These vehicle speeds have not been measured, the requisite stopping sight distance and forward visibility splay have not been determined and the highway safety considerations have not been considered.
- 3.99 It is not therefore possible to conclude that there would not be an unacceptable impact upon highway safety (NPPF test) as a result of this.

Pedestrians and Cyclists Along Knockhatch Lane

3.100 The TA discusses the provision of pedestrian facilities being provided between the parking area to the north of Knockhatch Lane and the main site to the south. The TA also states at its paragraph 6.1:

‘for others, particularly site employees, there are opportunities for accessing the site by walk, cycle or public transport’.

3.101 However, there has been no consideration as part of the proposals or within the TA for the provision of pedestrian facilities along Knockhatch Lane for existing users or their safety.

3.102 Appendix A demonstrates that there are existing pedestrians and cyclists along Knockhatch Lane. The proposals will introduce HGV movements along Knockhatch Lane but there are no facilities for pedestrians or cyclists proposed.

3.103 Pedestrians and cyclists would therefore have to walk or cycle within a 5.5m wide carriageway (the minimum width to enable two oncoming HGVs to pass one-another) sharing that carriageway with the vehicle movements generated by the livestock market between its eastern and western accesses, including its HGV movements.

3.104 Furthermore, the provision of the eastern access junction to the southern part of the site creates a very wide bellmouth, which is necessary to enable large vehicles to turn through it.

3.105 However, in doing so, this creates an approximate 20m long crossing distance for pedestrians across it.

3.106 Crossing distances are typically no more than 10m without a pedestrian refuge island for highway safety reasons.

3.107 Paragraph 2.11 of the TA references Manual for Streets 1 and 2 and their design principles. Both of these documents refer to pedestrian desire lines and providing pedestrian facilities along these. In this instance, Figure 4 shows that the pedestrian desire line is along the give way line of the bellmouth, which, as above, is an approximate 20m long crossing distance.

Figure 4: Pedestrian Desire Line Across the Eastern Access Junction to the Southern Part of the Site



- 3.108 The highway safety considerations of the above have not been considered within the TA. It is not therefore possible to conclude that there would not be an unacceptable impact upon the safety of pedestrians and cyclists along Knockhatch Lane (NPPF test).

Concern: Increased use of Hempstead Lane

- 3.109 Knockhatch Adventure Park has an emergency access onto Hempstead Lane that they are permitted to use in the event of a problem on Knockhatch Lane. Hempstead Lane is a narrow single carriageway road / single track with a number of businesses and properties along it. It is a cul-de-sac with access at its northern end from the A22.
- 3.110 In previous such instances when visitors of Knockhatch Adventure Park have had to use Hempstead Lane, issues have arisen from the business operators and property occupants causing blockages and becoming aggressive to Knockhatch Adventure Park, to such an extent whereby an official complaint had to be made to the police.
- 3.111 The concerns that are set out above would result in more instances of Knockhatch Lane becoming blocked and therefore more instances of needing to open the access onto Hempstead Lane due to visitors of Knockhatch Adventure Park being unable to exit.
- 3.112 Such increased occasions would not be as a result of Knockhatch Adventure Park, but as a result of the livestock market. Such increased occasions would therefore be an indirect impact upon Hempstead Lane resulting from the livestock market.
- 3.113 It is noted that East Sussex County Council will deliver improvements to the A22, subject to funding from the Department for Transport after submission of their Business Case for the works. Part of these works includes an upgrading of the Hempstead Lane / A22 junction to a roundabout.
- 3.114 This would offer benefit to the junction and to the users and occupants of Hempstead Lane. Notwithstanding their above concerns of using Hempstead Lane, Knockhatch Adventure Park

are of the view that if ongoing congestion or difficulties were to occur as a result of the livestock market, they may have no option but to operate a one-way system with all visitors exiting via Hempstead Lane and the new roundabout onto the A22.

3.115 This would not be as a result of Knockhatch Adventure Park, but as a result of the livestock market.

Concern: Continued Unencumbered Access Along Knockhatch Lane

3.116 Knockhatch Adventure Park benefit from a legal right of unencumbered access along Knockhatch Lane. However, this is at risk particularly during the construction of the livestock market.

3.117 There are a number of construction activities that have the potential requirement to close Knockhatch Lane as follows:

- Knockhatch Lane will be realigned;
- The culvert at the eastern end of Knockhatch Lane will be reconstructed;
- Knockhatch Lane will be widened to 5.5m;
- New access junctions will be constructed; and
- Utility works to make service infrastructure connections.

3.118 The DAS sets out that the construction period is likely to last 42 weeks.

3.119 There may be occasions during this construction period when access for Knockhatch Adventure Park along Knockhatch Lane may have to close or may be obstructed such that access would need to be taken via Hempstead Lane.

3.120 As above, this would not be a result of Knockhatch Adventure Park but a result of the livestock market.

3.121 Furthermore, there is a risk that during the construction works, there is an insolvency event which leaves access along Knockhatch Lane blocked or obstructed.

3.122 Protection therefore needs to be given to Knockhatch Adventure Park and the other users of Knockhatch Lane to maintain access along Knockhatch Lane at all times during the construction works.

3.123 In the event of a grant of consent, a planning condition(s) therefore needs to be imposed accordingly. Knockhatch Adventure Park is willing to liaise with Wealden District Council in this regard, and suggested wording is set out as follows:

'No works shall commence until details have been provided to the satisfaction of the Local Planning Authority and key stakeholders (including the existing users of Knockhatch Lane) that demonstrates how unencumbered access will be maintained along Knockhatch Lane for all existing users of Knockhatch Lane at all times during the construction period'.

Concern: Human Health Impact of Shared Access Along Knockhatch Lane

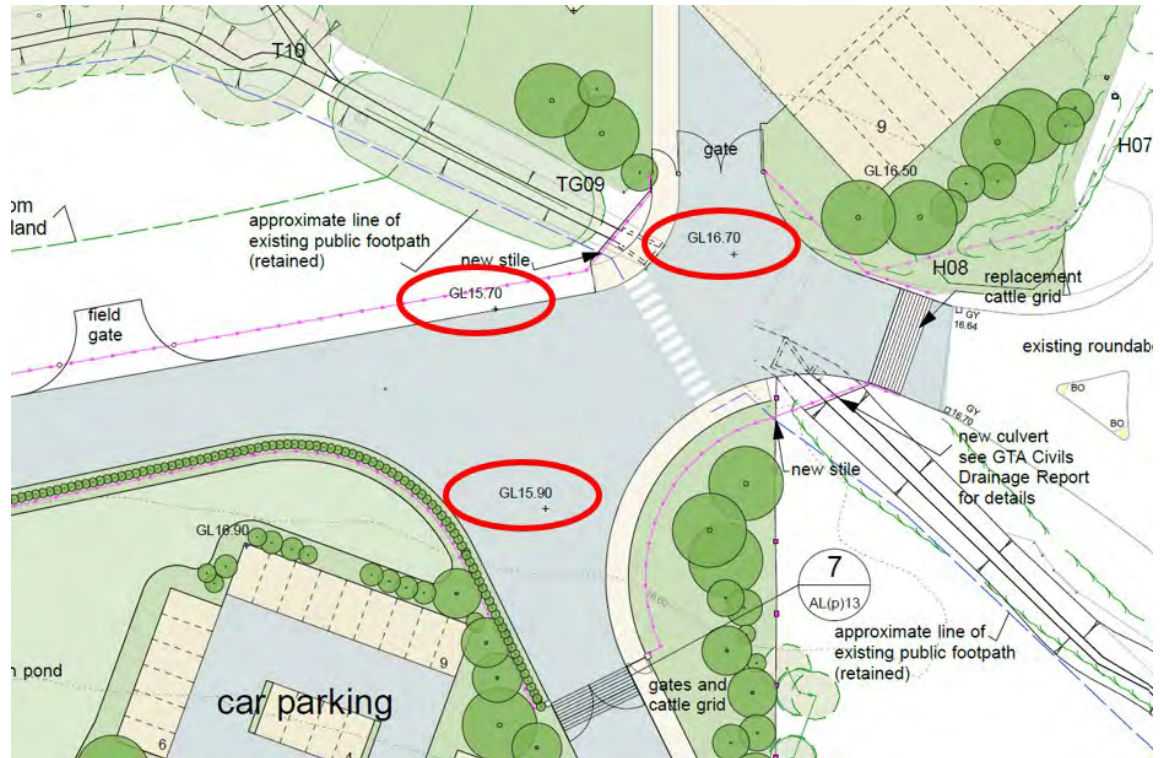
- 3.124 Knockhatch Adventure Park has human health concerns for the livestock market and the very real danger to human beings from the possibility of contracting E coli 0157. As a farm park, Knockhatch Adventure Park has to follow strict precautions and procedures to minimise the chance of their customers contracting this deadly disease, which is mainly spread from cloven hoofed animals, which the livestock market would mainly attract.
- 3.125 There is a risk of contamination caused by movement (vehicles, on foot, cycle etc) along Knockhatch Lane. The proposals would introduce the movement of cloven hoofed animals to and from the livestock market, or the movement of vehicles that have previously transported cloven hoofed animals to and from the livestock market that would travel along Knockhatch Lane.
- 3.126 This introduces the potential for cloven hoofed animal deposits onto Knockhatch Lane which visitors to Knockhatch Adventure Park would travel through before arriving.
- 3.127 This would result in a problem because if a visitor to Knockhatch Adventure Park became infected it would be impossible to source the origin, either Knockhatch Adventure Park or the livestock market.
- 3.128 It appears that those using the parking area to the north of Knockhatch Lane would travel clockwise through the site and thus have the potential to access the vehicle wash and mitten. However, there is no detail provided on, for example:
- How the facility would operate;
 - What length of time is required to fully clean each vehicle such that any deposits are fully removed;
 - What its capacity is and how that relates to the movement and circulation of vehicles through the site;
 - How effective the facility is;
 - What the residual effects of the facility are; or
 - What the risks are of such a shared access along Knockhatch Lane with an animal park that attracts vulnerable visitors (small children).
- 3.129 If those using the parking area to the north of Knockhatch Lane would not travel clockwise through the site and are able to turn right into that parking area, then that would introduce the movement of vehicles that have previously transported cloven hoofed animals along Knockhatch Lane without passing through the vehicle wash and mitten.
- 3.130 Furthermore, the swept path analysis contained within the TA shows that HGVs cross onto the opposite side of the carriageway when turning left into the southern area of the site to the south of Knockhatch Lane. An annotated extract of this is shown on Figure 5.

Figure 5: HGV Crossing onto Opposite Side of Carriage



- 3.131 This introduces the potential for deposits to be transferred onto parts of the carriageway that would be used by cars and who do not travel through the vehicle wash and mitten. This therefore has the potential for deposits to be spread over Knockhatch Lane introducing the above health related issues.
- 3.132 The proposals exacerbate these issues due to the realignment of the access road. These works change the current levels of the access road and create gradients along it. Figure 6 shows that there would level differences of up to 1.0m over short distances.
- 3.133 This will create gradients for the livestock vehicles to negotiate which will increase the potential for waste spillage, particularly liquids, from these vehicles. Furthermore, these gradients are located where vehicles will be turning which further exacerbates this issue.

Figure 6: Level Differences Along Site Access Road



3.134 The application does not consider these effects and there is a very real risk of contamination with associated human health issues as a result of the shared access route along Knockhatch Lane.

4 SUMMARY

4.1 This Note sets out Knockhatch Adventure Park's transport related concerns and objections to a planning application submitted to Wealden District Council (reference: WD/2022/2878/MAO) for the relocation of the Hailsham Livestock Market (the 'livestock market') to land adjacent to the A22 Hailsham Bypass, Hailsham.

4.2 A summary of Knockhatch Adventure Park's transport related concerns and objections are:

- The assessments do not consider the cumulative impact with Knockhatch Adventure Park:
 - Knockhatch Adventure Park and the livestock market both generate their peak movement demand between 10:00 and 11:00 (cumulative total of 578 vehicle movements during this hour), however, the TA does not consider this and only considers the highway network peak hours of 07:30 to 08:30 and 16:30 to 17:30;
 - Queuing occurs along Knockhatch Lane and onto the A22 Diplocks Roundabout, however, the cumulative impact from the livestock market and Knockhatch Adventure Park upon this has not been assessed;
- The assessment does not consider the impact upon Knockhatch Lane:

- There will be ‘internal’ vehicle movements crossing over and travelling along Knockhatch Lane due to the site being located on its northern and southern sides, however, this has not been assessed;
- The extent of queuing within the site has not been quantified nor assessed, therefore the potential for blocking back onto Knockhatch Lane has not been assessed;
- There would be an intensification of use upon the sub-standard entry onto the A22 Diplocks Roundabout, however, the highway safety impacts of this have not been adequately assessed;
- An insufficient number of total vehicle parking spaces is proposed;
- Disaggregated vehicular parking demand is not provided to demonstrate that a suitable number of each type of parking space is provided;
- The site layout creates highway safety issues:
 - There is no highway safety assessment of the eastern accesses onto Knockhatch Lane, which are both in close proximity to one-another as well as to the A22 Diplocks Roundabout with a long pedestrian crossing in between;
 - The western egress onto Knockhatch Lane is angled and creates a visibility issue;
 - There is a stopping sight distance and forward visibility splay concern for westbound vehicles along Knockhatch Lane which extends to the pedestrian crossing;
 - There are highway safety concerns of the additional HGV movements upon existing pedestrians and cyclists along Knockhatch Lane;
 - There are highway safety concerns for existing pedestrians and cyclists along Knockhatch Lane as a result of the new accesses proposed onto Knockhatch Lane;
 - Pedestrian refuges should be provided where crossing distances are greater than 10m (on the PRow crossing and on the eastern access on the south side of Knockhatch Lane) so as to provide safety for pedestrians in these locations;
- The proposals will increase the number of occasions Hempstead Lane needs to be used;
- There is no demonstration that Knockhatch Adventure Parks legal right of unencumbered access along Knockhatch Lane will be protected; and
- There is a human health concern resulting from shared access along Knockhatch Lane due to contamination resulting from the introduction of the movement of cloven hoofed animals.

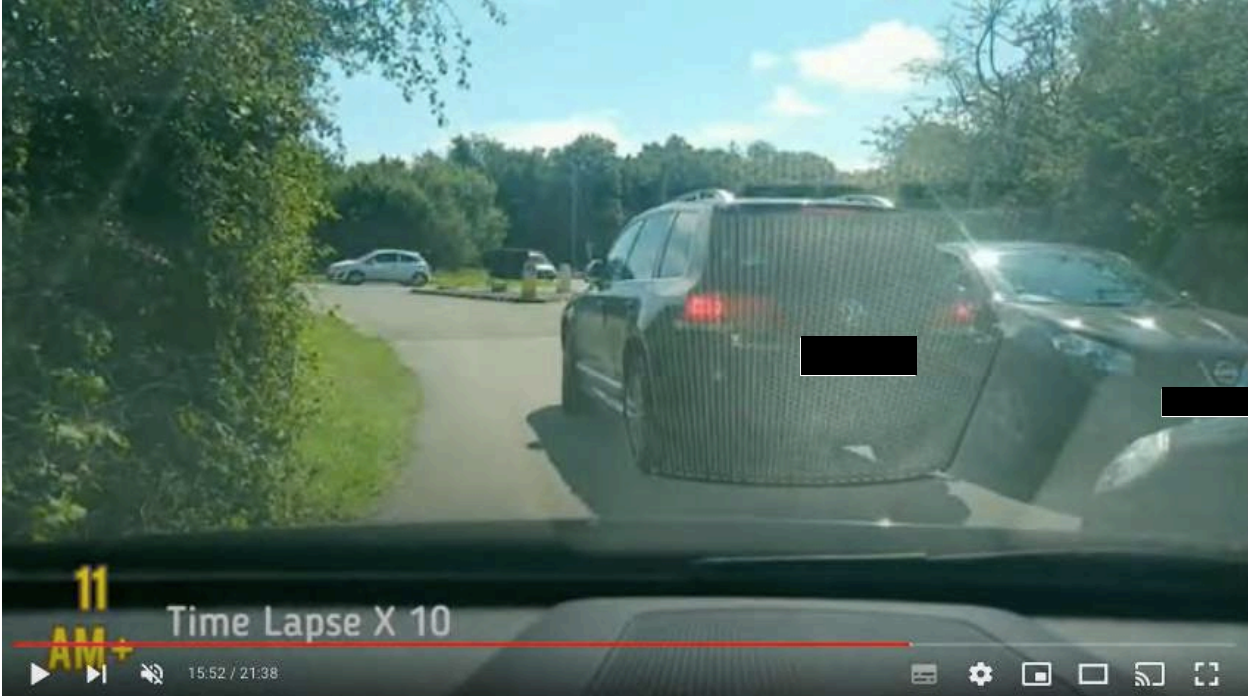
4.3 Following a review of the planning application and the identification of the above concerns, the application has:

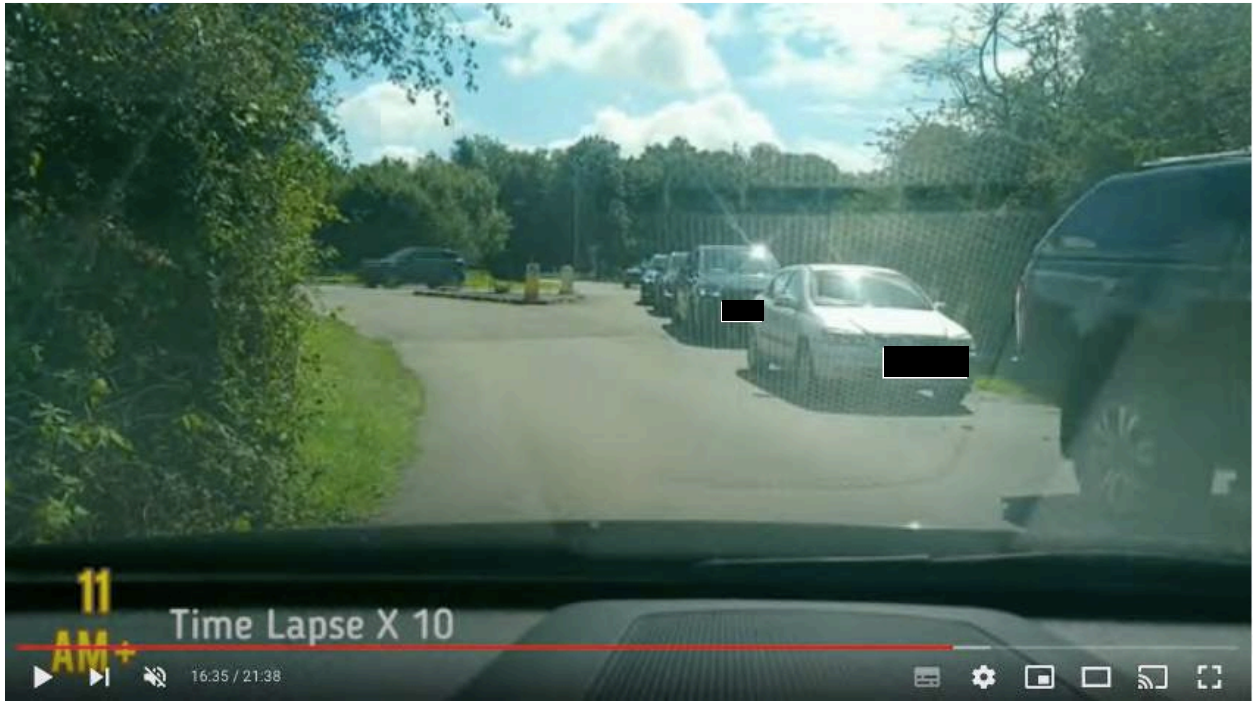
- Not demonstrated that the livestock market would not create a residual cumulative impact on the road network that is severe; and
- Not demonstrated that the livestock market would not result in an unacceptable impact upon highway safety.

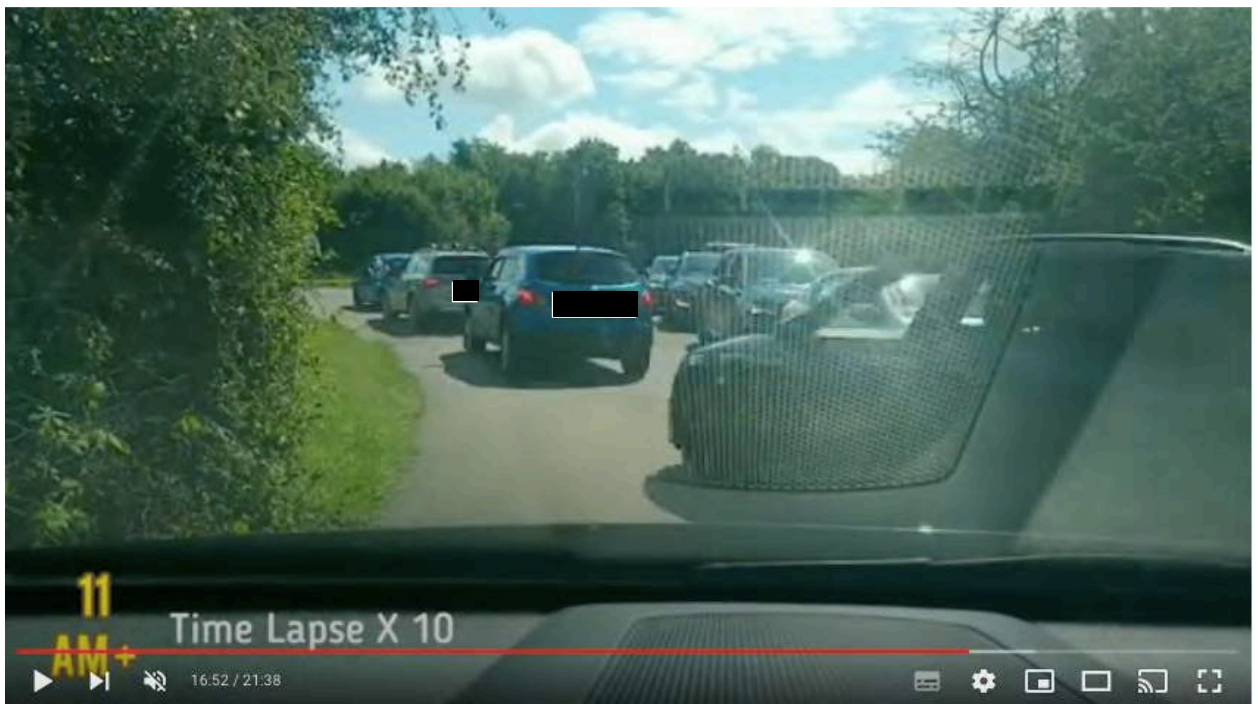
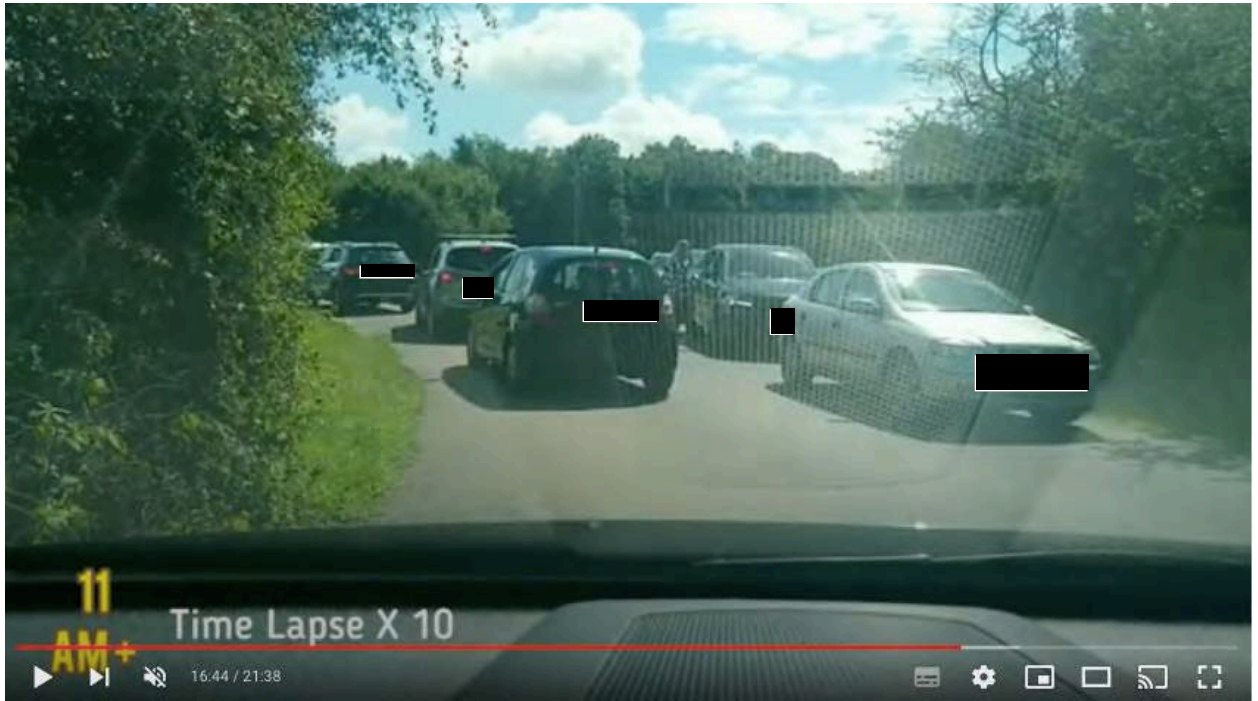
- 4.4 These are two key NPPF tests for planning applications and on this basis, the planning application should be refused.

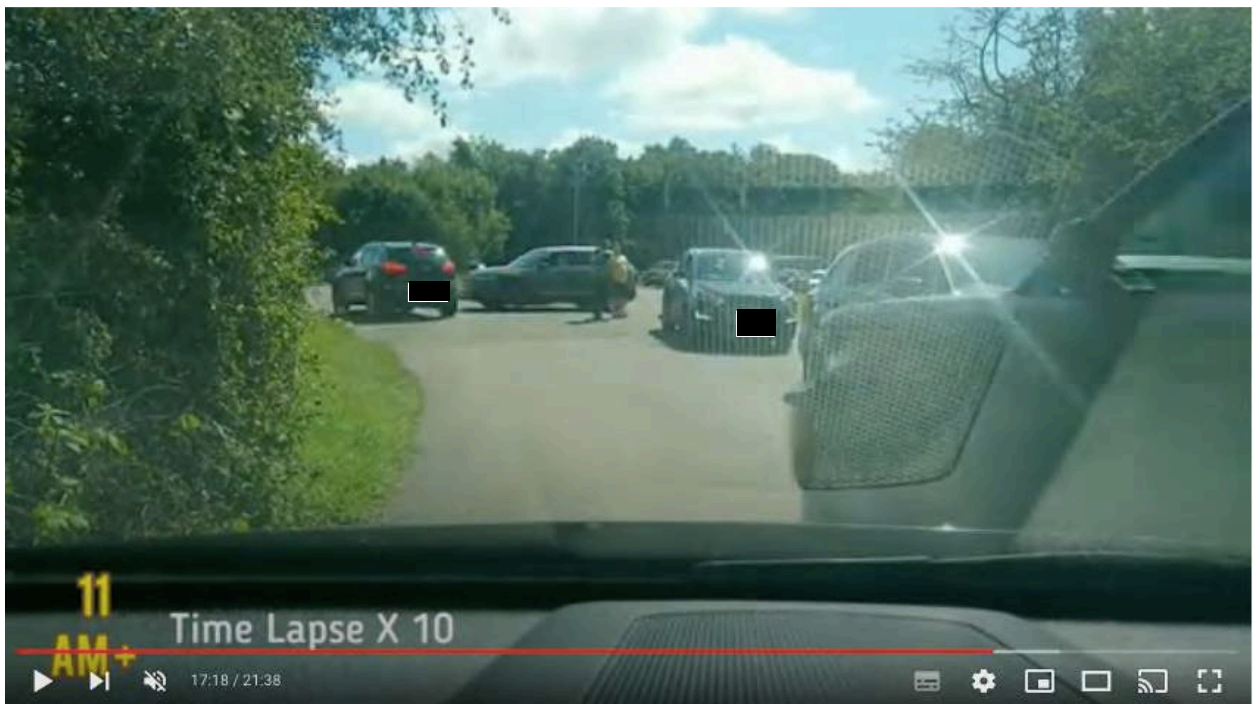
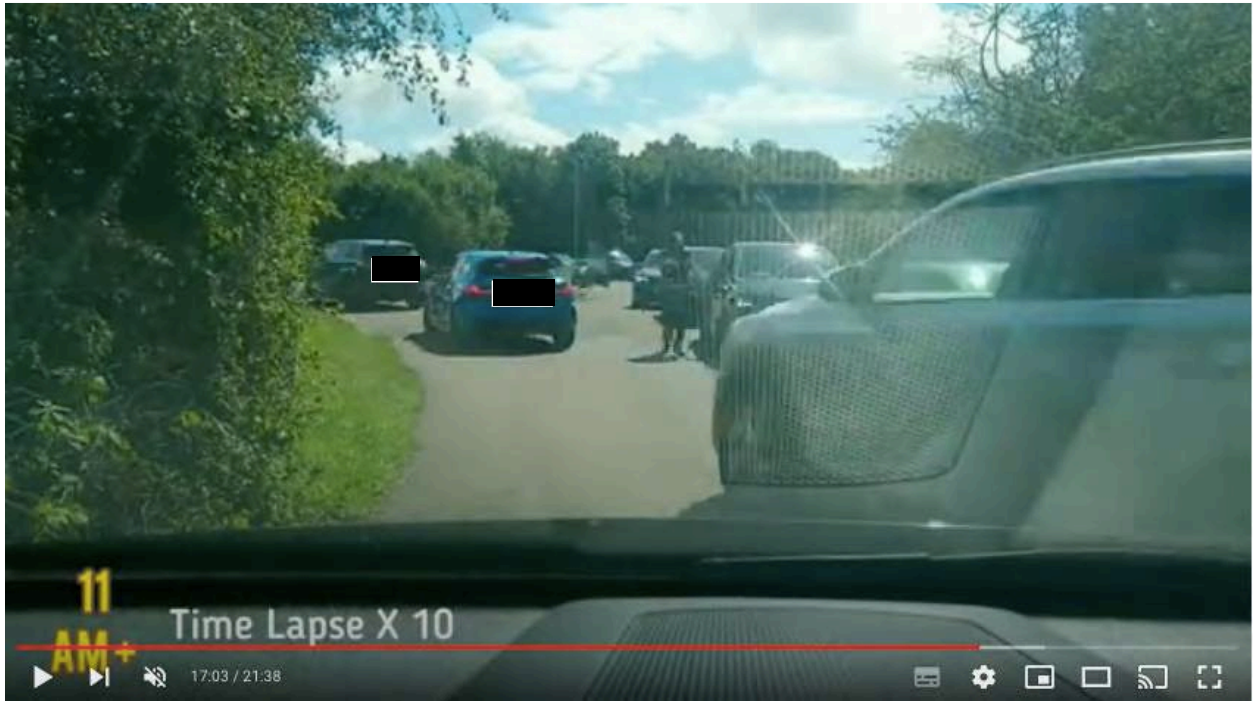
Appendix A: Congestion on Knockhatch Lane and Visitor Comments

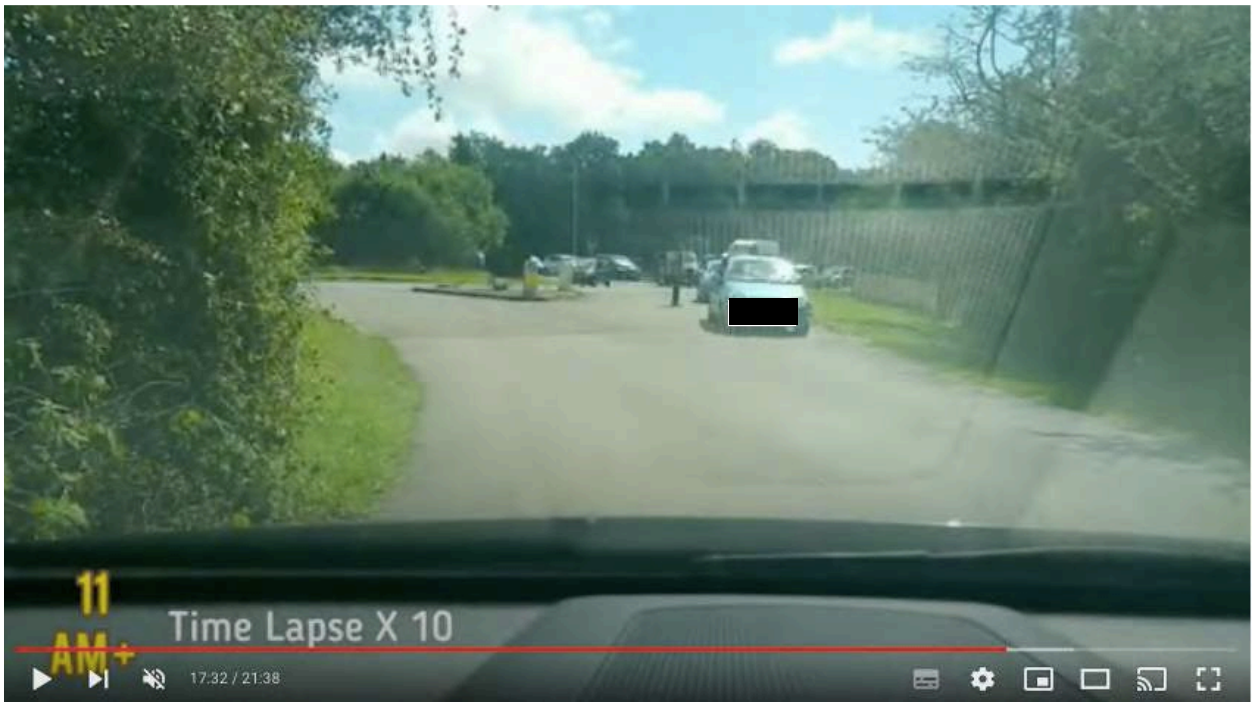
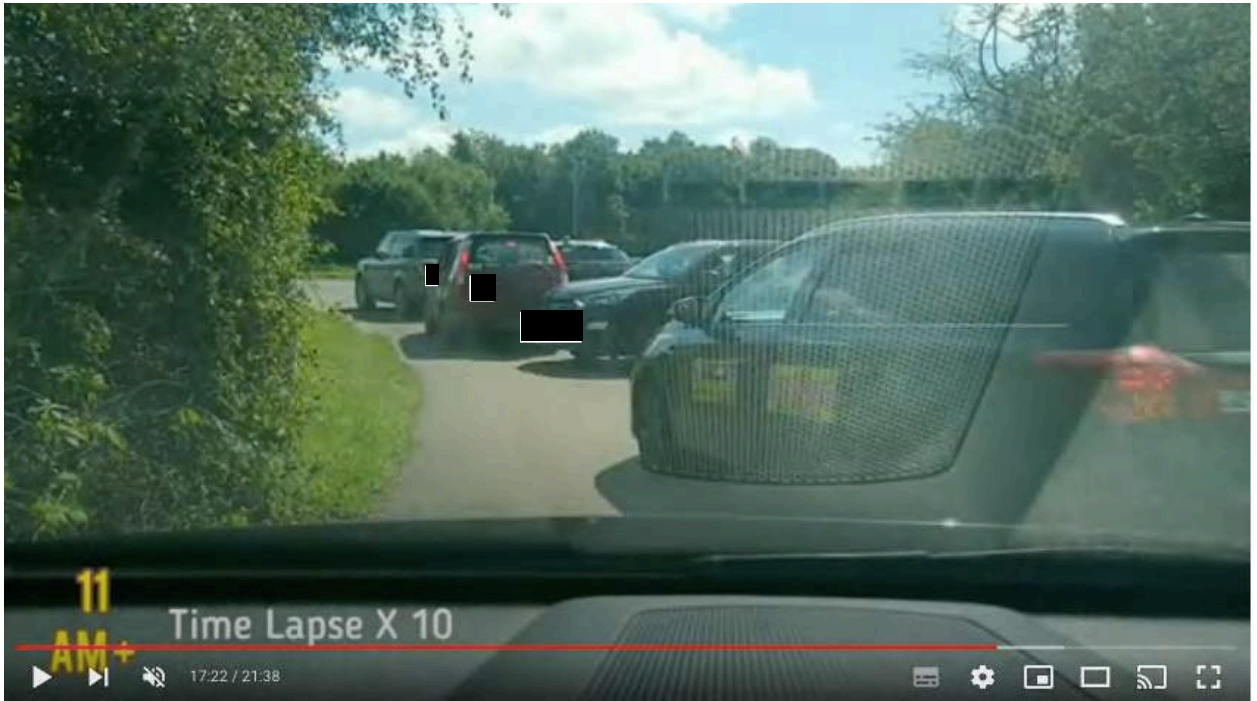
Video Stills of Congestion, Traffic Marshalling and Pedestrian Movement along Knockhatch Lane on a Peak Seasonal Day

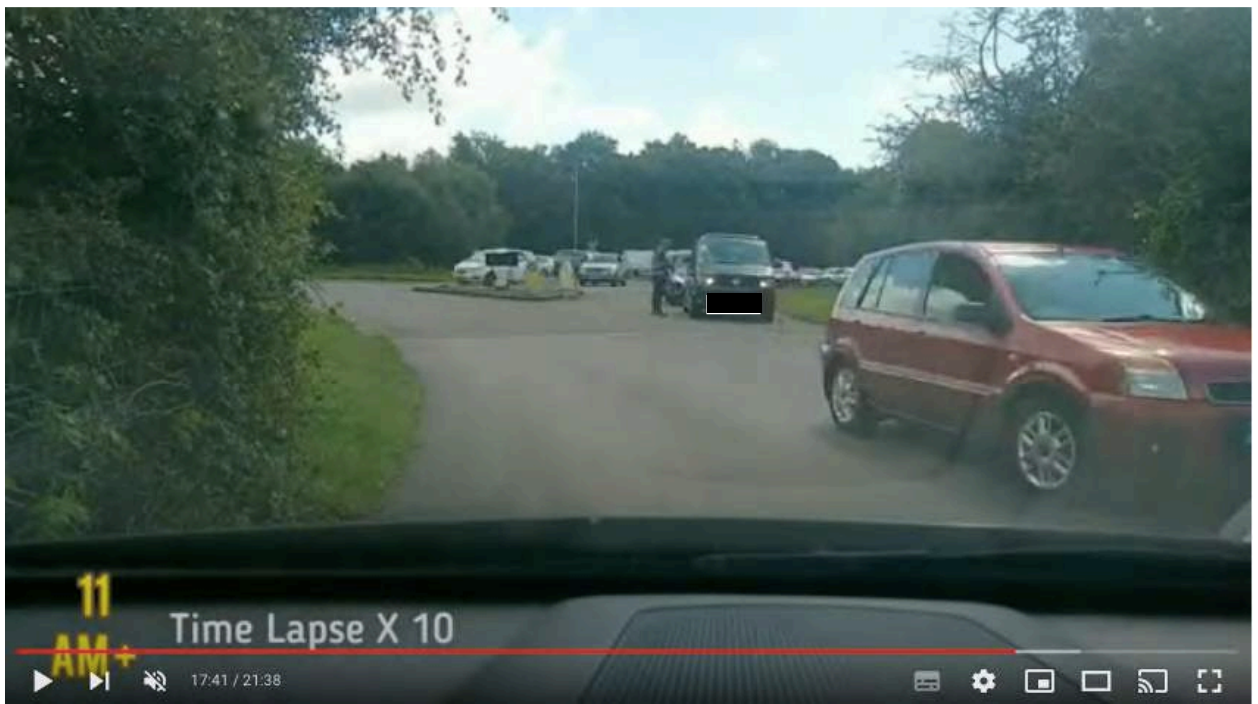
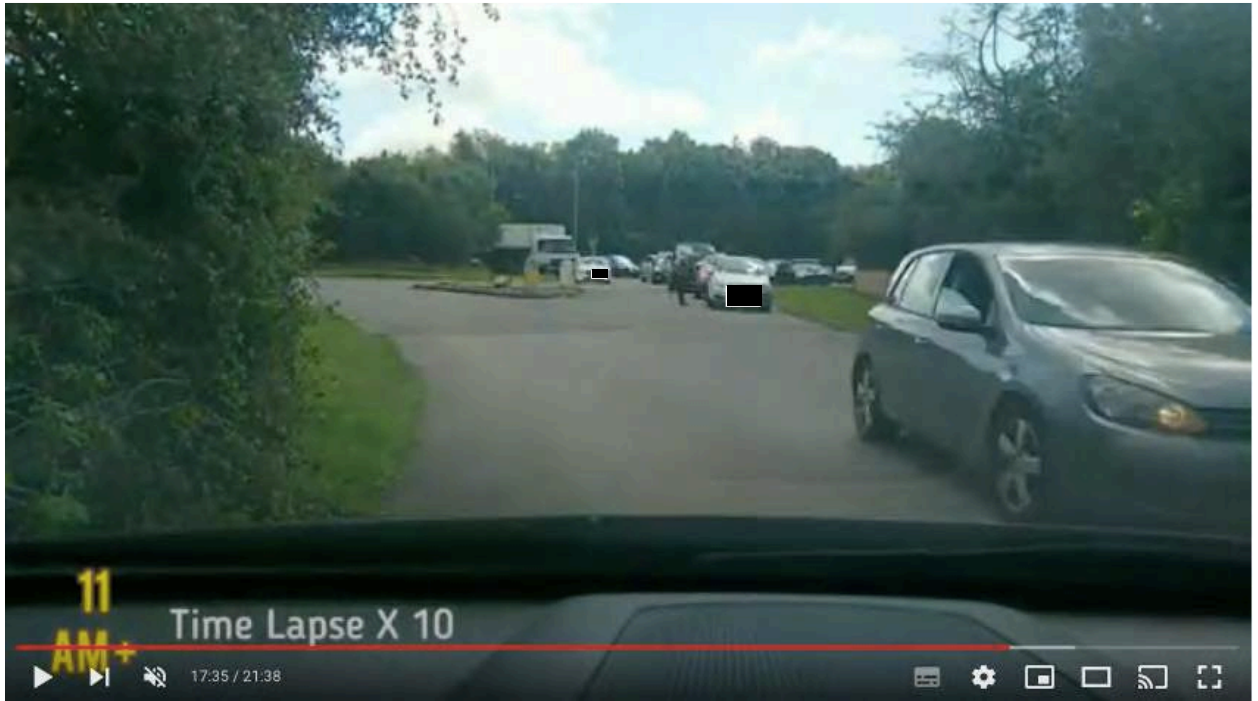


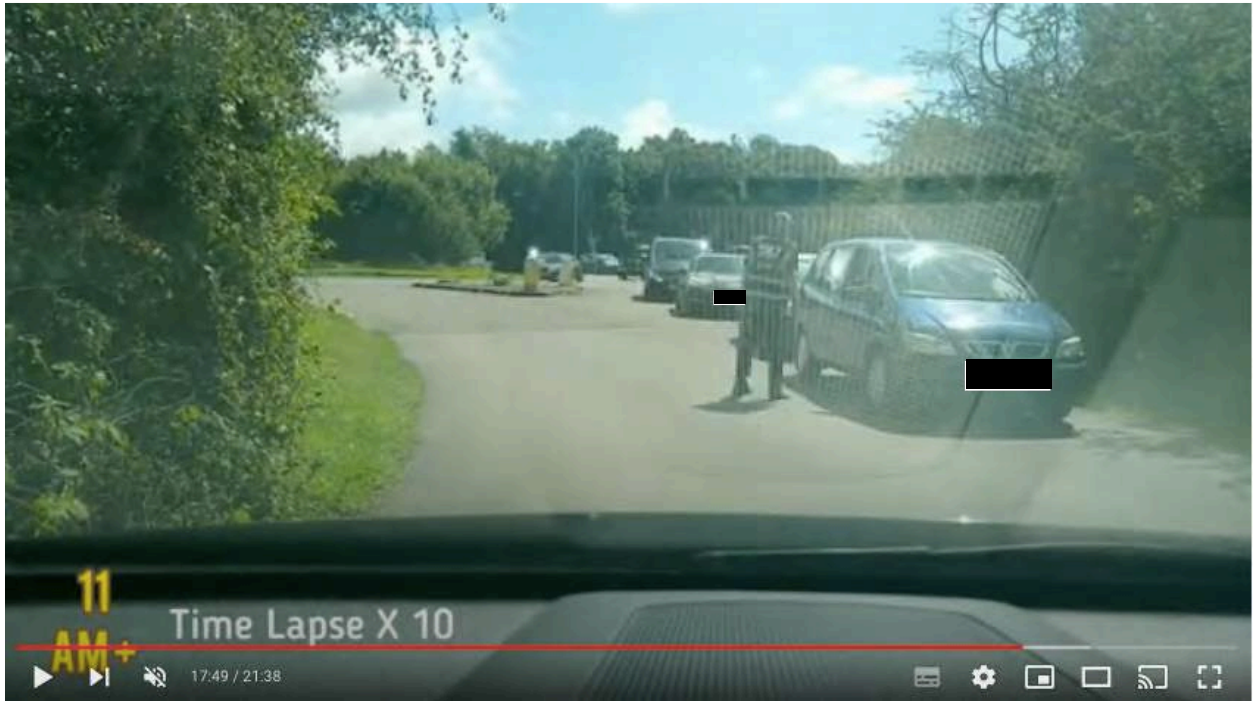




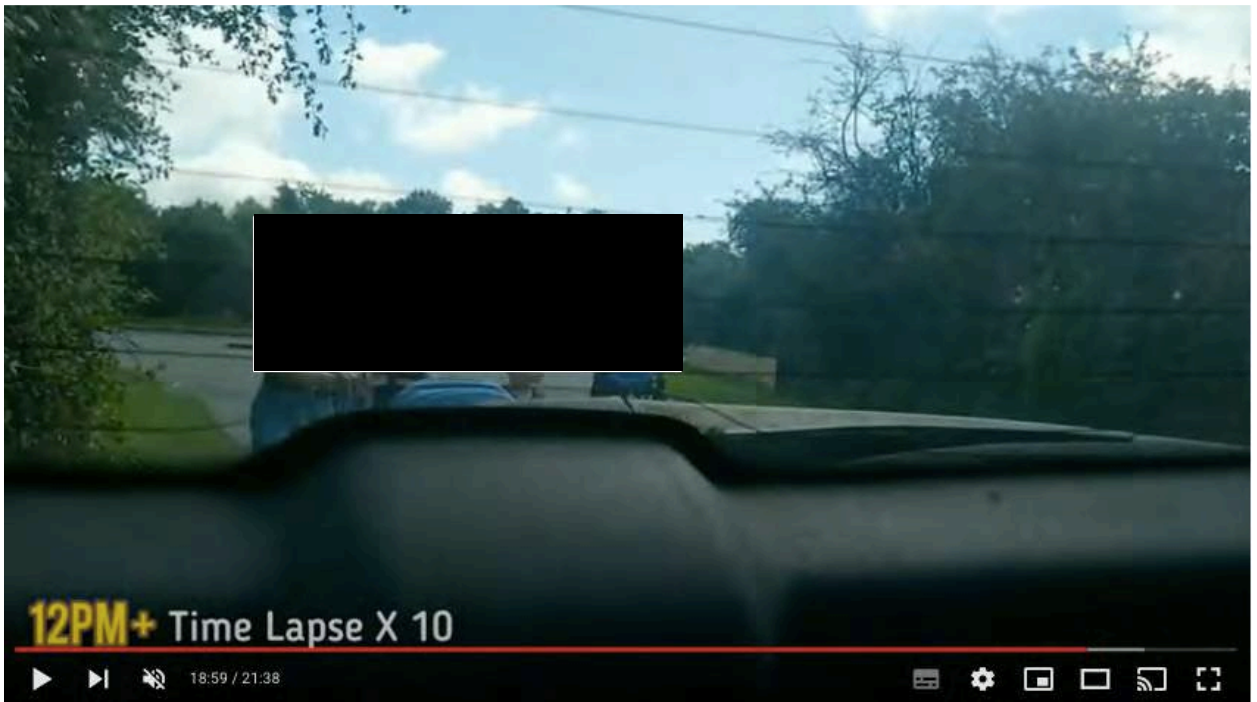




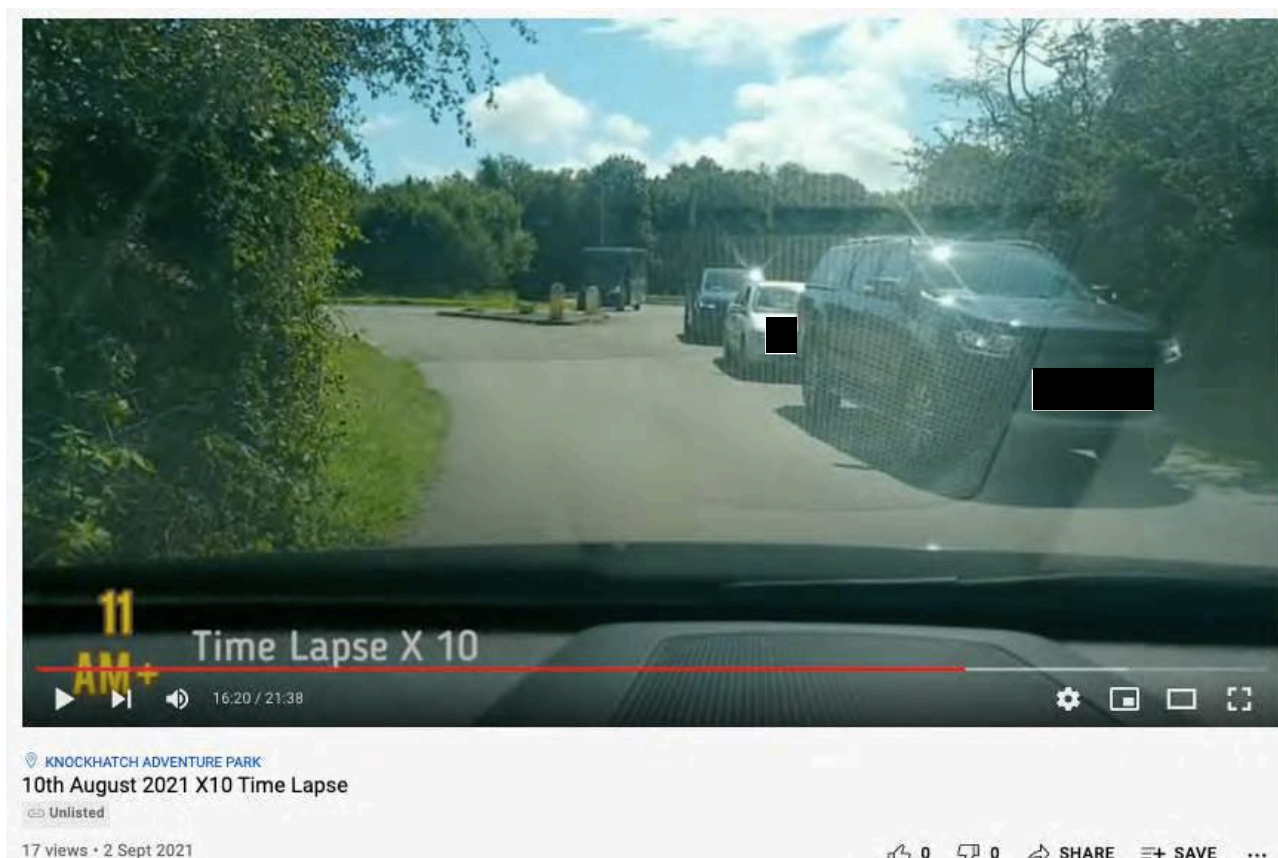








Screenshots of 10th August 2021





KNOCKHATCH ADVENTURE PARK
10th August 2021 X10 Time Lapse

Unlisted

17 views • 2 Sept 2021

0 0 SHARE SAVE ...



KNOCKHATCH ADVENTURE PARK
10th August 2021 X10 Time Lapse

Unlisted

17 views • 2 Sept 2021

0 0 SHARE SAVE ...



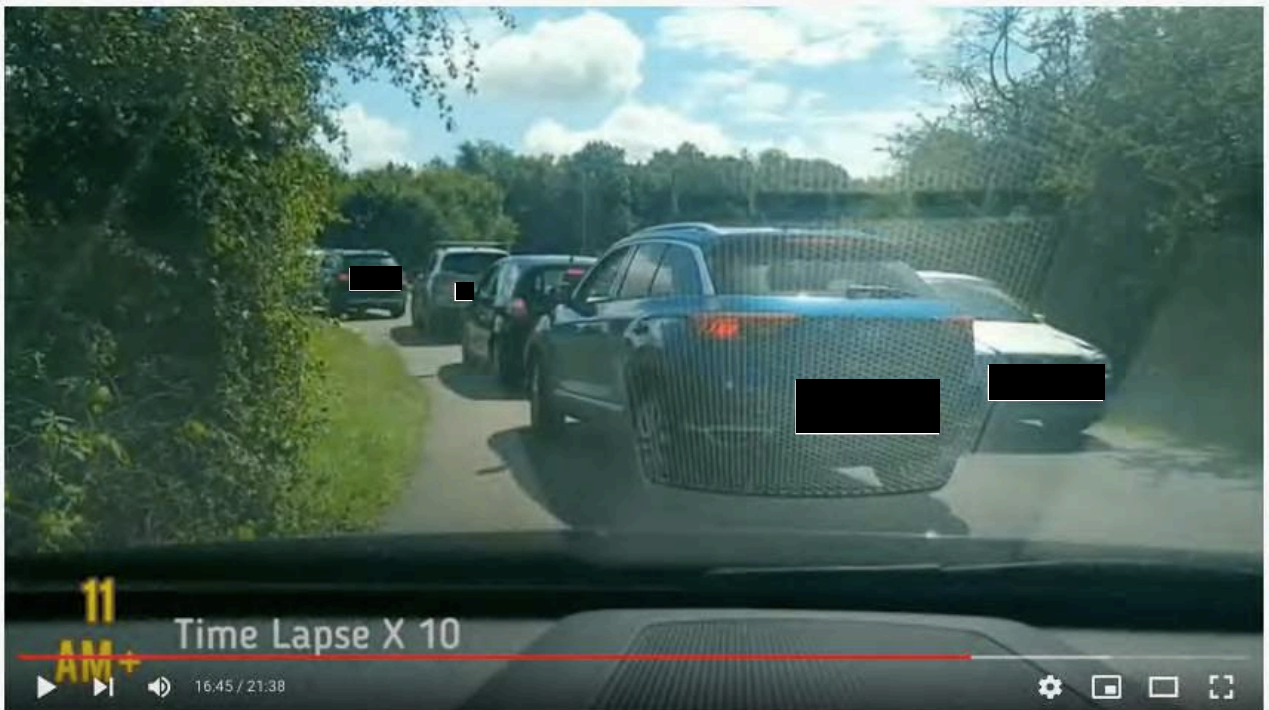
KNOCKHATCH ADVENTURE PARK

10th August 2021 X10 Time Lapse

Unlisted

17 views • 2 Sept 2021

0 0 SHARE SAVE ...



KNOCKHATCH ADVENTURE PARK

10th August 2021 X10 Time Lapse

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17 views • 2 Sept 2021

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Knockhatch Adventure Park

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Knockhatch Adventure Park

Published by Chris Beveridge · August 10

Due to our grass parking being water logged due to heavy rain, we are no longer accepting online bookings for Wednesday 11th August 2021.

You are welcome to turn up and pay on the gate, but once the car park is full, then customers will be asked to park responsibly off site.

To make sure there is ample parking please:

- 1) Follow the Marshalls instructions
- 2) Park responsibly
- 3) Car pool as much as possible

While there is always room for people in Knockhatch Adventure Park, parking is not unlimited and cannot be guaranteed on site.

PS. Taxis will not be turned away for drop offs/collections.

Thank you in advance for your patience. Enjoy your next visit!



21,446

People Reached

3,554

Engagements

Boost Post

46

105 Comments 17 Shares

Like

Comment

Share

Most Relevant

Comment as Knockhatch Adventure Park

Zoe Bark

Christopher Hustwayte Lynnette Hustwayte might be worth getting there early Friday just in case xx

Like Reply Sw

1 Reply

Julia Kent

I arrived at 9.45 today and parking was a doddle. Best thing to do is get there as early as u can. Just remember it's not the staffs fault we've had bad weather x

Like Reply Sw

1 Reply

Emma Burnett

We had a lovely time today as always - we were parked up just before opening and there was plenty of parking at the front unfortunately you can't predict the weather so they wouldn't have known when taking online bookings there would be less parking. O... See More

Like Reply Sw

1 Reply

Becky Wallis

Why have you deleted the other posts!?! It clearly showed how many customer you turned away even though they have prebooked tickets. It also demonstrated the awful mismanagement of the day, with you closing the phone lines so we couldn't speak to staff to find out what was going on, and relying on other cars to be told they were turning people away. I feel really disappointed that my children missed out on something we had been looking forward to and taking time off work to do.

FORWARD AND LABEL WITH OUR WORK TO DO...

Like Reply Sw

Corrine Hayler

Becky Wallis they would normally have plenty of parking but with the amount of rain there's been lately after such a dry spell the ground just can't take it. The staff didn't forecast the weather!

Like Reply Sw

6 Replies

Sonia Anderson

Becky Wallis I can't believe they deleted the previous post with "there" customers comments absolutely outrageous!!!!

Like Reply Sw

4

Sonia Anderson

Becky Wallis I know we got turned away today at 11.01am when they had only been open for an hour we sat 30 mins in the traffic down the narrow road with no one coming down to talk to anyone it was only because I walked up leaving my family in the car a... See More

Like Reply Sw

2

View 1 more reply

Most Relevant is selected, so some replies may have been filtered out.

Reply to Becky Wallis...

Robert Fitch

Knockhatch Adventure Park have you looked at maybe a temporary park and ride with a minibus operator, until your fields are usable. Im sure the people of sussex would understand.

Like Reply Sw

2

Stacie Kilroy

Might get there a little earlier to park to get a space and then queue to sort passes out Mandy

Like Reply Sw

4

Claire Sales

People need to drive slower in and out also

Like Reply Sw

1 Reply

Carl Smiff

There was ample of parking today as not only the overflow car park opened (filled to capacity) that the car park for the ski place was used (filled to capacity too) to help families to go to Knockhatch ...and sides of the road making it still safe for ... See More

Like Reply Sw

4

Jessica Tyler

I understand the issues, but to tell customers to go and "park responsibly off site" where exactly? I actually witnessed a lady with a very young family have to make a dash for it across the A22 at the knockhatch roundabout about 11am today. I thought ... See More

Like Reply Sw

7 Replies

Eddie Howland

Get all the 4x4s to park in the muddy field... But then I guess you don't want it churned up.

Like Reply Sw

1

Jane Clare

The traffic queuing round Diplocks roundabout trying to get in to Knockhatch today was ridiculous!

Like Reply Sw Edited

1

Clare Hicks

Knockhatch Adventure Park what happens if you have paid online and then get turned away?!? Do you get a refund??

Like Reply Sw

1

Casey Whicker

We have already booked online for Wednesday, are we still ok to come along?

Like Reply Sw

1

Knockhatch Adventure Park

Casey Whicker Yes!

Like Reply - Commented on by Chris Beveridge Sw

Casey Whicker

Becky Wallis oh no hun, so sorry to hear that

Like Reply Sw

4 Replies

View 4 more replies

Most Relevant is selected, so some replies may have been filtered out.

Anna Hallett

We got there at 10 today, and even then it was busy- after travelling from Essex for the day. I would not have been happy if we've been turned away so I'm pleased they've made the decision to avoid selling more tickets for tomorrow.

Like Reply Sw

1

Mandy Riches

I'm due to come on Thursday with a wheelchair disabled person and grandchildren and two adults booked end of July traveling from Godstone and actually don't want to attend now as I'm extremely worried about getting parked and the disabled passenger on... See More

Like Reply Sw

2 Replies

Lynsey Jayne

Hi, we are travelling from Bedfordshire and have pre booked our tickets for next Monday, quite worried we will be turned away after seeing this post. Should we still come?

Like Reply Sw Edited

2 Replies

Kayleigh Tasha

Car pool as much as possible with high cases of covid..good job

Like Reply Sw

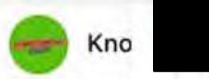
2 Replies

Peter Anderson

Absolutely ridiculous today.

Like Reply Sw

1



Jessica Tyler
I understand the issues, but to tell customers to go and "park responsibly off site" where exactly? I actually witnessed a lady with a very young family have to make a dash for it across the A22 at the knockhatch roundabout about 11am today. I thought she was crazy. Now I understand why she was doing it. It's so dangerous. It's an accident waiting to happen. What if one of her children had slipped? There were cars zooming past seconds after they got to the kerb. It's not somewhere you can park and walk to safely with little ones, and it's irresponsible of Knockhatch to encourage customers to do so.

Like Reply 8w

Carl Smiff
Jessica Tyler I cant understand why she was doing it though..why was she doing it ? Obviously if somewhere is full we go to another destination ?! Not play chicken with our children against very fast cars ? Yes I have seen how half of the motorists use that road (I would have put drive but they think the speed is unlimited and indicators are just for show not to be used)

Like Reply 8w

Jessica Tyler
Carl Smiff agree! It's not something I would attempt with mine. It makes me shudder just thinking about it.

Like Reply 8w

Rhian Trevethick
Jessica Tyler this morning a couple abs a baby in a pushchair walking around the roundabout as cant get a pushchair over the grass verges - so dangerous. Surely a trip to knockhatch isnt worth that. The road isnt safe to cross let alone with children. ... [See More](#)

Like Reply 8w

Carl Smiff
Rhian Trevethick I agree with you there ! But many seem to be lacking common sense because if a place is full to capacity..go somewhere else for the day or try going back later ✓ I went to Knockhatch one time and saw cars awaiting on the main road..common sense kicked in and went elsewhere !

Like Reply 8w

ENCLOSURE 2 – RPS Flood Risk Note



Our ref: HLEF03459

20 Farringdon Street
London, EC4A 4AB
T +44 20 3691 0500

Date: 15th February 2023

Knockhatch Adventure Park
Hailsham Bypass
Hailsham
BN27 3GD

Re: New Livestock Market, Hailsham – Technical Note

We are writing in response to your recent request for a review of the existing Flood Risk Assessment relating to the above site. RPS Consulting Services Ltd (RPS) cannot vouch for the accuracy or validity of the data supplied within the report sent for review and the following opinion is based solely upon the report. This letter should be read in conjunction with the report itself. The report has been reviewed in relation to assessing its appropriateness for identifying any potential flood risk associated with the site and does not comprise a full review of compliance with planning requirements or any assessment of off-site impacts.

1.1 Introduction

The following documents were provided for review:

- *Flood Risk Assessment – New Livestock Market, Hailsham; Report by GTA Civils Ltd, reference 7473, July 2021.*
- *WD-2022-2878-MAO_Representations_WD_2022_2878_MAO Hailsham Livestock Market: Position of the Pevensey and Cuckmere Water Level Management Board and Lead Local Flood Authority dated 19th January 2023.*

1.2 Summary of the FRA report

- GTA Civils Ltd has been appointed by South East Marts Ltd to produce a Flood Risk Assessment in relation to the proposed relocation of Hailsham Livestock Market on land west of the A22 Hailsham Bypass, Hailsham, East Sussex.
- The site comprises an irregularly shaped parcel of land that is occupied by a retail park with extensive car parking and a rear service yard. The buildings are of steel portal framed construction.
- A topographic survey has been carried out and it indicates that the site levels range from 18.5m AOD in the south-east corner and 17.5m AOD in the north east falling gently down to 15m AOD midway along the western boundary.
- The report identifies that the closest surface watercourse is the Knockhatch Stream (Main River – which means that it is controlled by the Environment Agency) which flows through the site from east to west before discharging into the Cuckmere River at approximately 1km. The Stream is culverted beneath the Bypass and beneath the access road to the site.
- The site is partially located within Environment Agency (EA) Flood Zone 3 (land assessed as having a 1 in 100-year or greater annual probability of river flooding in any year). However, all buildings will be located within Flood Zone 1.

- The existing and realigned access road crosses the floodplain area. Existing levels will be maintained when within the floodplain and appropriate mitigation measures will be provided to protect the visitors. The existing culvert will also be upgraded to facilitate the proposed road widening.
- SuDS features include permeable surfacing, rainwater harvesting and open ponds for storm attenuation. Attenuated discharges will flow into the Knockhatch Stream at greenfield rates.
- Treatment of surface water runoff is proposed however selection and design of the treatment measures are in development with details to be confirmed.
- The report conclusion proposes that the development will not increase the flood risk, either on this site or neighbouring properties, and is thus fully compliant with the 2021 NPPF/2021 NPPG.

1.3 RPS FRA Review and Recommendations

- Examination of the EA hydraulic modelled outlines provided as part of the assessment suggests that the presence of the existing culvert is not suitably captured within the EA flood risk data. As such the existing capacity of this structure and its influence on flood risk at the site is not understood and this is likely to change the mapped flood extents when looked at in detail. GTA Civils Ltd should have identified this within their FRA and by not identifying this they haven't adequately demonstrated that replacement of this culvert will not exacerbate flood risk at the site and in the surroundings. This could easily change the amount of developable area which would necessitate changes to the layout.
- Whilst GTA Civils Ltd has undertaken some analysis of the EA model data to estimate flood risk to the site and inform the design of the proposed culvert extension, the approach adopted is not best-practice and neither does it follow the standard methodology typically required by the EA / LLFA. The assessment should comprise refinement of the EA hydraulic model to make it appropriate for this site-specific project and to produce the flood risk data required (flows, levels, depths, extents) to inform the Flood Risk Assessment and scheme design. The modelling exercise should include: accurate representation of the existing culvert and existing watercourse/floodplain through the site; consideration of latest Climate Change Allowances; a 'proposed scheme' version of the model to allow assessment of the impact of the proposed scheme on flood risk to the site and elsewhere. Once that the above is complete then approval of the modelling approach should be sought from the EA which is in no way guaranteed
- GTA Civils Ltd has not adequately considered the impact of climate change on the proposed development. It uses the in-channel 1 in 1000-year flood levels as a proxy for the 1 in 100-year flood event plus climate change which is not considered to be acceptable and shows a lack of understanding of the requirements. The 1 in 1000-year flood event is not necessarily an appropriate proxy for the 1 in 100-year flood event plus climate change event as the introduction of Climate Change to the 1 in 100-year event can produce flows which are greater than the 1 in 1000-year event. If the 1 in 1000-year event is to be used as a proxy, further evidence (e.g. an assessment of model inflows) should be provided to demonstrate the appropriateness of this approach – none of this evidence has been provided.
- Following the latest EA Guidance on climate change, at the location of the proposed development, a minimum of 19% should be considered (2050s central allowance) as the site lies within the Cuckmere and Pevensey Levels Management Catchment. Depending on the lifetime of the development, the assessment may need to include the 2080s central allowance as well which accounts for 32%. The refined EA model would need to be re-run to account for climate change and new updated flood outlines would need to be produced to determine the extent of the flooding encroaching the site area. These new flood outlines would also need to take into account the culvert which hasn't been modelled sufficiently so are liable to increase in area and thus reduce the area to develop.
- Detailed drawings showing proposed levels at the site should be submitted as part of the planning application to demonstrate that the proposal will not incur in any loss in floodplain storage capacity, up and including the 1 in 100-year plus climate change event. These drawings have not been provided and without them GTA have not demonstrated that there will be no impact.
- No fluvial flood mapping is available for the unnamed drainage ditch running along the western boundary of the site. This poses a risk of flooding to the site. As this is classified as an ordinary watercourse, it is recommended that a modelling exercise is undertaken for this watercourse to determine flood extents during the 1 in 100-year plus an appropriate allowance for climate change. This again is likely to increase the area at risk of flooding and reduce the area for development.

- GTA Civils Ltd have not assessed site access and egress in relation to the flood risk at the site. The access road through the development site could become flooded and restrict access to and from the southern part of the site. Standard practice would dictate that a modelling exercise would demonstrate that safe access and egress is achievable and this should be done in consultation with the EA. Without this the development cannot be deemed to be safe.
- The site is partially located within Flood Zone 2 and 3. Although a sequential approach has been undertaken within the site boundary by placing the buildings outside of the modelled flood extent, the applicant must carry out a Sequential Test as part of the application by considering potential alternative sites within the LPA administrative area. Only by carrying an assessment of sites potentially suitable for the proposed development and demonstrating the lack of any sequentially preferable site within the search area (to be agreed with the LPA), a Sequential Test can be classified as passed. In this case it is abundantly clear that the Sequential Test is required, has not been followed correctly and has not been suitable tested.
- As part of the proposed surface water drainage strategy, GTA Civils Ltd proposes two attenuation (SuDS) ponds. The first one is proposed adjacent to the north bank of the Knockhatch Stream and lies entirely within Flood Zone 3, the second one, south of the watercourse, is partially located within the floodplain. Attenuation ponds need to remain operational in the event of fluvial flooding. SuDS measures which include these ponds are simply not permitted within the floodplain. Additionally, given that the FRA has not considered the impact of climate change on the fluvial extents and levels, storage for surface water attenuation purposes would be further reduced in the event of an extreme event. The location of the attenuation ponds would need to be informed by the results of a hydraulic modelling exercise for the Knockhatch Stream and the unnamed ditch, including an appropriate allowance for climate change. This has not been undertaken. There should be no siting of above ground sustainable drainage systems in fluvial Flood Zones 2 or 3 as this would result with the displacement of fluvial flood water and alter/block conveyance routes and flow paths. A situation whereby the surface water attenuation ponds could be full of fluvial flood water prior to the surface water runoff entering the ponds or vice versa (thereby rendering them ineffective) must be avoided.
- The proposed surface water attenuation ponds are also used as treatment for surface water runoff. Given the proposed use of the site, treatment of runoff is of significant importance and should be designed appropriately. Runoff from livestock markets is very difficult to control with different activities being undertaken around the sites. This includes washing out livestock pens, cleaning vehicles and much of this being contaminated with straw and other materials. Having worked on previous livestock markets we have seen that this runoff is highly contaminated and difficult to control with significant amounts of water used to clean yards etc. We recommend that details of treatment stages are submitted together with an updated surface water drainage strategy which takes into account the principles highlighted in this section.
- Furthermore, the site is located within the Pevensey and Cuckmere Water Level Management Board internal drainage district. The surface water drainage strategy for the proposed development would direct additional runoff into the Knockhatch Stream resulting in a likely increase in surface water volumes in the board's district. Discharges will need to be agreed in consultation with the Water Level Board and the necessary consents obtained.

1.4 Summary and Conclusions

RPS has reviewed and commented on the evidence submitted with the planning application.

RPS considers that the FRA report does not contain sufficient evidence to support the report's conclusion that the development is fully compliant with the 2021 NPPF/2021 NPPG and will not increase the flood risk, either on this site or neighbouring properties.

RPS supports Knockhatch Adventure Park's objection on flood risk and drainage related issues. The FRA submitted to support the New Livestock Market at the site does not provide sufficient evidence to demonstrate that the development will not increase the flood risk, either on this site or neighbouring properties.

RPS agrees with the position of the Pevensey and Cuckmere Water Level Management Board and Lead Local flood authority. The applicant has simply failed to meet the requirements to assess its acceptability in flood risk terms.

In addition to the objections highlighted in Pevensey and Cuckmere Water Level Management Board and LLFA's letter dated 19th of January, the proposed development site has not been supported by a Sequential Test. RPS has identified the proposed site as being located within a wider site deemed to be unsuitable for

Our ref: HLEF81739

development within Wealden's SHELAA (Strategic Housing and Economic Land Availability Assessment, Wealden District Council 2019).

The SHELAA assessment goes on to say that the proposed site is located within site reference no. 692/1310. The wider site comprises several fields adjacent to the A22 which runs along the eastern boundary of the site. A proportion of the site is subject to flood risk which runs through the middle of the site. The site is severed from Hailsham by the A22. Despite the site's proximity to the A22, the site is particularly rural in nature and is isolated and remote from local services and facilities and public transport. Owing to its isolation and the severance caused by flood risk **the site is unsuitable and development would be out of keeping with the surrounding land uses**. This confirms that Wealden District Council has assessed the wider site which comprises the proposed development site as being unsuitable for development both in terms of housing and employment.

The proposed site therefore has not passed the sequential test. The Applicant must identify an alternative site within the district administrative boundary to locate the proposed development.

From a brief high level review of the SHELAA 2019 document, it appears very likely that alternative sites are available for the proposed development within the LPA administrative area which would be considered sequentially preferable from a flood risk prospective.

If any of the issues raised in this letter require clarification, please do not hesitate to contact me at the above address.

Yours sincerely,
for RPS Consulting Services Ltd

Francesca Caggiano
Senior Consultant - Flood Risk
Francesca.caggiano@rpsgroup.com
+44 20 7280 3246

ENCLOSURE 3 – Previous Letter on Proposed Relocation
of Cattle Market



Mr Stacey Robins
Head of Planning and Environmental Services
Wealden Council
Vicarage Lane,
Hailsham,
East Sussex
BN27 2AX

Sent via email only to: Stacey.robins@wealden.gov.uk

16th June 2022

Dear Mr Robins,

RE: The potential relocation of Hailsham cattle market to land west of the A22 at Diplock Way.

Submitted On behalf of Knockhatch Adventure Park, Hailsham, BN27 3GD

I am writing on behalf of our client, Knockhatch Adventure Park, regarding the potential relocation of the Hailsham Cattle Market to land to the west of the A22 at Diplock Way, where Knockhatch has its main entrance. Our client currently holds a lease which permits the use of access. Our client is concerned that the relocation will have a severe impact on the subject area and on the operation of their business, concerns which may not have been adequately addressed.

Subsequently, our client wishes to provide the following information in advance of any planning application on the land for the consideration of both Wealden Council (as Local Planning Authority/LPA) and East Sussex County Council (ESCC) as the Local Highway Authority (LHA).

We have obtained a copy of the pre-application submission to the LHA (the Highway Access Feasibility Report), as well as Email correspondence between the developer's transport consultant and ESCC. We have also examined National and Local Plan policies, the Local Plan proposal map designations, and key environmental data. With this information, we contend that a number of issues have become evident which entail that the development is inappropriate due to issues of transport, flooding, sustainability, environmental impact, and the pursuance of good planning.

The foundations of the three primary concerns will be set out below.



Principle of Development

Other than the entrance to the park, the land in question is currently undeveloped greenfield land and is a strategic location. In light of this, a number of policy considerations become pertinent. Firstly, the Presumption in Favour of Sustainable Development, Policy WCS14 of the Wealdon Core Strategy, which states: -

“When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted.”

It is our position that the material considerations outweigh the Presumption in this case and that the development is not in line with the Local plan. The negative impact on the economic, social, and environmental conditions that the development would entail demonstrably outweigh the benefits.

The traffic and environmental considerations will be addressed later in this document, however the negative impact this may have on Knockhatch Adventure Park represents a social and economic impact as per the definitions of the Councils core strategy. As stated in the core strategy (SPO6), in order to improve economic prosperity the Council will support the growth of the Wealden economy by helping existing companies to expand and develop. Knockhatch Adventure



Park is an expanding company which draws visitors and income to Hailsham whilst also providing an increasing number of employment opportunities to the area. The detriment caused by further congestion on their entrance road, especially at peak times of the year (eg. school holidays), may cause the park to face a loss of custom and reputation, reducing the attraction of the park to visitors and subsequently eroding the Economic and Social benefit the park provides to Hailsham.

Paragraph 6.19 of the core strategy contains the Councils goals regarding future development in the Hailsham area. Stating that the Council *“supports the continuation of a livestock market in the vicinity of the town to assist in supporting the agricultural economy and local producers. The benefit of the development is accrued purely from locating the livestock market in the vicinity of the town.”* If the market remains within the vicinity of the town, then the benefit is retained regardless of the chosen location. Relocating the market to a location which will not generate the same substantial negative impact that is observable at the site at the A22, would be more favourable. Particularly if the chosen site is a brownfield location.

As per the Councils Spatial planning objective SPO14, the utilisation of previously developed brownfield sites is to be pursued wherever possible to make the most effective use of existing resources. It is our client’s position that there are other sites of a similar size available in the Hailsham area, as outlined in the Councils HELAA. Which, in line with SPO14, should first be considered wherever possible before contemplating the site at the entrance to Knockhatch.

Appendix A contains extracts from the HELAA of some of the viable alternatives of similar or greater size than the Knockhatch site. All have been recognised as appropriate for employment development.

Transport

One of the predominant concerns with the development which will cause detriment to the area is Transport. Several concerns are set out in more detail in the accompanying transport note.

Knockhatch’s entrance road is currently coping with the traffic demands of the Adventure park, although there is some issues during school holidays. The pre application transport report provided by the developer misidentifies the peak traffic times of the road, leading to an inaccurate conclusion of the impact the cattle market traffic will have.



As can be seen by the images provided in the transport note, often the queue of traffic entering the park spans the entire length of the road and spills out onto Diplock roundabout causing congestion on the A22. This is evidenced in Appendix B. The proposed re-alignment of the entrance to accommodate the cattle market, combined with the additional traffic during the Cattle markets opening hours (especially heavy vehicles), will exacerbate the congestion to unmanageable levels. This impacts the Adventure Park, the cattle market itself, and the wider transport links in the area including residents and businesses of adjoining routes. This is also without consideration for the further growth of the Adventure park which will also increase in the number of visitors, further compounding the issue.

Policy TR3 as retained from the 1998 core strategy, specifies that development will not be permitted where certain criteria are not met. One of said criteria being that the proposed development cannot create or perpetuate unacceptable traffic conditions.

Paragraph 6.15 of the 2013 Core strategy states that *“traffic congestion creates problems in Hailsham town centre and any additional traffic generated by development will require interventions through demand management techniques and alterations to the transport network.”* And that *“Congestion issues, created by additional development, at junctions between the town and the A22 including...the Diplocks Way roundabout will need to be addressed.”* As is clear from the Council’s strategy the congestion at the Diplock Way roundabout is already of concern to the Council, especially in anticipation of future development. Again, the images contained within Appendix B depict the traffic at the roundabout during busy times at the park.

It is certain that this concern will worsen with the relocation of the market to Knockhatch, which would create unacceptable traffic conditions. Therefore, the development would be in contravention of the Council’s transport policies.

Policy WCS7, the effective provision of infrastructure, states that the release of land for development is conditional on there being sufficient capacity in local infrastructure to meet the new demands. Accordingly, the already struggling transport links in the area would need expanding and improving before a new development on Knockhatch road should be considered.

Furthermore, Policy TR10 states that the Council will seek to control the movement of heavy goods vehicles within the district by resisting development proposals which would have a detrimental impact on the environment by reason of a



material increase in the generation and attraction of heavy goods vehicles within villages and along unsuitable country roads.

The move of the cattle market to this location would cause a movement of heavy goods vehicles to the area, and though the A22 cannot fall into the definition of an unsuitable country road, we would contend that Knockhatch falls into said definition. Further eroding the appropriateness of the development in relation to the Councils development policies.

Flooding

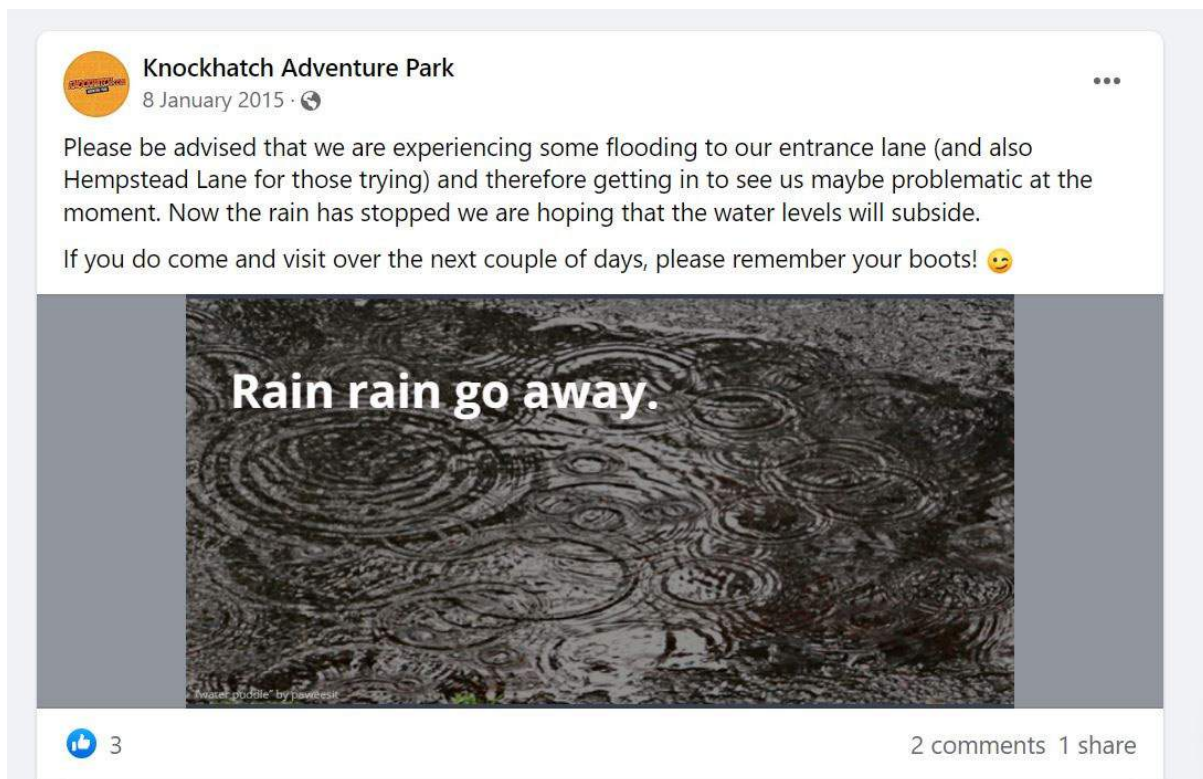
The site is currently subject to significant surface water issues, and the proposed re-alignment of Knockhatch's entrance is to a segment of the site which runs through a flood risk 3 zone and surface water flooding zones. SPO10 depicts the Council objective to ensure that land allocated for employment development should avoid medium to high-risk flood zones. The site was in fact deemed unsuitable for development in the 2018 HELAA.

Images contained in Appendix C and the attached transport note show the extent of the flood zones at the site.

Though the cattle market itself may not fall in the flood zone, it would increase the amount of hardstanding which may lead to surface water flooding to the access road. This would constrain and deter access to the park.

Flood at the access is already a problem. For example, Knockhatch had to announce on Facebook on 9th January 2015 that following heavy rains, there were severe flooding at their entrance, and in effect had to deter visitors from coming to the site (at least warn them that the entrance was flooded).





In addition, it is understood from the operators of Knockhatch Adventure Park that there is a clay geology to the site. It is noted that the site layout plan shows a surface water balancing pond and this is presumably due to the above. However, the land on which the surface water balancing pond is located is also to be used for overflow car parking.

Car parking should not be located on balancing ponds and it therefore appears that either there would be a lack of car parking on site or a larger site is required than currently proposed.

During times of flood, any excess vehicles will not have access to parking and would need to turn round and exit the site, further adding to the congestion.

There is no detail provided on how the balancing pond has been designed and this will be imperative to enable the site to be developed.

In further relation to flood risk, Paragraph 161 and 162 of the NPPF state:

- that all plans should apply a sequential, risk-based approach to the location of development, steering new development to areas with the lowest risk of flooding. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development



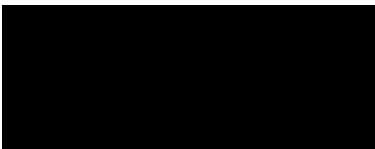
objectives), the exception test may have to be applied, to demonstrate that a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall (Paragraph 164).

Again, it is our position that the relocation does not meet the criteria and is not in line with National and Local guidelines.

Based on the information available, it is likely that the proposals for the cattle market relocation do not adhere to the Wealden Development Plan without significant material consideration to outweigh the evident policy conflicts and negative impacts. We believe that the Council should consider the points raised above in their discussion with the prospective applicant, advising them of these issues and that they may prove difficult to overcome.

If the applicant or Council wish to discuss this further, do not hesitate to contact us.

Yours sincerely,



Nayan Gandhi
Director



Appendix A

Wealden SHELAA Potentially Suitable Sites Summary


Plan showing whole extent of submitted site	Site Reference: 044/1310		
	Settlement: Hailsham		
	Parish: Hailsham		
	Address: Arlington Stadium, Arlington Road West		
	Suitable for housing: No Suitable for employment: Yes Site available: Yes Site achievable: Yes Site Conclusion: Deliverable		
Site area (ha) Gross: 6.74 Site area (ha) Net: 2.5			
Delivery Yr 1-5: 75	Delivery Yr 6-10:	Delivery Yr 11+:	Total Capacity 75

Reasons: The site comprises a racetrack, warehouse and associated buildings and car park and is located to the west of the A22 on Arlington Road West. The site is visually well contained by Ancient Woodland to the west and east. The site is severed from Hailsham by the A22 and is particularly rural in nature. It is isolated and remote from local services and facilities and public transport. Owing to its isolation this site is unsuitable for residential development and development would be out of keeping with the surrounding land uses. The site would be suitable for employment uses given its existing use. If a Local Plan proposes large scale development of this area with associated infrastructure and amenities then the site may be suitable for development. It would only be suitable for development in these circumstances if site 825/1310 and its associated sites come forward and the requirements set out in the site summary for site 825/1310 are met. In these circumstances suitable remediation works would be required to deal with any potential contamination on the site. Buffering would be required to protect the Ancient Woodland and trees subject to a group TPO on the site and to reinforce existing field boundaries.

N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP



Wealden SHELAA Potentially Suitable Sites Summary

Plan showing whole extent of submitted site	Site Reference: 305/1310
 <p>© Crown copyright. All rights reserved LA100018692 2018</p>	Settlement: Hailsham
	Parish: Hailsham
	Address: Bolneys Farm, South Road
	Suitable for housing: Yes Suitable for employment: Yes Site available: Yes Site achievable: Yes Site Conclusion: Developable
Delivery Yr 1-5: Delivery Yr 6-10: 75 Delivery Yr 11+: Total Capacity 75	Site area (ha) Gross: 3.57 Site area (ha) Net: 2.51

Reasons: The site comprises of agricultural fields and buildings and is located to the east of the roundabout connecting the A22 with South Road adjacent the southern edge of Hailsham. A significant constraint to development of this site is the lack of a suitable vehicular access point on the A295, due to traffic speeds and the proximity of any access to the existing roundabout. Access directly to the A22 would not be feasible. Further assessment would be required to establish whether a suitable vehicular access could be achieved to service development on this site. The developable area is reduced due to the presence of ancient woodland located adjacent to the south and north east and the presence of high volt electricity pylons bisecting the site from southeast to northwest. Landscape buffering would be required to protect the hedgerows on the site and to reinforce existing field boundaries.

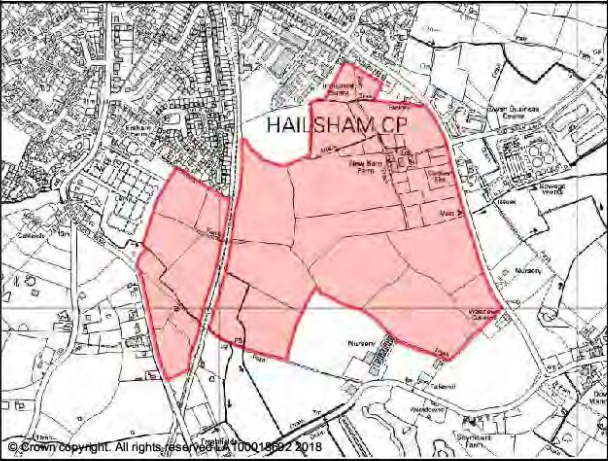
N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP



Wealden SHELAA Potentially Suitable Sites Summary

Reasons: The site is situated to the east of Hailsham and abuts the built form of the settlement. The area is currently rural with pasture, including grazing marsh, to the east and north and the urban edge of Hailsham to the west. It is a substantial site comprising of a collection of farm buildings and five fields crossed by a network of hedgerows. Large parts of the submitted site, mainly to the east, are affected by flood risk, zones 2 and 3, and are therefore removed from the developable area. The whole site is currently accessed by the farm track to the south and by Marshfoot Lane and Field Gates to the north. However the southern access is within the flood plain and a large part of the suitable land is separated by flood risk areas from Marshfoot Lane. An access may be possible across third party land to Observatory View to the west of the site to serve part of the development, and highway upgrading works to Marshfoot Lane could allow it to serve the northern part of the site. However access arrangements would need to be considered in conjunction with land to the west, also submitted through SHELAA and a full transport assessment is required to establish what highway works or other transport contributions would be required to ensure connectivity with the town centre and local highway network. The site is visible from a wide area to the east due to the flat and open character of the surrounding landscape. Long distance views into the site can also be gained from the housing rising up away from the site to the west. Any development of the site would be required to provide suitable buffering to the eastern edge of the site to mitigate the landscape impact. A watercourse/ ditch drainage system runs through the site which is connected to the Pevensey Levels Ramsar site and measures must be incorporated into any development scheme to mitigate any impact on these watercourses and to assist the improvement of the water quality of the Pevensey Levels.

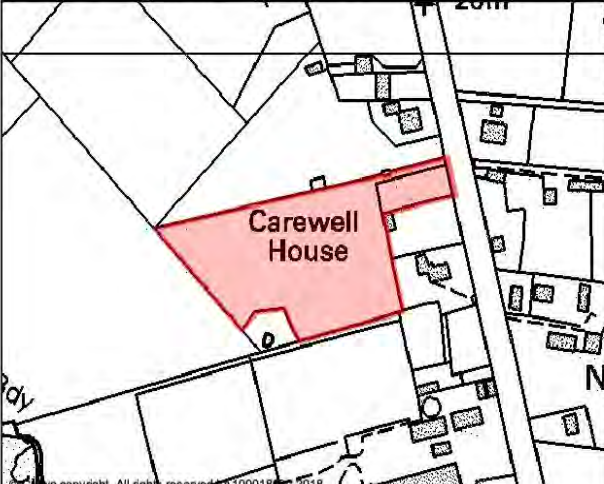
N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP

Plan showing whole extent of submitted site	Site Reference: 728/1310
	Settlement: Hailsham
	Parish: Hailsham
	Address: Land south of Hailsham -Site 1 Land East of Ersham Road (Ersham Park)-2-Land West of
	Suitable for housing: Yes Suitable for employment: Yes Site available: Yes Site achievable: Yes Site Conclusion: Developable
	Site area (ha) Gross: 49.659 Site area (ha) Net: 27.03
Delivery Yr 1-5: Delivery Yr 6-10: 500 Delivery Yr 11+: 310 Total Capacity 810	

Reasons: This is an extensive site located to the south and is connected to the existing

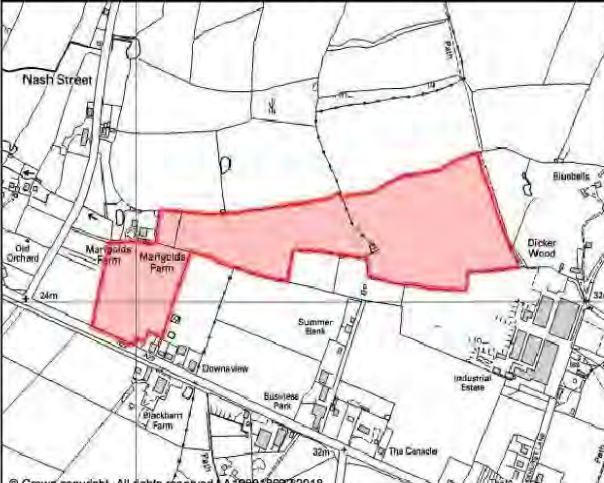


Wealden SHELAA Unsuitable Sites Summary

Plan showing whole extent of submitted site	Site Reference: 760/3090
	Settlement: Lower Dicker
	Parish: Chiddingly
	Address: Land adj. to Carewell House, Chalvington Road - Golden Cross
	Suitable for housing?: No Suitable for employment: No Site available: Yes Site achievable: Yes Site Conclusion: Not suitable
	Site area (ha) Gross: 1.02 Site area (ha) Net:

Reasons: The site comprises of a single field used as a paddock located to the west of Chalvington Road. The site is isolated and remote from local services and facilities and any rural settlement. Housing development would be unsuitable in this location and out of keeping with the generally rural character and appearance of the countryside.

N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP


Plan showing whole extent of submitted site	Site Reference: 880/3090
	Settlement: Lower Dicker
	Parish: Chiddingly
	Address: Marigolds Farm, Nash Street, Hailsham BN27 4AA
	Suitable for housing?: No Suitable for employment: Yes Site available: Yes Site achievable: Yes Site Conclusion: Not suitable
	Site area (ha) Gross: 12.69 Site area (ha) Net: 9.34

Reasons: The site comprises of three agricultural fields along the A22 at Lower Dicker. The site is accessed off the A22 but extends to the north behind undeveloped fields. The sites are close but not contiguous to a number of industrial estates along the A22. The site is isolated and detached from any identified settlement or local facilities and amenities. Development of this site at the frontage of the A22 should have a limited impact on the wider landscape however the remainder of

Wealden SHELAA Potentially Suitable Sites Summary

the site. Development of the site should have a limited impact on the wider landscape and is situated within an area dominated by business units and other businesses. In isolation the development of this site for housing would be unsuitable but employment uses would be suitable subject to suitable access being established and any additional infrastructure requirements incorporated into any scheme. Any development will need to take into account residential amenities and surrounding properties and take into account the need to protect the trees that are subject to a group TPO which extends slightly into the southern boundary of the site.

N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP

	<p>Site Reference: 534/3000</p> <p>Settlement: Hellingly</p> <p>Parish: Hellingly</p> <p>Address: Sussex Plants Ltd and adjoining land, Park Road Nurseries, Park Road</p> <p>Suitable for housing: Yes Suitable for employment: Yes Site available: Yes Site achievable: Yes Site Conclusion: Deliverable</p> <p>Site area (ha) Gross: 9.21 Site area (ha) Net: 7.1</p>
<p>Delivery Yr 1-5: 160 Delivery Yr 6-10: Delivery Yr 11+: Total Capacity 160</p>	

Reasons: The site comprises a mix of commercial buildings, extensive growing facilities, some small enclosed fields and patches of grass and is located to the north of the urban edge of Hailsham adjacent to the Cuckoo Trail (located to the west) and Park Road (located to the east). Visibility is limited to the immediate surroundings due to the planted buffer that extends around the north and west of the site. There is limited visual exposure to the east and south. The western edge of the site located next to the Cuckoo Trail is more sensitive and would benefit from landscape mitigation. The site currently has an employment use the loss of which, if developed for residential uses, would be required to be assessed by the Council against development plan policy and as part of the Local Plan. Much of the site is occupied by the nursery development and therefore potential for some contamination exists. Access for vehicles and pedestrians exists however a full transport assessment and modelling will be needed to assess local impacts and to help determine the additional works or facilities required.

N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP



Wealden SHELAA Potentially Suitable Sites Summary

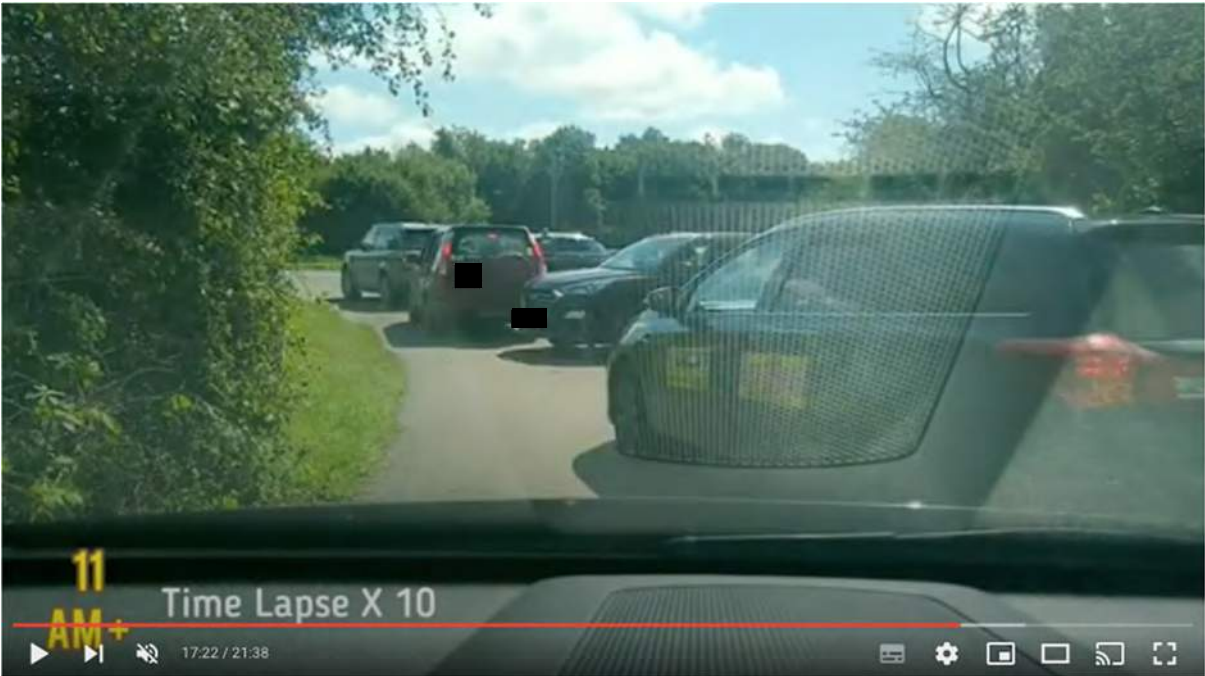
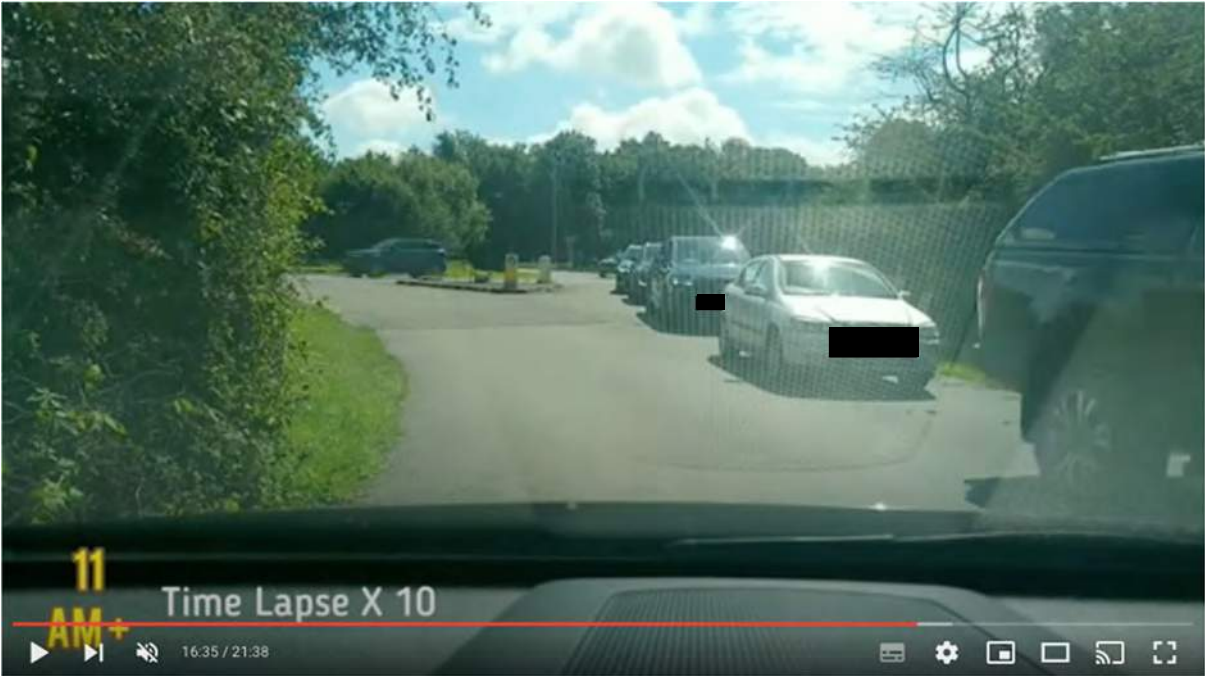
	Site Reference: 864/3090		
	Settlement: Lower Dicker		
	Parish: Hellingly		
	Address: Ades Farm, Lower Dicker, Hailsham, BN27 4BH		
	Suitable for housing: No Suitable for employment: Yes Site available: Yes Site achievable: Yes Site Conclusion: Deliverable		
Site area (ha) Gross: 4.01 Site area (ha) Net: 3.3			
Delivery Yr 1-5:	Delivery Yr 6-10:	Delivery Yr 11+:	Total Capacity

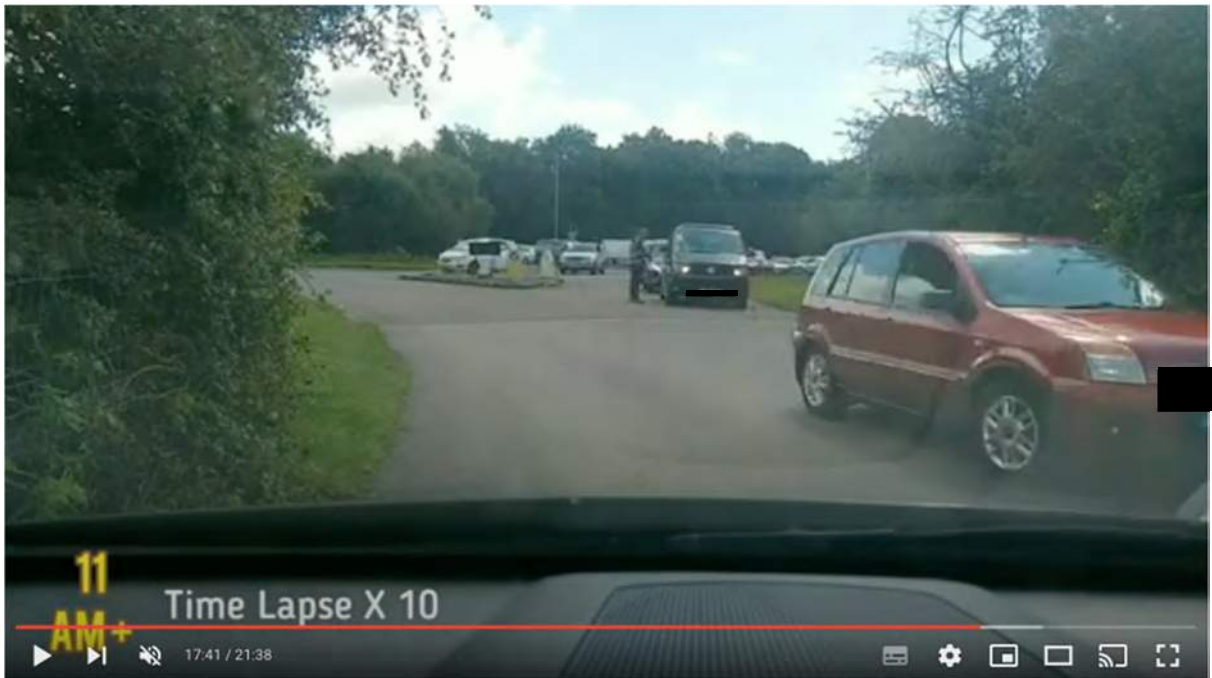
Reasons: The site comprises of four agricultural fields isolated and detached from any identified settlement or local facilities and amenities. The site is situated off the A22. There are two sections of the site situated within the frontage strip of land on the A22 dominated by business units and other businesses. Development should have a limited impact on the wider landscape. In isolation the development of this site for housing would be unsuitable but employment uses would be suitable subject to suitable access being established and any additional infrastructure requirements incorporated into any scheme. Any development will need to take into account residential amenities and surrounding properties.

N.B. The SHELAA has been conducted in advance of decisions on the planning strategy in the WLP

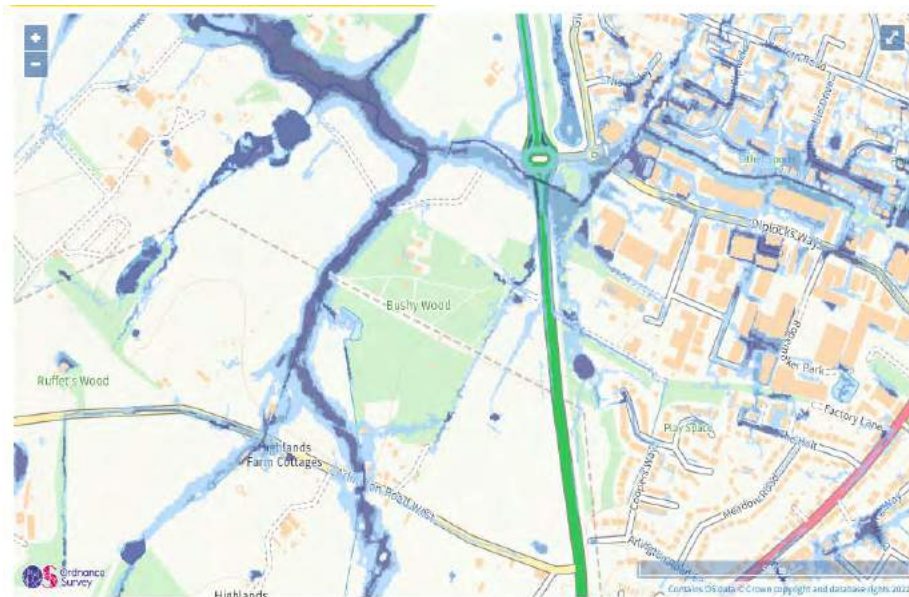
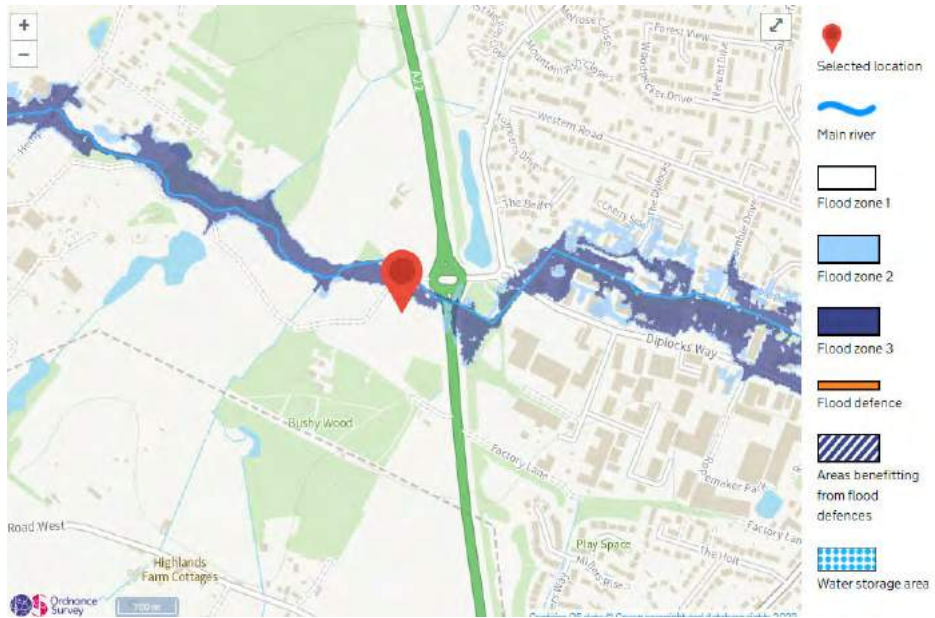


Appendix B





Appendix C



Extent of flooding from surface water
 ● High ● Medium ● Low ○ Very low



TECHNICAL NOTE

Project Title: Knockhatch Adventure Park

Report Reference: JNY11152-01B

Date: 23 March 2022

Introduction

- 1.1 This Note has been prepared on behalf of Knockhatch Adventure Park to consider the proposals to relocate the Hailsham Cattle Market onto land to the west of the A22 and the resultant potential transport related considerations upon the Knockhatch Adventure Park.
- 1.2 A Freedom of Information (FOI) request was made to East Sussex County Council (ESCC) for correspondence related to the proposal. This was received on 11 February 2021 and contained the following that has informed this Note:
- Email correspondence between the developer's transport consultant and ESCC;
 - Proposed Layout Plan; and
 - Highway Access Feasibility Report (GTA Civils Consulting Engineers report reference 7473 dated December 2018).
- 1.3 In addition, information has been provided by the operator of the Knockhatch Adventure Park on its daily visitor numbers to inform this Note.
- 1.4 Despite the information contained within the FOI and the clear progression of the proposals, there has been no contact with Knockhatch Adventure Park, either formally or informally, to discuss how the proposals could be evolved around the existing conditions, their existing operations and their visitors. This has increased the concerns of the Knockhatch Adventure Park with the proposals and has led to the preparation of this Note.

Review of FOI and Consideration of Impact

- 1.5 The Highway Access Feasibility Report focusses on the highway network weekday AM (08:00 to 09:00) and PM (17:00 to 18:00) peak hours and considers existing traffic flows at the A22 Diplocks roundabout, as taken from ESCCs strategic traffic model of the area.
- 1.6 However, these are not the peak hours for traffic flows along Knockhatch Lane and nor would they be the peak hours of traffic flows at the relocated Hailsham Cattle Market.
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- 1.7 The traffic flows along Knockhatch Lane identified within the Highway Access Feasibility Report are 116 and 65 movements during the AM and PM peak hours respectively. These are stated as being passenger car units (PCUs), however, given an assumed negligible number of large vehicles on Knockhatch Lane, it is reasonable to assume these are broadly equivalent to vehicle movements. If the number of large vehicles on Knockhatch Lane was not negligible, then the number of vehicle movements would be lower than those that are stated.
- 1.8 It is not reported what these traffic flows are based upon and how they reflect the seasonal variation in traffic flows along Knockhatch Lane. It is stated that they are based upon a 2015 base year (assumed to be observed year) with traffic growth rates applied to represent a 2018 year (the year in which the Highway Access Feasibility Report was prepared).
- 1.9 The Highway Access Feasibility Report undertakes highway capacity assessments of the A22 Diplocks roundabout and concludes that the additional impact of the relocated Hailsham Cattle Market would not be significant and would not result in a 'severe residual impact'.
- 1.10 However, because the Highway Access Feasibility Report only considers the peak hours, it has not identified the peak congestion that can occur on Knockhatch Lane, the effect this has upon the A22 and the subsequent congestion on the A22 and the A22 Diplocks roundabout.
- 1.11 Appendix A sets out some photos of the congestion that can occur along both Knockhatch Lane and the A22 together with some comments to visitors of Knockhatch Adventure Park. It shows that queuing can occur from Knockhatch Adventure Park extending onto the A22 and affects the operation of the A22 Diplocks roundabout. During busy periods marshals are employed by Knockhatch Adventure Park and in such instances of queuing they turn visitors away in attempts to maintain the free flow of traffic on the A22. This can be seen within Appendix A.
- 1.12 Such queuing can occur, for example, during busy periods at Knockhatch Adventure Park when the inflow of vehicles exceeds the ability of cars to park in the car parks. The peak arrival times to Knockhatch Adventure Park are during the morning before 11:00.
- 1.13 The Highway Access Feasibility Report uses the TRICS database as part of its trip generation exercise and sets out trip data for three sites therein. Of note, it sets out that the peak arrival time for the three sites within TRICS is 09:00 to 10:00 and 10:00 to 11:00. These periods coincide with the peak arrival times to Knockhatch Adventure Park.
- 1.14 Although the Highway Access Feasibility Report does not set out the number of vehicle movements at the three sites during these periods, it does set out those during the AM peak hour, which ranged between 121 and 206 vehicle movements per hour. A review of these three sites shows that there does not appear to be a direct correlation between the number of vehicle movements during the AM peak hour and the site size.
- 1.15 Furthermore, given that the AM peak hour is not the peak hour of the three sites, the number of vehicle movements that they generate during these periods will be higher than those reported for the AM peak hour (i.e. higher than between 121 and 206 vehicle movements per hour).
- 1.16 Based upon the above, it is likely that the peak arrival times of the relocated Hailsham Cattle Market would coincide with the peak arrival time of Knockhatch Adventure Park.
- 1.17 The impact of this has not been considered within the Highway Access Feasibility Report, thus the report conclusions have not been derived correctly. In particular, given the congestion that
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- can occur along both Knockhatch Lane and the A22, additional vehicles generated by the relocated Hailsham Cattle Market would increase the length and duration of such queuing on the A22, which is a high speed dual carriageway road and a highway safety concern that would need to be assessed and, if necessary, mitigated.
- 1.18 Due to these deficiencies, Knockhatch Adventure Park have concerns over the relocated Hailsham Cattle Market, its traffic impact and the subsequent effect upon its operations.
- 1.19 In addition to the public highway, the impact upon Knockhatch Lane also needs to be considered. In particular, this needs to be considered in the context of HGVs arriving, checking in and then parking and the impact of this upon the movement of other vehicles along Knockhatch Lane.
- 1.20 It is understood that HGVs queue to check in to the current Hailsham Cattle Market and this results in HGVs and other vehicles blocking back and queuing on High Street.
- 1.21 Reviewing the proposed site layout plan contained within the Highway Access Feasibility Report suggests that similar blocking back would occur at the relocated Hailsham Cattle Market. Once within the site, there is a 'vehicle control box' which appears to be a check in point. Beyond that, HGVs would travel clockwise within the site to the loading / unloading dock and then have to continue clockwise to travel back out onto Knockhatch Lane and back through the vehicle control box / check in point to then reach the trailer parking locations.
- 1.22 It is likely that these movements would occur at the same time as arrivals to Knockhatch Adventure Park, for which the above sets out the queuing that can occur on Knockhatch Lane. 120 HGV parking spaces are proposed and for such a level of HGVs to check in, unload and then park, it appears that the existing queuing along Knockhatch Lane would be compounded.
- 1.23 Knockhatch Adventure Park have concerns over the impact created on Knockhatch Lane as a result of the relocated Hailsham Cattle Market and the subsequent effect upon its operations.
- 1.24 In relation to the PM peak hour, the Highway Access Feasibility Report sets out that 120 HGV parking spaces are proposed and that these would depart approx. 2 hours after the public, which from the data suggests would be during the PM peak hour. However, the Highway Access Feasibility Report estimates only 6 vehicle movements during the PM peak hour.
- 1.25 If 120 HGV parking spaces are proposed, then such demand must be envisaged, however, this is not reflected in the trip generation estimates. There are two points to consider here:
- Highway capacity onto the A22. This doesn't appear to have been considered appropriately.
 - Interaction of HGVs on the shared access track with Knockhatch Adventure Park and the other uses, particularly during peak seasonal times. With up to 120 HGVs exiting the Hailsham Cattle Market during a period when visitors are also exiting Knockhatch Adventure Park, the internal site layout, road network and Knockhatch Lane needs to be assessed during peak seasonal conditions to ensure all are appropriate and suitable for the predicted movements.
- 1.26 The access arrangements retain the existing geometries of the eastern end of Knockhatch Lane onto the A22 Diplocks roundabout. These geometries do not appear to accord with current highway design standards. This needs to be considered in the context of a new development generating an increase in traffic through it, particularly HGVs.

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- 1.27 The key highway changes proposed is west of the A22 Diplocks roundabout on the private land, whereby the access track to Knockhatch Adventure Park (and the other uses) will be realigned to the north-west of existing.
- 1.28 The access track will be widened for its sections that are shared with the Hailsham Cattle Market. For the sections to the west of this, it appears the track would be broadly the same width as current (but in a different location / alignment).
- 1.29 A footway is provided on parts of the southern side of the widened shared access track. It is suggested that a footway should be provided along all parts of the shared access track.
- 1.30 Knockhatch Adventure Park has an emergency access onto Hempstead Lane that they are permitted to use in the event of a problem on Knockhatch Lane. Hempstead Lane is a narrow single carriageway road / single track with a number of businesses and properties along it. It is a cul-de-sac with access at its northern end from the A22.
- 1.31 In previous such instances when visitors have had to use Hempstead Lane, issues have arisen from the business operators and property occupants causing blockages and becoming aggressive to Knockhatch Adventure Park, to such an extent whereby an official complaint had to be made to the police.
- 1.32 Knockhatch Adventure Park is concerned that the additional movement and the queuing that they expect to occur onto Knockhatch Lane as a result of the relocated Hailsham Cattle Market would result in more instances of Knockhatch Lane becoming blocked and therefore more instances of needing to open the access onto Hempstead Lane due to visitors being unable to exit.
- 1.33 Such instances would therefore be an indirect impact upon Hempstead Lane resulting from the relocated Hailsham Cattle Market. Given their past experiences of having to use Hempstead Lane in an emergency, Knockhatch Adventure Park would be concerned with any potential for additional usage.
- 1.34 It is noted that ESCC are consulting on improvements to the A22, part of which includes an upgrading of the Hempstead Lane / A22 junction to a roundabout. This would offer benefit to the junction and to the users and occupants of Hempstead Lane. Notwithstanding their above concerns of using Hempstead Lane, Knockhatch Adventure Park are of the view that if ongoing congestion or difficulties were to occur as a result of the relocated Hailsham Cattle Market, they may have no option but to operate a one-way system with all visitors exiting via Hempstead Lane and the new roundabout onto the A22.
- 1.35 It is noted that the majority of the land on which the site is located is not within any flood zones. However, its north-western corner and the proposed realigned access road to Knockhatch Adventure Park would be within flood zone 3, as is Hempstead Lane, as shown below.
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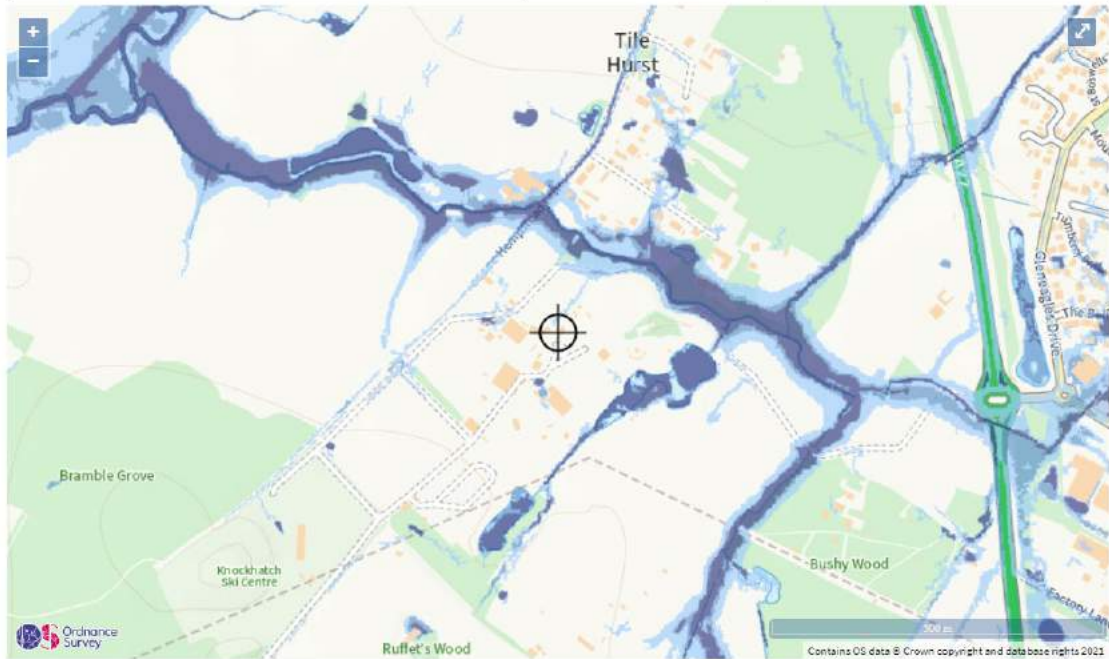
Extract From <https://flood-warning-information.service.gov.uk/>

Flood risk

Extent of flooding

Location

Enter a place or postcode



Extent of flooding from surface water

- High
- Medium
- Low
- Very low
- ⊕ Location you selected

Extract From <https://flood-map-for-planning.service.gov.uk/>

FLOOD ZONE 3

Land and property in flood zone 3 have a high probability of flooding

[More information about flood zones](#)

- 1** You must carry out a [flood risk assessment](#) for development in flood zone 3
- 2** For some types of development in flood zone 3 you must follow the [Environment Agency's standing advice for carrying out a flood risk assessment](#)
- 3** You can also [read more about flood risk assessments for planning applications](#)

[Learn more about the potential sources of flood risk in this area](#)

- 1.36 The relocated Hailsham Cattle Market would therefore increase the amount of hardstanding within flood zone 3 which in particular may lead to increased surface water flooding along the realigned access road to Knockhatch Adventure Park and along Hempstead Lane.
- 1.37 This could result not only in a constraint to access but also a deterrent to access (particularly for vulnerable road users) to the detriment of visitor numbers. It could also impact upon Hempstead Lane, its businesses and its property occupants and owners.
- 1.38 In addition, it is understood from the operators of Knockhatch Adventure Park that there is a clay geology to the site. It is noted that the site layout plan shows a surface water balancing pond and this is presumably due to the above.
- 1.39 However, the land on which the surface water balancing pond is located is also to be used for overflow car parking. Car parking should not be located on balancing ponds and it therefore appears that either there would be a lack of car parking on site or a larger site is required than currently proposed.
- 1.40 There is no detail provided on how the balancing pond has been designed and this will be imperative to enable the site to be developed.
- 1.41 Knockhatch Adventure Park have concerns over the impact of surface water and flooding upon their business.

- 1.42 Knockhatch Adventure Park has human health concerns for the relocated Hailsham Cattle Market and the very real danger to human beings from the possibility of contracting E coli 0157. As a farm park, Knockhatch Adventure Park has to follow strict precautions and procedures to minimise the chance of their customers contracting this deadly disease, which is mainly spread from cloven hoofed animals, which the relocated Hailsham Cattle Market would mainly attract.
- 1.43 There is a risk of contamination caused by movement (vehicles, on foot, cycle etc) along Knockhatch Lane. In particular, because of the movement of cattle to and from the relocated Hailsham Cattle Market, there would be cloven hoofed animal deposits onto Knockhatch Lane which visitors to Knockhatch Adventure Park would travel through before arriving.
- 1.44 This would result in a problem because if a visitor to Knockhatch Adventure Park became infected it would be impossible to source the origin, either Knockhatch Adventure Park or the relocated Hailsham Cattle Market.
- 1.45 It is noted that this site was considered within Wealden District Councils Strategic Housing and Economic Land Availability Assessment (SHELAA) in 2018 as was judged to be unsuitable for development in part due to flood risk. Comment was also made on the need for a buffer to the ancient woodland located adjacent to the western boundary of the site which limits its developable area. Knockhatch Adventure Park queries why other sites in the SHELAA that were considered suitable for employment development are not being considered, particularly those on the eastern side of the A22 within the curtilage of the town, for example near the Boship roundabout, near Amberstone or near Arlington Eagles roundabout.

Validation of FOI Against Recorded Daily Visitor Numbers at Knockhatch Adventure Park

- 1.46 Data received from Knockhatch Adventure Park consists of:
- Annual visitor numbers covering 2017 to 2019 (and part of 2020 pre-covid);
 - Estimated car arrivals and departures over the same period based upon an applied car occupancy rate; and
 - Hourly traffic count data covering days of the week within the Easter school holidays 2021.
- 1.47 The hourly traffic count data was undertaken whilst covid related restrictions were in place. As part of the restrictions, there was a booking system that placed a limit on the number of daily visitors to a level well below capacity. The booking system also allotted times of entry for all visitors to between 09:30 and 13:30 and thus spreading the arrivals over a longer period than typical.
- 1.48 As a result, visitor numbers and movement during the Easter school holidays 2021 was suppressed and is not wholly representative of unsuppressed visitor numbers and movement during typical unsuppressed peak seasonal periods.
- 1.49 Advice from Knockhatch Adventure Park is that 80% of arrivals are typically on site before 11:00. A review of the data received sets out that under covid restrictions, only 45% of all arrivals are on site before 11:00.
- 1.50 There are no vehicle movements at Knockhatch Adventure Park during the AM peak hour. This is not affected by any covid restrictions. There are vehicle movements at Knockhatch

Adventure Park during the PM peak hour and these are affected by covid related restrictions. This arises because of the spread of arrivals and the subsequent effect of delaying departures to later in the day resulting in more departures during the PM peak hour than typical (non-covid).

- 1.51 Therefore, if any adjustments were to be made to the hourly traffic count data to reflect typical arrival and departure profiles, this would result in fewer vehicle movements during the PM peak hour.
- 1.52 If such adjustments were made (adjust all arrivals so that 80% are on site before 11:00 and adjust all departures accordingly), then the number of vehicle movements at Knockhatch Adventure Park during the PM peak hour in the Easter week in 2021 would be lower than the number of vehicle movements that the Highway Access Feasibility Report assumed. This suggests there is 'spare' traffic flow over and above that generated by Knockhatch Adventure Park within the assumptions of the Highway Access Feasibility Report.
- 1.53 However, this would be an incorrect assumption. It is noted that the daily traffic flows at Knockhatch Adventure Park recorded in 2021 are lower than those set out between 2017 and 2019 (due to visitor numbers being suppressed during this time), as set out in Table 1:

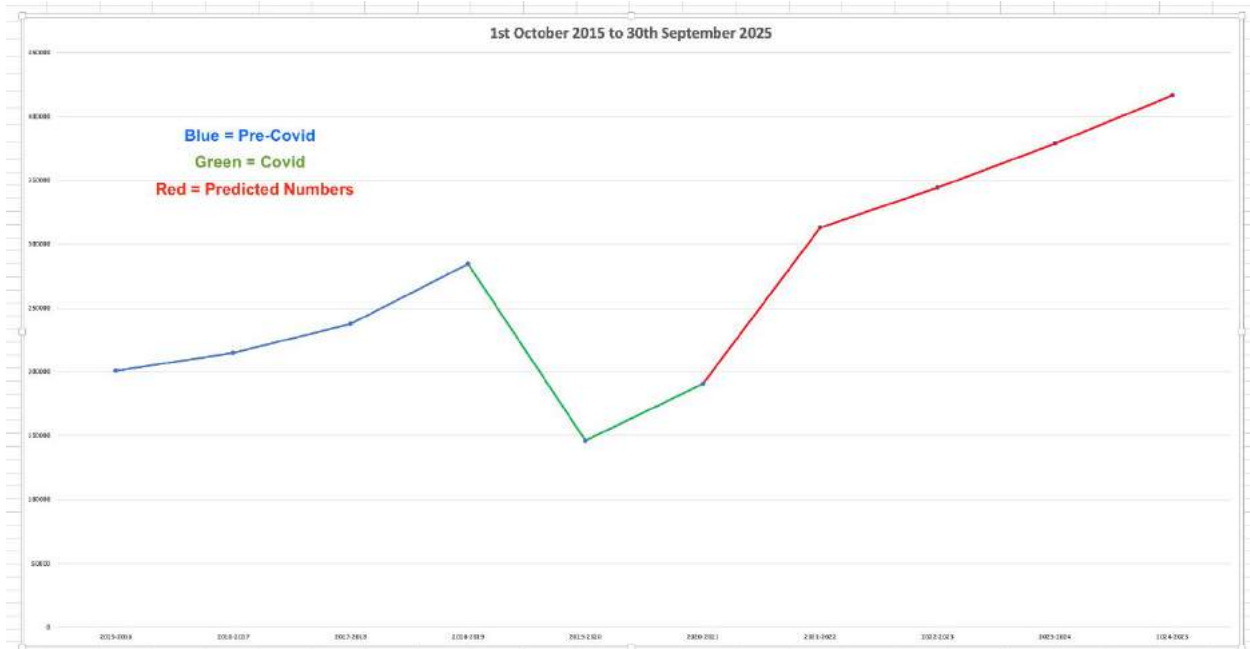
Table 1: Daily Car Arrivals During Last Week of Easter Holidays

	Monday	Wednesday	Thursday
2017	489	532	628
2018	418	666	491
2019	745	1013	1089
2021	415	455	484

- 1.54 The adjusted (non-covid) 2021 hourly traffic flows can be applied to the 2017 to 2019 traffic flows to estimate the number of PM peak hour traffic flows on each weekday of the year.
- 1.55 For the years 2017, 2018 and 2019, there were 31, 38 and 49 weekdays on which the PM peak hour traffic flow was higher than the assumptions of the Highway Access Feasibility Report. This represents 12%, 15% and 19% of the year respectively.
- 1.56 The relocated Hailsham Cattle Market would operate on these days, therefore, the Highway Access Feasibility Report needs to consider these peak days and assess the impact of the relocation based upon the conditions of such peak days.
- 1.57 Although these are being referred to as peak days, it is noted that they occur on up to 19% of all weekdays during the year. They are not therefore an actual peak day but simply a day within a seasonal period in which visitors would be more inclined to visit Knockhatch Adventure Park.
- 1.58 A peak day would typically occur on a good weather day when the schools are not open (a weekday or a weekend).
- 1.59 Given that the relocated Hailsham Cattle Market could operate on these days, the Highway Access Feasibility Report needs to identify both a peak seasonal day and a peak day at Knockhatch Adventure Park and assess the impact of the relocation based upon such conditions.

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- 1.60 These traffic flows are also relevant to Knockhatch Lane and the interaction of all vehicle movements along it. The Highway Access Feasibility Report appears to underestimate vehicle movements generated by Knockhatch Adventure Park in this regard.
- 1.61 Another consideration is footfall at Knockhatch Adventure Park. Although the vehicle movements between 2017 and 2019 have been derived from footfall, it is possible to consider this metric in its own right.
- 1.62 The Highway Access Feasibility Report applied traffic growth from a 2015 base year to estimate 2018 traffic flows on Knockhatch Lane. Although the growth rate is not provided, traffic growth rates are typically in the order of approximately 1% per annum, although this can vary between locations and road types.
- 1.63 Footfall at Knockhatch Adventure Park was 218,604 over 2017, 245,005 over 2018 and 284,444 over 2019. This represents a growth of 30% between 2017 and 2019, which is an average of 15% per annum.
- 1.64 Although this covers different years to those of the Highway Access Feasibility Report, there is a significant difference between the two growth rates.
- 1.65 Based upon this, there is potential that the Highway Access Feasibility Report underestimates the traffic flows along Knockhatch Lane, particularly during the PM peak hour.
- 1.66 Knockhatch Adventure Park have concerns over this apparent underestimation and the resultant potential impact upon their business.
- 1.67 To further consider this, Knockhatch Adventure Park have set out in Graph 1 their observed at their projected annual visitor numbers between 2015 and 2025. As can be seen, and consistent with the above, there has been a year on year increase in annual visitor numbers up to 2020 at which point covid restrictions resulted in a reduction.
- 1.68 However, visitor numbers have now returned and Knockhatch Adventure Park project annual visitor numbers to reach 425,000 by 2025. The growth contained within the Highway Access Feasibility Report falls far short of this and such allowance needs to be made as part of future year traffic conditions to ensure the full impact that the relocation of Hailsham Cattle Market to this location would have is fully understood and fully and appropriately assessed.

Graph 1: Observed and Projected Annual Visitor Numbers at Knockhatch Adventure Park 2015 to 2025



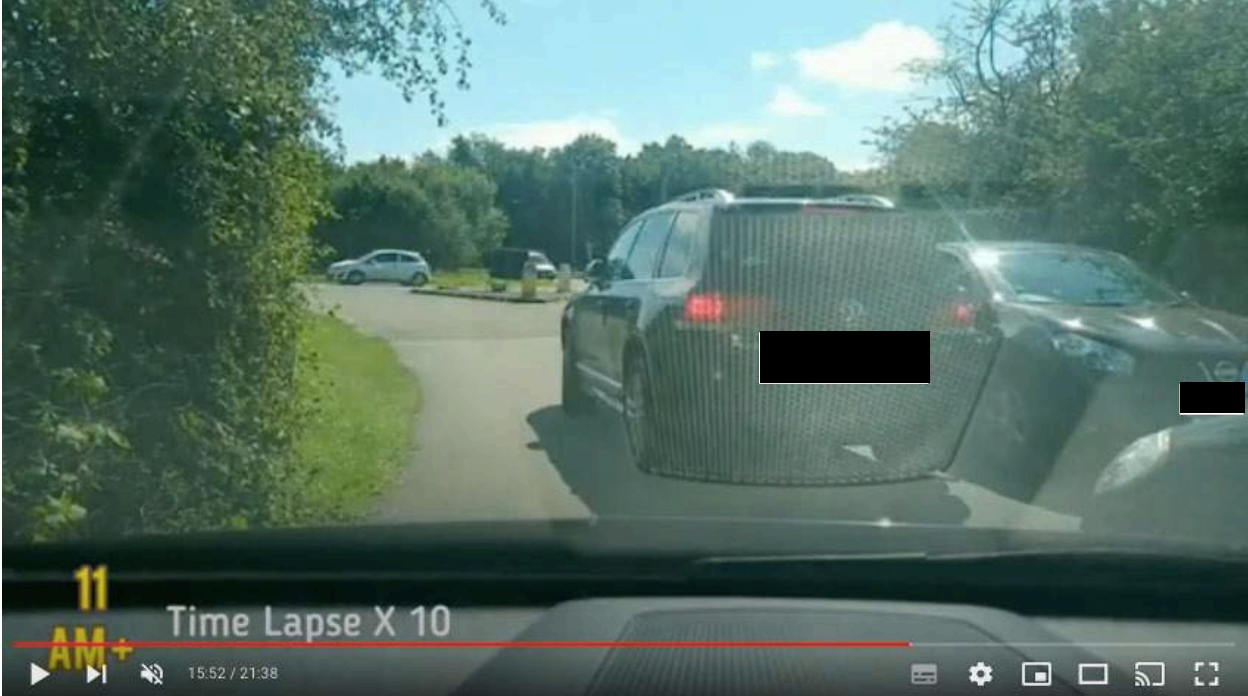
Summary

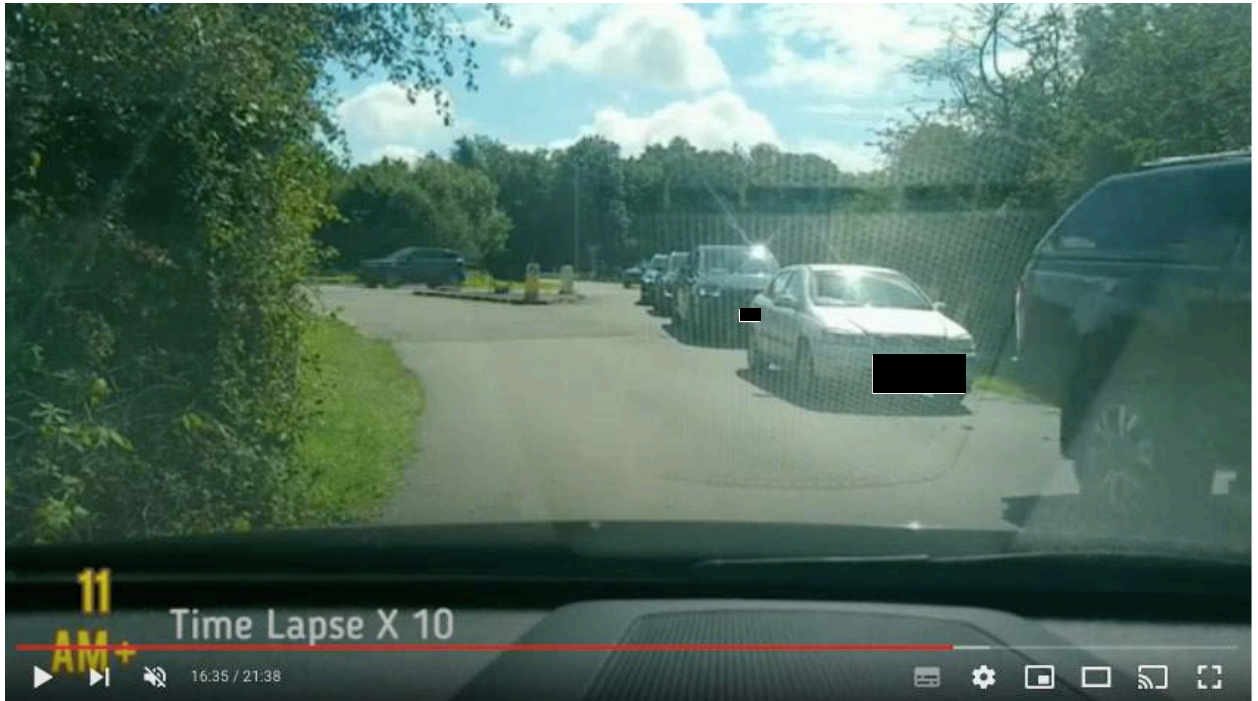
- 1.69 The proposal onto Knockhatch Lane would need to demonstrate there would be no highway capacity issues at the A22 Diplocks roundabout including during seasonal variations as part of its planning application. The proposal will need to ensure its traffic generation is robust in this regard.
- 1.70 The Highway Access Feasibility Report does not consider seasonal variation and it appears that it underestimates vehicle movements at Knockhatch Adventure Park. This has implications for Knockhatch Lane and also on the A22.
- 1.71 The Highway Access Feasibility Report does not consider the peak times for vehicle movements along Knockhatch Lane and does not recognise queuing that can occur during busy periods at Knockhatch Adventure Park which extends back onto the A22. An increase in traffic from the relocated Hailsham Cattle Market would exacerbate this and result in road safety concerns for Knockhatch Adventure Park.
- 1.72 The site layout appears likely to result in HGVs queuing to check in, unload and then park, which is an occurrence at its existing location on High Street. Such queuing would exacerbate the existing queuing that occurs on Knockhatch Lane and the A22 and result in road safety concerns for Knockhatch Adventure Park.
- 1.73 The Highway Access Feasibility Report appears to have underestimated growth in vehicle movements at Knockhatch Adventure Park and subsequently vehicle flows along Knockhatch Lane. This has implications for Knockhatch Lane and also on the A22.

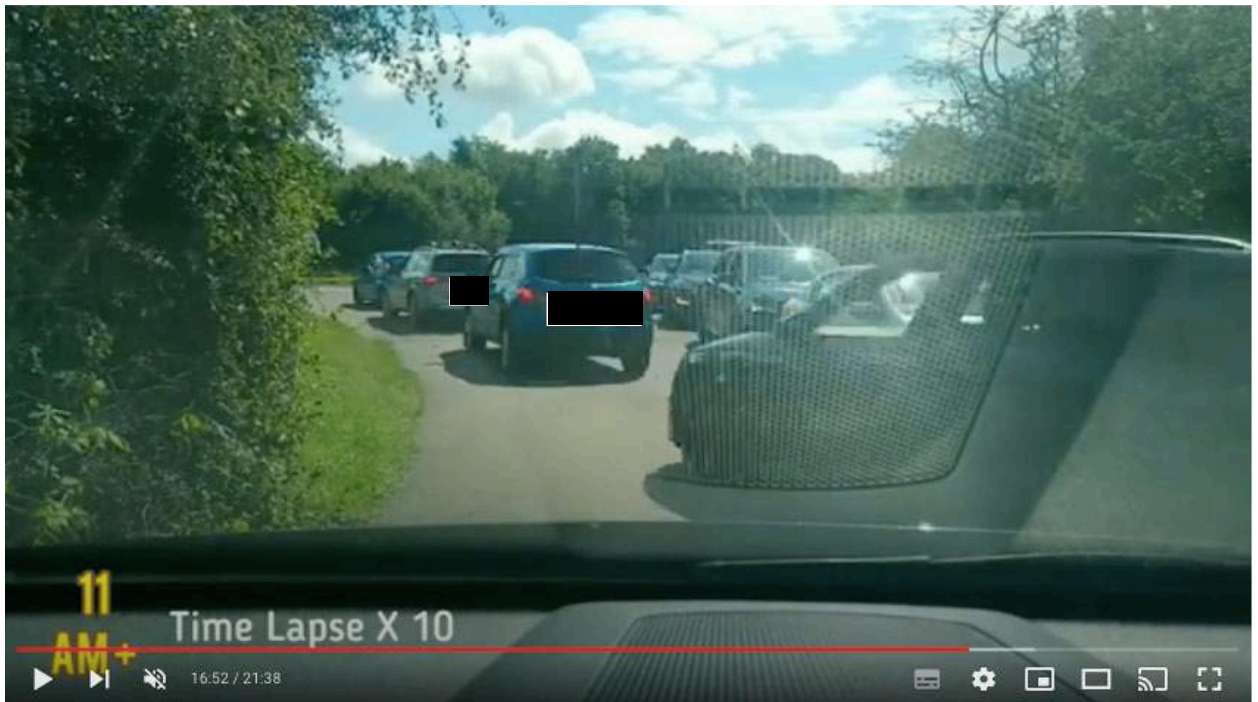
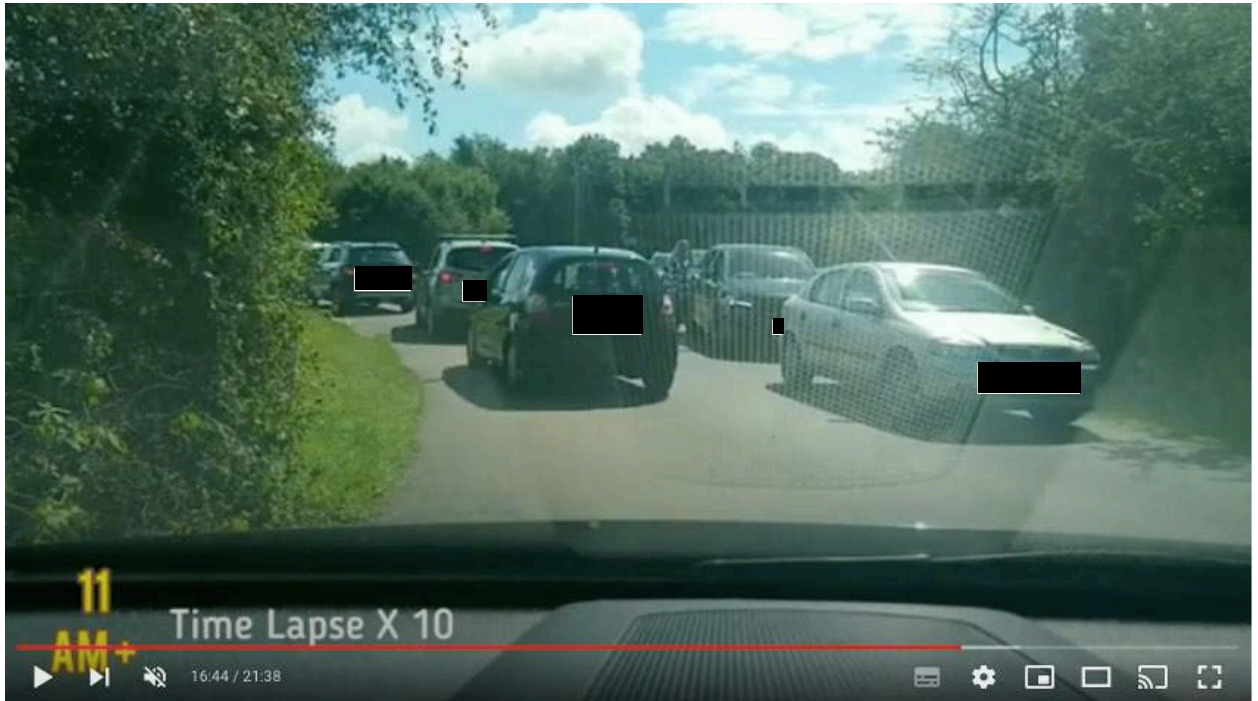
- 1.74 Part of the site and the proposed realigned access road to Knockhatch Adventure Park would be located in flood zone 3 and it is understood that there is a clay geology to the site. A surface water balancing pond is proposed, however, there is also overflow car parking located on this land. It therefore appears that either there would be a lack of car parking on site or a larger site is required than currently proposed. Notwithstanding, details of the surface water run off calculations and the overall drainage strategy to determine the balancing pond will be required for scrutiny.
- 1.75 Given the Highway Access Feasibility Report, the information and assessments, or lack of, therein, Knockhatch Adventure Park have concerns over the impact of the relocated Hailsham Cattle Market upon their business. There has been no contact with Knockhatch Adventure Park with regards to the proposals which increases these concerns.

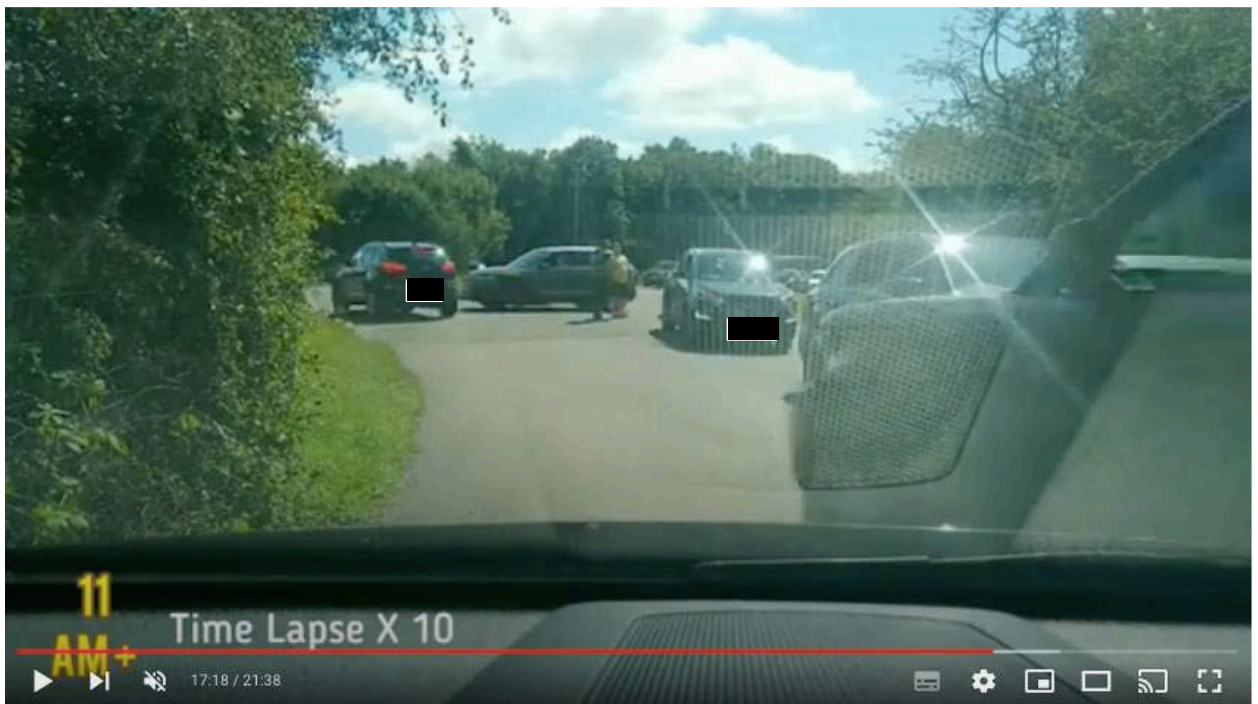
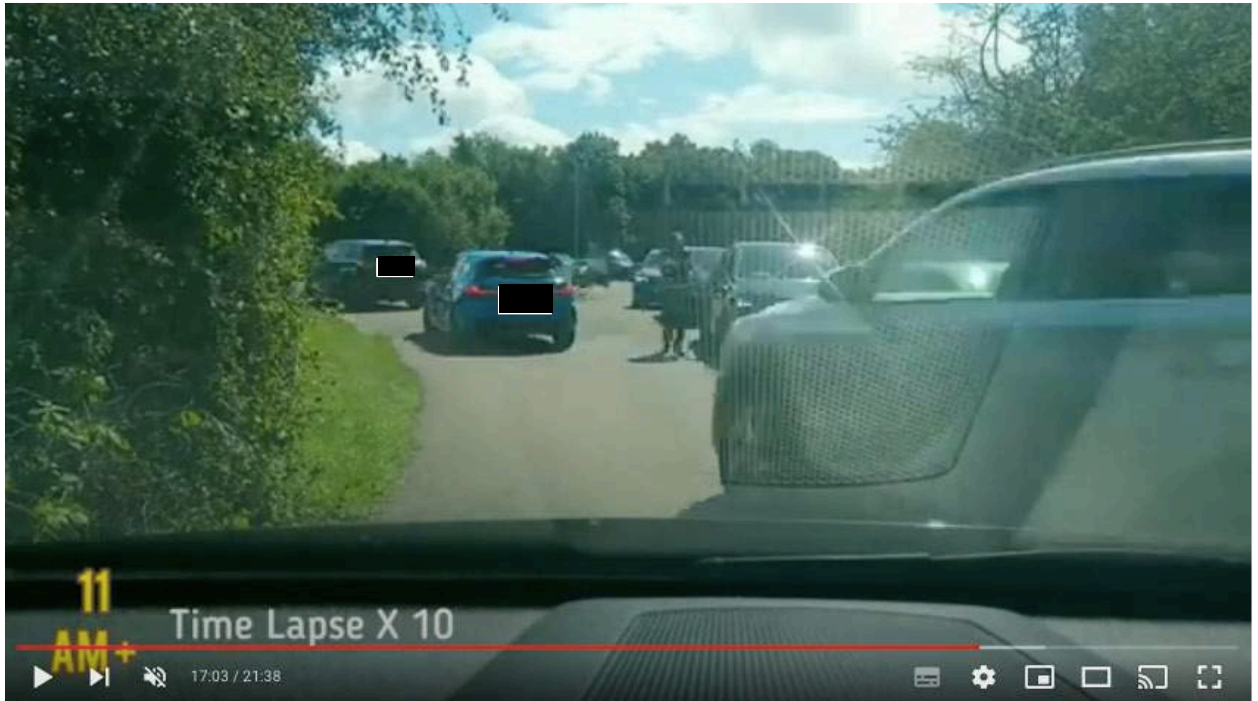
Appendix A: Congestion on Knockhatch Lane and Visitor Comments

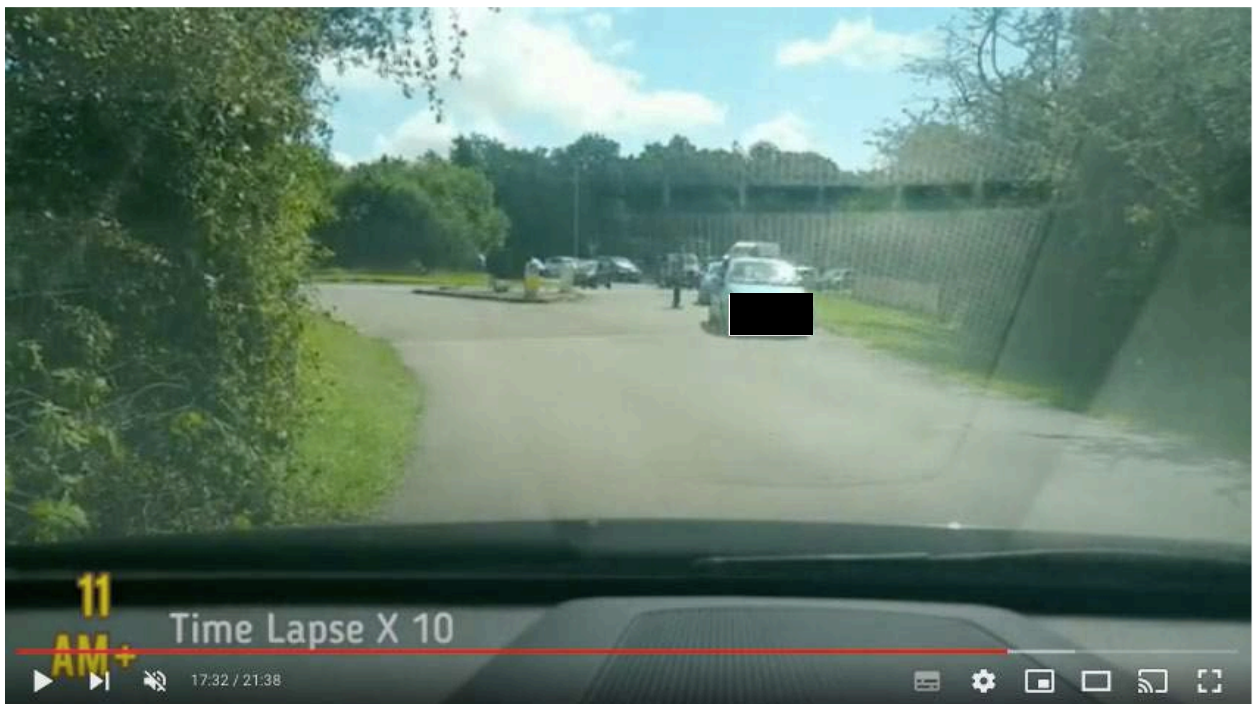
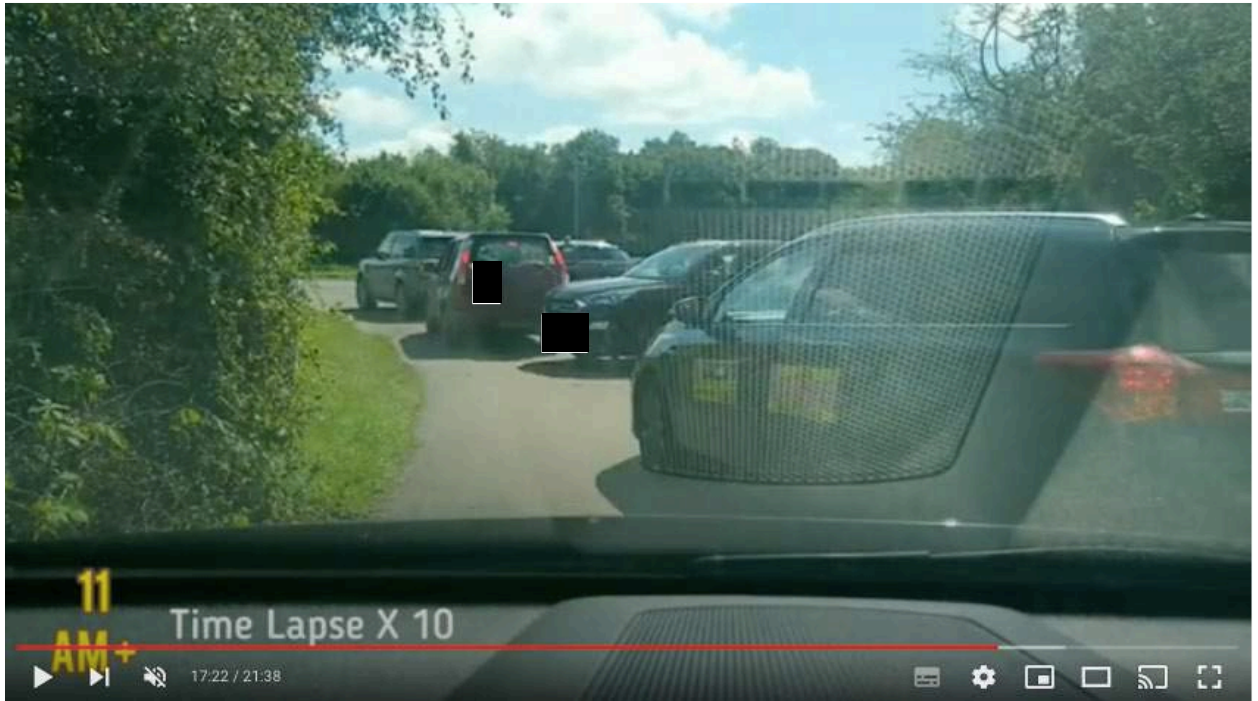
Video Stills of Congestion, Traffic Marshalling and Pedestrian Movement along Knockhatch Lane on a Peak Seasonal Day

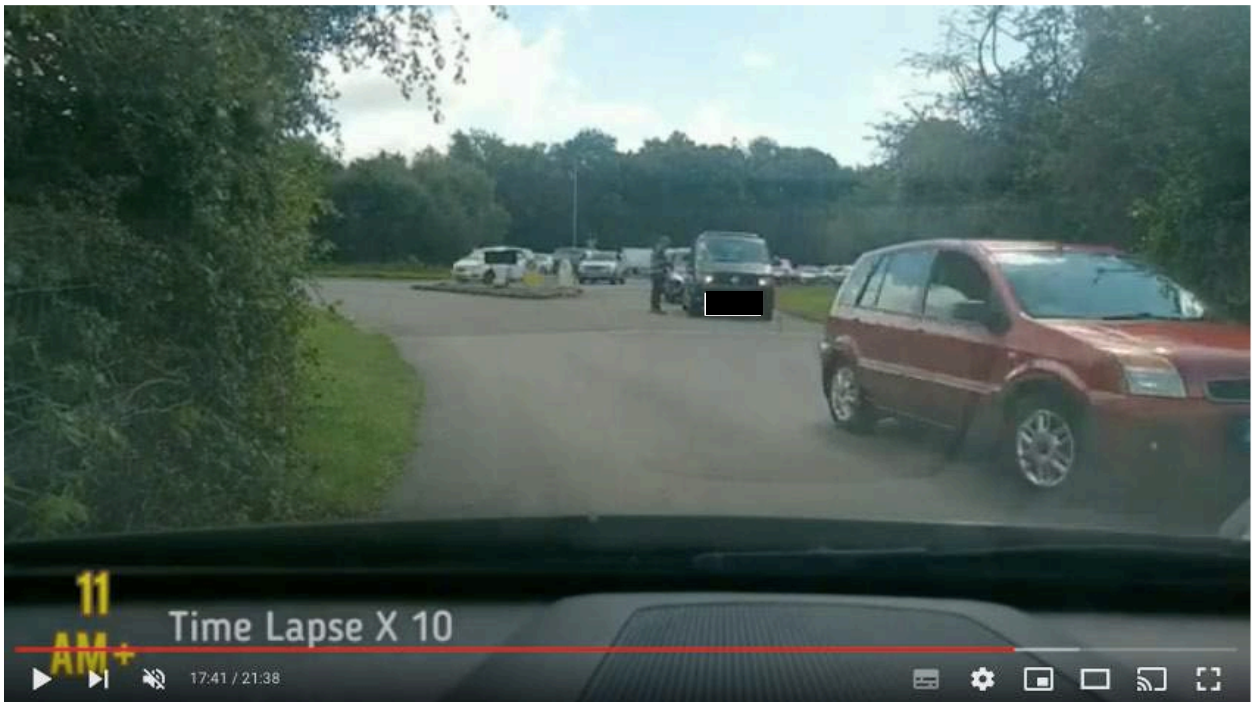
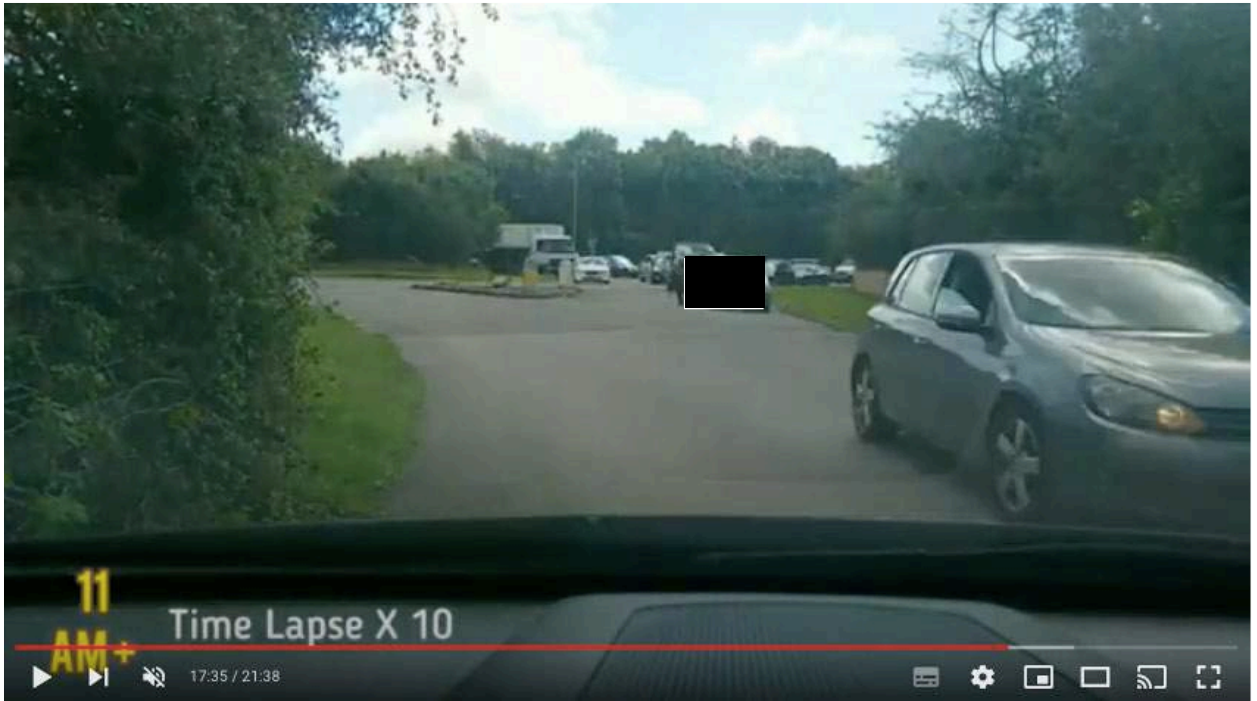


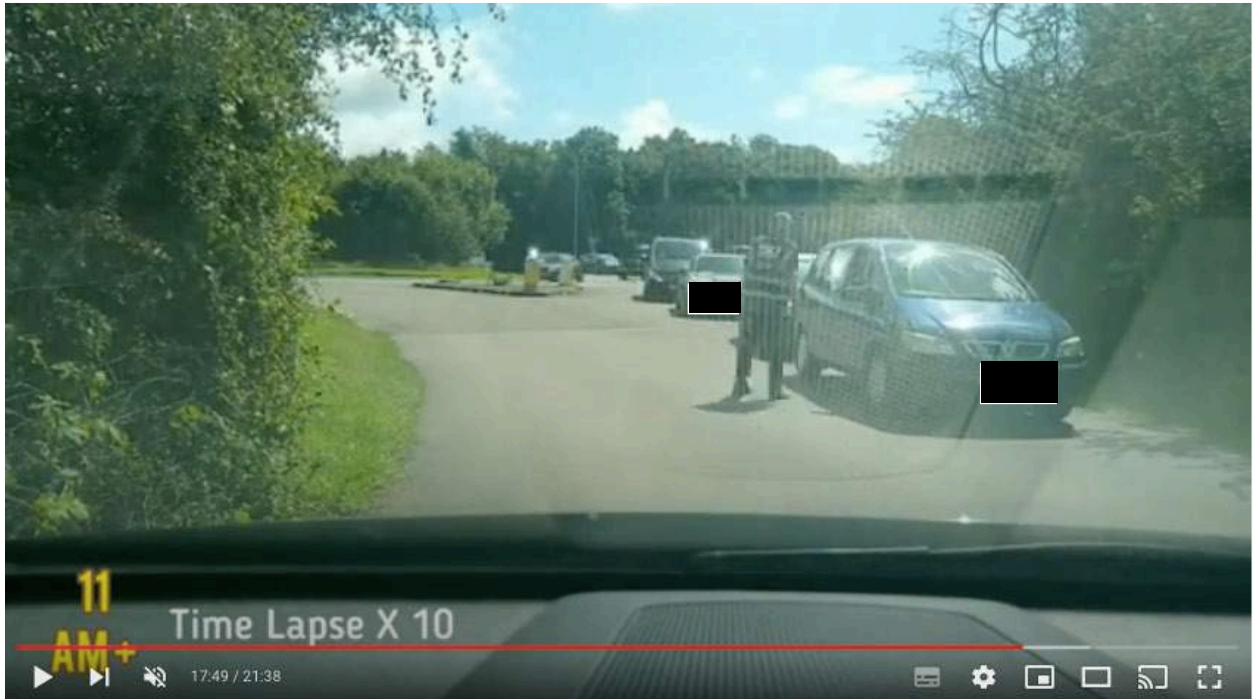




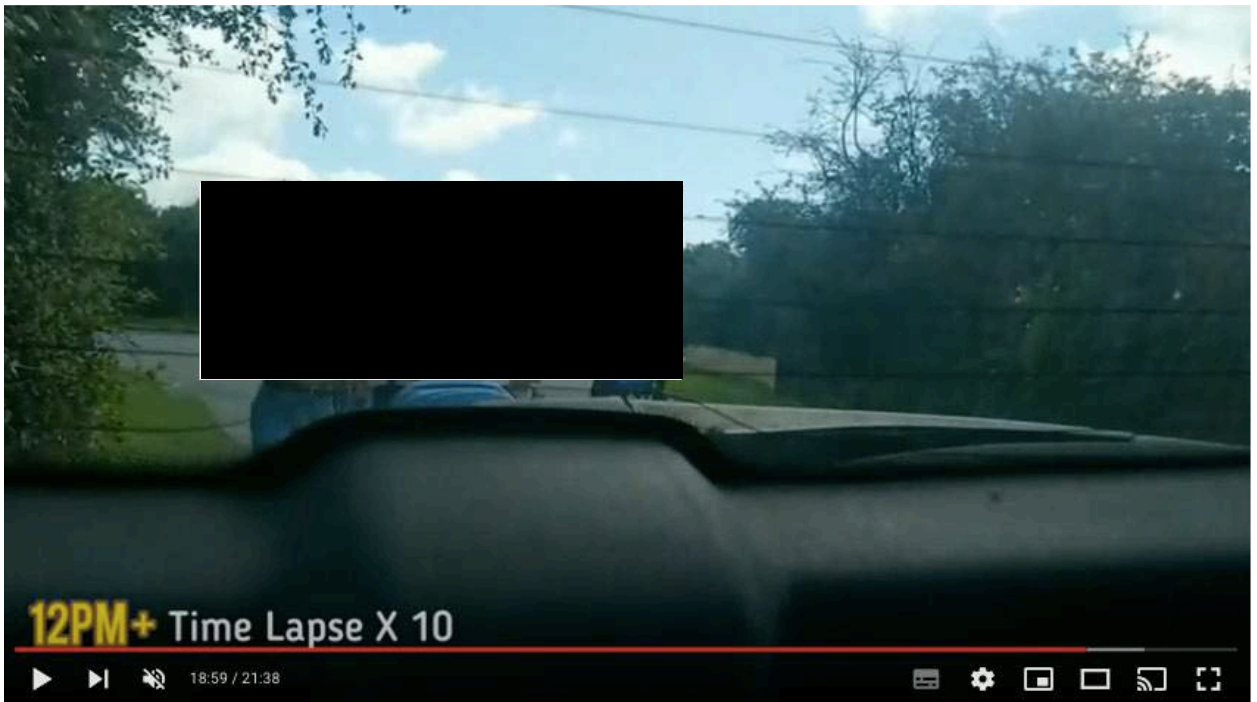












Screenshots of 10th August 2021





KNOCKHATCH ADVENTURE PARK
10th August 2021 X10 Time Lapse

Unlisted

17 views • 2 Sept 2021

0 0 SHARE SAVE ...



KNOCKHATCH ADVENTURE PARK
10th August 2021 X10 Time Lapse

Unlisted

17 views • 2 Sept 2021

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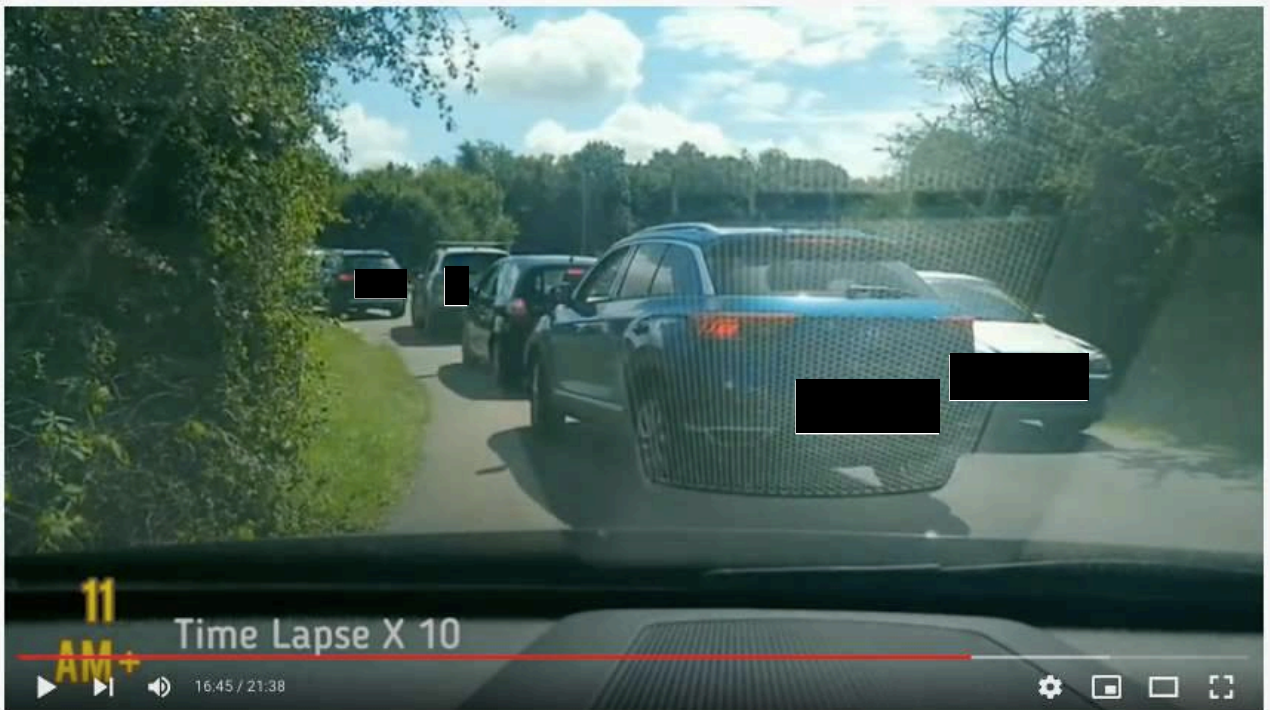
KNOCKHATCH ADVENTURE PARK

10th August 2021 X10 Time Lapse

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17 views • 2 Sept 2021

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KNOCKHATCH ADVENTURE PARK

10th August 2021 X10 Time Lapse

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17 views • 2 Sept 2021

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[KNOCKHATCH ADVENTURE PARK](#)
10th August 2021 X10 Time Lapse

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[KNOCKHATCH ADVENTURE PARK](#)
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Knockhatch Adventure Park

@Knockhatch · Amusement & Theme Park

Edit Shop on Website

Home Jobs Reviews Events More

Promote



Knockhatch Adventure Park

Published by Chris Beveridge · August 10

Due to our grass parking being water logged due to heavy rain, we are no longer accepting online bookings for Wednesday 11th August 2021.

You are welcome to turn up and pay on the gate, but once the car park is full, then customers will be asked to park responsibly off site.

To make sure there is ample parking please:

- 1) Follow the Marshalls instructions
- 2) Park responsibly
- 3) Car pool as much as possible

While there is always room for people in Knockhatch Adventure Park, parking is not unlimited and cannot be guaranteed on site.

PS. Taxis will not be turned away for drop offs/collections.

Thank you in advance for your patience. Enjoy your next visit!



21,446

People Reached

3,554

Engagements

Boost Post

46

105 Comments 17 Shares



Most Relevant

Comment as Knockhatch Adventure Park

Zoe Bark

Christopher Hustwayte Lynnette Hustwayte might be worth getting there early Friday just in case xx

Like Reply Sw

1 Reply

Julia Kent

I arrived at 9.45 today and parking was a doddle. Best thing to do is get there as early as u can. Just remember it's not the staffs fault we've had bad weather x

Like Reply Sw

1 Reply

Emma Burnett

We had a lovely time today as always - we were parked up just before opening and there was plenty of parking at the front unfortunately you can't predict the weather so they wouldn't have known when taking online bookings there would be less parking. O... See More

Like Reply Sw

1 Reply

Becky Wallis

Why have you deleted the other posts!?! It clearly showed how many customer you turned away even though they have prebooked tickets. It also demonstrated the awful mismanagement of the day, with you closing the phone lines so we couldn't speak to staff to find out what was going on, and relying on other cars to be told they were turning people away. I feel really disappointed that my children missed out on something we had been looking forward and taking time off work to do.

FORWARD AND LABEL WITH OUR WORK TO DO...

Like Reply Sw

Corrine Hayler

Becky Wallis they would normally have plenty of parking but with the amount of rain there's been lately after such a dry spell the ground just can't take it. The staff didn't forecast the weather!

Like Reply Sw

6 Replies

Sonia Anderson

Becky Wallis I can't believe they deleted the previous post with "there" customers comments absolutely outrageous!!!!

Like Reply Sw

4

Sonia Anderson

Becky Wallis I know we got turned away today at 11.01am when they had only been open for an hour we sat 30 mins in the traffic down the narrow road with no one coming down to talk to anyone it was only because I walked up leaving my family in the car a... See More

Like Reply Sw

2

View 1 more reply

Most Relevant is selected, so some replies may have been filtered out.

Reply to Becky Wallis...

Robert Fitch

Knockhatch Adventure Park have you looked at maybe a temporary park and ride with a minibus operator, until your fields are usable. Im sure the people of sussex would understand.

Like Reply Sw

2

Stacie Kilroy

Might get there a little earlier to park to get a space and then queue to sort passes out Mandy

Like Reply Sw

4

Claire Sales

People need to drive slower in and out also

Like Reply Sw

1 Reply

Carl Smiff

There was ample of parking today as not only the overflow car park opened (filled to capacity) that the car park for the ski place was used (filled to capacity too) to help families to go to Knockhatch ...and sides of the road making it still safe for ... See More

Like Reply Sw

4

Jessica Tyler

I understand the issues, but to tell customers to go and "park responsibly off site" where exactly? I actually witnessed a lady with a very young family have to make a dash for it across the A22 at the knockhatch roundabout about 11am today. I thought ... See More

Like Reply Sw

7 Replies

Eddie Howland

Get all the 4x4s to park in the muddy field... But then I guess you don't want it churned up.

Like Reply Sw

1

Jane Clare

The traffic queuing round Diplocks roundabout trying to get in to Knockhatch today was ridiculous!

Like Reply Sw Edited

1

Clare Hicks

Knockhatch Adventure Park what happens if you have paid online and then get turned away?!? Do you get a refund??

Like Reply Sw

1

Casey Whicker

We have already booked online for Wednesday, are we still ok to come along?

Like Reply Sw

1

Knockhatch Adventure Park

Casey Whicker Yes!

Like Reply · Commented on by Chris Beveridge Sw

Casey Whicker

Becky Wallis oh no hun, so sorry to hear that

Like Reply Sw

View 4 more replies

Most Relevant is selected, so some replies may have been filtered out.

Anna Hallett

We got there at 10 today, and even then it was busy- after travelling from Essex for the day. I would not have been happy if we've been turned away so I'm pleased they've made the decision to avoid selling more tickets for tomorrow.

Like Reply Sw

1

Mandy Riches

I'm due to come on Thursday with a wheelchair disabled person and grandchildren and two adults booked end of July traveling from Godstone and actually don't want to attend now as I'm extremely worried about getting parked and the disabled passenger on... See More

Like Reply Sw

2 Replies

Lynsey Jayne

Hi, we are travelling from Bedfordshire and have pre booked our tickets for next Monday, quite worried we will be turned away after seeing this post. Should we still come?

Like Reply Sw Edited

2 Replies

Kayleigh Tasha

Car pool as much as possible with high cases of covid..good job

Like Reply Sw

2 Replies

Peter Anderson

Absolutely ridiculous today.

Like Reply Sw

1



Kno

Jessica Tyler
I understand the issues, but to tell customers to go and "park responsibly off site" where exactly? I actually witnessed a lady with a very young family have to make a dash for it across the A22 at the knockhatch roundabout about 11am today. I thought she was crazy. Now I understand why she was doing it. It's so dangerous. It's an accident waiting to happen. What if one of her children had slipped? There were cars zooming past seconds after they got to the kerb. It's not somewhere you can park and walk to safely with little ones, and it's irresponsible of Knockhatch to encourage customers to do so.

Like · Reply · 8w

Carl Smiff
Jessica Tyler I cant understand why she was doing it though..why was she doing it ? Obviously if somewhere is full we go to another destination ?! Not play chicken with our children against very fast cars ? Yes I have seen how half of the motorists use that road (I would have put drive but they think the speed is unlimited and indicators are just for show not to be used)

Like · Reply · 8w

Jessica Tyler
Carl Smiff agree! It's not something I would attempt with mine. It makes me shudder just thinking about it.

Like · Reply · 8w

Rhian Trevethick
Jessica Tyler this morning a couple abs a baby in a pushchair walking around the roundabout as cant get a pushchair over the grass verges - so dangerous. Surely a trip to knockhatch isnt worth that. The road isnt safe to cross let alone with children. ... [See More](#)

Like · Reply · 8w

Carl Smiff
Rhian Trevethick I agree with you there ! But many seem to be lacking common sense because if a place is full to capacity..go somewhere else for the day or try going back later ✓ I went to Knockhatch one time and saw cars awaiting on the main road..common sense kicked in and went elsewhere !

Like · Reply · 8w