## Regarding Planning Application Reference No. WD/2016/2796/MAO

The original Village Concerns objection from December 2016 / January 2017
to the above planning application still stands.
The amendments submitted on 1/12/2017 do not overcome our original objections.
Please do not approve this application.

The additional amendment documentation listed below* re London Rd entrances does not have the detail and full analysis to ensure safety of pedestrians and vehicle users nor does it address the objections submitted by ESCC Highways in Jan and Feb 2017. The proposed changes in 6198/203G involve a whole scale removal of hedgerows, trees and verges along the London Rd causing ecological and Landscape damage.

Ailies Lane and Waldron Rd entrances have not been considered, no detail has been provided.

* Highways Amendment 6198/203F

*Highways Amendment 6198/203G

*Stage 1 Road Safety Audit

* Designers Response

## Issue 1 Traffic and Safety

**For clarity in this section quotes are in black from above mentioned documents and our responses in red.**

**Stage 1 Road Safety Audit Nov 2017 for London Rd entrances**

**1.1.6** "Traffic Flows were moderate and vehicle speeds were observed as being low."

The audit conducted a site visit for half an hour from 10.30 to 11.00am.

This non quantitative assessment based on such a short time span carries no weight.

**1.1.8** The Road Safety Audit "has not considered structural safety or checked for compliance to standards. The Safety Audit does not carry out a Technical Check. It is assumed that the project sponsor is satisfied that such a Technical Check has been successfully completed prior to this Safety Audit".

There is no evidence of this "Technical Check".

**3.1.1** "the right turn pocket could lead to rear end shunt style collisions".

"Further information required and /or to be provided to confirm the expected number of right turning vehicles at Peak Times entering the site".

Although the Designers response gives figures from the Traffic Assessment the Peak Times are given as AM 7.30 to 8.30 and PM 16.30 to 17.30.

The comments from ESCC Highways in Feb 2017 are that " AM figure could exclude the school run and give a lower prediction for the standard PM peak of 17.00 to 18.00 hrs that allows for more commuter trips to be included. I would request that the Peak segment selection is provided for the standard peak hours to make a comparison prior to taking a view on the impact of the development traffic".

These Peak Hour figures have not been given and hence the Safety of this right turn pocket has not been fully assessed.

**3.1.2** The photograph clearly shows children will be using this area but apart from moving the sign no mention is made for extra safety measures for children.

**3.3.1** "Ensure adequate visibility sightlines can be provided."

This will result in loss of trees, hedgerows and habitats. See further comments below.

**Designers' Response**

**1.2** "The new development will result in significant vehicle movement onto East Hoathly".

**1.3** "The road is a bus route and rural in the main".

The proposed development would destroy the rural atmosphere of this village. The 205 houses represent a 50% in the number of houses in the Village.

**ESCC Highways Report Feb 2017**

Highways objected to the application on various grounds and the latest amendments have not addressed the issues raised. Bear in mind the application has 2 entrances on London Rd, one on Waldron Rd and one on Ailies Lane.

"Swept Path for a 12m refuse truck and agricultural vehicles is not provided for any access point".

Still not provided.

In fact, the vehicle shown in the notes for the amendment are 10.595 metre vehicles and so a lower standard is being used and then failing to meet it.

"Access onto Waldron Rd is shown as an Emergency only access. What is not provided is the means to restrict other use of the access other than Emergency vehicles to prevent a cut through between Waldron Rd and London Rd"

Waldron Rd "A swept path for emergency vehicles is required to demonstrate suitability for this".

Still not provided.

**Peak Hour Trip Rates requested for London Rd**

See above

Still not provided

**Full Application on Ailies Lane**

"This application seeks full consent. As this is a new development on a Green Field Site, the proposed vehicular access requires consideration in terms of Highway Safety. No details are provided. A 7 day speed survey should be provided".

Still not provided

"The proposal would result in material change in the volume of traffic using London Rd and hazards would be introduced by the additional slowing, stopping and turning traffic in conflict with the additional non motorised activity that would be generated by this proposal".

**"The details provided do not overcome my original objections and as the residential portion of the Hybrid Application is seeking 'Outline' seeking approval of 'access' as such it is expected that the level of access detail should be that of a 'Full' Application."**

**The Ailies Lane proposal cannot be assumed to be accepted unless supported with the appropriate evidence, in this case actual speeds."**

**Access Width**

In addition 6198/203G does not appear to show wide enough access for the largest vehicles which would overhang kerbs and could not pass each other without mounting the pavement or enter oncoming traffic lanes.

The documentation is flawed and lacking in the necessary detail to ensure the Safety and well being of the residents of East Hoathly.

## Issue 2

## Environment: Trees, Hedgerows and Green Approach

**In this section, Wealden's documentation quoted in red.**

In the documents submitted on December 1st, 2017, London Road Highway Improvements, AMENDED, in three places along the London Road on the drawing, are these words: "Hedges and undergrowth to be cut back. Trees to be removed where necessary to be agreed with ESCC/WDC."

*We object to the omission of consultation with residents of the Village, the Parish Council and any other interested local organisations.*

Village Concerns does not want removal of trees or ancient hedges along the London Road. We want the green approach / the green corridor to the village to remain. We want wildlife to be preserved. We do not want destruction on this scale only to be replaced by new trees / new hedgerows which take a lifetime or more to mature.

Loss of trees, hedges and verges reduces absorption and increases surface water run off increasing flood risk. Meddling with the environment does therefore have varied consequences.

In Wealden's own "Landscape & Ecological Assessment Study, July 2017", the following is said throughout the Study of East Hoathly and includes the London Road:

"Trees should be retained in accordance with the Wealden Design Guide and best arboriculture practice."

"The hedgerows and trees around the Site contribute to the green infrastructure ….."

"…. an important green infrastructure link …."

"high landscape value"

"Avoiding/reducing intrusive highway engineering and maintaining its wooded "green" boundaries will ensure this character is safeguarded."

Wealden and its Planning Department. You cannot agree to destroy the natural world when you have studies of your own that say the above.

Also in this same Study, on pages referring to East Hoathly, there are long lists of "Protected and Notable Species within 1km" of all sites including this site.

Here is the list and is it not impressive? Wealden, you must agree.

<u>Protected Species</u>

Adder

Brown Long-eared bat

Common lizard

Common Pipistrelle bat

Grass snake

Great crested newt

Hazel dormouse

Pipistrelle sp. bat

Slow worm

Soprano Pipistrelle bat

Sussex Biodiversity Action Plan Species

Buff ermine (moth)

Cinnabar (moth)

Common toad

Dot moth

European hedgehog

Grizzled skipper

Lesser butterfly-orchid

Minor shoulder-knot (moth)

Pale eggar (moth)

Rustic (moth)

Small blue

Small heath

Small pearl-bordered fritillary

Three-lobed crowfoot

Wall

White admiral

White ermine (moth)

Sussex Rare Species Inventory

Alder kitten (moth)

Anacaena bipusulata

Black-headed cardinal beetle

Bog beacon

Broad-bordered bee hawk

Criorhina ranunculi

Downy emerald

False chanterelle

Festoon (moth)

Grass rivulet

Hydrochus angustatus

Hypomyces aurantius (seems to be a toadstool)

Kent black arches

L-album wainscot (moth)

Matt bolete

Median wasp

Nigma puella (seems to be a spider)

Oak-leaved goosefoot

Ochreus pug (moth)

Orange footman (moth)

Pearl-bordered fritillary

Red-necked footman (moth)

Rosi marbled

Satin lutestring (moth)

Sedge fanner (moth)

Short-leaved water-starwort

Three-lobed crowfoot

Volucella inanis

Wasp spider

Wood sage plume

Yellow-legged clearwing

**Regarding the hedgerow along the London Road**.

The hedgerow has been surveyed and recorded with Sussex Biodiversity and defined as intact and plant species rich.

There are 9 animal protected species in this area (as the list above shows) and at least some of them use the hedgerow as their corridors and for foraging.

In addition, we would like to point out that the proposed removal of the hedgerow would be in contravention of Statutory Instrument No 1160, "The Hedgerows Regulations 1997".

The hedgerow has at least 8 woody species, is over thirty years old and over 110 metres in length and supports both these types of species, as categorised under schedule 1 "Wildlife and Landscape".

On all of these counts and for all of these reasons, removal of the hedgerow is therefore prohibited, and protected without question.

Below are photos of what could be lost if those who make decisions, do not listen to the wishes of the Residents who live in this Village.

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All photos below of the London Road along it or perpendicular to it.




Footpath




Footpath



The view of a fabulous oak tree that is also in the above photograph. This is where the footpath turns left, the footpath mentioned in the four new / amended submitted documents.



A mature, beautiful Oak on the corner of the London Road by the Lane where Croom Cottage is and across from the village's allotments.



The London Road where on the right are the fields for the proposed development. As you can quite obviously see there are beautiful trees on the right. Pines follow and very mature hedges.



Another view of the London Road, across from the field owned by WDC called Broomy Lodge. This is near where a new entrance is proposed to the development. We would not want the entrance to include taking down this Oak tree or the hedgerows.



Another view of the Oak tree described above but from the other direction, going back into the village. In the distance on the left, is the perpendicular row of trees, by the woodlands.

We ask for these images in these photographs to remain the same, even after potential development.

Below, on the Waldron Road, by the road hedge and trees. 1 sycamore, 1 birch, 3 pines

On the Liam Russell Architects Master Plan for the development, it says “existing tree group retained”. This is marked G43-PA on sheet number 4 of 4 on the Phorum document.



Carpenters Croft. Mainly Ash trees, 1 Oak and Cyprus, plus hedge and a Leylandii hedge

We request these trees and hedges be retained as they have given privacy to Carpenters Croft residents for 30 odd years and is a huge nesting opportunity for birds especially tree sparrows. There are three layers of greenery which includes the Leylandii, so it is an especially good barrier to any new development. The two photos below are of Carpenters Croft, taken in winter so the trees do not look as beautiful as they would in the Spring or Summer. These are marked as G47-PA on sheet number 4 of 4 of the Phlorum report.






Submitted by Katherine Gutkind
On behalf of the Village Concerns Steering Committee
East Hoathly's Village Concerns Action Group

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