

The Planning Policy Team
Rother District Council
Town Hall
Bexhill on Sea
TN39 3JX

draftlocalplan@rother.gov.uk

Dear Sir or Madam,

With reference to publication “Rother District Local Plan 2020 – 2040” regarding the “Identification of sites for Gypsies, Travellers and Travelling Show people in Rother Interim Report Draft (Regulation 18) Version – April 2024”.

We would like object to the proposed site GYP0003 in relation to the location, material impacts and safety of the site in the Flimwell area. We note there does not appear to be planning permission in place for this site at present, however it appears to be under consideration by yourselves.

With regard to GYP0003, The Hollies, The Mount, Flimwell, Ticehurst parish, our objections are:

- This site appears to be presently owned by a Traveller / Gypsy who has already commenced works in preparation for urbanising the site (as far as we can tell, without permission). It also appears under the heading “Other Matters” in Planning Application RR/2023/2331/T that: “Comments have been received in regard to unauthorised works on the land concerning the siting of mobile home and static caravans and that these works are subject to an ongoing enforcement case”. The Planning Application also contains quite valid objections, referenced below in bullet points 1 - 15 regarding tree preservation orders, the inadequate site management to date and general adherence to guidance / regulations contained within the Planning Application.
- The Planning Application also refers to the remaining trees: “(Beech Tree – Remove lower limbs, Willow – Coppice (subject to tree being allowed to regenerate) 2x Holly Trees – Coppice (subject to trees being allowed to regenerate) and 2x Chestnut Trees – Coppice should not be removed”. I find it hard to believe that these trees will re-generate with regard to their root structures under what will effectively become a static caravan park, hard standings, soft standings and heavy vehicles with trailers / caravans driving over them and the associated large turning circles of lengthy vehicles with trailers and caravans.
- It appears from photos of the site (given below) that the entry and egress boundary of the site to the A268 is also lined with what is now reduced coppice trees, therefore it would be impossible for adequate entry and egress from the site unless driving over coppice trees mentioned in the previous planning permission. From the historic photo (2019) given below it also appears that “protected” coppice trees have been removed to gain access to the site. Even with these trees removed the access is not wide enough for car and static caravan access with regard to turning arc to enter the site from the main road without damaging the “protected” coppice trees.

Photo showing entry to site with coppice trees/shrubs & turning arc for lengthy trailer type vehicles entering the site



Photo showing original trees and natural habitat now destroyed.



(Planning Application RR/2023/2331/T previous objections mentioned above with which we agree)

1. Wildlife that enjoyed this piece of woodland have been disturbed,
 2. Mobile home and static caravan on the site without planning permission, together with rough access road and parking for several vehicles. Not shown on plan,
 3. Large attractive trees do not impact neighbouring properties or overhang the road,
 4. Most of the regrowth has been systematically removed since TPO was placed on site,
 5. None of the trees are dead and have given a wonderful display of leaves and vibrant colour in the past year,
 6. Removing the stump will stop regrowth of the tree from the stump,
 7. Would destroy what should be and recently was dense woodland, which serves as a green gap and natural wooded habitat,
 8. Entire site is subject to a TPO which includes, and included, all trees on the plot of land and the ancient hedgerow,
 9. Application is unclear, birch trees are not dead; they have no leaf/are dormant because of winter. Removing these trees would further urbanise and leave no woodland in this area on the site,
 10. Beech tree is a beautiful and mature specimen and a considered approach should be taken,
 11. Concerned that coppice is not for woodland management purposes but just serving to further urbanise the plot of woodland,
 12. Unnecessary removal (or coppice), Holly trees not referred to on written form, only in the drawing – unnecessary removal. Holly trees serve as excellent winter habitat and shelter for birds,
 13. Measures should be put in place to try and repair the damage that has already been done, rather than allow more works to be carried out,
 14. Damage includes visually degrading the land, destroying wildlife habitat, damaging the environment and disrupting the ecology,
 15. Allowing the removal of more woodland would set precedent for other protected green gaps along this road to be ruined.
- As per the CROW Act and The Levelling Up and Regeneration Act 2023 amended section 85, I am sure that you are aware there is a new duty on relevant Local Authorities who “must ensure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB”. Please refer to the two photographs below prior to the destruction carried out so far at site GYP0003 and a previous photo taken (2019) prior to

destruction. There doesn't appear to be any conserving or enhancing of the natural beauty of the AONB. The disgraceful historical management of the site to date by the present owner and damage caused we fear is a pre cursor to the ongoing, and eventual end result of the site for many years to come. We also feel that if permission is granted for this site, it sets a precedent for anyone, be it settled resident or Traveller/Gypsy, to disregard the best interests of the AONB, area in general and Planning Permission or guidance supplied by Gov.UK in numerous publications with regard to sites of this type.

Present photo of the site from Google Maps. Please note that further destruction and urbanisation of the site has taken place since this google image was taken.



Previous (2019) photo of the site prior to destruction on site.



- With reference to **safety** when considering the prospective site and **vehicular** entry / egress from site GYP0003 if it becomes urbanised. We feel there is a high risk of accident in the vicinity of the site entrance. As can be seen from the below photo there is a bend further along the A268. This is a busy unlit road that carries fast articulated vehicles both in summer and winter along with all the additional risk that entails. We believe there will be five families (sites) using the single entry / egress point into this fast road, therefore a busy entry / egress point with a highly increased risk factor. We also believe accidents are highly likely due to slow moving large vehicles, caravans and trailers turning into / out of the site. The present entry to the site is limited in width due to the coppice trees each side of it. This results in increased turning arc of a vehicle towing a caravan or trailer into the oncoming traffic side of the road. From the photos provided it appears the protected coppice trees are gradually being removed to enlarge the entrance gap to the site.

Photo showing bend in the A268 in relation to the entry point of the proposed site GYP0003



- We have serious concerns with respect to **safety of pedestrians (especially children)** walking to and from the site with regard to inadequate kerb width (or no kerb at all) over the entire length of the A268. This is especially relevant to a person pushing a pram and to any child / children who may be accompanying them on foot, scooters or bikes etc. Our concerns also encompass disabled access to the site by people using mobility scooters or restricted / slow walking ability. The kerb width is simply not wide enough to safely accommodate any of the above scenarios. Heavy articulated vehicles pass (at speed) very close to pedestrians along this extensive stretch of road along with the associated suction / drag they produce whilst in motion. Added risk increases during the winter months with water, ice, restricted visibility and night driving on an unlit road. Just a little further from the intended site in both directions the kerb reduces to practically zero width, in one area just before a bend leading to even a single able bodied person having to cross the busy A268 at speed to safely walk on the other side of the road. Therefore we believe general pedestrian access along with disabled access in general to a five family site regularly using one entrance, directly onto a restricted width kerb which reduces to zero very quickly along side a fast road with articulated lorries would be rated high risk if assessed by an independent safety professional. The risk significantly increases during the winter months especially in respect of historical records of death and accidents on the road. In our opinion, as the risk is already known we believe it would be negligent to allow a five family, one entrance access, to this road. We also believe that due to the proximity of the main road and available kerb, the site does not

achieve any standard close to the guidance given in the government document, “Communities and Local Government, Designing Gypsy and Traveller Sites, Good Practice Guide” bullet points 3.3 and 3.4.

- With reference to your publication Rother Local Plan Draft (Regulation 18) Version April 2024 (**Cabinet Version**), **Proposed Policy HOU11: Gypsies, Travellers and Travelling Showpeople Criteria** Page 259. All proposed Gypsy / Traveller sites within the Flimwell area inclusive of GYP0002 and GYP0003 do not meet the majority of your own criteria laid out within the previously mentioned document, especially in relation to policy wording bullet points (I, III, IV, V, VII, VIII, X)

Kerb width just outside the intended site.



Kerb width decreasing further along the A268 westward.



Kerb width severely decreasing just up from the site and next to a bend in an Easterly direction.



Kerb width 250m west of site decreases to zero and the busy Road has to be crossed to the thin kerb on the other side.



Sincerely Yours
Samantha and Alan Wallace

