

Comment for planning application WSCC/004/20

Application number

Name

Address

Type of Comment

Comments

My objection is based on the hazards that will be caused by the use of these large vehicles on narrow roads, the fact that the audit does not cover the whole route along "C" roads, is not clear on the number of vehicle movements, and Imberhorne Lane is being unnecessarily used. . I note that the route for lorries has now been modified and is now via Saint Hill Green for vehicles both for accessing and leaving the site. This solves the problem of HGVs using Dunnings Road and the Town, but still leaves the problem of them negotiating very narrow lanes in the area and, in fact, makes the problem worse with twice as many lorries using the same roads. It is proposed to widen the access to the site to allow two lorries to pass each other. However just south of the entrance is a very narrow section through a rock cutting which is not wide enough for two cars to pass, let alone HGVs so this doesn't completely solve the problem. There is also a possibility the cutting could be damaged by these vehicles hitting it. Just south of NT entrance is another very narrow hazardous section with blind bends where two HGV cannot pass each other or even a car and certainly not the 84 bus that uses this route. The bends restrict visibility of oncoming traffic so that if two vehicles meet one will have to reverse creating a further hazard. If one of the reversing vehicles is a large vehicle this will be particularly hazardous. Additionally there are blind drive entrances just south of the bends. Saint Hill Green is also a hazard for large lorries turning. Turning right into Saint Hill Road from the northern arm would be a very difficult turn as the driver would have very little visibility of on coming traffic. Using the southern arm is also difficult as the turn is acute, which will likely result in verge damage. For delivery vehicles, turning left into West Hoathly Road is also poorly sighted for oncoming traffic. All this area is in the High Weald AONB and one of the features is narrow lanes. Excessive large vehicle movements such as this are not appropriate for these narrow lanes. Widening of the roads to accommodate them should not even been considered. Road surface damage is likely but there is also likely to be damage to the banks of the road. Imberhorne Lane is a "C" road and should not be used in preference to using the B2110 to and from the A22. Large vehicles should be using roads with the highest classification ie A&B, wherever possible and not using minor road "rat runs", and hence the route to and from Saint Hill Road should be via the B2110 and not Imberhorne Lane. This will also minimise highway damage as the construction of the A22 (and B2110) is more suitable for continual use by heavy vehicles. Apart from a transport assessment near to the B2110 and the bends on Imberhorne Lane near the WSCC recycling site there hasn't been any assessment further north along Imberhorne Lane. The historic bridge over Worth Way has restricted visibility for motor traffic with priority signs and was never intended to have excessive use by vehicles such as these. Traffic calming has been implemented on Imberhorne Lane north of the bridge as it is already being used as a "rat run" with vehicles travelling too fast, and the proposal to allow a continual flow of heavy lorries is adding to this problem. BW EG44 is heavily used and crosses the road as does FP43. Also the road passes Imberhorne Upper School and this is a further problem for the use of this road. None of these issues has been mentioned in the gta report. The plan states 31 deliveries per 10 hour period ie 1 every 19 minutes(4.4). However this is 62 vehicle movements ie 1 in every 9.5 minutes along 2 way roads ie 50%. increase from that implied. It is the number of vehicle movements that is important, not the number of deliveries. Astoundingly the safety audit, whilst acknowledging the roads haven't a footway (2.10) and that pedestrians could be near PROW 29EG (2.12), completely ignores the fact that the consequence of a lack of footway is that walkers have to use all roads in the area where these vehicles will travel, apart from the northern section of Imberhorne Lane. Also, whilst the plan states cycling parking will be provided for staff (3.7), it totally ignores the use of roads by cyclists and the extra hazard these lorries will be for those users. Section 3.4 states there aren't any issues from using the planned route from the Imberhorne Lane traffic lights to the sites. However this statement is not true if all factors are taking into account (which they clearly haven't been), some of which I've indicated above. My conclusion is the audit seems to have been applied only to immediate area of the site and not to all the area affected, and therefore its conclusion is inaccurate. The type of lorries that will be used can cause significant road damage. This especially occurs as a result of sharp turns where the rear wheels scrub the road surface. But also significant damage occurs on roads not suitably constructed for large amounts of this type of traffic. All the proposed access roads from the A22 are not suitably constructed and will suffer damage. The problem is the difficulty in determining what damage has been caused by this operation and allocation of costs, a thorough highways condition survey should be carried out by WSCC before work commences. I note there is an S59 agreement to repair damaged highway (and this needs to include the structure of the 2 bridges), but it is not stated what option to reclaim excess highway expense will be used.

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