

## Response for Deadline 5 concerning the access route across the Hoverport site

Planning Inspectorate ref: EN020026

My ID: [REDACTED]

I am writing to object to the plans put forward by the Applicant for access to the intertidal area using the Hoverport.

### Executive Summary

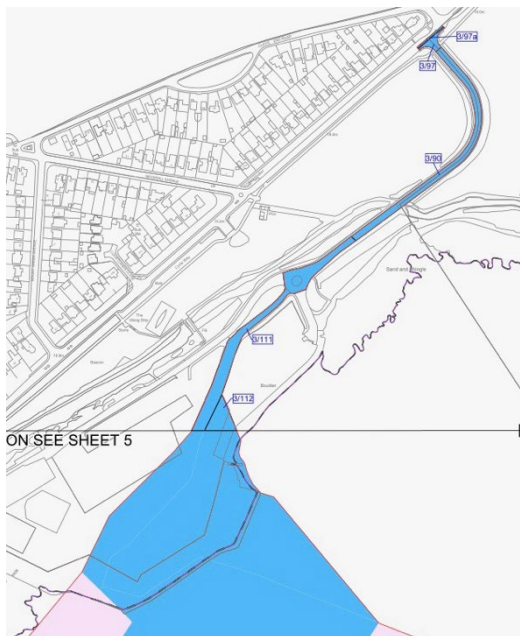
The plans put forward by the Applicant risk:

- Removing two of the three access points to the Hoverport for the public.
- Preventing access for people with limited mobility (unable to negotiate stairs).
- Preventing access for people in wheelchairs / mobility scooters.
- Preventing or at the very least making it difficult for families with young children and pushchairs.
- Devastating the local ecology due to the sheer quantity of vegetation / habitat that will have to be removed.
- Contravening *under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended)*.

### Introduction

The former Hoverport site is a rewilded, biodiverse site that supports rare and protected species. It is widely used by locals throughout the year giving access to nature walking predominately on hard standing which is particularly important in the winter months. At present, the public have 3 ways to access the whole of the Hoverport. The route from Sandwich Road down the old access road has a gentle sloping hardstanding surface which is ideal for people with limited mobility, those in wheelchairs and families with pushchairs.

### Plans by the Applicant



The diagrams above from the Applicant show the proposed order limits (REP4-003) and the possible alternative routes across the Hoverport (REP3-070). In REP4-086 the Applicant states in answer to AP9 that *“the construction access would be typically 7m wide to enable the two-way movement of vehicles”*.

The Applicant goes on to say that “fencing would be Heras or similar to segregate the construction vehicles from pedestrians and adjacent sensitive habitat”.



The image (courtesy of Google maps) on the left shows the old access route from Sandwich Road to the Hoverport. Point 01 indicates the point where the Viking Trail crosses the access route. Point 04 indicates the crossing point for a public footpath.

Measurements taken at the four points shown give the widths of the tarmacked area free from vegetation:

- 01 = 8.5m (kerb to kerb)
- 02 = 6.3m
- 03 = 6.2m
- 04 = 6.4m

Fig1

### Implications for public access

In REP4-086 the Applicant states in answer to AP11 that “*The hoverport shall not be used as a construction compound or for the parking of vehicles*”. This means that all the vehicles including heavy plant will be doing 4 journeys (2up and 2down) along the access road each day.

To enable two-way movement of vehicles established habitat will have to be cleared to give the 7m width specified by the applicant.

As indicated in my introduction, the approach road shown in Fig. 1 above is used by the public to access the Hoverport site either from point 01 or point 04. Even if it is deemed acceptable by a suitably qualified ecologist to clear the vegetation to allow two-way traffic there will not be room for the safe movement of pedestrians.

At its widest point, the road is 8.5m reducing to 8.0m kerb to kerb which only leaves a maximum of 1m for a pedestrian footpath and a suitable barrier. As indicated above, the Applicant seems to think a “*Heras Fence or similar*” would provide a safe separation between the public and heavy plant. I am no Health and Safety expert, but I cannot imagine that this would pass any risk assessment. It is my opinion that concrete blocks such as Jersey Blocks would be required.

It is clear to me that either the Applicant accepts that two-way traffic is not possible on this part of the approach or that the public will be excluded from using either access point (01 or 04). This would only allow pedestrian access using the steep stairs (shown in the photographs below). This will prevent anyone with mobility issues and anyone in a wheelchair from access to the Hoverport area. I believe this is discriminatory. In addition, families with young children and / or using a pushchair will at best find it very difficult to access the Hoverport and is a possible Health and Safety issue.

Although I do not feel that the Applicant should be allowed to use the Hoverport at all but the least bad option would be for the Ex A to insist that there is only one-way traffic on the approach with a dedicated footpath for the public separated by Jersey Blocks or similar.



It is worth noting that the path at the bottom of the stairs is muddy and often suffers from puddling particularly during the Autumn and Winter periods.

### **Clearing of vegetation**

#### **a) On the approach road**

As has already been stated above, to give 7m of hardstanding on the approach road, vegetation will have to be cleared.

This appears to be contrary to the statement given by the Applicant in REP4-089 1.1.7 which states that:

*“For the first stretch the existing track will be used (the habitat of interest being either side of that track) then for the final stretch construction plant will drive across the open unvegetated areas of hardstanding, thus avoiding habitat suitable for orchids, rare invertebrates or reptiles. There will thus be no vegetation clearance, although some pruning back of shrub branches may be needed depending on extent of growth prior to works commencing”.*

#### **b) Mid-section**

The approach road comes to what had been a roundabout for the former Hoverport site, but it is now heavily overgrown (see photograph below). This has reduced the access considerably as can be seen in Figure 2 below.

It would appear from the evidence that to achieve a 7m two-way access route considerable vegetation clearance will be required and not just *“some pruning back of shrub branches”*.



Measurements taken at the four points shown give the widths of the tarmacked area free from vegetation:

05 = 4.6m

06 = 4.0m

07 = 2.8m

08 = 3.3m

Kerb to kerb = 5.9m

Fig2



The photograph clearly shows the established habitat on the roundabout and either side of the track as acknowledged by the applicant as “*the habitat of interest*”. In REP3-078 the Applicant makes the following **commitment** (my emphasis):

*“To ensure ecological interest features of the former hoverport are not affected during construction, the following approach will be taken: a) pre-construction botanical survey will be undertaken to map vegetation stands of particular significance to protect, such as orchids or dense stands of dock or wild carrot (the larval floodplants of the two rarest vertebrates on site). b) An access route will subsequently be marked out which avoids these stands, along with dense stands of other vegetation. c) A suitable qualified ecologist will be on site to supervise and guide the marking out of the access route”.*

It is hard to see how the route adopted by the Applicant can possibly avoid removing “*dense stands of other vegetation*” with the resulting loss of habitat.

In REP4-089 1.1.7 the Applicant states that “*The hoverport site is known to support rare invertebrates, including fiery clearwing moth and Sussex emerald moth, both of which are legally protected under*

*Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). It also contains habitat suitable for reptiles and supports populations of man orchid and lizard orchid”.*

The two-way movement of heavy noisy vehicles so close to this habitat is bound to have a serious negative effect on the rare, protected invertebrates and should not be permitted.



Both the photographs above illustrate that there is no clear path free from vegetation. In the second photograph it is possible to see two kerbs in the foreground. This gives a maximum width of 5.9m if all vegetation is cleared but this would be contrary to the commitment given in REP3-078.

In the second photograph it is possible to see on the right-hand side a bridge (no longer in use) and there is a set of steep stairs beyond that. This could be the only access route for the public. As stated before, this would make it very difficult for people with limited mobility and impossible for people in wheelchairs to access the Hoverport. It would also make it much more difficult for families with young children and pushchairs to access the site.

### c) Final area of vegetation

Although the distance from kerb to kerb in the area shown in Fig 3 increases to 13m, there is no clear path that is free of vegetation:



Once again, contrary to statements and commitments made by the Applicant, large quantities of vegetation including large stands of vegetation will have to be cleared to give a two-way access route for the construction traffic.

Fig 3

**For all the reasons listed above I firmly object to the plans put forward by the Applicant for the use of the Hoverport.**

**David Stevens.**