

## Objection letter

East Sussex

FAO Transport and Works Act Unit

Statement of evidence

Dear Sir/Madam,

I object to Rother Valley Railway's application under the Transport and Works Act. My understanding is that this legislation is intended to enable projects whose expected benefits to the wider public outweigh the general assumption in law that a person is entitled to hold and enjoy their own property. I do not believe this is the case here. I will explain why in three key areas: lack of socio/economic benefits, traffic congestion and risk of flooding. As background information, I have lived in the village for almost 6 years but have been visiting here all my life as my grandparents moved here in the 1950s. I have seen the village grow and known it when the A21 was the High St. I also have concerns about the misleading information RVR have sent to objectors as part of the pre inquiry discussions.

### Socio/economic benefits

Over the years, various claims have been made for expected economic benefits from the link to the mainline railway, reaching into the millions. However, when it comes to making this application, RVR are noticeably more cautious. Their own report( Environmental survey Addendum A) states,

"The local social/economic impacts of the scheme would be minimal, though very marginally positive amongst certain receptors in the impact area. The benefits would arise from improved connectivity for inward tourism that would translate to a small increase in local jobs in this sector."

My understanding is that RVR uses volunteers so will not create jobs actually running the railway. If, as they hope, all the visitors would come by train, they would only use shops etc in walking distance. The High St is full of listed buildings, so there is no room to expand and the shops are those which fulfil the needs of a small village (mini-supermarkets, pharmacy, baker, vet, florists, hairdresser). It would be harmful to the village if one of the existing facilities was turned over to tourist trade, which would only be seasonal. There is also the risk to existing businesses if parking becomes very difficult. The baker's is also a small coffee shop, with 4 small tables squeezed in and 2 outside. They have no room to expand. It seems unlikely any new business would be viable

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if it only has business for 4 months a year.

Supporters of the scheme have said a halt at Salehurst would bring extra business to the Salehurst Halt pub: I have never seen it short of customers, the garden is well used in summer and the owner is clear she does not need or want the railway for her business. As with other businesses, there is no room to expand. Traffic congestion has economic costs as well. Finally, I work in the tourist trade in a minor way, I let one room as an Airbnb. And I would not expect this scheme to bring me in more bookings. Some people come by train now, one couple happily walked to Bodiam(not to get the train).

The other major economic risk of this project is associated with the greater risk of flooding which I cover more fully in a later paragraph. As well as the cost of insurance claims and higher premiums, there is the statement in the Environmental Survey non tech Vol 1 Section 4 that, "There are no plans to defend the museum.....(and) a , commercial building on Station Road...". The museum is also a forge and stove shop and the commercial property on Station Rd I think must be the cricket bat factory, so the costs of putting that out of operation should be considered significant. There would also be a risk the owners would relocate, costing the village jobs.

## Traffic/congestion

RVR have not provided any projections on how increased numbers of visitors to the railway would affect traffic in Robertsbridge. They have said they would all come by train but offer no evidence to support this view. Two small studies, of visitors to Bodiam and to a heritage railway near Tunbridge Wells indicate the opposite. So they predict more visitors but offer no analysis of how their cars would impact on the village. It seems possible that cars would be arriving to catch the train just as people returning on the train were leaving, an unknown number of cars ,in a 20 minute time window.

I attach a map of the village showing areas where the traffic is effectively one way because of parked cars. You will see that traffic coming from the A21 to the station would meet 3 of these bottlenecks. We already have the effect of commuters who do not want to pay for parking leaving their cars wherever they can; Mill Rise, Bellhurst Road and lower Langham Road are favourites. RVR intend to avoid "rush hour" as in 9ish and 5/6ish. However we have a rush hour at 3-4pm as we have two schools, a primary on George Hill and a secondary at the top of Knelle Road. RVR would be running a train at this time. More cars park on George Hill at these times and 6 buses travel through the village to the secondary school every school day. There is also short term congestion at the crossroads between Langham Rd and Knelle Rd at school

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pick up time.

In addition the village has been allocated a target of providing another 150 houses and small infill developments do not count towards this total so there will actually be more than 150. A small village, with a conservation area, in a flood plain where 2 rivers converge, struggled to find suitable sites within the development boundary. One of these sites would be accessed from Northbridge St, near the proposed level crossing, the other from George Hill. Obviously this extra housing will generate more traffic. This is not RVR's fault but the cumulative effect needs to be considered. Also, when there is an accident and the A21 is blocked, traffic from the trunk road is routed through the village. This creates gridlock very quickly. I think it happened last year and I heard it took 2+ hours to get through the village. There are obvious concerns if emergency vehicles cannot get through or are stuck amidst cars with so space to pass on pavements or verges.

Robertsbridge is a "Service Village", providing essential facilities such as GPs, a pharmacy and dentists to neighbouring villages. Those living outside Robertsbridge need to be able to park when they visit them.

There is a car park at the station but no proposals from RVR on how visitors would be induced to use it, and no information on whether there would be enough spaces. Therefore there is a significant risk that visitor parking would exacerbate congestion. People unfamiliar with the village do not know if their chosen parking space will block a road. As an example, a few months ago, a car was parked on Knelle Rd. There are no yellow lines, no indication that this would be a problem. But along came the first of the school buses and struggled to get by as the car was on the curve of the road opposite a large tree. As the first bus struggled on the verge to get its wing mirror past the tree, the other 5 buses were blocking Brightling Road/Station Road. At the same time, cars parked at the crossroads between Langham Road and Knelle Rd had left space for a car to get through but certainly not a fire engine.

The decision by Rother District Council includes this comment from the local Highways Authority, East Sussex County Council,

"Concerns have been raised locally regarding the potential impact that this development will have on the centre of Robertsbridge, particularly with regard to on street parking. These concerns are shared by this highways authority and therefore we would wish to ensure that a travel plan is included as part of any proposal. Specifically, the travel plan should review the existing car parking within the High St, Northbridge Street, Station Road and associated streets."

This application does not include any assessment of this kind.

In conclusion, increased traffic and parking would adversely affect daily life in the village and trade, worsen air pollution and potentially delay access to emergency vehicles.

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### Flood risk

Robertsbridge grew up on the confluence of 2 rivers. Clay soil becomes waterlogged, run off into rivers can be fast from the surrounding higher ground and as it is not very far to the sea at Rye, a high tide slows the rate at which the water flows out to sea. In the past river meadows served their purpose, could be used for grazing in summer and flood in winter with little harm done. However, over time, more houses were built on lower ground and in the 1980s the A21 Robertsbridge bypass was built across the flood plain on an embankment. Around the year 2000, this was found to have acted as a dam and the lower parts of the village were flooded twice. A very expensive flood prevention scheme was put in place, with flood gates, bunds and automatic pumping out of a drainage ditch if water levels rose too high. The Environment Agency keep a very close eye on the village when flooding is possible, they stay here, they are up all night, the risk is seen as a very real one.

Now RVR propose to build an embankment across the flood plain, joining the A21 embankment and at rightangles to it. Their own assessment

(Environmental survey Non Tech Vol 1 Section 4) states,

"The presence of the new railway embankment will result in a loss of floodplain storage and the bridge crossings will impact flooding by obstructing flood flows.... Flood defences at Northbridge St and Station Rd would need to be raised by .3 m to mitigate the increased flood risk caused by the proposed scheme. There are no plans to defend the museum, pavilion, a commercial property on Station Road, properties at Robertsbridge Abbey, Udiam Cottages, Forge Farm and Park Farm."

The next section of the report refers to the proposal from RVR to fund improvements to flood defences. They seem to have abandoned this commitment. However, after referring to these promised improvements, the report continues,

"However for an electricity substation west of the High St and a pumping station/electricity substation east of the village, there would be an increased risk of flooding, which is considered a significant effect."

So they are saying there would be an increased risk of power failure and sewage not being pumped away from the village even if the flood defences were raised, but RVR are not proposing to pay for them to be raised.

Rother District Council imposed the following condition on the application for the A21 crossing,

"No development shall take place until a satisfactory scheme for compensatory flood storage has been submitted. The applicant will need to demonstrate that there will be no loss of floodplain storage post development with any loss of flood plain storage to be compensated for on a volume by



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volume, level by level basis and in a suitable location. "

The fact that RVR's own flood risk assessment indicates flood water levels would rise suggests to me that this condition would not be met. I would also like to refer you to the Environment Agency's letter objecting to this application.

I believe that the human and economic cost of potential flooding far outweighs any gains from having a railway.

This railway would not be of use to anyone travelling to or from work at usual times and would be too expensive to use regularly. I would have expected the applicants would have to provide a detailed business plan, to demonstrate that the scheme would be viable but they just say their charity has the money to do this work. This seems inadequate to me. As an example, if the village floods, would insurance companies seek redress from RVR if it was clear the new embankment had exacerbated flooding? Would insurance cover that risk and have they budgeted for this?

I know other objectors will have gone into detail about the environmental effects of the proposed line. I support them on this. I walked along the banks of the river in May, it was a perfectly tranquil, beautiful setting, the river meadow bordered by a linear copse of mature trees which would be felled to create the railway line. The hoped for gains do not sufficiently outweigh the damage to the whole community to justify this destruction.

I have further comments about the letter RVR sent, as was their right, to respond to my concerns and invite me to withdraw my objection. I found it disingenuous and misleading.

They wrote about the economic benefits of other heritage railways and mention a current unfinished study but do not mention their own submission in their application that there would be minimal economic benefits for Robertsbridge. They list the bodies which supported the development. None of these have the remit to put the interests of Robertsbridge first.. The National Trust, for example, have an interest in anything which would reduce traffic at Bodiam, and Kent County Council will of course support increased trade for Tenterden-it is not their job to care about Robertsbridge. They say Network Rail supports the scheme yet at the time of the planning application, the Highways Agency was saying, "We do not, in principle, support installation of level crossings on our network. We are working with Network Rail to remove them for safety reasons and to relieve obstructions to the free flow of traffic." RVR do not mention that the EA, HE and the ORR have made formal objections.

Their only response to my comments on parking and congestion was that the planning process looked at this and the application was approved-no mention

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of the condition that they must produce a travel plan, reviewing parking provision.

They offer no evidence that visitors will travel by train, just say they will be able to. They point out that parking is cheaper at the station at weekends and public holidays but omit to mention that trains will also run on weekdays.

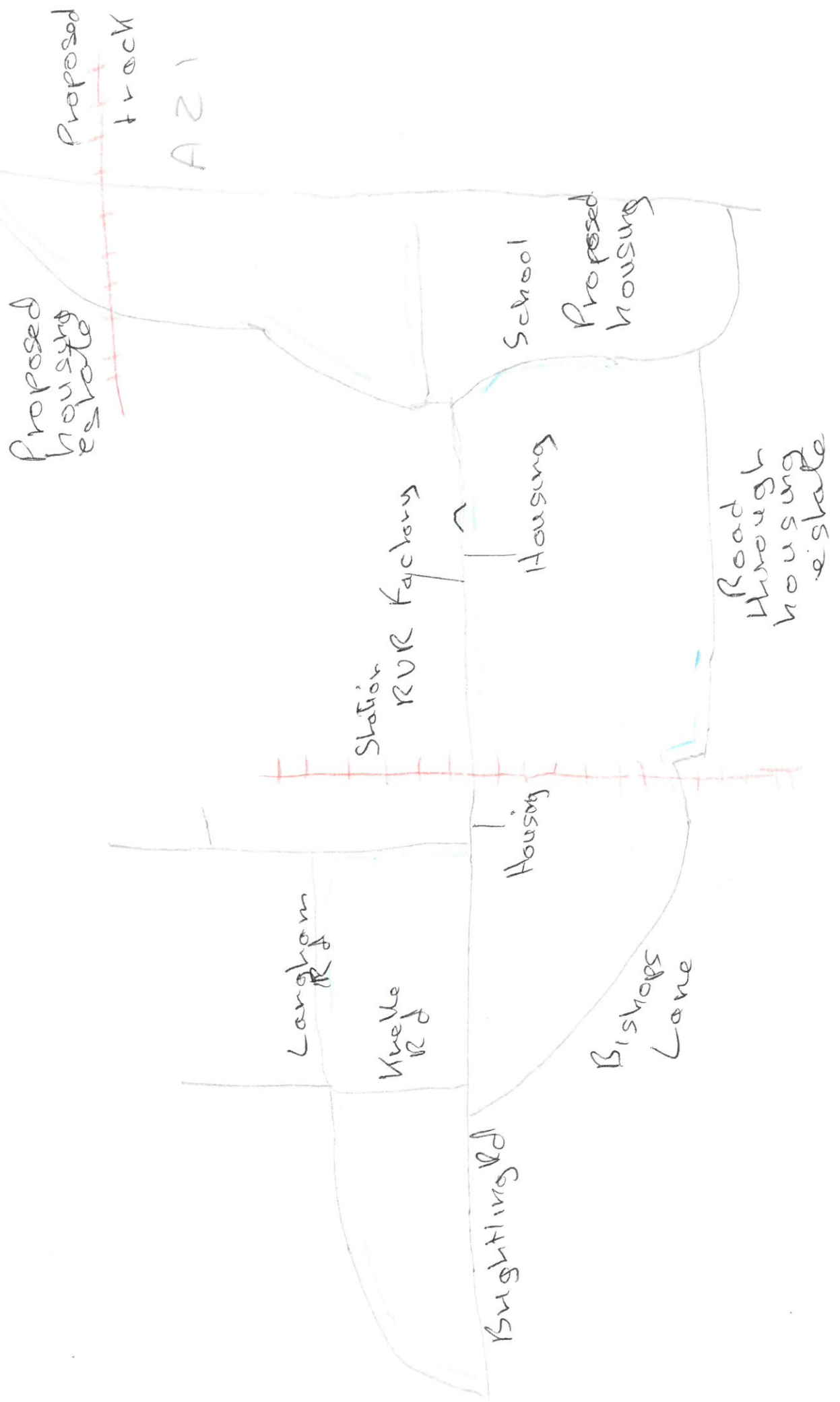
Regarding flooding, they say, " ...it has been possible to demonstrate that the reinstatement of RVR would have no significant effect on the flooding of Robertsbridge and the surrounding areas." This directly contradicts the statements made in the documents supporting this application , which I have quoted earlier.

I am extremely concerned that if I had not already read the details of this application, I could have easily been misled into withdrawing my objection and I find this completely unacceptable.

Kathryn Bell

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### Summary of objection

Summary of my objection to Rother Valley Railway's Transport and Works Act application.

My objections to this application are founded on the failure to show that any potential gains sufficiently outweigh potential losses. There must be a high bar, based on benefits to the public, to justify the serious action of depriving property owners of enjoyment of their property. Instead of gains to the public, in the Robertsbridge area, this project would create greater risks of flooding with its associated costs, increased traffic congestion and parking problems in the village. RVR have failed to offer proposals to reduce these risks. Their own supporting documents refer only to very marginally positive socio-economic benefits in the local area and I can see no reason to think this is a pessimistic view. They have failed to respond to concerns from the Environment Agency and Highways England, according to the objection letters from those agencies which suggests a worrying failure to consider interests other than their own. Large sums of public money have been spent in the past on flood defences: it seems perverse to allow a scheme which would increase the risk of flooding again.

Kathryn Bell