

## **Wishing Tree Residents' Association - Proof of Evidence**

My name is Alan Smith and I am representing the Wishing Tree Residents' Association, of which I am vice chairman. I wish to make it clear that I am not a highways or a traffic expert and request that Counsel for ESCC takes note of that fact.

WTRA have a current paid up membership of just under 200 local residents. Our membership area extends broadly from Churchwood Drive to the South, London Road to the West, Filsham Road to the North West and Wishing Tree Lane to the South. Our association was formed some 35 years ago, originally to oppose the Spur 1 and subsequently Spur II road construction, the history of which is outlined in the ESCC scheme history document (ES-Chapter 4). The fear then, as now, is that our residential area will suffer significant adverse traffic consequences from a scheme that provides little, if any, positive benefit to our area.

During the Public Inquiry into the eastern and western bypass proposals WTRA opposed the route and design principle chosen by the Highways Agency, but not the general principle of a Bexhill & Hastings bypass scheme itself. Our associated objection was to the proposed Spur II that would have extended the Spur I road to the top of Gillsmans Hill. At the Public Inquiry, ESCC (the promoters of Spur II) initially sought to positively exclude the inspector considering the consequences of the bypass scheme on our area via the Spur II proposal. The inspector consulted with the Lord Chancellors office and ruled that he would indeed hear any such evidence, insofar as it enabled him to understand the consequences of the bypass. ESCC undertook to submit their Spur II proposals at a consecutive and thus extended Public Inquiry. Objectors were advised by the inspector to limit their cases on the bypass consequences, saving the details for the consecutive phase. ESCC reneged on their undertaking and that phase of the inquiry did not happen. As a result, the detailed consequences of the bypass schemes were never publically tested. The failure to subject the present link road scheme to Public Inquiry meant that once again, the consequences of the link road were not challenged. This inquiry into the side road and compulsory purchase orders is the first opportunity to do so.

We draw your attention to this historical issue, only because ESCC have, over very many years, repeatedly sought to avoid any detailed critical scrutiny of the consequences of originally the combined bypass schemes, and now the more limited Bexhill to Hastings link road scheme. Over all these years, whilst certain details may have changed, the consequences on our residential area will still be intolerable. Intolerable perhaps seems a rather strong word but in fact was the expression used by the then deputy chief highways engineer of ESCC to describe the consequences of the then bypass schemes on the Gillsmans Hill area.

Whilst in history mode, it is worth drawing your attention to another detail of the previous inquiry. The then inspector, Lt. Colonel Jeapes, had a somewhat mischievous inquiring mind. About half way through the inquiry he required both

the Highways Agency and ESCC to look at the implications of removing the Eastern and Western bypasses from the proposals, leaving just the middle section; essentially the scheme being considered at this inquiry. Representatives of the Highways Agency and ESCC could barely hide their contempt for such a ludicrous idea but the inspector's requirement was of course implemented and the resulting traffic modelling, not surprisingly perhaps, showed that it made absolutely no sense in traffic management terms. Indeed they concluded, as many objectors had already done, that it would simply transfer an acknowledged traffic problem from one location to another. The problems of the A259 Bexhill Road would simply be transferred to areas surrounding Belle Hill in Bexhill and the Ridge and Gillsmans Hill areas in Hastings.

That is the essence of our objections to the proposals before this inquiry. The link road as presently proposed takes a problem from one location and imposes the same problem on another area. It solves nothing.

It was explained to the pre inquiry meeting that you had to be satisfied that the costs, both material and environmental, justified the confirmation of compulsory purchase and side road orders sought by ESCC. We seek to draw your attention to costs that have not, in our view, been adequately highlighted in the case presented by ESCC.

WTRA do not presume to comment on the effects in Bexhill. The Gillsmans Hill corridor is our primary concern, although the consequences on the Ridge will also impact on many local residents in our area. The root cause of both the major Hastings issues is the proposed junction and scheme termination with Queensway. The most obvious consequence of West to East traffic wishing to access central Hastings itself is that the existing Wishing Tree roundabout will not be able to cope with the increased traffic loading. ESCC engineers have decided that the only solution is to replace the existing roundabout with an enlarged signal controlled junction arrangement. Such a solution inevitably causes unnecessary stop start traffic flow, even when traffic loading is light. When, for highway maintenance reasons usually, temporary traffic lights are installed in and around the existing roundabout, Crowhurst Road, Ironlatch Avenue, Gillsmans Hill and Harley Shute Road all lock up, and that is with current traffic load levels. We have been unable to identify the inclusion of these direct and indirect costs in the proposals before this inquiry. Traffic modelling shows that most of the traffic heading south from the proposed link road junction will seek to travel along Gillsmans Hill. Some relief work has already been completed with the top section now being one way traffic only. However, this work will not be sufficient to cope with the consequences of transferred traffic and we assume that something similar to what was previously proposed as Spur II will be required, taking the road off line to facilitate a major realignment of the junction with Springfield Road. We cannot locate reference to this consequential traffic engineering cost in the documents before this inquiry.

The Ridge is always going to be a major traffic engineering challenge, dictated entirely by the geography. Junction solutions considered have ranged from high level 'Spaghetti Junction' type arrangements to tunnels in order to connect new road schemes to the existing A21, the main traffic artery into both the Hastings and Bexhill areas. The Department for Transport came up with a proposal to connect Queensway, from just north of the existing Castleham junction, to the A21 just south of where the Ridge crosses it. This proposal seemed to meet with the perhaps reluctant approval of most interested parties, based at least on the public consultation results. Regrettably, in a wonderful example of joined up thinking, Hastings Borough Council allowed new building development on the only viable route. We now have a situation whereby the Department of Transport continue to look for solutions to an acknowledged need, but as ESCC admit in their case documents, such are the doubts that any such scheme would or could ever now be implemented that they have excluded the possibility from their case. The consequence of course is that in the absence of a viable solution, local residents, visitors and commercial traffic will have to suffer a grid locked Ridge. ESCC's answer to the problem is to propose a signal controlled junction between Queensway and the Ridge. They are simply addressing a consequence, not the cause of congestion. The problem today lies with the junction between the Ridge and the A21. Traffic routinely backs up westwards to the Beauport roundabout and eastwards beyond the Conquest Hospital. The problem is the turning onto Junction Road. If you now add in the massive increase in traffic joining the Ridge that will derive from the proposed link road, the problem only gets worse. Without solving the Ridge/A21 junction problem first then the proposed link road only makes matters worse. Of course, when traffic coming south from Battle encounters a traffic backup at Beauport, it heads on down Battle Road towards Silverhill - causing yet more traffic congestion, demanding yet more traffic engineering solutions and hidden cost of the scheme before this inquiry. Interestingly, if you look at the 2025 traffic projection for the A21 it is only slightly higher than the projection for Gillsmans Hill.

We have outlined the generalities of our opposition to the link road scheme. We now wish to draw attention to some of the details, with specific regard to the traffic flow data generated by ESCC and incorporated into their document evidence. We have used that information, specifically, figure 4.2 in the Traffic and Transport Report. Because the data is very difficult to read, indeed it is almost impossible to read, we have abstracted the pertinent information into our appendix ONE. The data is exactly as the ESCC data, but we have also added the 'difference' value in vehicles, not just as a percentage figure.

We also looked back to the data presented by ESCC as part of their documentation in respect of the application to build the link road itself, self approved as we all know. Our appendix TWO shows the ESCC traffic flow data from the original application and appendix THREE provides a comparative table with the data before this inquiry. Some interesting discrepancies become apparent and one wonders if all our traffic problems could be solved by simply tweaking the traffic modelling software.

Our curiosity now aroused, we dug back into the original bypass public inquiry documentation that we have retained and indeed, we reviewed the verbatim transcripts of the proceedings. It reminded us that under the bypass proposals, AADT traffic flow projections at the top end of Gillsmans Hill ranged between 19,000 and 23,000. Under those proposals, whilst it was acknowledged by ESCC that such flows would normally require a duel carriage standard road, local environment considerations dictated only a single carriageway standard, albeit an off line new road and another very large signal controlled junction. Under cross examination, the ESCC highways engineer admitted that such a construction standard would be unable to cope with the traffic demand, leading to unacceptable delays at peak times. The original ESCC link road data shows a figure of 17,370 for the same location, not far below the figure used in the bypass inquiry. With a touch of the Paul Daniels, magically, the data presented to this inquiry shows that figure down to 11,200 – and that at a date 2 years later than the original 2023 data date. Similar magic seems to have been performed in other key area of negative consequences. Compare the figures for Ridge West, The Ridge (slightly lower) and The Ridge near Grange Road.

While considering data presentation, look at figure 4.4 and the values for Upper Maze Hill. Then look at the sample location. It's at a point where most of the traffic will have dispersed into the various side roads that feed in towards central Hastings. If you took that data point back towards the junction with Gillsmans Hill the figures would likely be closer to the values used in the bypass inquiry, around the 20,000 mark.

We raise these details because they all relate to consequences of the link road scheme and none of them appear to have been included in the costs that this inquiry has to balance against the environmental damage being caused by the proposed road across Coombe Valley. Attempts to alleviate those consequences will keep traffic engineers busy for many years if this current proposal is allowed to proceed, and at what material cost we do not know.

Others have said already, and some will continue to point out to this inquiry the negative consequences of the present road scheme. Without wishing to stray into their territory, suffice it to say that the collective view of WTRA is that if a road scheme is ever to be allowed across the wonderful, and some would say magical, Coombe Valley, then the benefits will need to be not just marginal but overwhelming. We believe that the cost/benefit argument for the scheme as presented by ESCC does not justify the damage. If you add in the consequential costs we have tried to highlight then we believe that the overwhelming evidence is to not recommend confirmation of the orders that ESSC seek.

Whilst this presentation on behalf of WTRA has tended to concentrate on adverse traffic consequences of the proposals before this inquiry, it would be wrong of me to not admit that some within WTRA are indeed fundamentally opposed to what they

perceive to be a waste of taxpayer monies and the increase in damaging emissions that inevitably flow from any new road scheme. Their objections are based on the entire principle of the proposals and nothing short of total rejection of the proposals will satisfy their objection. Others within WTRA, myself included, are of the view that properly engineered 'joined up' proposal might justify a new road solution.

What is before this inquiry is the rump end of previous schemes, attracting all the inevitable negative consequences of any significant road building scheme. The claimed benefits, such as they are, do not justify the direct or consequential capital costs and they certainly do not justify the certain damage to our valley and our residential area. There are solutions to the problems of the A259 Bexhill Road that would meet the objections of all but the most extreme anti road lobby. ESCC and the Department of Transport need to work together more closely towards a better integrated scheme that provides sufficient realistic benefit to the whole area. With respect, this scheme is not it.

Gillsmans Hill		
9300	N/A	N/A
7800	9700	<b>+24% = +1900 vehicles</b>
8600	11200	<b>+30% = +2600 vehicles</b>

Harley Shute Road		
16100	N/A	N/A
15300	9600	-37% = -5700 vehicles
14100	11000	-22% = -3100 vehicles

Ironlatch Avenue		
10200	N/A	N/A
8400	8800	<b>+5% = +400 vehicles</b>
8500	10000	<b>+18% = +1500 vehicles</b>

Crowhurst Road – B2092		
13700	N/A	N/A
15600	13800	-12% = -1800 vehicles
15800	16500	<b>+4% = +700 vehicles</b>

Upper Maze Hill		
7800	N/A	N/A
8300	7800	-6% = -500 vehicles
9400	9300	-1% = -100 vehicles

The Ridge		
1850	N/A	N/A
20200	25200	<b>+25% = +5000 vehicles</b>
23500	28600	<b>+22% = +5100 vehicles</b>

The Ridge nr Grange Road		
12300	N/A	N/A
13700	18200	<b>+33% = +4500 vehicles</b>
16800	21300	<b>+27% = +4500 vehicles</b>

The Ridge West		
19800	N/A	N/A
23100	27000	<b>+17% = +3900 vehicles</b>
26300	30100	<b>+14% = +3800 vehicles</b>

Bexhill Road		
29500	N/A	N/A
32000	21600	-33% = -10400 vehicles
31300	24600	-21% = -6700 vehicles

Queensway		
9500	N/A	N/A
12000	21900	<b>+83% = +9900 vehicles</b>
14000	24500	<b>+75% = +10500 vehicles</b>





**AppendixTHREE****Data comparison 2023 vs. 2025**

<b>Gillsmans Hill</b>		
17300	11200	<b>-35% = -6200 vehicles</b>

<b>Harley Shute Road</b>		
13600	11000	<b>-20% = -2600 vehicles</b>

<b>Ironlatch Avenue</b>		
12920	10000	<b>-23% = -2920 vehicles</b>

<b>Crowhurst Road – B2092</b>		
23740	16500	<b>-30% = -7240 vehicles</b>

<b>The Ridge</b>		
28420	28600	<b>+1% = +180 vehicles</b>

<b>The Ridge nr Grange Road</b>		
28050	21300	<b>-24% = -6750 vehicles</b>

<b>The Ridge West</b>		
33430	30100	<b>-30% = -3330 vehicles</b>

<b>Bexhill Road</b>		
22920	24600	<b>+7% = -1680 vehicles</b>

<b>Queensway</b>		
21180	24500	<b>+15% = +3320 vehicles</b>