

7 Thomas Turner Drive
East Hoathly
East Sussex
BN8 6QF

Telephone:01825 840082

E-mail: villageconcerns2016@gmail.com

Thursday, 9 July 2020

Planning Application: WD/2016/2796/MAO
Rebuttal of Officer's Report

Dear Mr Robins,

1. Village Concerns strongly objects to Planning Application WD/2016/2796/MAO. We represent the views of over 210 supporters against the overdevelopment of our Parish.

2. The Officer's Report for this application is astounding in its prejudgement of the planning issues. It fails to present the planning committee with a balanced view of the evidence that has been submitted since 2016 and is solely focussed on presenting statements to councillors that support the decision already made by the planning department. This bias is based on a determination to approve planning applications regardless of their merits in pursuit of a 5 year land supply figure.

Proposed 106 Agreement

3. The Report includes a range of proposals for a Section 106 Agreement that have been produced with no consultation with the Parish Council, the Community and possibly even the Developer. No details of the supposed agreement are provided and it therefore lacks all credibility and should not be considered as part of the planning committee proceedings. For example:

a. The supposed 106 Agreement provides for ["A financial contribution toward youth and adult recreation space in accordance with the requirements of the Council's draft SPG Outdoor Playing Space and saved policies LR3 and LR5 of the Wealden Local Plan"](#).

What does this mean, is it £5 or £500,000 and what is being proposed ?

b. How did the Planning Department determine that the improvement to the bus service would be best served by enabling a 7 day service for 3 years. Did they ask the bus users, the community, the Parish Council ? It is possible that the bus users would prefer other adjustments to the timetable or routes.

4. We also find it disturbing that the planning department have included in the publicly available Officer's Report a recommendation for Approval but in letters to the the Parish Council and our District Councillor they are recommending Adjournment (Legal Agreement). Nobody that we have spoken to seems to understand what this means but the implication is that these 106 Agreements have not been agreed and that any planning decision is therefore premature.

5. We also strongly object to the proposal to re position the Wealdway footpath further away from the village to approach the village centre along the roadside rather than in its current rural route. You should note that it has already been re positioned by the current landowner to go around the field margins rather than its historic original route across the open fields. We particularly object to the Planning Officer's repeated description of this route change as an "improvement". There are no circumstances whereby the existing rural footpath can be described as improved by re routing it onto a pavement alongside a busy and noisy road.

Access

6. The only part of this application being considered for Full Planning Approval is the access arrangements. The Officer's Report does not even include a plan of the proposed access arrangements. We presume that the assertion that Revision C of the applicants submissions is approved is a typographical error and that it should be recommending Revision G (Revision C does not appear in the application documentation.). Revision G has been the subject of many objections and yet the Officers Report is content to disregard these without fully considering them or explaining the issues to councillors. We have copied Revision G at Annex A so that councillors can see what they are being asked to approve.

7. There is a clear conflict between the Revision G Plan which shows a large amount of the species rich hedgerows and trees being removed to provide sight lines and Condition 26 which states that there will be "reinforcement of existing vegetated boundaries of not less than 5m with

native tree and shrub planting to provide screening between the development and the site boundaries”. This also conflicts with the ESCC Highway Authority’s opinion that, “the introduction of visible frontage development allows visual integration with the existing village and will influence the speeds of vehicles”. You cannot have a visible frontage and implement Condition 26. We are also deeply concerned with the Highways Authority’s assertion that a visible frontage would cause speeds to be reduced from the National Speed Limit to a safe level for the 500 vehicles exiting this housing estate or the pedestrians walking into the village. It remains unclear what is happening in terms of landscaping along London Road and, more to the point, what the Highway Authority has assumed will be happening.

8. The access point onto Waldron Road is still shown on the plans but no detail provided. No assessment has been carried out by the Highways Authority and no Safety Audit submitted. It appears that Full Planning Consent for this access point is being considered as part of this application without any detailed plan or scrutiny.

Changes to Application

9. The Executive Summary makes reference to the application being “revised and supplemented” and “scaled down”. This is untrue. In 2016 the application was for 205 homes, that remains so. The removal of the Ailies Lane element has left unanswered the issue of the continued viability of the Hesmonds Stud business. The original application proposed the demolition of recently refurbished facilities on the site and the rebuilding of these facilities (enhanced) at the Ailies Lane site. The withdrawal of the Ailies Lane element has not been balanced by the retention of the facilities proposed for demolition. How this will effect the viability of the business and local employment is unclear, unanswered and ignored by the Planning Department and the Officer’s Report.

10. The Developer has resolutely not changed the application. This attitude has prevailed despite the overwhelming local opposition and the objections of Historic England and your Conservation Officer that quite explicitly indicate that a reduced application that takes into account the heritage issues might be acceptable.

Lack of Consistency

11. The Planning Department appear to be flexible in their interpretation of the significance of Planning Policies. In this instance they claim that policies GD2 and DC17 carry very limited weight. However, in the Wealden Appeal

Statement for the South Street application it does “allow weight to be afforded to it”.

12. The Officer’s Report dismisses that fact that this application is contrary to Saved Policies GD2 and DC17 but completely fails to mention that it is also contrary to other Saved Policies. These were all cited by Wealden in its Appeal Statement for the South Street arguing against development in this village. It must be asked why Saved Policies EN2, EN8, EN12, EN27, SPO1, SPO3, SPO7, SPO13, WCS7, WCS12, WCS13 and WCS14 are not now mentioned ? They all still apply and indicate that this application should be rejected.

NPPF Objectives of Sustainable Development

13. The Executive Summary reproduces the usual template portrayal of how the application meets all the requirements of sustainable development. Please stop claiming that small rural communities gain economic benefit from the construction phase of house building. None of this gain is long term or significant and it is embarrassing that it keeps being repeated. The proposed development provides no real employment or economic gain.

14. It goes on to state that the application would provide much needed housing. This ignores the point that the housing is not needed in East Hoathly. It needs to be built where the need is, where the jobs are, where the schools are, where the shops are and where the leisure facilities are.

15. It states that “the delivery of on site open space would provide additional recreation space for both existing resident and future residents”. The existing residents of East Hoathly currently enjoy the view of the open space as they walk the Wealdway across this site. How can building 205 homes over this view possibly makes the situation better ? It should also be noted that the open space shown on the plans is the land adjacent to Long Pond. This is a significant biodiversity habitat and has remained untouched for over 30 years. It is known to contain protected species but it has not been subject to a full biodiversity survey. The Wealden Biodiversity Officer has not managed to submit a report on this application and presumably has not considered the impact on this habitat. The Officer’s Report does report a conversation that has been had with the Biodiversity Officer but it is embarrassing that this is considered adequate for a major planning application particularly one that has attracted so much opposition. To turn this important habitat into a public open space would be devastating to all its wildlife.

Transport

16. The Executive Summary contains a very slim paragraph on Transport. Irrespective of the Access issues already covered above, there are huge issues relating to Transport. The Report on Transport Issues produced by Railton TPC has not been mentioned in the Officer's Report nor any acknowledgement that consideration has been given to the significant issues that it raised. There is a total lack of any consideration of transport sustainability. The Executive Summary makes no mention of it and the Planning Balance section apparently assumes that transport sustainability has no relevance with respect to planning balance. The issue is not considered anywhere else in the Report. This makes a mockery of the NPPF, Government commitments with regard to global warming and your own Climate Emergency Plan.

17. The Officer's Report repeatedly makes mention of the proposal to reinstate a Sunday bus service for 3 years as if this will magically mend the broken transport sustainability of this village. It is an attempt at a magician's slight of hand to distract readers from the reality. This is a car dependent community as would be the 205 homes proposed. The proposal to include a Travel Plan is also added as a Section 106 Agreement despite the reality that it is a waste of money. The Railton Report clearly identifies that: ["the development would be largely car dependent and that a Travel Plan will have a negligible effect on travel patterns since it is not possible to reduce car dependency if there are no practical and convenient alternatives"](#).

18. The proposed development will generate a significant amount of new vehicle trips on the sections of highway included within the Conservation Area. The High Street and South Street are sensitive not only because of the presence of the Conservation Area but also due to the presence of vulnerable highway users in the form of parents and children accessing the primary school, the presence of a care home, narrow footways in places and existing conflicts between pedestrians and larger vehicles that find it difficult to negotiate the narrow carriageway, including at the junction of London Road and the High Street.

19. The proposed development will lead to adverse transport environmental impacts in terms of pedestrian amenity, community severance and pedestrian safety. The applicant has not assessed these impacts and no mitigation has been identified to reduce their severity.

20. The 2011 Census data shows that 78.1% of local people currently drive themselves to work. This is an extremely high car driver mode share. Only two other of the twenty-one output areas within Wealden have higher car driver mode shares with the highest being 81.9%. The high car driver

mode share reflects the fact that there are few work opportunities within the village and neither cycling nor public transport represent realistic alternative means of accessing major destinations in the area.

21. There is virtually no opportunity for modal shift away from car dependency in this community. This is contrary to sustainability principles and should mean that you do not put developments in such rural areas.

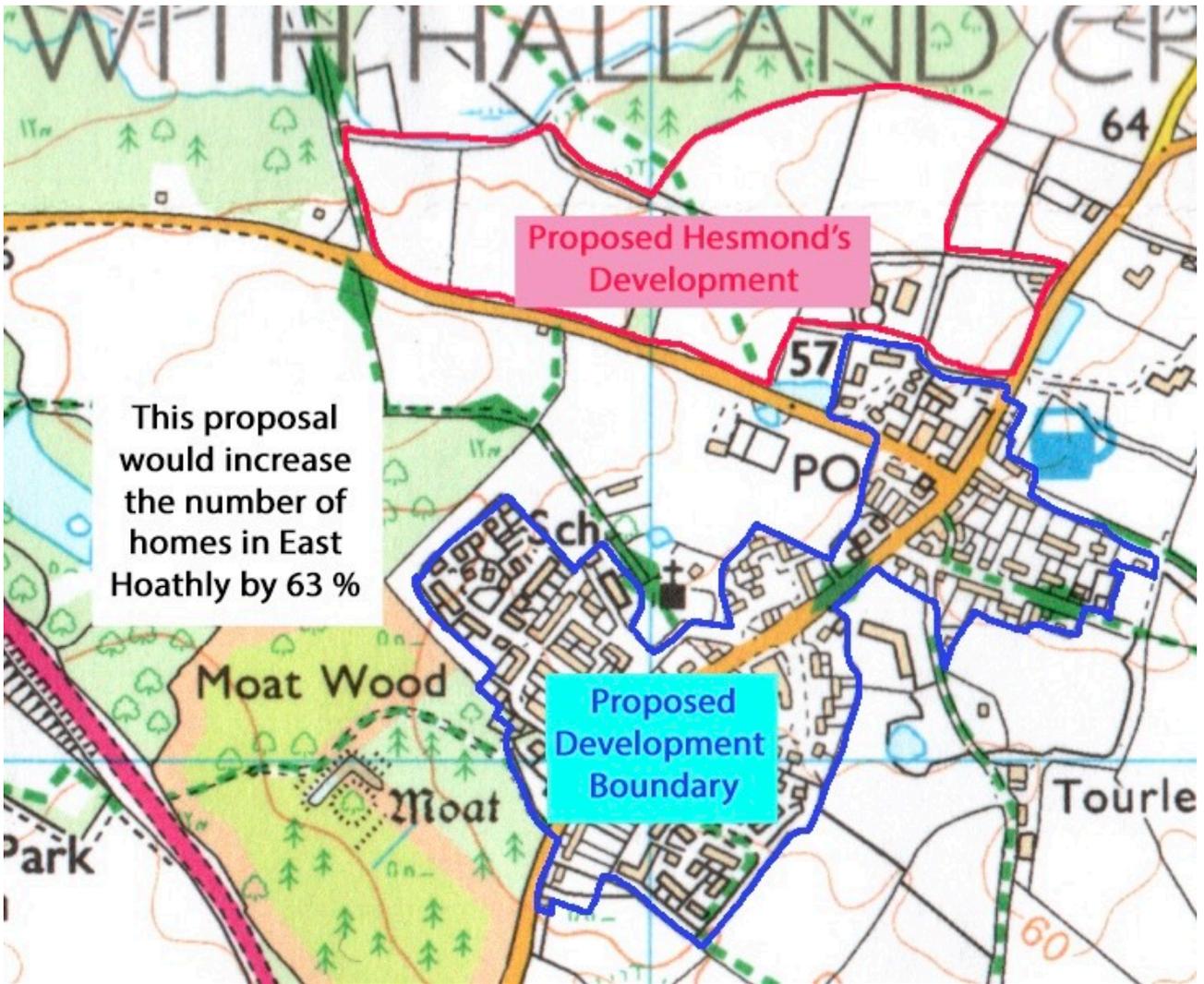
Climate Emergency Plan

22. The 2013 Core Strategy makes much of the need to incorporate climate change matters into any new development (as set out in the Wealden Climate Emergency Plan) yet this application makes no reference to this and nor do the Conditions set out in the Officers Report. It should be a clear condition that any new development meets the requirements of the Climate Emergency Plan relating to design, construction methods, materials, and the use of renewable energy. Otherwise, how is Wealden going to deliver its plan ?

Scale

23. The Officer's Report only makes one comment about the scale of the proposed development on East Hoathly. On page 50 it states: "[The scale of the development proposed for up to 205 dwellings is clearly a large development. However, in this context it is not considered to be significant or excessive scale](#)". This is offensive to local residents and the issue of scale was one of the primary objections made by them. It should matter to the Planning Department yet they seem oblivious to it. The following is an extract from our comments on the EIA Screening Opinion for this site:

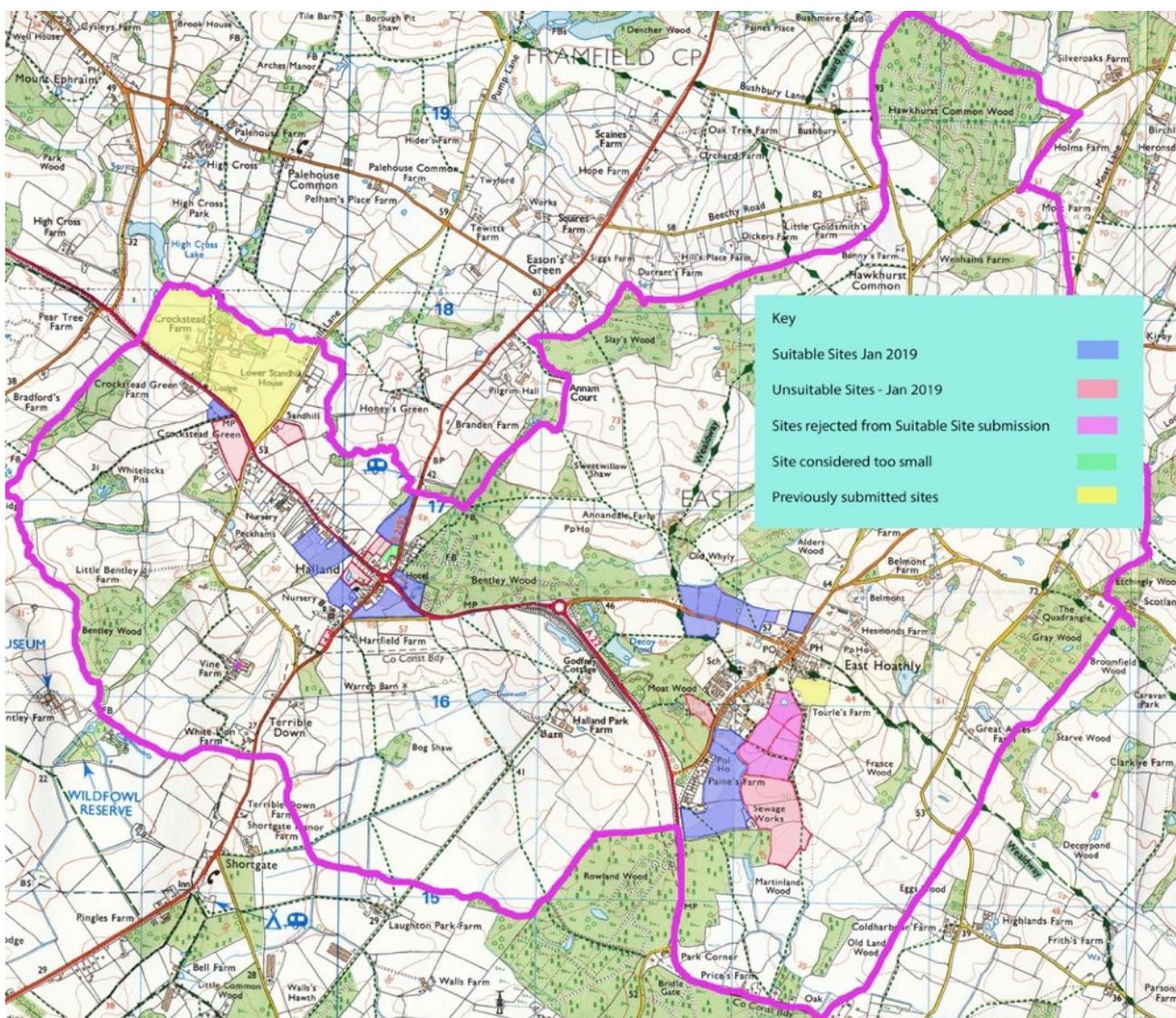
The notes to Part 3 of your Screening Matrix indicate that the relevance of the magnitude and spacial extent (including population size affected) should be taken into account. We feel that you have ignored the scale of the proposed development on this community. We have pointed out many times that building 205 homes in a community of only 381 homes is grossly disproportionate. The map below shows the scale of the area of the proposed development to the Development Boundary proposed in the 2019 Submission WLP. It clearly doubles the physical size of the village and you have made no reference to this. Building 205 homes on the edge of a town would have a significant environmental impact. Building 205 homes in East Hoathly would have an impact on a wholly different scale.



This also does not give sufficient weight to the other planning applications that have been submitted for this village and that you have either given your recommendation for approval or given every indication that you intend to support. The photograph above shows the scale of the changes that you should be considering collectively in this Screening Opinion.

SHELAA

24. The Officer's Report states that the application site was considered as part of the Wealden SHELAA January 2019. Only part of the application site was included in that SHELAA. About 40 % of the land area was not included and has therefore not been subject to a SHELAA.



Heritage Assets

25. The Officer's Report uses the applicant's desk based assessment of the Heritage Assets to provide the core of its input despite having commented in the Executive Summary that: "there is clear criticism over the adequacy of the applicant's heritage submissions". It conflates the opinions of the various objectors on these matters and completely ignores the submission of The Georgian Group. Heritage is barely mentioned in the section on Planning Balance nor in the Conclusion.

26. Nowhere in the Report is there any proper analysis of the clear heritage harm caused - simply the recurring statement that because the harm is "less than substantial" Paragraph 196 of the NPPF allows the harm to be outweighed by the public benefits. Councillors are not being given any explanation of the harm that will be caused. Councillors should also note that Historic England, Wealden's Conservation Officer and Dr Doggett of Asset Heritage Consulting all rate the level of harm at the upper end of the scale within the category of "less than substantial". The only level of harm higher than this would be "substantial" harm which is reserved for situations such as the demolition of a listed building. It is therefore quite clear that the significance of the harm assessed by the professionals is really serious.

27. The Developer, the Developer's Desk Based Consultant and, as far as we are aware, the members of PCS and the author of the Officer's Report have not visited the Designated Heritage Assets on which this harm will be caused. The people who have visited, namely Historic England, Wealden's Conservation Officer and Dr Doggett have all concluded that the level of harm demands an objection to this application. The Planning Department have not fully understood the complexities of the Heritage issues that have been raised and are placing their opinion above that of the experts in this field who have seen the assets and given their quite clear opinion that this development should not be approved.

28. The issue of the Public Benefits is woefully inadequate and laughably disingenuous. It cites the need for housing generally but ignores the reality that this housing would be in the wrong place and unsustainable. It again cites the minuscule benefit of employment opportunities during the construction phase - is this really the basis on which Wealden's employment policies are based? It claims footpath improvements that are false. None of the quoted public benefits are of any significant relevance to this community. It is perverse in its disregard of the public opinion that has been deluging Wealden and arrogantly decides to tell us what will be public benefit. It is a meaningless collection of words being used to justify the dismissal of the harm being proposed to the Heritage Assets of this community.

29. The greater the degree of harm the greater the barrier will be for public benefits to outweigh that harm. In this instance the level of harm is at the upper end of the scale of “less than substantial” so the public benefits would have to be significant and specific to this site. The Report puts forward no such case.

Timescale

30. The Officer’s Report has recommended a Condition that would impose a reduced time limit for the development consent. This is wholly opposed. The concept of 205 homes added to this community is wholly opposed but the delivery without phasing in a reduced time period would be even more devastating. This might be a credible policy for a large urban area that can readily adapt to an increase of 205 homes but a small village could not sustain this. The equivalent proportional increase in the population of Hailsham would be almost 12,000 extra inhabitants within a 5 year period. Such an idea would be inconceivable for Hailsham and the same should apply to East Hoathly.

31. A further issue relating to timescale relates to the removal of sewage. The existing Sewage Plant is already working at its capacity and the main pipe connecting the village to it is old and failing. The work to replace this pipe and upgrade the Sewage Plant would be considerable and impose major disturbance to the community. We have seen no plan or costings for this work and it is difficult to see how you could grant approval with a condition for a reduced time limit without such information.

CIL Money

32. The old chestnut has been rolled out again of telling a community not to worry about problems with their infrastructure and services because CIL money will resolve the problems. Another laughable trope from the Planning Department used to justify more housing development. East Hoathly has seen no CIL expenditure by Wealden and does not expect to receive any. The Officers Report (Page 64) indicates that CIL money will: “deliver improvements ... in particular demands placed on primary school places to serve the area”. This very vague statement is presumably included because the East Hoathly Primary School is full and has no space or plans to expand. The statements does not suggest that money would be directed to East Hoathly School and any provision of places outside this community will condemn families to endless car journeys in the rush hour congestion. This is not sustainable planning.

Meaningless Jargon

33. The Officer's Report is peppered with meaningless jargon. On Page 65 it states: "Through the landscape and environmental enhancements and the ecological mitigation proposed, these factors would positively contribute to the overall sustainability of the application site". We would be delighted if anyone could explain to us what this means. As far as we are concerned the beautiful open views and green fields that frame our village are perfect as they are, the ecology is thriving and already sustainable.

Ashdown Forest

34. East Hoathly is known to be a significant contributor to traffic movements on both the A26 and A22 compared to other areas and therefore all growth was removed from the 2013 Core Strategy and the now withdrawn Local Plan. East Hoathly is situated in Middle Super Output Area (MSOA)13 South. Development within and around this settlement contributes to nitrogen levels and nitrogen deposition on Ashdown Forest on both the A22 and A26 and some of the more minor roads crossing the Forest'. (Wealden Local Plan Sustainability Appraisal Report, Proposed Submission Document, August 2018, pp 197-198)

35. It is made clear in Appendix A of the Sustainability Appraisal that the decision to reject development at East Hoathly is based on an analysis of the relative impact on Ashdown Forest of traffic associated with development in the various MSOA areas within the District: "Overall the settlement contributes a high level of traffic from new housing development within the District. In terms of the A22, the contribution for [the] MSOA is one of the highest within the District" (Page 25 of Appendix A of Sustainability Appraisal)

36. The demise of the Local Plan does not change these facts. The Officer's Report dismisses such concerns by stating that "the development proposed is considerably less than the quantum of growth promoted in the Submission Wealden Local Plan 2019 when considered on its own or in combination, the proposed development would not adversely impact on the integrity of the protected European Sites". It is very difficult to take this statement seriously. Wealden have not abandoned their intention to bring forward the sites for the 14,228 homes identified in the 2019 Plan. The statement also implies that there is no level of housing that would cause harm to the SACs. Natural England have clearly said that 14,228 homes would cause no harm. What if 24,228 homes were built, surely Natural England would concede that this level would cause harm. It is wrong to take the view that building anything in excess of 14,228 is acceptable, be it 55 or 10,000. Wealden and Natural England should establish what the safe

threshold is before they proceed to develop in excess of their intention to develop the 14,228 homes identified in the 2019 Plan.

37. It is also important to note that Natural England have offered no evidence to support their claim that your 2019 Plan was wrong, they merely disagreed with your evidence. Having abandoned your HRA you will have to prepare a new one and it is inconceivable that you will ignore the evidence base you already have. You well know that much of the argument to adopt Scenario B was based on assumptions of vehicle fleet improvements and predictions of air quality improvements that have always fallen well short of expectations. Your arguments in the Camberlot Stables Appeal, supported by the Secretary of State and the High Court indicate that you do not really agree with the statements produced in the Officer's Report for this application.

38. The Officer's Report makes an Assessment of the likely significant effects on the SPA. It dismisses any impact from the proposed development on the grounds that it is more than 7 Km from the SPA and based on visitor surveys that most visitors live within 7 Km. This is a very weak argument. People from further than 7 Km certainly visit the SPA and Wealden know this. More importantly, Wealden know that traffic from East Hoathly has a large impact on the A22 and much of it goes North through the SPA. There is a very clear link between houses in East Hoathly generating traffic that crosses the SPA to get to Schools, Jobs or Shopping in Haywards Heath, Gatwick, East Grinstead, Tunbridge Wells or London.

Biodiversity

39. As previously discussed the Wealden Biodiversity Officer has not submitted a report for this application and the objections of the Woodland Trust do not apparently merit any comment in the Officer's Report. The Landscape and Arboricultural Officer has commented that the removal of Hedgerows H13 and H16 should not be removed because they are an important part of the landscape and habitats in themselves and even more so because of the role they play in connecting adjacent habitats. Also, that an Oak tree T27 should be by assessed by WDC for protection as a Veteran Tree. We feel strongly that these issues should be imposed as a condition to this application.

40. We have concerns that the Ancient Woodland will be subject to flooding from the watercourse on the boundary of the site. The significant amount of run-off from this development will discharge into this watercourse. The Planning Department will no doubt repeat its usual reassurance that the modern run-off systems can cope but we know that this is not true. The new development of the Juziers Estate in East Hoathly has a system of swales



and these regularly overflow and cause flooding of a public right of way (within 6 metres of the swale system) as can be seen in the photograph above. Any failure of the swale system would cause flooding of the Ancient Woodland. The proximity of so many people and their pets living adjacent to the Ancient Woodland and the likely increase in flood events will lead to a deterioration of the Ancient Woodland. This is contrary to Paragraph 175c of NPPF 2019. The Woodland Trust submitted 2 objections on this basis and the Officer's Report provides councillors no explanation of this or the "[wholly exceptional argument](#)" to recommend approval as required by the NPPF.

Summary

41. This Officer's Report is very disappointing and does not present all the information that councillors require to make a balanced and informed judgement on this important matter. It only includes information that supports its recommendation for Approval. It lacks balance and fails to examine the issues critical to sustainable development during a Climate

Emergency. It sweeps aside the Historic Environment objections without presenting the issues on which the objections rest. It ignores the scale of the development in relation to this small village and ignores the car dependant nature of this proposal and the transport and sustainability issues that this will cause.

42. It fails to examine the access issues on which PCS will be asked to give full permission and ignores the significant loss of species rich hedgerows and the safety concerns of the villagers.

43. Its assessment of the Planning Balance is biased and excludes matters that do not help reach the predetermined position. The Executive Summary suggests that the development would only impose “modest impacts”. This is a disgraceful and insensitive statement. Doubling the size of this community in the biggest development in over 400 years of rural history is immodest, indecent and utterly inappropriate.

44. The Planning Department are being driven to satisfy a 5 year land supply figure and have lost sight of their responsibility to only put forward sustainable development that does not cause harm. We believe that they are predetermining their position and exhibiting bias. They are putting undue pressure on planning committees to approve applications regardless of the merits of the application and are being highly selective in the information they present to councillors to make their decisions.

45. The key thing about NPPF Section 2 is that it is focussed on Achieving Sustainable Development. This is why at Paragraph 10 it introduces the concept of a *presumption in favour of sustainable development*. Thus, the tests of sustainability come first. If the proposed development is not sustainable then it should not be approved irrespective of any development plan or whether or not such plans are out of date. This application fails the sustainability test and should not therefore be subject to any tilted balance assessment.

46. Villages such as East Hoathly are the jewels of Wealden and to urbanise them for the sake of 205 homes would be wrong. Please reject this application.



Kathryn Richardson
Chair
Village Concerns

Annex

A. Hesmonds Access Drawing - Revision G.

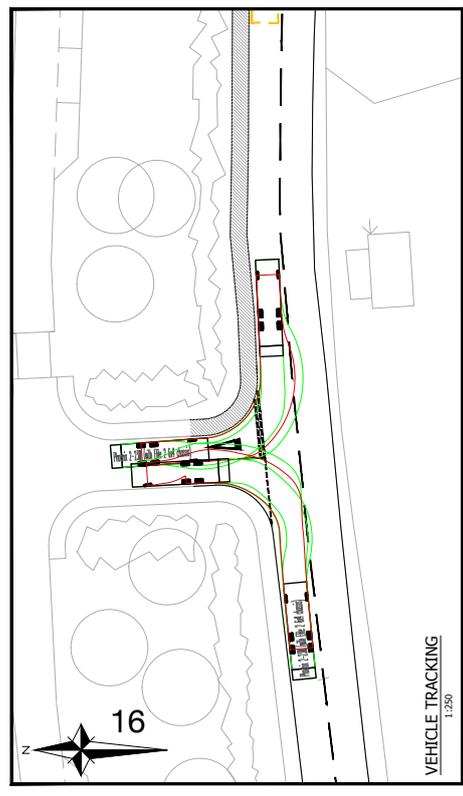
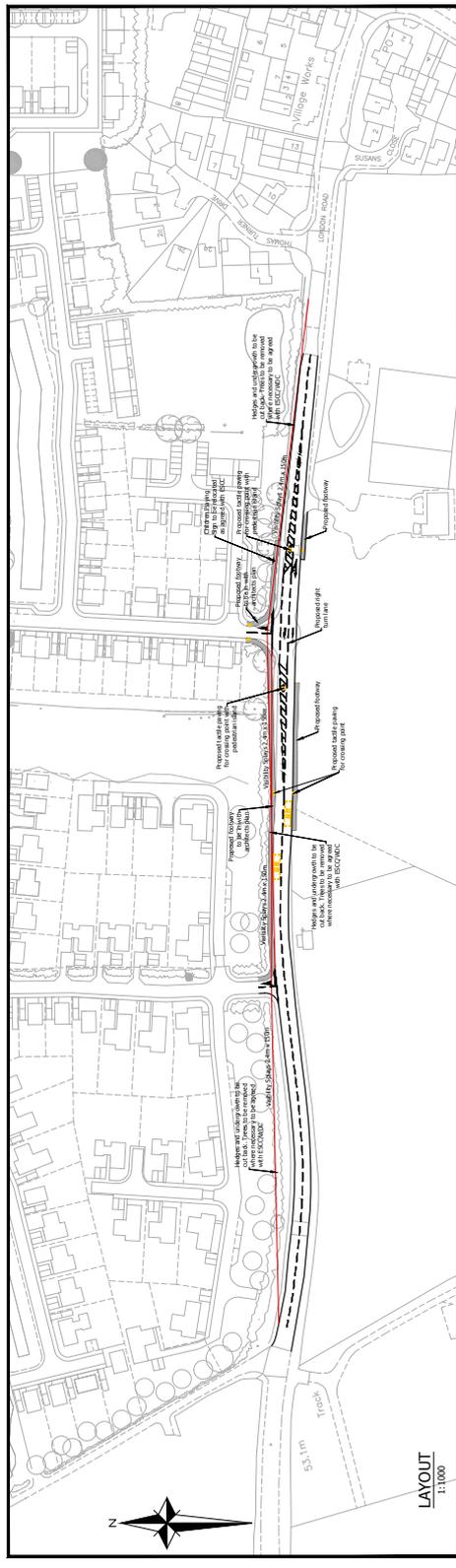
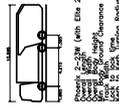
cc

Councillor Susan Stedman
Councillor Angela Snell
Councillor Gavin Blake-Coggins
Councillor Bob Bowdler
Councillor Neil Cleaver
Councillor Geoffrey Draper
Councillor Richard Grocock
Councillor Johanna Howell
Councillor Gary Johnson
Councillor Stephen Shing
Councillor David Watts
Councillor Chris Hardy
Councillor Michael Lunn
Councillor Philip Lunn
Councillor Gareth Owen-Williams
Councillor Brian Redman
Councillor Peter Roundell
Councillor Daniel Shing
Tony Pope
Chris Magness
Malcolm Ramsden

Annex A

Hesmonds Access Drawing - Revision G.

- GENERAL NOTES:**
- The location, size, depth and level formation of existing services may vary from those shown on drawings or records. The contractor shall be responsible for identifying and recording the location and depth of all services prior to construction and shall be responsible for any necessary work to be carried out to ensure the safe installation of any new services.
 - Where any existing services are shown on drawings, the contractor shall be responsible for identifying and recording the location and depth of all services prior to construction and shall be responsible for any necessary work to be carried out to ensure the safe installation of any new services.
 - Do not cut into any existing services without the written agreement of the relevant utility company.
 - No services shall be installed in any way which would be liable to damage, disturbance or interference with any existing services.
 - Where any services are shown on drawings, the contractor shall be responsible for identifying and recording the location and depth of all services prior to construction and shall be responsible for any necessary work to be carried out to ensure the safe installation of any new services.
 - All drawings, specifications and communications issued by you are for the contractor's use only. You shall be responsible for ensuring that the contractor is aware of any changes to the drawings, specifications and communications issued by you.
 - Where any services are shown on drawings, the contractor shall be responsible for identifying and recording the location and depth of all services prior to construction and shall be responsible for any necessary work to be carried out to ensure the safe installation of any new services.



NO.	DESCRIPTION	DATE	BY	CHKD.
1	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
2	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
3	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
4	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
5	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
6	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
7	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
8	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
9	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
10	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
11	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
12	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
13	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
14	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
15	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
16	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
17	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
18	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
19	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
20	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
21	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
22	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
23	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
24	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
25	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
26	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
27	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
28	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
29	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
30	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
31	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
32	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
33	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
34	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
35	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
36	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
37	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
38	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
39	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
40	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
41	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
42	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
43	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
44	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
45	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
46	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
47	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
48	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
49	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
50	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
51	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
52	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
53	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
54	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
55	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
56	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
57	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
58	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
59	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
60	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
61	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
62	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
63	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
64	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
65	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
66	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
67	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
68	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
69	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
70	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
71	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
72	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
73	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
74	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
75	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
76	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
77	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
78	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
79	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
80	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
81	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
82	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
83	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
84	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
85	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
86	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
87	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
88	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
89	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
90	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
91	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
92	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
93	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
94	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
95	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
96	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
97	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
98	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
99	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS
100	ISSUED FOR PERMITS	05/11/2016	AW/STW	LS



6198/203

6198/203