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To: Planning Inspectorate

Comments on Planning Appeal APP/C1435/W/21/3275234
against Refusal of Planning Application WD/2016/2343/MAO
for Bramblebank, Halland (30 dwellings)

1. The Steering Group of the Village Concerns Action Group represent the views of over 200 supporters from our community. We objected to Planning Application WD/2016/2343/MAO when it was determined by Wealden District Council (WDC) and we wish to submit the following comments on the Planning Appeal now lodged.
2. We wish to be part of any Appeal process including any Virtual Hearings related to this Appeal.
3. This Application was refused planning consent for a wide range of reasons but the fundamental reason is that this is an Unclassified Settlement at the very bottom of the Settlement Hierarchy. Halland is unsustainable and nothing has changed in that regard. Village Concerns submitted a detailed assessment of the sustainability issues facing Halland as part of the Planning Application process. We do not intend to repeat those arguments here but ask that the Inspector read our submission dated 6 June 2020.
4. In this submission we concentrate on challenging the Appellant's Appeal Statement.
5. Throughout the Appellant's Appeal Statement the incorrect version of the NPPF is quoted so all the paragraph references are incorrect and do not refer to the current NPPF 2021. Their references therefore make no sense with current National Planning Policy. This might be considered a minor issue

but it is indicative of their sloppy approach to this important matter as is the incorrect depiction of Halland as a Local Service Centre.

EXAMINATION OF APPELLANTS APPEAL STATEMENT

Previous Planning Appeals

6. The Appellant claims that 2 planning appeals that were refused in Halland had an influence on the decision to refuse the Bramblebank planning application. This is incorrect and irrelevant. The Appellant argues that a significant factor in the failure of the Halland appeals was that no 106 agreement had been reached for Affordable Housing. This was not the case and the lack of signed 106 agreements for Affordable Housing was only a very minor reason for the refusal of these appeals:

Hop Garden Application WD/2017/0331/MAJ and Appeal APP/C1435/W19/3226973

The primary reason for the refusal of this Appeal is that the settlement of Halland is Unclassified and unsustainable. It does not have the infrastructure or services to support major housing development. This is therefore fundamentally in breach of the whole principle of sustainable development and Wealden's planning policies. Some of the Inspectors comments were:

“The site is also not located within the proposed Core Area for the village of Halland in the ELP. The purpose of Core Areas is to allow small scale scattered growth which reads as natural development to a settlement. The intention is for new development to take place near to the centre or heart of the settlement in order to promote sustainability, with physical connectivity to the community and facilities.

As such, although the site is located on the edge of a village, due to its location outside any DB, in planning policy terms, it is located within the countryside. Saved Policies GD2 and DC17 within the Wealden Local Plan 1998 (LP) generally resist new housing development in the countryside which is not essential for agriculture or forestry needs or has some other similar justification for a rural location (such as rural affordable housing exception sites). The proposal is not a rural affordable housing exception site and no evidence has been submitted to demonstrate that the proposal would comply with any of the other any of the categories listed under the above policies.

Even if this was considered a rural affordable housing site, no s106 agreement or unilateral undertaking has been provided as part of this appeal to secure the affordable housing (AH). The site is also not within any strategic development area identified within policies WCS4 and WCS6 of the CS. Therefore, the principle of the development in this location would be contrary to the above mentioned policies.

However, the proposed development would not provide a suitable location for housing having regard to local and national policies, the accessibility of services and facilities and policies concerned with rural housing. Therefore, it would not accord with Saved Policies GD2 and DC17 of the LP, and Policies WCS4, WCS6, and SP07 of the CS. Amongst other things, these seek to preclude residential development outside development boundaries and in the countryside unless in accordance with specific policies in the Plan and seek a reduction in the need to travel by car. These policies generally accord with the Framework and therefore I attach significant weight to them”.

The Inspector also refused the Appeal on the grounds that the proposed development would cause harm to the Ashdown Forest SPA and Ashdown Forest/Lewes Downs SACs. This harm is still being caused and although the demise of the 2019 Submission Wealden Local Plan means it is not currently being given any consideration by Wealden as a planning issue it is likely to be revisited. Given the ongoing Climate Emergency and the expected requirement to include biodiversity gain into all new development it is very possible that this will be a valid reason to refuse such car dependent developments in locations that have a known impact on SPAs and SACs.

Halland Forge Application WD/2018/0320/MAJ and Appeal APP/C1435/W/19/3229579

Again, the primary reason for the refusal of this Appeal is that the settlement of Halland is Unclassified and unsustainable. In addition the Inspector rightly identified the unacceptable proximity of the proposed building to the Ancient Woodland and the harm that this would cause. The Inspector also found the proposal to adapt a previously approved hotel extension design into residential units was unacceptable. Some of the Inspectors comments were:

“The location of the proposed development would not be appropriate, conflicting with the policies of the Framework and with saved LP policies EN1, EN2, GD2 and DC17 which promote sustainable development, which seek to ensure that new developments generating significant travel movements are located efficiently in relation to public transport and which resist housing development outside development boundaries unless it accords with other policies in the Plan.

The appeal proposal would harm the ancient woodland, placing it in conflict with saved LP policy EN13 which says that the Council will resist development that would prejudice the ecology of ancient, semi-natural woodland, as well as with the Framework, and Natural England’s standing advice on ancient woodland.

I conclude that the proposed development would provide unacceptable living conditions for future occupiers, placing it in conflict with saved LP policy EN27 which requires development to ensure a satisfactory environment for future occupiers and with the Framework which indicates that decisions should ensure that developments will function well over their lifetime.

It would also be at odds with the Framework where it says that developments should add to the overall quality of the area and be visually attractive as a result of good architecture, layout and appropriate landscaping. This indicates that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area, taking into account local design standards or style guides in supplementary planning documents. The Council’s Design Guide encourages legible environments which present a clear impression of their form and function and demonstrate how they fit with their surroundings, as well as other good design practice, sound guidance with which this proposal would conflict.

However, given my conclusion on the effect of the proposal on ancient woodland, defined in the Framework as an irreplaceable habitat, and in accordance with footnote 6 of its paragraph 11, this does not indicate that permission should be granted in this case. Even were this not the case, because of the environmental harm identified, the proposal would not be

sustainable development, its environmental impacts significantly and demonstrably outweighing its social and economic benefits when assessed against the policies in the Framework as a whole”.

South Street Application WD/2019/1674/MAO and Appeal APP/C1435/W/20/3257830

The Appellant also tries to claim that the successful appeal of a decision in East Hoathly is relevant in that it gave weight to the provision of housing. We very strongly opposed this decision by the Planning Inspector but it is irrelevant to the Bramblebank case. East Hoathly is designated a Sustainable settlement so the 2 cases are not comparable.

TRANSPORT ISSUES

7. The Appellant puts forward a case that the transport issues posed by such a development in an unsustainable rural settlement are not important because in the future we will all be driving electric vehicles and working from home. There can rarely have been such a misguided and disingenuous argument put forward to justify development. The world is in a Climate Emergency, political leaders are finally taking note of it at the COP 26 meeting in Glasgow but all that is about solving the problems in the future.

8. Village Concerns commissioned their own Transport Consultant to examine this community in relation to Transport Issues and its impact on Sustainability. The Report related specifically to the Hesmonds Application WD/2016/2796/MAO in East Hoathly but the arguments are fully applicable to this Appeal. The Report's principal conclusion was that developments in this Parish would be largely car dependant and fail to comply with Paragraph 104 of the NPPF 2021. The full report is included at Annex A.

Cycle Paths

9. There are no Cycle Paths in the Parish or planned for the Parish. This has recently been confirmed by the release of the East Sussex County Council (ESCC) Local Cycling and Walking Infrastructure Plan which contains nothing for rural areas and understandably focuses its intentions on the large urban areas. Cycling on the lanes around the village is hazardous. Cycling on the A22 and B2192 (which are the links to other major settlements for Schools, Employment, Shopping and Leisure) is extremely hazardous. The traffic is significant and speeds are often excessive.

Bus Service

10. The Bus service is inadequate. There are no evening services and no Sunday services in Halland. The bus only runs every hour making it a problem for commuting to work as the times will often not connect with employment hours or connecting transport links. Evening shift work is impossible as the last bus is 7.30 pm. The service from Halland to Lewes and Brighton effectively ceased in 2019. The Bus service is effectively of no use to the residents of Halland and no amount of new residents will make it so.

Travel Plan

11. The Highways Report includes the usual “fig leaf” of requiring that the development be accompanied by a Travel Plan. These Travel Plans are a waste of time and money for rural villages (See Annex A for details). They may have a chance of delivering real benefits in places that have genuine travel options but in this village there are no realistic options. This community is totally car dependent.

12. This is reflected in the Planning Inspector’s comments in Refusing the Appeal for South Street APP/C1435/W/20/3257830: “[However, in considering the environmental objective, whilst there are some facilities within East Hoathly, residents would still be largely reliant on private cars as demonstrated by the submitted Transport Assessment](#)” This view was also supported by another Planning Inspectors comments on the Refusal of the Appeal for the Halland Forge APP/C1435/W/19/3229579: “[However, because of the distance of the site from these settlements and the frequency of services to them, the likelihood of public transport being a realistic alternative to the private car is limited.](#)”

13. 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.

14. There is virtually no opportunity for modal shift away from car dependency in this community (See Annex A for details). This is contrary to sustainability principles and should mean that you do not put developments in such rural areas. Some examples of how this conflicts with National and Wealden policies:

Wealden Local Plan (1998) – It contradicts Saved Policy EN1 Sustainable Development which requires consideration of incorporating renewable energy and reducing the need to travel.

Paragraph 105 of NPPF 2021 - “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

Paragraph 110 of NPPF 2021 reinforces the requirement stating: “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;”

The Wealden Core Strategy 2013 (WCS6) removed the Development Boundary from Halland and denoted it as an Unclassified Settlement. Objective SP03 of the Core Strategy states that, “The majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion.” This objective is entirely consistent with the requirements of national policy relating to sustainable transport. Halland is not identified as one of the rural settlements with growth potential (i.e. less than “up to 10 dwellings”).

Ultra Low Emission Vehicles (ULEV)

15. The Appellant claims that electric and plug in hybrid sales are growing. This may be true but it is from an extremely small base and the numbers of such vehicles in the Wealden total number of vehicles is very small. Department for Transport Table VEH0203 shows below that in the last 10 years the fuel usage in cars has barely changed. New car dependent development will add to the damaging emissions and the potential for fewer emissions in the future should not be allowed to avoid the uncomfortable truth that we have not even made a dent in our emissions emergency:

	Fossil Fuelled	Hybrid Fuel	Zero Emission
2010	99.7 %	0.3 %	0 %
2020	96.7 %	3.3 %	0.6 %

16. All hybrid vehicles still produce damaging emissions and should not be used in the same argument as ULEVs. No statistics are available to show how often the owners of Hybrid vehicles charge their vehicles from the Grid. If it is not done on a daily basis the user is effectively driving a petrol car that carries around with it a very heavy battery. The Hybrid car charges its own battery and there are significant concerns that this is disguising the need to re charge these vehicles from the Grid.

17. The Wealden Climate Emergency Plan 2019 indicates that Wealden had seen an increase from only 100 ULEVs in 2015 to 600 in 2019. This needs to be compared to the total number of cars in Wealden (Department for Transport Table VEH0105) which is 98,000. Thus although the increase in ULEVs is rising sharply it is still only 0.06 % of the total fleet and therefore statistically irrelevant.

18. In 2019 the Wealden Climate Emergency Plan noted that Wealden only had 12 public EV charging points. Zap Map (<https://www.zap-map.com/live/>) shows that this has risen to 17 in 2021 but it should be noted that over half of all these charging points are on private property and are for use of customers of businesses only and not truly public charging points. This clearly shows how ill served Wealden is to cope with the 600 ULEVs that existed in 2019. This lack of public EV charging points is a significant problem in promoting the increase in ULEV ownership.

19. Department for Transport statistics already show that the growth of ULEVs ownership is slowing. This is partly because of supply and material problems but also the significantly higher cost in comparison to petrol and diesel vehicles. People with wealth and an environmental conscience have already moved into this market but fewer people will be able to afford these more expensive vehicles going forward and this will impact the growth of this already heavily subsidised market (tax incentives, reduced VAT on charging and fuel duty).

E Commerce

20. The Appellant claims that the growth in E Commerce is an argument in favour of development in rural villages that are poorly served by public transport. This is a farcical argument. E Commerce has seen a huge increase in vehicles delivering packages to rural homes. Most of these are large diesel vehicles often delivering small packages. A person might previously have driven to the shops and bought several items in one trip. With E Commerce, each item is likely to be delivered separately and in a more polluting vehicle. The impact of E Commerce on rural sustainability is

unknown at present but it is just as likely to be damaging rather than beneficial.

Claim of Decreasing Car Use

21. The Appellant carefully selects data from the Department for Transport to claim that car use is diminishing. They have had to seek data from the US and Europe because the data does not support their case in the UK other than in some very small (and therefore irrelevant) groups of vehicle users. Looking at other more important UK and Wealden data, the Department for Transport Table VEH0105 shows that car ownership has increased every year in Wealden since records were first published. There were 86,000 in 2009 rising to 98,000 in 2020. The small groups of people who are using cars less often is massively outweighed by the increase in vehicle ownership, vehicle use and recorded congestion levels on roads. Department for Transport figures (Table CGN402) show a steady rise in congestion from a UK average of 7.9 seconds per vehicle per mile in 2015 to 9.7 seconds per vehicle per mile in 2019. The Department for Transport Interactive Map for Delay and Speed on A Roads shows that the Average Delay on the A22 in Halland was 14.39 seconds per vehicle per mile in 2019. It is therefore quite clear that congestion on roads is increasing along with the size of vehicle fleet and that congestion on the A22 in Halland is significantly above the national average and getting worse year on year.

22. The Appellant claims that the Government's commitment to cease the sale of new petrol and diesel vehicles by 2030 can be used to justify this development. This suggests that without the Government commitment the development would not be acceptable. The damage that vehicles are doing today and beyond 2030 is adding to the Climate Emergency and destroying the natural environment. Department for Transport Table VEH0101 shows the current UK vehicle fleet as 40.5 million. The majority of these vehicles will not be zero emission by 2030. The damage will not end after 2030 as a prolonged period of phasing out of the existing petrol and diesel fleet will continue to damage the environment. It is also a Government commitment that may change and Climate Change targets may not be met. The Climate Emergency may also get worse as it has been for the last 100 years. To argue that car dependent development is acceptable because of a commitment to improve emissions in the future is deplorably weak and should not be used in planning arguments. We must save the planet first rather than damaging it further with unsustainable development.

Transport Issues Summary

23. The Appellant fails to consider the real arguments of car dependency and puts forward suggestions that this is offset by the “phenomenal growth of online shopping and the global lurch towards home working”. We have not come across these technical phrases before but they are unvalidated by evidence. They are equally likely to be temporary Covid related effects, may be small in impact and should not be acceptable as planning arguments.

24. The evidence undeniably shows that Halland is a car dependent community and it will remain so in the future. E Commerce, Home Working and the transition to ULEVs will have some effect but it is not certain in which direction or when this will be achieved. The evidence clearly shows that any positive effect is currently negligible and is not likely to change radically in the next decade.

HOUSING NEED

25. Most of the Appellant’s case is based on the benefit of providing housing. They include a significant amount of what they call evidence using arguments based on the withdrawn Submission WLP 2019 which has no planning weight. Halland has no housing allocation in the 1998 Local Plan or the 2013 Core Strategy and these are the only extant policies in relation to housing provision. The wider District need for housing does not override the reality that this site under existing planning policy is in an Unclassified Settlement and unsustainable. There can therefore be no planning balance in favour of **sustainable** development.

26. The Appellant complains that the LPA have changed their position in regard to the impact of development in the open countryside. If, the LPA have changed their position, it has only been to correctly recognise the status of the proposed development which is a greenfield site in open countryside. It is also demonstrably an unacceptable tandem or backland development.

27. The Appellant also complains that the LPA have acknowledged that Halland is unsustainable. We do not believe that WDC have ever regarded Halland as anything but unsustainable. The Appellant states that Halland is a Local Service Centre. This is incorrect. Wealden Core Strategy 2013 (WCS6) quite clearly denotes Halland as an Unclassified Settlement. Local Service Centres are large villages such as Mayfield, Frant, Buxted, Herstmonceux, Ninfield, Pevensey Bay, Horam, Alfriston, Groombridge, Hartfield, Westham, and Rotherfield. It is really shocking that the Appellant could make such a fundamental mistake and shows how little they understand the District and its planning policies.

ENVIRONMENTAL HARM

28. It is deeply troubling that the Appellant states in their Executive Summary that the proposed development will only cause “minor environmental harm”. It should cause no environmental harm. If the developer was aspiring to follow the emerging government policy it would be seeking a net biodiversity gain.

29. The proposed development will result in the loss of the bat roosts in the house to be demolished and the loss of another greenfield site that is a foraging site and transit route for wildlife especially at its margins. The Prime Minister has stated very clearly that new development should be on Brownfield sites and this is partly to prevent the continued degradation of biodiversity on greenfield sites.

30. When a Local Plan or Neighbourhood Plan is prepared the proposed development in terms of scale and location are supported by a Sustainability Appraisal to determine the impact on the environment. This proposed development in Halland falls outside the scrutiny of such a Sustainability Appraisal as it is a speculative development seeking approval because Wealden cannot satisfy their 5 Year Land Supply target. We feel strongly that any major housing development that has not been examined in a Sustainability Appraisal should be subject to a Environmental Impact Assessment. No such Appraisal has been submitted for this application and no Screening has been undertaken by Wealden. We believe that this should be challenged as a matter of national policy.

CONCLUSION

31. The Appellant makes the case that various previous planning Appeals in Halland support their case. This is incorrect as they have selectively chosen one element of the Inspectors comments to argue that their application would be a sustainable development. The fact that their application does have an agreed Section 106 Agreement for Affordable Housing was only a minor factor in the demise of the other Appeals in Halland.

32. The Appellant chose to ignore the more significant reasons that the other Appeals were rightly refused. The main reason the other Appeals failed is that Halland is an Unclassified Settlement at the bottom of the Settlement Hierarchy and is unsustainable. It does not conform with extant planning policies and the planning balance is demonstrably against this being a sustainable development.

33. The Appellant argues that car usage is diminishing and home working increasing such that this development would not be car dependent. This is a gross misrepresentation of the evidence which clearly shows that the vehicle fleet is increasing as is congestion in Halland. This development would be car dependent and the vast majority of those vehicles will not be emission free for many decades.

34. We urge you to Dismiss this Appeal.

Katherine Gutkind and Kathryn Richardson
Co Chairs
Village Concerns

Annex A - Transport Study

Annex A - Transport Study



Land at Hesmonds Stud, East Hoathly Report on Transport Issues on behalf of Local Residents

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Railton TPC Ltd ref:	East Hoathly Transport Objection Rev A
Planning Inspectorate	Ref: N/A
Planning Authority	Ref: WD/ 2016/2796/MAO
Date:	February 2020
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Appendix 1: Census Travel to Work Data (Distribution)

Appendix 2: Census Travel to Work Data (Mode of Travel)

Appendix 3: East Hoathly Conservation Area

1. INTRODUCTION

- 1.1. This report has been prepared on behalf of local residents and constitutes an objection on highways, transport sustainability and transport environmental grounds to the proposed development of 205 dwellings on land at East Hoathly, East Sussex (Wealden District Council (WDC) planning application ref. WD/ 2016/2796/MAO).
- 1.2. The work focuses on technical assessments set out in the Transport Assessment (TA) prepared by GTA Civils Consulting Engineers (November 2016) and revised access arrangements as detailed in GTA's Drawing No. 6198-203 rev. F that has been subject to a Stage 1 Road Safety Audit (EC Road Safety, November 2017) and GTA's Designer's Response (November 2017). The work is also informed by discussions with local residents and a site visit undertaken on Tuesday 11 February 2020.
- 1.3. The author of this report is Director of Railton TPC Ltd and has worked for 30 years in the transport planning industry. He has dealt with the transport and access matters for a wide range of development types from local to strategic scale and has been involved with numerous transport studies for public and private sector clients. He has given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and at a DCO Hearing.
- 1.4. The following section considers the proposed access arrangements. Section 3 deals with the availability of sustainable modes of transport. Section 4 deals with the transport environmental impact of the proposals. Section 5 assesses the level of traffic impact on Ashdown Forest and Section 6 provides a summary and conclusion.

2. PROPOSED ACCESS ARRANGEMENTS

- 2.1. The currently proposed access arrangements are shown in GTA's Drawing 6198-203 rev. F. Vehicular access is proposed via two junctions on London Road. The more easterly access is shown as a ghost island priority junction located approximately 60m to the west of the existing access into the car park on the southern side of London Road serving the tennis courts and playing fields. The access is around 140m west of the existing change in speed limit from 60mph (national speed limit) to 30mph through the village. The more westerly access takes the form of a simple priority junction located another 120m to the west.
- 2.2. The eastern junction would serve 155 dwellings. The western junction would serve 50 dwellings. No internal vehicle connection is proposed within the site between the two development parcels served by the two access points.
- 2.3. The proposed access arrangements have changed since the submission of the Transport Assessment. The Transport Assessment showed the eastern junction as a mini-roundabout. This raised an objection from the Highway Authority on safety grounds. The Highway Authority has now withdrawn its objection (consultation response dated 05 /01/2018) and takes the view that the currently proposed priority junctions provide sufficient visibility to cater for vehicle speeds along this section of London Road with no need for any change in the existing speed limit. The Highways Officer states:

'It is considered that the residential element of this proposal could not be objected to as the access provisions currently meet the appropriate highway standard. In terms of integration of the proposal into the village setting, it is agreed through discussions with the transport consultant that this application could with visible frontage development and through the introduction of vehicle turning movements influence actual speeds in London Road.' (Highway Authority response 05/01/2018)

- 2.4. It is not clear whether the Highway Authority is seeking visible frontage development or is relying on visible frontage development to achieve a change in street environment that will cause drivers to moderate the speeds of their vehicles along this section of London Road. No Conditions are required by the Highway Authority to achieve a change in street environment. The site layout shown on Drawing 6198-203 rev. F includes hedges and a landscape belt between London Road and the residential development. It therefore appears that the intention is to retain the rural setting of the road in this location. If the intention is to urbanise the setting then there may well be adverse landscape implications that would have to be assessed.

- 2.5. It is noted that the latest access plan shows the visibility splay to the west from the western junction crossing hedges. The proposed landscaping (or other built features) need to be revised to keep this visibility splay clear.
- 2.6. At present the section of London Road adjacent to the site is wide (over 7.0m), with verges on both sides and a generally straight alignment although the road to the west of the western access bends to the north thus limiting visibility between vehicles emerging from the site and vehicles approaching from the west. It was clear during the site visit that many vehicles travel at considerable speed along this section of road. There has been only one speed survey undertaken by the applicant, approximately 50m inside the 30mph speed limit (approximately 180m east of the more easterly of the two access points). This showed 85th percentile speeds in both directions of 43mph. Given that vehicles are currently travelling 13mph above the speed limit within the 30mph zone and the unconstrained nature of London Road to the west it appears possible that vehicle speeds could be well in excess of 50mph in the vicinity of the access points, particularly the western access. The requirement to remove existing hedgerows and move them away from the edge of the carriageway to widen verges and achieve the proposed 150m visibility splays will have the effect of further increasing vehicle speeds along this section of London Road, particularly for those travelling towards the village. The Highway Authority has accepted visibility splays of 150m without any **evidence** that these visibility splays are appropriate and safe.

3. TRANSPORT SUSTAINABILITY

Policy Context

- 3.1. The proposed development is of a significant size and will generate over 1,800 person trips per day (see Table 7.2 of TA).
- 3.2. With this in mind it is worth noting paragraph 77 of the NPPF that states that, '*Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs*' and paragraph 78 that includes, '*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*'. In the absence of identified needs for housing or the need to maintain the vitality of rural communities, as is the case here, the relevant policy requirement is summarised in paragraph 103 of the NPPF that states:

'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes' (NPPF, Para. 103)

- 3.3. Paragraph 108 of the NPPF reinforces the requirement stating:

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

[...] (NPPF para. 108)

- 3.4. Although it could be argued that the rural location might be subject to different sustainability thresholds compared with a more urban setting, it is clear that the proposal **type** of is one of **major development** and should therefore be subject to the same transport sustainability standards that would be applied elsewhere. The removal of development into isolated locations with poor transport infrastructure is not an excuse to neglect this very important aspect of sustainability.
- 3.5. The adopted Core Strategy (WDC, Feb 2013) classifies East Hoathly as a Neighbourhood Centre: '*A settlement with limited, basic or no facilities but with access to another centre, or a settlement with facilities but poor accessibility or access only to a service or local centre*'. Objective SP03 of the Core Strategy states that, '*The majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion*'. This objective is entirely consistent with the

requirements of national policy relating to sustainable transport. East Hoathly is not identified as one of the rural settlements with growth potential (i.e. less than 'up to 10 dwellings').

- 3.6. The recently withdrawn Local Plan carries through the Core Strategy objective by allocating a windfall allowance of 48 new dwellings within the Wealden 013 South area as a whole. This area includes East Hoathly along with other settlements including Halland, Loughton and Chiddingly plus hamlets and other settlements. The Local Plan was not withdrawn on the basis of any criticism of the proposed allocations of housing.
- 3.7. The context in which the current proposals should be judged is also informed by the national commitment to achieve zero net emissions by 2050 and the declaration of a climate emergency by WDC at the end of 2019. To build significant development that is essentially car dependent would be contrary to the aim of minimising and reducing emissions from transport.
- 3.8. To judge whether the location is or can be made sustainable and whether it offers a genuine choice of transport modes, the following sections consider the location of facilities, the opportunities to travel to these facilities by the main sustainable modes; walking, cycling and public transport and the degree to which the proposed development would be dependent on the use of the private car.

Location of Facilities

- 3.9. East Hoathly contains a limited range of facilities including a primary school that is currently operating at capacity, a small village shop and post office, a hairdresser, a café, a medical centre, a church, a pub, a small number of workshops/small business units and some recreational facilities. The medical centre is a branch surgery and many appointments are made at the main surgery in Buxted, 11km from the site and inaccessible by public transport.
- 3.10. The following main facilities are **not** provided locally:
 - The vast majority of employment;
 - The vast majority of food shopping;
 - Comparison shopping;
 - The vast majority of personal business travel (banks, building societies, solicitors, launderettes, dry-cleaners, barbers, betting shops, estate agents, libraries etc);
 - Hospital:

- Secondary education;
- Tertiary education;
- The majority of leisure and recreational activities (leisure centres, swimming pools, cinemas, restaurants, evening classes etc.).

3.11. The nearest major centre providing many of the above is Uckfield located 8km to the north-west. Other major centres that would attract travel from the proposed development are Lewes (14km), Heathfield (11km), Hailsham (12km) and Eastbourne (25km).

Travel on Foot

- 3.12. Most of the local facilities are located within 800m of most of the site although the form of the site, extending west from the centre of the village does not minimise walk journey lengths to some local facilities with the result that the school, for example, lies around 1.2km from the furthest parts of the site.
- 3.13. It is understood that the local primary school is currently operating at capacity and it is understood that there is no scope for expansion. It therefore appears likely that many children in the proposed development (or living within existing housing in the village) would be forced to travel by car to primary schools elsewhere.
- 3.14. No facilities outside of the village are reasonably accessible on foot.
- 3.15. The proposed development is not bringing forward any other land uses that would reduce the need to travel to existing facilities outside the site. Indeed, the proposed development will lead to some reduction in local employment with the removal of existing equestrian facilities.

Travel by Bicycle

- 3.16. Uckfield, the closest settlement offering higher order facilities lies beyond the limit of what is generally considered a practical cycling distance (5km). There are no designated facilities for cyclists on local roads and the routes to other settlements are generally unlit, carry heavy flows of fast-moving traffic (even on London Road) or are narrow, country lanes, winding in places. The presence of numerous roundabouts along the A22 represents a further obstacle and safety risk for cyclists. Cycling would offer a realistic option for only a tiny minority of determined and experienced cyclists living within the proposed development and then only for a tiny minority of journey purposes.

- 3.17. Census data for the local area (see **Appendix 1**) shows that only 1% of people currently cycle to work. This confirms that cycling does not offer a realistic sustainable mode of travel for residents within the proposed development.
- 3.18. No measures are proposed that could alter the attractiveness of cycling as a means of accessing facilities outside of the village.

Travel by Public Transport

- 3.19. East Hoathly has two bus services.
- 3.20. One of these (No. 142) is the school service that provides a single journey on school days to and from the Kings Academy, Ringmer (secondary school).
- 3.21. The other service (No. 54) runs between Eastbourne and Uckfield via Polegate, Hailsham and Halland. The service runs roughly hourly from 07:00 and 19:30 Monday to Saturday. There is no bus service on Sundays. It should be noted that from East Hoathly it is possible to arrive in Uckfield on weekdays at 08:15 but not then until 09:30. It is not, therefore, convenient for those working conventional office hours.
- 3.22. The overall level of bus provision, although generally within a reasonable walking distance of the site, is of a low standard (hourly service) and will not provide any particular incentive for residents to take the bus rather than use the car. An hourly service provides little opportunity to coordinate travel with appointments or meetings and will tend to be used by those who have no other option than to use the bus.
- 3.23. There is no bus service between East Hoathly and Lewes/Brighton, which together constitute the main employment area for local people (25% of all car work journeys - see census data attached as **Appendix 1**). Bus services offer no opportunity to undertake evening leisure and recreational activities since the last buses back to East Hoathly arrive at 19:35 from Eastbourne and 20:03 from Uckfield.
- 3.24. The census data attached in **Appendix 2** show that only 1.4% of people living in the area currently use the bus to travel to work. The average for the District is 2.2% and the average for the South-East Region excluding London is 4.8%. The local level of bus use is therefore 64% of the District average and only 29% of the regional average.
- 3.25. It is concluded that the current level of bus service in the vicinity of the site will not offer a practical or realistic mode of travel for anything but a tiny minority of journeys.
- 3.26. There are no train stations within walking or cycling distance of the proposed site. Train services are available in Uckfield but provide services only towards London (journey time 1hr 20 minutes). The Census data show that 7.4% of work trips are currently

undertaken by train. It is likely that the majority of these train trips include a one-way car trip if the traveller parks at the station or a two-way car trip if a train traveller is dropped off or picked up. For non-work journeys it is likely that the train will cater for a far smaller proportion of journeys since the train services are not within easy walking distance, are unlikely to integrate well with bus times, are relatively expensive and offer a limited range of destinations.

- 3.27. It is concluded that train travel offers very limited travel opportunities for residents within the proposed development.

Travel by Car

- 3.28. The Census data attached as **Appendix 2** show 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 the District 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.

Summary of Sustainable Access

- 3.29. A summary of the review of sustainable access with reference to the key journey purposes and the main available destinations is set out in the following table:

Table 3.1: Summary of Access by Sustainable Modes

Facility/journey purpose	Distance from Site	Access by Mode		
		Walk	Cycle	Public Transport
Employment (Lewes – 16.7% work trips)	14km	x	x	x
Employment (Uckfield – 10.8% work trips)	8km	x	x	?
Employment (Brighton and Hove – 8.0% work trips)	27km	x	x	x
Employment (Eastbourne – 5.3% work trips)	26km	x	x	√
Employment (mid-Sussex – 7.6% work trips)	30km	x	x	x
Top-up shopping/post office	0.65km	√	√	n/a
Food shopping (Uckfield, Heathfield)	8-11km	x	x	?
Comparison shopping (Uckfield, Lewes, Eastbourne)	8-25km	x	x	?
Personal business (Uckfield, Heathfield, Lewes, E'bourne)	8-25km	x	x	x
Primary education (Church Marks Lane, East Hoathly)	1km	√	√	n/a
Secondary education (Ringmer)	8km	x	x	√
Tertiary education (Lewes, Brighton)	14-27km	x	x	x
GP surgery (Juziers Drive, East Hoathly)	0.85km	√	√	n/a
GP surgery (Buxted)	11km	x	x	x
Hospital (Uckfield Community Hospital)	8km	x	x	x
Leisure (pub)	0.45km	√	√	n/a
Other leisure (Uckfield, Lewes, Eastbourne)	8-26km	x	x	x
Recreation ground	0.5km	√	√	x

Green (√): Journeys possible by this mode

Orange (?): Some journeys difficult by this mode

Red (x): Journeys impossible or impractical by this mode

3.30. The table shows quite clearly that the vast majority of journey purposes cannot be undertaken by sustainable modes from the proposed site. Walking or cycling offers an opportunity to access facilities within the village. Public transport only realistically offers an opportunity to access secondary education in Ringmer, a very limited amount of employment and some shopping and personal business trips in Uckfield or Eastbourne. Even in these instances the level of bus service is poor. It is understood that the secondary school at Ringmer is approaching capacity and it is not certain that the additional children at the proposed development would be able to be accommodated at the school.

Conclusion on Sustainable Travel

3.31. The proposal is for a significant development that would generate a significant amount of transport demand in perpetuity. Travel patterns would be 'built into' the system. The analysis set out above provides strong evidence that the development would be largely

car dependent and that car journey lengths would tend to be long: the nearest higher order facilities being at least 8km from the site.

- 3.32. The development of 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 to the car. The applicant proposes no other mitigation that will have any significant impact on the level of sustainable travel associated with the site.
- 3.33. In policy terms the proposals fall far short of paragraph 103 of the NPPF that requires significant development to be focused on locations which are or can be made sustainable through limiting the need to travel and offering genuine choice of transport modes.
- 3.34. It should be noted that paragraph 103 of the NPPF constitutes a planning matter and is not something that is taken into account in the decision of the Highway Authority. The absence of an objection on transport sustainability grounds from the Highway Authority should not, in any way, be understood as implying that the location is appropriate for major housing development.

4. ENVIRONMENTAL IMPACT

- 4.1. A large proportion of East Hoathly is designated as a Conservation Area. A plan showing this area is attached as **Appendix 3**. The Conservation Area includes South Street, the High Street, Waldron Road and Hollow Lane.
- 4.2. The proposed development will generate a significant amount of new vehicle trips on the sections of highway included within the Conservation Area. The following table summarises the increase in daily vehicle trips within the Conservations Area resulting from the proposed development. It has been assumed that any trips to and from the A22 south will choose to travel via the High Street and South Street since this is a shorter route than that via London Road west. This assumption has also been made by GTA in assigning traffic to the network:

Table 4.1: Increase in Vehicle Trips within Conservation Area

Location	Increase in Daily Vehicle Trips*		
	GTA Distribution	Railton Distribution	% Impact**
South Street/High Street	390	169	16.9% - 39.0%
Waldron Road/Hollow Lane	111	73	Daily flows not available
At London Road/High Street Junction	501	242	Daily flows not available

*derived from daily trip generation shown in Table 7.3 of Transport Assessment

**based on daily flows set out in Table 3.1 of Transport Assessment

- 4.3. The distribution adopted by GTA differs significantly from that derived from Census data as shown in **Appendix 1**. GTA does not supply its working and assumptions so it is not possible to identify the reasons for the differences. It is, however, clear that GTA assign a much higher proportion of the traffic generated by the development to the south.
- 4.4. The information in the table above indicates that between 169 and 390 new daily trips will be generated by the proposed development on South Street and the High Street. This represents an increase of between 16.9% and 39.0% on a daily basis. In transport environmental terms any increase of more than 30% is considered potentially significant and any increase more than 10% is considered significant in sensitive areas¹. The High Street and South Street are sensitive not only because of the presence of the

¹ *Guidelines for the Environmental Assessment of Road Traffic*, Institute of Environmental Assessment, 1991

5. IMPACT ON ASHDOWN FOREST

Conservation Area but also due to the presence of vulnerable highway users in the

5.1. The Wealden Local Plan Sustainability Report, August 2018 identified the following form of parents and children accessing the primary school, the presence of a care home, reason for rejecting development at East Hoathly:

narrow footways in places and existing conflicts between pedestrians and larger vehicles that find it difficult to negotiate the narrow carriageway, including at the junctions of London Road and the High Street.

- 4.5. Whether the distribution of traffic presented by GTA or that derived in **Appendix 1** is used, 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

5.2. It is made clear in Appendix A of the Sustainability Appraisal that the decision to reject reduce their severity.

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’ (p. 25 of Appendix A of Sustainability Appraisal)

- 5.3. It is therefore the view of Wealden District that development at East Hoathly will generate a significant amount of traffic within the sensitive Ashdown Forest area.
- 5.4. I-Transport has prepared a Technical Note assessing the impact of the proposed development on Ashdown Forest (i-Transport, October 2018). The Technical Note derives the distribution of work trips in a way that closely resembles that set out in **Appendix 1** of this report. The i-Transport work therefore contradicts the distribution assumptions that have been made by GTA (see above).
- 5.5. The i-Transport work identifies a daily increase of 213 vehicle trips on roads within Ashdown Forest resulting from the proposed development. The methodology distinguishes between work and non-work trips and counts some trips more than once if they use more than one road within Ashdown Forest.
- 5.6. **Appendix 1** includes an estimate of the proportion of work trips that travel through Ashdown Forest by summing all those trips travelling to or from the north via the section of the A22 north of Uckfield. This suggests that 15.2% of work trips travel through Ashdown Forest. If this figure is extrapolated to include all trips and applied to the daily car trips generation of the development, it would suggest 169 additional car trips through Ashdown Forest per day.

- 5.7. The figure derived above using the data in **Appendix 1** is not identical to that calculated by i-Transport since the methodologies differ but it is clear that whichever methodology is applied, the proposed development would lead to an increase in traffic in Ashdown Forest that is not insignificant. The calculations set out in **Appendix 1** and that undertaken by i-Transport therefore support the decision taken by Wealden District to reject further development at East Hoathly on the basis of a relatively high level of traffic impact on Ashdown Forest.
- 5.8. The findings of Wealden District, i-Transport and the author of this report are hardly surprising given the proximity of Ashdown Forest and the need for drivers to pass through the area if wishing to access areas to the north including Crawley, East Grinstead, Tunbridge Wells, the M25 and London.

6. SUMMARY AND CONCLUSION

- 6.1. This report has been prepared on behalf of local residents and constitutes an objection on highways, transport sustainability and transport environmental grounds to the proposed development of 205 dwellings on land at East Hoathly, East Sussex (Wealden District Council (WDC) planning application ref. WD/ 2016/2796/MAO).
- 6.2. The Highway Authority has withdrawn its objection to the proposals on the basis of site access junctions with 150m visibility splays. No speed surveys have been undertaken in the locations of the proposed access points. It is not, therefore, possible to judge, on the basis of evidence, whether the proposed accesses would be safe.
- 6.3. The proposed access arrangements will require the removal of significant lengths of existing hedgerow either side of the proposed access points.
- 6.4. It is unclear whether the proposed development will alter the road environment along London Road with visible frontage development or, as currently shown on the plans, the existing rural nature of the road will be retained. If the latter, the widening of verges and improvement of forward visibility along the road is likely to have the effect of increasing already high vehicle speeds.
- 6.5. The proposal is for significant development located in what is essentially an isolated rural location. An analysis of opportunities to travel by sustainable modes provides strong evidence that the development would be largely car dependent and that car journey lengths would tend to be long: the nearest higher order facilities being at least 8km from the site.
- 6.6. National policy as articulated by paragraph 103 of the NPPF requires that, '*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*'. Local policy is required to be in accordance with this national policy. The wider context for this policy is the national commitment to reduce net emissions to zero by 2050 and the declaration of a climate emergency by Wealden District Council at the end of 2019. The proposed development clearly fails to comply with paragraph 103 of the NPPF.
- 6.7. The applicant proposes no mitigation measures that could overcome the proposed development's significant deficiencies in transport sustainability.
- 6.8. The proposed development is likely to have an adverse impact in terms of pedestrian amenity, community severance and pedestrian safety in the highly sensitive parts of the village that are included within a Conservation Area. No work has been undertaken to assess the extent of this adverse impact and no mitigation measures are proposed.

- 6.9. The proposed development will generate a significant amount of new vehicle traffic through Ashdown Forest. This finding is in line with work undertaken by i-Transport that calculates an additional 213 daily vehicle trips in Ashdown Forest and supports Wealden District Council's view that East Hoathly is an inappropriate location for new development as set out in the Local Plan Sustainability Appraisal.
- 6.10. Overall it is concluded that the proposed development, by virtue of its scale and inappropriate location fails to comply with policy that seeks to reduce the need to travel and maximise the use of sustainable modes. In addition, it has not been demonstrated that the proposed access arrangements are safe and the transport environmental impact of the proposals has been ignored.

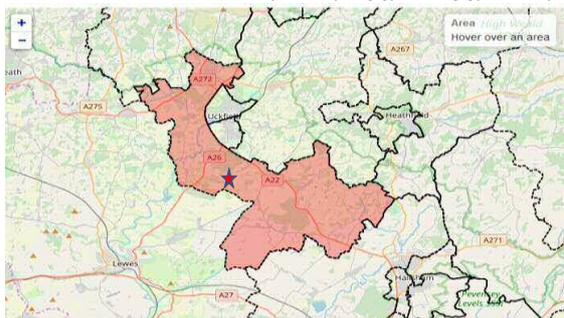
Appendix 1: Census Travel to Work Data (Distribution)

WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)

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population All usual residents aged 16 and over in employment the week before the census
 units Persons
 date 2011
 usual residence E02004415 : Wealden 013 (2011 super output area - middle layer)

place of work	Train	Bus	m/cycl e	car driver	car pass	Bicycle	walk	% (car)	Car Driver						
									Route assignment			% assignment			
									A22 N	A22 S	Waldron Road	A22 N	A22 S	Waldron Road	
Wealden 001	0	2	0	13	1	0	3	0.8%	1.0			0.8%			
Wealden 002	1	1	0	9	0	0	1	0.6%	1.0			0.6%			
Wealden 003 Crowborough	0	0	0	15	0	0	1	0.9%	1.0			0.9%			
Wealden 004 Crowborough	0	0	0	32	1	1	3	2.0%	1.0			2.0%			
Wealden 005	0	1	0	6	3	0	0	0.4%	1.0			0.4%			
Wealden 006 Crowborough	0	1	0	15	4	0	1	0.9%	1.0			0.9%			
Wealden 007	0	0	0	38	3	1	2	2.4%	1.0			2.4%			
Wealden 008	0	0	0	65	6	0	1	4.1%	1.0			4.1%			
Wealden 009 Uckfield	0	5	3	128	17	1	4	8.0%	1.0			8.0%			
Wealden 010 Heathfield	0	2	0	30	1	0	0	1.9%			1.0			1.9%	
Wealden 011	0	0	0	26	1	0	2	1.6%			1.0			1.6%	
Wealden 012 Uckfield	2	1	0	44	2	1	0	2.8%	1.0			2.8%			
Wealden 013 E Hoathly	1	0	1	113	12	6	58	7.1%	0.5	0.3	0.2	3.5%	2.1%	1.4%	
Wealden 014	0	0	0	9	1	0	1	0.6%			1.0			0.6%	
Wealden 015	0	1	0	12	1	1	0	0.8%		1.0				0.8%	
Wealden 016	0	0	0	21	1	0	1	1.3%		1.0				1.3%	
Wealden 017	0	0	0	5	0	0	0	0.3%		1.0				0.3%	
Wealden 018	0	0	0	43	1	1	2	2.7%		1.0				2.7%	
Wealden 019	0	0	0	5	0	0	1	0.3%		1.0				0.3%	
Wealden 020	0	0	0	7	0	0	2	0.4%		1.0				0.4%	
Wealden 021	0	0	0	3	0	0	0	0.2%		1.0				0.2%	
Adur	1	0	0	9	0	0	0	0.6%		1.0				0.6%	
Ashford	0	0	0	5	0	0	0	0.3%	1.0			0.3%			
Aylesbury Vale	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Brighton and Hove	2	6	2	127	7	1	0	8.0%	1.0			8.0%			
Chichester	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Crawley	2	0	1	69	2	0	0	4.3%	1.0			4.3%			
Dartford	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
East Hampshire	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Eastbourne	0	4	3	84	5	1	0	5.3%		1.0			5.3%		
Eastleigh	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Epsom and Ewell	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
Guildford	0	0	0	3	0	0	0	0.2%	1.0			0.2%			
Hart	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
Hastings	0	0	0	18	0	0	0	1.1%			1.0			1.1%	
Horsham	0	0	0	11	0	0	0	0.7%	1.0			0.7%			
Lewes	5	2	2	267	16	4	1	16.7%	1.0			16.7%			
Maidstone	0	0	0	4	1	0	0	0.3%	1.0			0.3%			
Medway	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Mid Sussex	0	0	1	121	1	0	0	7.6%	1.0			7.6%			
Mole Valley	0	0	0	9	0	0	0	0.6%	1.0			0.6%			
New Forest	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
Oxford	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Reigate and Banstead	1	0	0	17	0	0	0	1.1%	1.0			1.1%			
Rother	1	0	0	20	2	1	1	1.3%		1.0			1.3%		
Runnymede	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
Rushmoor	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Sevenoaks	0	1	0	15	0	0	0	0.9%	1.0			0.9%			
Spelthorne	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
Tandridge	0	0	0	10	1	0	0	0.6%	1.0			0.6%			
Tonbridge and Malling	0	0	0	8	0	0	0	0.5%	1.0			0.5%			
Tunbridge Wells	1	7	0	60	3	0	0	3.8%	1.0			3.8%			
Waverley	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Winchester	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Wokingham	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Worthing	0	0	0	8	0	0	0	0.5%	1.0			0.5%			
East	0	0	0	16	0	0	1	1.0%	1.0			1.0%			
London	136	0	0	40	1	1	7	2.5%	1.0			2.5%			
North East	0	0	0	1	1	0	0	0.1%	1.0			0.1%			
North West	0	0	0	3	0	0	0	0.2%	1.0			0.2%			
Scotland	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
South West	2	0	0	6	0	0	1	0.4%	1.0			0.4%			
Wales	0	0	0	1	0	0	0	0.1%	1.0			0.1%			
Yorkshire and The Humber	0	0	0	2	0	0	0	0.1%	1.0			0.1%			
	155	34	13	1,596	95	20	94	100.0%				78.2%	15.2%	6.6%	
	7.7%	1.7%	0.6%	79.5%	4.7%	1.0%	4.7%	2,007				used in TA	55.0%	35.0%	10.0%



15.2% A22 North through Ashdown Forest

Appendix 2: Census Travel to Work Data (Mode of Travel)

QS701EW - Method of travel to work

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population All usual residents aged 16 to 74
 units Persons
 date 2011
 rural urban Total

Area	No.									%						
	all	train	bus	m/cycle	car driver	car pass.	bicycle	walk	total	train	bus	car driver	car pass.	bicycle	walk	total
Wealden 001	4,653	327	59	12	1,828	89	42	352	2,709	12.1%	2.2%	67.5%	3.3%	1.6%	13.0%	100.0%
Wealden 002	4,526	451	34	10	1,878	97	21	172	2,663	16.9%	1.3%	70.5%	3.6%	0.8%	6.5%	100.0%
Wealden 003 Crowborough	4,101	224	52	16	1,923	127	16	262	2,620	8.5%	2.0%	73.4%	4.8%	0.6%	10.0%	100.0%
Wealden 004 Crowborough	5,082	270	77	9	2,198	133	17	289	2,993	9.0%	2.6%	73.4%	4.4%	0.6%	9.7%	100.0%
Wealden 005	5,516	570	40	16	2,038	115	29	294	3,102	18.4%	1.3%	65.7%	3.7%	0.9%	9.5%	100.0%
Wealden 006 Crowborough	5,923	231	183	21	2,878	283	24	325	3,945	5.9%	4.6%	73.0%	7.2%	0.6%	8.2%	100.0%
Wealden 007	3,948	259	24	17	1,588	100	14	229	2,231	11.6%	1.1%	71.2%	4.5%	0.6%	10.3%	100.0%
Wealden 008	5,750	353	34	18	2,466	116	25	179	3,191	11.1%	1.1%	77.3%	3.6%	0.8%	5.6%	100.0%
Wealden 009 Uckfield	6,148	183	98	26	2,850	197	60	616	4,030	4.5%	2.4%	70.7%	4.9%	1.5%	15.3%	100.0%
Wealden 010 Heathfield	5,524	173	47	29	2,739	184	33	322	3,527	4.9%	1.3%	77.7%	5.2%	0.9%	9.1%	100.0%
Wealden 011	4,992	179	38	18	2,330	148	12	205	2,930	6.1%	1.3%	79.5%	5.1%	0.4%	7.0%	100.0%
Wealden 012 Uckfield	4,394	174	97	21	2,227	141	31	369	3,060	5.7%	3.2%	72.8%	4.6%	1.0%	12.1%	100.0%
Wealden 013 E Hoathly	4,497	194	36	18	2,053	106	22	201	2,630	7.4%	1.4%	78.1%	4.0%	0.8%	7.6%	100.0%
Wealden 014	4,680	123	28	27	2,200	84	22	202	2,686	4.6%	1.0%	81.9%	3.1%	0.8%	7.5%	100.0%
Wealden 015	3,905	72	63	16	1,835	142	39	237	2,404	3.0%	2.6%	76.3%	5.9%	1.6%	9.9%	100.0%
Wealden 016	3,813	68	62	19	1,671	144	40	273	2,277	3.0%	2.7%	73.4%	6.3%	1.8%	12.0%	100.0%
Wealden 017	3,927	50	76	19	1,540	165	56	310	2,216	2.3%	3.4%	69.5%	7.4%	2.5%	14.0%	100.0%
Wealden 018	7,528	206	83	20	3,235	189	45	326	4,104	5.0%	2.0%	78.8%	4.6%	1.1%	7.9%	100.0%
Wealden 019	5,241	439	64	31	2,139	176	51	222	3,122	14.1%	2.0%	68.5%	5.6%	1.6%	7.1%	100.0%
Wealden 020	6,643	246	105	43	3,116	215	70	197	3,992	6.2%	2.6%	78.1%	5.4%	1.8%	4.9%	100.0%
Wealden 021	5,088	189	107	20	2,241	163	49	178	2,947	6.4%	3.6%	76.0%	5.5%	1.7%	6.0%	100.0%
Wealden District	105,879	4,981	1,407	426	46,973	3,114	718	5,760	63,379	7.9%	2.2%	74.1%	4.9%	1.1%	9.1%	100.0%
South East Region	6,274,341	311,895	189,926	36,467	2,590,701	200,386	127,614	463,662	3,920,651	8.0%	4.8%	66.1%	5.1%	3.3%	11.8%	100.0%

Appendix 3: East Hoathly Conservation Area

