

7 Thomas Turner Drive
East Hoathly
East Sussex
BN8 6QF

Telephone:01825 840082

E-mail: villageconcerns2016@gmail.com

Thursday, 5 May 2022

Dear Mr Robins,

**Redrow Homes - Hesmond's Stud Detailed Planning Application WD/
2022/0341/MAJ**

Village Concerns Objection 4 - Sustainability

1. We are writing to you as the Co-Chairs of Village Concerns, a local Action Group from East Hoathly with Halland Parish. We represent the views of over 200 supporters against the overdevelopment of our Parish.
2. We object to Planning Application WD/2022/0341/MAJ. We wish to restate our objection of 3 March 2022 that there are fundamental problems with this application:

The application is incomplete and does not contain sufficient detail for a full planning application.

The application is premature in that it assumes that the principle of development has been established and that the Judicial Review process (relating to the grant of outline consent for this site) has concluded. The Judicial Review process continues and your statements and the developers assertions are factually incorrect and you have not corrected them.

The applicant's claim on their website (<https://redrowconsults.co.uk/east-hoathly/>) to have begun the process of purchasing the site in early 2020. Elsewhere on the website they contradict this by saying they began the process of acquiring the site in Spring 2021. They also state on the website that they have exchanged contracts. At the public consultation event in November 2021 they went further and told many residents that they had purchased the site. We believe that this claim to be the owner of the site

would amount to a breach of the Planning Condition that Planning Application WD/2020/2660/PO seeks to discharge.

3. We raised these matters with you on 3 March 2022 and you have not responded despite our request that you do so.

4. This Objection covers Sustainability matters, further objections on other matters will follow. The sections highlighted in blue are quotes from Wealden District Council (WDC) documents or policy documents such as the National Policy Planning Framework (NPPF).

5. The Wealden Local Plan Core Strategy 2013 identified East Hoathly as a Neighbourhood Centre which it defined as 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 device or local centre. The Core Strategy 2013 also removed the Development Boundary from East Hoathly and proposed no growth for the Parish. In 2009, 75 homes were built in the Parish and since 2013 a further 16 have been built and 6 more are under construction. This equates to an average increase of 7 homes per year which is a 1.3% growth per year. In Wealden over this period the average growth has been 0.97%. It can therefore be seen that this Parish has already had more than its share of growth compared with Wealden. Fifty five new homes have been approved for South Street and if this application is approved it would amount to an additional 260 homes in the Parish. For a Parish which WDC has identified for no growth, with no improvements in infrastructure and already a higher rate of housing growth than Wealden as a whole, it would be negligent to approve this application.

Sustainability

Failures to Satisfy Sustainability Policy

6. Paragraph 8 of NPPF 2021 requires that the planning system achieve 3 overarching objectives to achieve Sustainable Development. This Application fails to satisfy any of these criteria:

Economic Objective

The building of the homes might have some minor short term economic benefit to the local economy and would benefit the building sector in the short term but it would cause significant harm to the economy in the longer term. Building new homes in a village with “limited, basic or no facilities” and no employment opportunities will require those facilities to be provided at a cost for which there is no budget. The reality is that new residents would have to commute, by car, to get to jobs, schools, shops

and services. The cost of dealing with this poorly located community and the traffic it would generate would be significant and last forever. The cost to the road network, greater need for car parks and the cost impacts relating to climate change are all economic factors that WDC has already identified as having significant funding shortfalls.

Social Objective

Increasing the size of this community by 113% since 2009 with no strategic plan in place to improve the already failing local infrastructure would be irresponsible. It would not result in a “strong, vibrant and healthy community”.

Environmental Objective

This proposal would cause serious harm to the natural environment of East Hoathly. It would clearly not “improve biodiversity”, nor would it “use natural resources prudently” and it would not “minimise waste and pollution or mitigate and adapt to climate change, including moving to a low carbon economy”:

It would build on some of the very best agricultural land in the Parish at a time when consideration should be given to increasing local food production. The land has not even been surveyed to establish its grading within the Department for Environment, Food and Rural Affairs categorisations.

It would devastate the biodiversity of the fauna that live along the hedgerows, and ancient woodland around the site that use the area for grazing and foraging. The protected Great Crested Newts in the adjacent ponds would have all of their foraging sites and transit routes destroyed.

The creation of a totally car dependent estate would be the epitome of a high carbon economy that will do nothing to alleviate climate change. It would add a significant additional Carbon Dioxide burden caused by the addition of at least 462 cars all commuting to get to jobs, schools, shops and services.

This proposal seeks to demolish recently refurbished equine facilities and an existing home. **If** they are no longer required, these facilities could be repurposed for some other agricultural or commercial purposes. To demolish them is contrary to WDC policy and NPPF 2021 Paragraph 152.

This proposal would also cause harm to the historic environment. This has been covered in Village Concerns Objection 3 - Historic Environment submitted on 25 April 2022. This reflects the objections to this application submitted by Historic England and the WDC Conservation Officer.

7. When WDC recommended the approval of planning application WD/2016/2796/MAO in 2020 they made the judgement that the benefits of meeting their housing targets would not significantly and demonstrably outweigh the adverse impacts of the proposal. We believe that they were wrong in 2020 and should not make the same mistake again. The public would not benefit from this development. WDC, and many others, have challenged the government housing targets as they believe they are wrong. WDC should not approve development when they fundamentally believe it is wrong. They should refuse the application, defend their decision if it is appealed and challenge the government position. The only people who would benefit from this development would be the developer and the billionaire landowner.

8. This Application does not accord with Saved Policy EN1 of the Wealden Local Plan 1998:

“Policy EN1. The Council will pursue sustainable development, having regard to the principles contained in Government guidance and its own Strategy for the Environment, in considering the location, layout and design of development, renewable energy and waste management proposals and in assessing the effects of proposals on the environment, including on water and air quality.”

9. This Application does not accord with Policy SPO8 of the Wealden Core Strategy 2013:

“Policy SPO8. We will maintain and where appropriate enhance through the encouragement of growth, the effective network of villages that will continue to support the day to day needs of our rural communities, and which will accommodate some additional growth where this would be sustainable.”

The Broken Sustainability of East Hoathly

Education

10. East Hoathly Primary School has been oversubscribed for over a decade and new residents usually have to find school places in other villages or towns. This proposal and the already approved South Street application would result in an estimated addition of 68 children of Primary School age. The School has no

capacity to take additional children and all new residents would be forced into their cars to deliver and collect their children outside the Parish.

11. The usual choice of Secondary School for East Hoathly is Ringmer and Uckfield which both require bus or private car to access them. There is no potential for walking or safe cycling.

Doctors

12. The Doctors Surgery amalgamated with the Buxted Practice in 2001 and opened in a new premises in 2012. In the last decade, the possibility of seeing a Doctor in East Hoathly has diminished. This is partly due to a general shortage of GPs but also a result of resources being centralised to Buxted. It is frequently difficult to get a Doctors appointment in East Hoathly and patients are often asked to travel to Buxted. This is inconvenient for all patients but impossible for those who do not have a car. Doctors are not available on a daily basis at the surgery. This is a highly valued resource and the work they do is amazing but it is not able to satisfy the demand and needs of the residents of this Parish, in this Parish. The Surgery does not have the capacity to take on extra patients and cannot currently meet the needs of existing patients.

Bus Service

13. The Bus service is inadequate. There are no evening services and no Sunday services in East Hoathly. 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 when the timetable was reduced to an extremely limited and fractured service.

14. The Bus services are really important for those residents who have no other choice, but the level of use is extremely low. On average only 19 people use the East Hoathly bus each day and the average number of people on any bus passing through the Parish is 3 (mostly on double decker buses). It should be noted that this is following 2 housing developments in this community that have produced travel plans to improve bus usage. The applicant's Transport Assessment determines that the proposed development will generate 35 people using the bus on a daily basis. They have clearly not examined the existing level of bus usage.

15. Rural bus services are expensive , infrequent and clearly not providing an attractive enough alternative to car travel. It is inconceivable that any new Travel Plan will achieve any modal shift to sustainable transport. The Travel Plans that

are put in place include a requirement to audit their effect. We can find no evidence that these audits are ever carried out or that anyone takes any action based on them. They are a waste of money and a fig leaf to justify unsustainable development.

Facilities Lost

16. The following facilities have closed in East Hoathly, thereby reducing sustainability:

The Petrol Station/Garage in East Hoathly closed in 1988.

The Smock Shop in East Hoathly closed in 1996.

The Public Toilets in East Hoathly closed in 1998.

The Butchers Shop in East Hoathly closed in 2001.

The Foresters Pub in East Hoathly closed in 2017.

Reductions in Local Employment

17. Since 1964 East Hoathly has seen a continuing reduction in local employment opportunities as planning consents have been granted to build housing on the sites of local businesses:

1964 - Susans Close built on the site of a Workshop and Garden.

1988 - Thomas Turner Drive built on the site of Trills Builders.

1988 - Carpenters Croft built on the site of Bookers Pill Factory.

2001/2 - An extension to the Mews built on the site of Chapman and Smith Safir Works.

2009 - Juziers Drive and Trug Close built on the site of E&A Carriers and PB Fencing.

18. This proposal will remove one of the Hesmond's Stud business units and associated workers leading to further loss of local employment. The proposal offers no new employment opportunities.

Infrastructure

Electrical Supply

19. This village suffers from frequent power cuts. UK Power Networks recorded 24 power cuts for BN8 6** in the years 2018/2019 and 33 power cuts in the years 2020/21. Modern homes are increasingly dependent on electric devices and timing devices. This level of power cuts is clearly frustrating and irritating for all consumers but is particularly problematic for businesses and those with freezers. It indicates that the existing electrical infrastructure is inadequate and the proposal to add an additional 205 homes will make it worse.

20. The Climate Emergency should be pushing us into a future of renewable energy for all new developments. New developments should be dependant on electric vehicles, electric heating and electric cooking. This proposal contains nothing suggesting that renewable energy is being considered for the site and does not specify what heating systems will be provided. The application does not provide any public electric vehicle charging for visitor car parking and an inadequate allocation for the homes. Current building regulations set a price cap to allow developers to avoid providing charging points if the price cap is exceeded. This will result in the proposed development having insufficient charging points to allow all vehicles to be charged simultaneously. This is unacceptable for a totally car dependent housing estate.

Transport

21. This Application clearly fails to satisfy Local Plan 1998 Saved Policy:

“Policy EN2. The Council will seek to maintain the existing settlement pattern and ensure that major new developments generating significant travel movements are located efficiently in relation to existing development and to public transport.”

22. This Application also fails to satisfy Section 9 of NPPF 2021 by failing to promote sustainable transport. It specifically fails to meet the requirements of NPPF 2021 Paragraph 105:

“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”.

23. The 2011 Census figures show that this Parish has a higher proportion of vehicles per home, 1.8 per home compared with Wealden at 1.6 and England at 1.2 This clearly shows the car dependent nature of this Parish. This is further

demonstrated by the following table using data extracted from Office for National Statistics Table QS701EW:

	Total people who Travel to Work	Public Transport	Car/Van/Taxi/Motor Cycle	Cycle	Foot
South East	3,762,813	327,233	2,844,304	127,614	463,662
		8.7%	75.6%	3.4%	12.3%
Wealden	63,682	6,539	50,666	717	5,760
		10.3%	79.6%	1.1%	9.0%
East Hoathly with Halland	702	48	570	7	77
		6.8%	81.2%	1.0%	11.0%

24. There are arguments that the changing nature of modern life is reducing this car dependency with more people working from home and the use of home delivery reducing the need to travel to larger urban centres. However, these changes in modern life bring with them additional pressure on rural villages from vehicles:

Every home delivery brings a vehicle into the village (often with a much larger vehicle than the car that would have done the job).

Home deliveries are now made for individual small items which might previously have been collected as part of a bigger shopping trip.

Individual meals are now home delivered as a matter of routine and always with some form of vehicle.

Supermarket home deliveries have increased, particularly during the Covid 19 pandemic, but this is not believed to have reduced the number of shopping trips made by most households.

People who have chosen to work from home rather than in an urban centre now have to travel to shopping and leisure facilities whereas previously they may have incorporated this into their working travel.

25. Traffic in the village is increasing and congestion around the Post Office corner is often problematic. There is an increasing trend of people using the village and back lanes to avoid the congestion on the A22. The addition of further housing will add to the congestion in the village but also onto the A22 as every new resident will be totally car dependent for schools, employment, shopping and leisure.

Applicant's Transport Assessment

26. The applicant's Transport Assessment produces data that does not match the reality of a rural car dependent development. The vehicle movements from the proposed development will exceed those calculated. This is partly because the comparator sites that the Transport Assessment uses are not comparable with East Hoathly. Most of the comparator sites are urban, edge of town sites that do not compare with a small rural village with inadequate public transport and too far to walk or safely cycle to alternative places.

27. This Transport Assessment also claims that in the am peak period of one hour, 43 people will walk out of the proposed development, 7 people will use the bus and 4 will cycle. A recent survey of the Juziers development (45 homes) showed that the level of pedestrians is about half the Redrow calculation, no one used a cycle and only 2 people from the whole village used the bus. Village Concerns believes that the "missing" pedestrians and cyclists will in fact be in more cars. This situation could be exacerbated further because the East Hoathly School is already oversubscribed so none of the new residents of South St or the proposed Redrow development will be able to walk their children to East Hoathly School. They will all get into cars and drive elsewhere.

28. The applicant's Transport Assessment states that there are 2 trains per hour from Uckfield in the peak hours. This is incorrect, it is one. It describes this level of service as moderate frequency and that it goes to key destinations. These key destinations are Crowborough – Cowden – Oxted – East Croydon – London Bridge. The service of one per hour is not moderate frequency it is low frequency and only London Bridge is a key destination. Key destinations would be Brighton, Tunbridge Wells, Eastbourne, Lewes, Haywards Heath and Heathfield, none of which are accessible by train.

29. The applicant's Transport Assessment takes no account of the South Street development of 55 homes which will have a cumulative effect on traffic flows and has been ignored. A more realistic and valid Transport Assessment was carried out by Railton TPC Limited and this report is attached at Annex A. Although it was prepared for the first application to develop this site its findings remain applicable to this full application.

Car Parking

30. Car Parking is a problem in most of the village housing developments including those built in 2009. This application proposes to meet the minimum requirement of ESCC and hence will repeat the failings of previous developments and provide inadequate parking space for the higher levels of vehicle ownership in this car dependent rural village.

31. The proposal claims to provide 456 car parking spaces but none of the plans clearly shows where these are and how they are allocated to specific properties. Irrespective of this, the number of spaces will be inadequate because:

It is based on 2 spaces per house and 1.33 spaces per flat whereas the existing car ownership in the village is 2.25 vehicles/home. Even a one bed flat is likely to have 2 occupants who may each have a vehicle. This application proposes an already inadequate level of parking spaces.

Self-employed residents often have an additional vehicle for their trade and this has to be parked in the village. NPPF 2021 Paragraph 109 recognises the need for overnight parking of lorries but this does not extend to self-employed business vans and vehicles. The parking allocation in modern housing developments does not allow for these additional vehicles and they usually end up being parked on the streets. These are often large vans and this creates access problems as the narrow streets are not designed to have such vehicles parked on them. The result is that they are commonly parked on the approaches to the village. These large working vehicles are inappropriate in scale and appearance to park in residential areas. This application offers no parking arrangements for self employed business vehicles.

Many parishioners also have the addition of caravans or other recreational equipment that takes up their allotted space and thereby forces them to park their cars on the streets. This application provides no space for such things.

32. Parking for new developments is generally provided to the minimum standard set down by ESCC and these spaces are too small for many modern vehicles and too few for existing vehicle ownership. The result is more on-street parking. From an aesthetic perspective it also creates a very unappealing view of the places in which people live. Cluttered forecourts crammed with vehicles that spill out onto the roads and encumber the pavements.

33. The space allocated for a parking bay is generally 5m x 2.5m and this is too small for many modern vehicles to park and then open their doors (particularly the 4x4 SUVs that are very common in rural areas).

34. The garages are too small to accommodate large cars. This proposal shows the internal space for a single garage is 3 x 6 m with a 2.4 m wide door. A Landrover Discovery could not open its doors or boot whilst inside. Logically a double garage should be twice as big but they are 5.6 x 5.5 m inside and therefore inadequate. The result would be more on-street parking. This

application proposes the minimum ESCC space standards and will therefore repeat the failings of previous developments and provide parking spaces and garages that are too small for modern vehicles.

35. No plan is shown for the visitor parking space. The proposal does not show the allocation of parking spaces to homes so that it cannot be determined where the visitor parking is sited. Visitor parking spaces are normally used by residents and it is important that it is clearly marked to show visitors where they can park. This application provides no information to enable us to comment on the level and siting of visitor parking.

Sewage

36. Some of the plans show the existence of the Sewage Pump but none of the plans are labelled to show that it is a Sewage Pumping station nor are the details shown of the planned sewage storage tank. This is an important feature of the proposal and should have much more detail about how it is operated and what failsafes it employs ? How big is the tank ? Will it ever be emptied by tanker ? Will it be noisy ? Will there be any odour ?

37. The application provides a plan called Flood Risk Assessment 1. This shows a plan of part of the site only. It omits the Western end of the site. What is clear is that a pipe leaves the proposed sewage Pumping station with a diameter of 150 mm. It then disappears off the edge of the incomplete plan and re-emerges along the London Road and is now shown with a diameter of 100 mm. The implications are that the Sewage disposal plan is not complete or fully designed. This is unacceptable for a full planning application and the full plans and drawings should be submitted before any decision can be made.

38. A sewage pipe of 150mm would have to travel around 750m in order to pump the sewage from the lowest part of the site to get to Thomas Turner Drive to access the main sewer. Simple calculation shows that this would result in 53 tonnes of sewage being in that pipe all the time. It is presumed that every time the pump operates it would empty its tank and push some sewage into the main sewer at the Thomas Turner Drive junction but the pipe would remain full with 53 tonnes of sewage. If this system fails the effect on the area would be appalling - what level of safety and redundancy would prevent this ? A detailed planning application should have all of this information. How will the Main Sewer (another 150 mm pipe) to which this would connect, cope and how will the East Hoathly Sewage Plant cope with this additional load ? This application provides no information for this to be considered and should be rejected as incomplete.

Surface Water Drainage

39. The area of the East Hoathly War Memorial Sports Ground is the natural catchment of water draining from the higher ground to the East. It is regularly waterlogged. The public right of way over the proposed development site is often flooded and has had boardwalks installed to alleviate the problem. The area around Old Whyly Cottage is also prone to flooding during heavy rainfall.

40. The applicant provides complex documents regarding surface water flooding and the design of the SUDs system claiming that it will easily cope and that no flooding will occur. However, similar schemes and claims were made for the new Juziers development in East Hoathly. This regularly discharges water onto the Public Footpath on the Juziers site making it impassible. This application does not address concerns that the watercourse passing through the Hesmond's site will not cause flooding into the adjacent woodlands, the Public Footpath and the property at Old Whyly Cottage.

41. We note also the objection submitted by Professor Julian Murton (Professor of Permafrost Science and professional geologist) on 22 March 2022 who raises the same points with a clear geological explanation of why this is an unsuitable site.

42. ESCC have also objected to this proposal requesting further investigations and proposals. This land is unsuitable for housing and will create a significant flooding problem for the places onto which its run-off is discharged.

Broadband

43. Broadband internet connection is now a fundamental part of modern living. It is the conduit for social networking, entertainment, online shopping, online education, research and business. It is increasingly the only viable way to book events, banking services, online utility accounts, access businesses, district council services, government services and medical services. Survey results show that average download speeds in this village are 36 Mbps compared with the government target of 1000 Mbps. This application makes no mention of providing every home with fibre broadband to enable this target to be achieved.

Climate Emergency

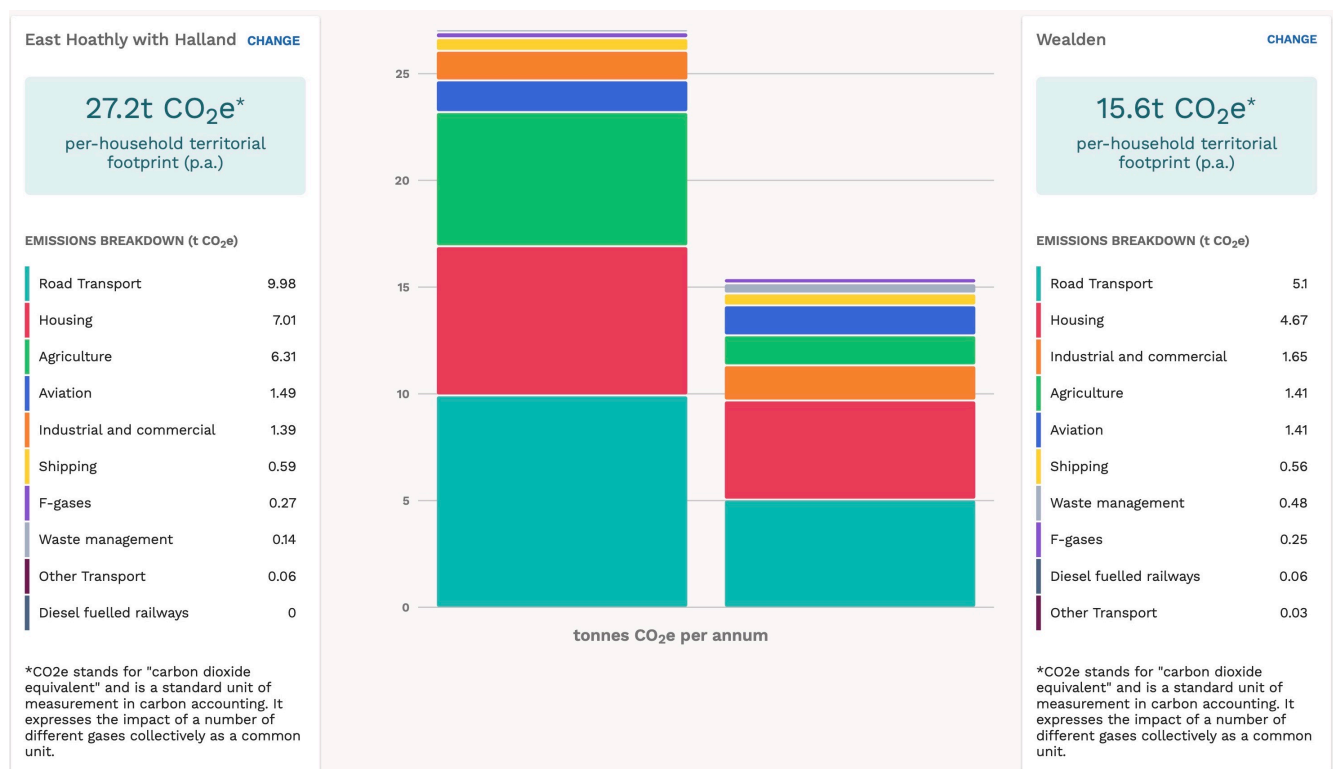
44. The Design and Access Statement makes no mention of heating systems, use of grey water, chimneys, use of renewable energy, fibre cables, electric vehicle charging points and does not mention the CLIMATE EMERGENCY.

45. The Energy Report essentially says that Redrow are aiming to be much better for the planet in the future but for this development it will be the minimum requirements of Building Regulations. They will not go beyond what they have to do by law.

46. The Energy Report is a perfect example of a desk top report by someone with no knowledge of the site or situation in this community. It describes East Hoathly as urban, it is not urban - towns and cities are urban. It discusses the use of Air Source Heat Pumps being used to replace gas boilers when they need replacing - this village has no mains gas.

47. The Energy Report calculates that the new development will be 4.3% better in CO2 emissions than previous housing. This is not enough to even scratch the surface of the Climate Emergency. There should be a step change towards carbon neutral homes if we are to have any impact. Redrow seem to be content to leave the Climate Emergency for someone else to solve.

48. The Centre for Sustainable Energy provides calculations of Carbon Emissions as shown below:



49. It clearly shows that our Parish has a much greater level of emissions than Wealden as a whole. This is largely because we are a rural parish that has commensurately higher level of agricultural emissions. However, the most significant item is that of transport, reflecting that we are a highly car dependent

community. The proposal to add 205 additional homes would exacerbate these emissions and worsen climate change.

Consultation

50. WDC should, under NPPF 2021 Paragraph 34, “set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure”. The Applicant should have liaised with WDC and the Parish Council in order to address this issue. We are not aware of any such liaison taking place. This application does not propose any contribution for infrastructure improvements in East Hoathly. The infrastructure of East Hoathly is already seriously compromised and this Application to add 205 homes whilst not proposing any infrastructure improvements is nonsensical.

51. WDC should, under NPPF 2021 Paragraph 133, “ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life⁵¹. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing”. We are not aware that there has been any engagement by WDC with the Parish Council or the local community to provide such workshops or carry out any public consultation prior to the submission of this application.

Recent Appeal and Planning Decisions

Appeal Decision - Bramblebank, Halland - APP/C1435/W/21/3275234

52. The Bramblebank Appeal was refused in part because “it would generate significant travel movements and not promote sustainable transport”. The Planning Inspector identified “considerable environmental harm” and “a considerable degree of social harm in respect of providing new homes in a location which does not provide suitably for the day-to-day needs of its residents, nor give ready access to them by sustainable means and so would encourage unsustainable patterns of travel”. This was for a development of 30 homes so clearly the proposal for 205 homes would have a far more harmful effect.

Appeal Decision - Catsfield Road, Ninfield - APP/C1435/W/21/3272342

53. The Catsfield Road Appeal was refused in part because it “would transform the rural character of the eastern approach to the village from Catsfield Road on account of the substantial loss of trees and hedgerow”. The Planning Inspector further noted that “it would be unsympathetic and harmful to its rural setting and the character and appearance of the countryside from where it would be experienced along Catsfield Road. The proposed development would therefore cause significant harm to the rural character and appearance of the area”. In summing up the planning balance, the Planning Inspector concludes that “the proposal would not constitute sustainable development for which the presumption in favour applies”. This was for a development of 38 homes so clearly the proposal for 205 homes would have a far more harmful affect in respect of East Hoathly.

Planning Decision - Old Nursery House, Framfield - WD/2021/0573/MAO

54. The Old Nursery House Planning Application was Refused because it was deemed to be unsustainable development:

“Bus services along the B2102 are limited and do not offer a realistic choice to incoming residents.

The proposed development is likely to generate a range of needs for its various residents to travel outside the village to access services and facilities including employment, healthcare and leisure. The above combination of factors is likely to constrain access to facilities by means other than the private car”.

55. This was for a development of 58 homes so clearly the proposal for 205 homes would have a far more harmful affect in respect of East Hoathly.

Planning Decision - Old Orchard House, Horam - WD/2021/2356/MAO

56. The Old Orchard House Planning Application was Refused because it was deemed to be unsustainable development:

“Resulting in an unacceptable and inappropriate form of development. It would significantly impact upon the visual amenity of the rural landscape character of this edge of settlement location, having an urbanising effect on the land and impacting on the rural setting of Horam village. Therefore, it does not ensure a high quality and locally distinctive development appropriate to the locality.

Given its distance from key day to day services and a lack of alternative options to the car to access those services, it would not represent a sustainable form of development

57. The Planning Committee also noted that the “Without capacity for foul drainage and known surface water drainage issues on site there would be an increased flood risk for the area and potential for harm to the natural environment. The Council is concerned about the ability to connect to the foul drainage network”.

58. This was for a development of 38 homes so clearly the proposal for 205 homes would have a far more harmful affect in respect of East Hoathly.

Conclusion

59. WDC has already approved 55 new homes for this village with no improvement to the infrastructure or services. To build a further 205 homes would be unsustainable development. This village has “limited, basic or no facilities” within Wealden’s settlement hierarchy. The School and GP surgery have no capacity for additional residents. It fails to satisfy the Economic, Social and Environmental objectives required for Sustainable Development. It would produce a totally car dependent housing estate at a time when this is the epitome of what planners should be avoiding. There is no public benefit in building homes without the services and infrastructure they need to sustain them. It would condemn the new residents to live in their cars, commuting to work, school, shops and for leisure.

60. The sewage disposal plan is incomplete in that part of the plan is missing and incomplete by having insufficient detail to allow it to be fully examined. The existing sewage plant is working beyond its capacity, the connecting pipework is too small and too old to cope. The sewage plant regularly discharges untreated waste into the watercourse.

61. The application offers nothing other than the bare minimum requirements of Building Regulations in regard to matters affecting Climate Change. This is not enough to meet the challenge of the Climate Emergency and it is hugely disappointing that onsite renewable energy is not considered, heating proposals are not included, grey water recycling is not considered and carbon neutral homes not mentioned.

62. Recent decisions at Planning Committees and Appeal Decisions have rejected applications for fewer homes in locations similar to East Hoathly on the grounds that they were unsustainable car dependent proposals where the day to day needs of residents could not be sustained.

63. We believe that WDC has failed to meet its obligation to set out the infrastructure requirements for this application under the NPPF nor to consult with the local community. We urge you to reject this application.

Katherine Gutkind and Kathryn Richardson
Co-Chairs
Village Concerns

Annex

A. Railton TPC Ltd Report.

cc

Councillor Draper
Parish Council

Annex A

Railton TPC Ltd Report



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

Railton TPC Ltd

41 York Road
Newbury
Berkshire RG14 7NJ
T. 07500 557255
E. brbamber@hotmail.com

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
Author:	Bruce Bamber BSc MA MSc MCIHT



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Appendices

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, Laughton 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

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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

Conservation Area but also due to the presence of vulnerable highways 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.

- 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 reduce their severity.

5. IMPACT ON ASHDOWN FOREST

- 5.1. The Wealden Local Plan Sustainability Report, August 2018 identified the following reason for rejecting development at East Hoathly:

'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. East Hoathly is situated in MSOA Wealden 013. 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)

- 5.2. 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' (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.

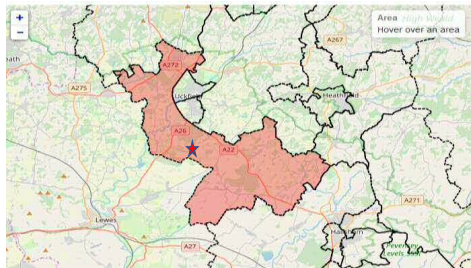
- 6.9. The proposed development will generate a significant amount of new vehicle traffic through Ashdown Forest. This finding is in line with work undertaken by i-Transport that calculates an additional 213 daily vehicle trips in Ashdown Forest and supports Wealden District Council's view that East 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)
 ONS Crown Copyright Reserved [from Nomis on 7 February 2020]

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/cycle	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

