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Monday, 16 November 2020

To: Planning Inspectorate

**Comments on Planning Appeal APP/C1435/W/20/3257830**  
**against Refusal of Planning Application WD/2019/1674/MAO**  
**for Land South of South Street, East Hoathly (55 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/2019/1674/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. The Questionnaire submitted by WDC in relation to this Appeal contains all the required statutory information including the Neighbour Responses to the Application. However, this ignores the previous Planning Application for this site which was refused and then dismissed again at Appeal. The community objected in great numbers to the original Application in 2018 and Appeal in 2018 (WD2018/1508/MA and APP/C1435/W/3223599) . Both Applications were virtually identical and we feel strongly that you should review the public objections to the first Application as well. The public are wholly against development on this site but fatigue against the tenacity of the Developer and confusion regarding the ever changing paperwork that they have submitted has caused many to think that their objection to the original application was still valid.
4. This Application was refused planning consent for a wide range of reasons but Wealden District Council chose to only cite one reason in their

Decision Notice. We wish to raise all the matters that led to the Planning Committee voting to refuse this application.

5. We have no objection to the reasons laid out by WDC in their Decision Notice but it only presents a small part of the reasoning that led to the Planning Committee voting to refuse the Application and why we feel that you should now dismiss the Appeal.

6. We present our case as follows:

Examination of Appellant's Appeal Statement.

Background Information.

Related Appeals/Applications.

## **EXAMINATION OF APPELLANTS APPEAL STATEMENT**

### **Five Year Land Supply**

7. The Appellant makes reference to Wealden's failure to achieve its Five Year Land Supply target. This is speculative as the last published figures for Wealden cite a Five Year Land Supply figure of 3.67 in its December 2019 Authority Monitoring Report. Since then the figure has not been updated despite a huge number of planning approvals and developments in Wealden (WDC have approved applications for 2063 homes between May to September 2020 in addition to having approvals for 6227 homes approved but as yet unbuilt). WDC refuse to publish an updated Five Year Land Supply figure and say that it cannot be updated because sites cannot be inspected during the Covid restrictions. Building new developments is continuing so it is not credible that inspections cannot also continue. Until Wealden have an updated figure they should not be able to use an out of date Land Supply Figure as the basis for permitting development.

8. It should also be noted that when the first Appeal for this site was heard in 2019 Wealden's published Land Supply Figure was 2.69 and this is now believed to have improved considerably.

### **Conformity with Extant Policies**

9. This Application does not comply with saved policies GD 2 and DC 17 of Wealden Local Plan 1998 in that the site is outside the Development Boundary.

10. This Application does not comply with saved policy WCS 6 of Wealden Core Strategy in that the Development Boundary for East Hoathly was removed and thereby deemed not suitable for any development as indicated by Paragraph 6.47: “Development boundaries enable a clear distinction to be made between settlements (towns and villages) where certain forms of development may be appropriate or encouraged, and the smaller settlements and rural areas where protection of the countryside would usually take precedence. In order to sustain our larger, and more sustainable, villages the retention of development boundaries will allow a flexible approach in the provision of employment and other services and facilities. The role of development boundaries is to enable the market to deliver investment, regeneration, employment and growth subject to the detailed control of design and other matters through the development management process. However, within the development boundaries the principle of development is acceptable. Therefore, in addition to the towns the strategy seeks to retain development boundaries in those centres classified as a District Centre, Service Centre and Local Service Centre in order to ensure sustainable settlements in the future and provide for vital villages supporting the rural area. Each rural settlement will be considered on its own merit in following Development Plan Documents and, if appropriate, the development boundary reviewed and adjusted to meet the needs and characteristics of the area.”

### **Wealden’s Policy in Relation to East Hoathly**

11. The Appellant agrees that the Policies GD2 and DC17 carry very limited weight because they relate to a Plan from 1998 which only looked at housing requirements up to 2004. This is wrong and ignores the direction of all WDC strategic planning policy for this Village:

The 1998 Local Plan defined a Development Boundary which excluded the proposed site and only identified modest potential for growth. This modest potential was more than exceeded in 2005 when WDC published a Non Statutory Local Plan that proposed the 45 homes inside the Development Boundary and 30 homes as an extension to the village.

The WDC Local Development Framework of 2 July 2007 included an Issues and Options Consultation Paper covering the period 2006 to 2026. East Hoathly was described as a Smaller Local Service Centre and having Intermediate Growth Potential but that there should be no further growth beyond 75 dwellings proposed in the 2005 Non Statutory Local Plan.

In the Core Strategy Local Plan 2013, East Hoathly was defined as a Neighbourhood Centre. No housing was allocated to the Parish and the Development Boundary had been removed.

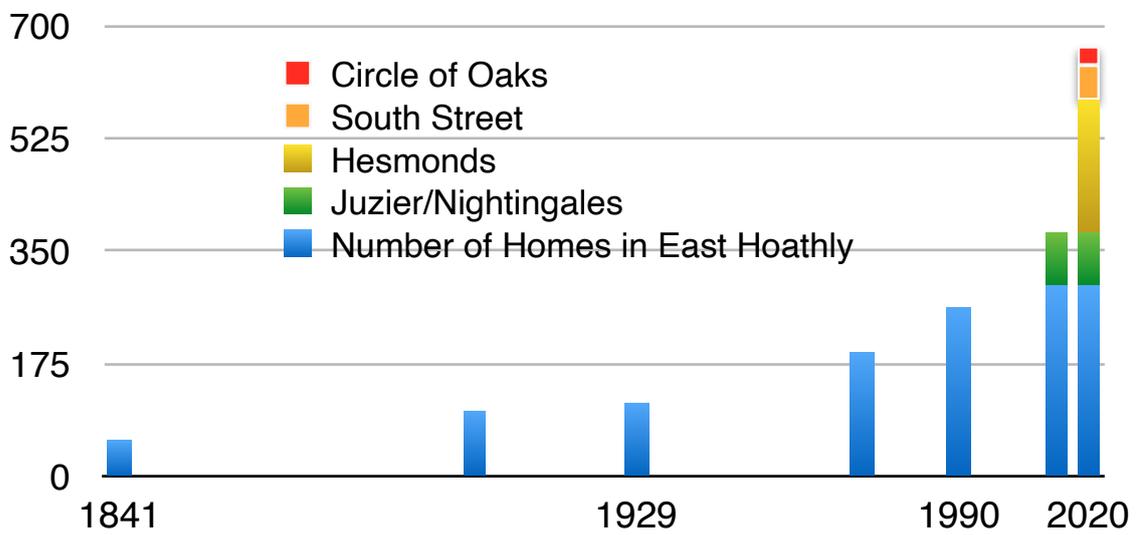
On 22 March 2017 a Draft WLP was approved by Wealden. East Hoathly had an allocation of zero homes and a tightly drawn Development Boundary.

In July 2018 Wealden published a revised Draft WLP for the Plan Period 2013 - 2018 in which Middle Super Output Area (MSOA) 13 South had a Windfall Allowance of 66 homes. East Hoathly was one of 3 parishes in MSOA 13 South. East Hoathly had a tightly drawn Development Boundary. Most of this Windfall Allowance had already been used up in the period 2013 - 2018 with small developments and individual dwellings spread across the 3 parishes. Only 20 remained from the Windfall Allowance for the 3 parishes in the remaining 10 years of the Plan 2018 - 2028. This Draft WLP became the 2019 Submission Wealden Local Plan and was subject to a Public Examination by the Planning Inspectorate during 2019. The Plan was rejected by the Planning Inspector after Stage One of the Inspection process in December 2019 and finally withdrawn by WDC in February 2020.

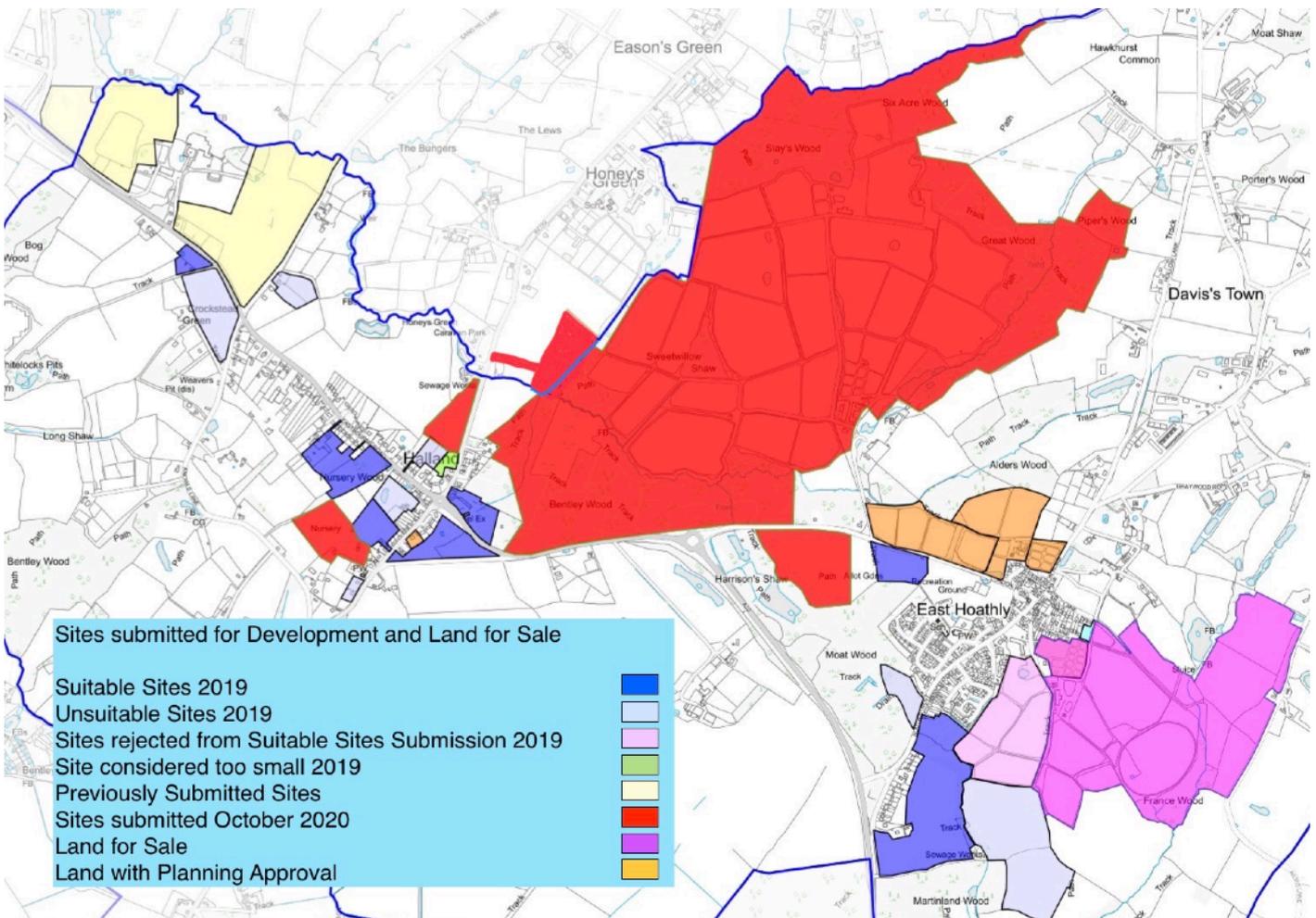
12. This clearly demonstrates that WDC have since 1998 had no strategic intention of enlarging this village beyond the huge enlargement by 25% in 2007. This is a clear indication that Wealden believe that this is the wrong location in which to build large numbers of houses. This was reinforced in Wealden's Appeal Statement to the first Appeal for this site: ["that the acceptability of housing in East Hoathly had shifted considerably since the pre-application meeting in 2016"](#).

### **Scale of Proposal**

13. The scale of the proposal is significant within this village. The number of homes in the village in 2009 was 296. This had increased by almost 30% by 2019. This Application is one of 3 major applications currently being considered by WDC. They have approved Outline Consent for 205 homes at Hesmonds (WD/2016/2796/MAO), and are due to consider an application for 26 homes at Circle of Oaks. If the Circle of Oaks application (WD/2018/2741/MAO) is approved and the additional 55 homes for this Application, it would reflect an increase since 2009 of 125%. It is inconceivable that anyone would consider such an increase of a town or other large settlement and you should not do so here. It is unsustainable and would create a dormitory village.



14. It should also be noted that the desire of the Developers goes much further than this. The Call for Sites process that is part of the New Wealden Local Plan process has produced even more land that has been put forward for housing development. All of this contains not one proposal for infrastructure improvements or employment opportunities.



## **Wealden's Consideration of Policies in its Officer's Report**

15. The Case Officer acknowledged in the Officer's Report Executive Summary that the site is contrary to Saved Policies GD2 and DC17 of the adopted Wealden Local Plan 1998. She attached only limited weight to these policies. This was wrong and it was not the view of Wealden when they refused the previous application on this site. Nor was it the view of the Planning Inspector when he Dismissed the Appeal of the previous application for this site: "the scale of proposal, 74 units [the change to 55 units remains equally applicable], would be significant within this large village. It would also be set to the rear of characterful ribbon development fronting South Street on the less dense approach to the centre of the village. Critically, it would be set outside the adopted settlement boundary. The principle of residential development would therefore not be acceptable having regard to local planning policy as it would be contrary to policies GD2 and DC17 of the LP and Policy WCS6 of the Wealden District Core Strategy Local Plan (2013) (CS). These, taken together and amongst other objectives, preclude development outside settlement boundaries and set a classification of settlements suitable for additional housing." Clearly the Saved Policies GD2, DC17 and WCS6 still carry significant weight.

16. The Officers Report dismissed the fact that this application is contrary to Saved Policies GD2 and DC17 but completely fails to mention that it is also contrary to other Saved Policies. These were all cited by Wealden in its Appeal Statement for the previous Application arguing against development on this site. It must be asked why Saved Policies EN2, EN8, EN12, EN27, SPO1, SPO3, SPO7, SPO13, WCS7, WCS12, WCS13 and WCS14 were not now mentioned in the Officers Report. They all still apply and indicate that this application should be rejected.

## **BACKGROUND INFORMATION**

### **Transport**

17. 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 but the arguments are fully applicable to this Appeal. The Report's principal conclusion was that developments in East Hoathly would be largely car dependant and fail to comply with Paragraph 103 of the NPPF. The full Report is included at Annex A.

## **Cycle Paths**

18. 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**

19. The Bus service is inadequate. There are no evening services and no Sunday services in East Hoathly. The bus only runs every hour (not as claimed by the applicant in Paragraph 8.4 of the Transport Report) 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 East Hoathly and no amount of new residents will make it so. 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.”

## **Post Office Corner**

20. 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. Online shopping deliveries are also adding to vehicles in the village. 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. The Applicant's assertion that traffic emerging from the proposed development would turn South to gain access to the A22 betrays an embarrassing lack of knowledge of the local road network and considerably devalues the worth of their report. Traffic from this site that turns South and attempts to access the A22 will find it dangerous as the and traffic speeds are high on this section of the A22 and if they then need to turn North on the A22 is virtually impossible at peak periods. The result is that all traffic emerging from the site will turn North to enter the A22 at the



roundabout and hence every vehicle will pass through the Conservation Area and add to the congestion at the Post Office Corner. This Application clearly fails to comply with NPPF 2019 Paragraph 110 in that the new residents (with a predicted 137 new vehicles - see Annex B for calculation) would be almost totally car dependent:

“Paragraph 110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

### **Conservation Area**

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

22. 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.

### **New Access Points onto South Street**

23. The Application for the Circle of Oaks land adjacent to the proposed site would result in an additional access onto South Street. The submitted designs for both applications conflict with each other. WDC and the Highways Authority have failed to consider the impact on safety of having 2 access points so close together.

### **Travel Plan**

24. 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.

25. This is reflected in the Planning Inspector’s comments in Refusing the Appeal for the earlier application on this site: “[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: “[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.”

26. 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.

27. 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 103 of the NPPF - “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 108 of the NPPF 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 Core Strategy 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”).

The recently withdrawn Local Plan reflected this part of the Core Strategy objective by allocating a windfall allowance of 48 new dwellings within MSOA 13 South 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. An allocation of 48 homes spread across 3 parishes over 10 years is realistic and sustainable. To put 55 homes in one small village is unsustainable particularly when there is no potential to avoid further car dependency and it would come in addition to the 205 homes recently approved by WDC.

### **Appellant's Section 106 Planning Obligations Statement**

28. There is no evidence to show that Travel Plans are effective for rural villages (See Annex A for details). Paragraph 1.8 of Schedule 4 of the Section 106 Planning Obligations Statement states that the Owner shall implement further suitable measures in the Travel Plan Objectives are not being achieved. Its proposals for Reducing Car Use are:

“promotion of car sharing e.g. use of lift share or Travelchoice car share database, car sharing matching facility, guaranteed emergency ride home for car sharers, priority parking for sharers, car sharer coffee mornings, priority parking and reduced car parking fees for car sharers

promoting the choice of alternative fuel vehicles purchased by staff or residents e.g. electric moped or car charging points, priority EV parking spaces

financial incentives e.g. for not driving, for giving up a parking space  
Park and Ride: parking in existing public car park on urban fringe, then catching a bus/cycling/walking to site

Raise awareness of health, social and environmental benefits of reduced car use”

29. Clearly most of these ideas are beyond the scope or intention of this Developer and are therefore not valid. We are not aware of any such Travel Plan having any effect on reducing car dependency in a rural village such as ours. We have repeatedly asked that evidence be produced to show that Travel Plans work in our situation. WDC and the Developers have failed to produce any evidence. It should also be noted that charging points are not required in new developments by WDC and the Developer does not propose them. They should therefore have the grace not to include any reference to electric vehicles in their Travel Plan proposals.

## Flood Risk

30. The Appellant claims that there are no issues regarding flood risk. However, we raised objections on this matter and they were not addressed by the LLFA or WDC and remain unanswered.

31. The WDC Drainage report comments that only a single attenuation pond is shown on the drawings. It states “[The design as shown totally ignores the comments on the use of swales and a linked chain of ponds made in the pre-application advice letter of 29 November 2016. Even at this outline stage, these matters need to be considered sufficiently to ensure that enough space exists for the surface water drainage features within the overall layout.](#)” The WDC Drainage report has several other

significant misgivings that clearly indicate that the consultant used by the applicant has been put together as a cut and paste exercise desk top report that has not been checked by the applicant and does not reflect situation in Wealden. We strongly believe that these important matters should not be left as a condition. They should be addressed fully and a revised drainage plan submitted to ensure that it can be accommodated in the site area and the constraints of the South Street and Biodiversity buffer zones.

32. In East Hoathly the developments of The Mews and subsequently Juziers Drive/Trug Close have urbanised a significant area of agricultural land on the East of the village. The surface water

run-off from these developments is discharged into the watercourse running along the East of the development area. The catchment Swales that were constructed in the Juziers development are already silted up and no longer



working effectively. They regularly overflow and flood the public footpath and field margins below the development.

33. An additional planning application (WD/2018/2741/MAO) has been submitted for more housing in the Circle of Oak's field between the Appellant's site and the Juziers development. This area is now regularly flooded. If the Circle of Oaks application is approved this will also discharge its surface water run-off into the watercourse to the East of the Village. If this proposed development is permitted it will add to the surface water run-off and discharge an ever increasing amount of water onto the footpath and into the water course that then runs South into the East Hoathly Sewage Plant. This has flooded in the past and no assessment has been done to look at the potential impact of the increased flood risk to this whole area and the Sewage Plant in particular. The cumulative effect of surface water run-off from the Juziers development and the proposed developments has not been examined by WDC or the LLFA.

34. A secondary issue with urban run-off is that it is contaminated by fuel, road spillages, cleaning materials, household detritus and domestic garden products. All of this contaminates the water courses and damages the environment. The effect of one development may be small but the cumulative effect is significant and does not support the NPPF requirements to protect the environment.

## CIL

35. The Officers Report makes repeated claims that CIL money will be used to solve the infrastructure problems in this community. If this were the case there should be no infrastructure problems. Previous developments CIL payments would surely have resolved all these problems. The majority (85%) of CIL payments go into Wealden's CIL fund and Wealden's AMR Reports show that none of this has ever been spent in our Parish and no future spending is planned for our Parish. WDC should stop claiming that CIL money will solve infrastructure problems when processing planning applications.

36. The Appellant claims that the impact on existing infrastructure and services can be disregarded. This is arrogant and wrong. No Wealden CIL money has been spent in this village and none is included in the WDC Reg 123 List for future expenditure. All the Wealden CIL money is spent on major projects in the South of the District and large urban centres. The small amount of CIL receipts that are given to the Parish are insufficient to do anything significant and certainly not to redress the impact of major developments on an already crumbling infrastructure.

## **Employment in East Hoathly**

37. Most of the house building in East Hoathly in the last 70 years has been on the sites of businesses and this has significantly changed the balance of the living and working community. Most residents now have to travel out of the Parish (almost exclusively by car) to work, to school and for shopping and leisure. Most of the local sources of employment have been turned into housing.

38. It is the clear intention of Wealden Core Strategy 2013 to concentrate housing where they are sustainable. This Application clearly fails to comply with Policy SP03:

“Policy SPO3. To help address the need for homes, to ensure the economic prosperity of the District and to support its residents and the changing requirements of residents in terms of size, type, tenure and location of homes, whilst protecting our valued environment we will provide for at least 9440 homes within Wealden from 2006 to 2027. The delivery of on average 450 dwellings per annum provides a realistic timeframe for the market to deliver the housing and also better provides for the timely delivery of necessary infrastructure. 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. Development will be focused in and around the settlements of Hailsham/ Hellingly, Polegate/ Willingdon/ Stone Cross and Uckfield to help stimulate investment in those centres, and, to varying but lesser degrees, in and around Crowborough and Heathfield to meet housing need.”

39. The NPPF 2019 Paragraph 77 states that “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs”. There is no local need for the proposed 55 houses. The East Hoathly with Halland, Community Land Trust (CLT), Housing Needs Survey - July 2019 determined that 21 households in the parish were in need of affordable housing. They generally need realistically affordable rented accommodation which the CLT is working towards rather than developer driven unrealistic affordable housing that is often not delivered.

40. The NPPF 2019 Paragraph 83 requires that decisions should enable “the sustainable growth and expansion of all types of business in rural areas”. This application makes no contribution to existing businesses and provides no new employment or business opportunities.

# **Sustainability**

## **The Broken Sustainability of East Hoathly**

### **Infrastructure**

41. The existing infrastructure of the village is stretched significantly:

There are frequent power cuts in our Parish (Twenty Four Power Cuts were recorded by UK Power Networks during 2018/9) and a significant number of very short interruptions to the supply. This is mostly as a result of overhead supply lines being affected by trees and windy weather. It should be noted that the move away from fossil fuels will lead to the existing and any new homes to be increasingly dependent on electricity. This will exacerbate the existing problems with our electrical supply network. It would be interesting to know if UK Power Networks have been asked if their supply network will be able to cope in rural locations such as ours when everyone has plugged in their electric cars and replaced oil heating with electric heaters. It could be that we will look back fondly on the level of power cuts we currently suffer. The Wealden Climate Emergency Plan quotes a National Grid report that states “that there could be between 2.7 and 10.6 million Electric Vehicles (EV)s on the roads by 2030 which would present a broad-ranging challenge across all areas of electricity infrastructure”. In other words, if we get even close to the levels of EVs necessary, the National Grid will not cope.

Broadband speeds are slow and the service is intermittent. Frequent drop outs are experienced. Current Broadband speeds and reliability prevent many home businesses being viable.

Foul drainage pipes are already struggling to cope and problems occur regularly. The pipe diameters and gradients are too low to allow the addition of additional users.

There is no mains gas supply. The majority of homes are heated by oil delivered by tanker.

42. The Applicant does not propose any contribution for infrastructure improvements as required by NPPF 2019 Paragraph 34 and East Hoathly is again omitted from any inclusion on Wealden’s Regulation 123 List. The infrastructure of East Hoathly is already seriously compromised and this Application to add 55 homes whilst not proposing any infrastructure improvements is nonsensical especially as it would come in addition to the recently approved 205 homes.

## **Education**

43. The village school has been oversubscribed for over a decade and new residents usually have to find school places in other villages or towns. All new residents would be forced into their cars to deliver and collect their children.

44. ESCC figures for Secondary School Admissions/Allocations 2019/20 show that for Secondary Schools within 10 Km of East Hoathly the number of places available was 900 and 885 places were allocated. The usual choice of Secondary School for East Hoathly is Ringmer and Uckfield where there were 420 places and 408 places allocated and we understand that this has worsened and both schools are now full. There is clearly no capacity for new students to be homed in East Hoathly.

45. Tertiary Education is largely based in Lewes and Brighton. With no bus service from the Parish to these destinations, cars are the only alternative.

## **Doctors**

46. 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. The journey involves a bus to Uckfield and then Train to Buxted with the return trip taking at least 3 to 4 hours. A community bus serves the Uckfield to Buxted route but this is once daily and cannot be used for a return trip. 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 can only be described as a Part Time service.

## **Reductions in Services**

47. The following have led to reductions in East Hoathly's Services, facilities and employment opportunities - all reducing Sustainability:

The Foresters Pub closed in 2017.

The Butchers Shop closed in 2001.

The Smock Shop closed in 1995.

The Public Toilets closed in 1999.

The remaining local business are an important part of our local economy. They attract customers and visitors to the community and provide employment opportunities for local people. However, the changes of the types of business can sometimes have a detrimental effect on the Sustainability of the Parish. The replacement of businesses that enhance Sustainability by businesses that do not help with Sustainability is detrimental. In employment terms the changes of these businesses is often neutral but the effect on the community is important. Some examples of this have been:

The Butchers Shop was replaced by a Craft Shop and then a Book Shop.

The Petrol Station/Garage was replaced with a range of small business units currently: Homeopathic Vet, Sign-writer, Glass Bead Maker, Photographers, Osteopaths and Dressmakers.

### **Reductions in Local Employment**

48. 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.

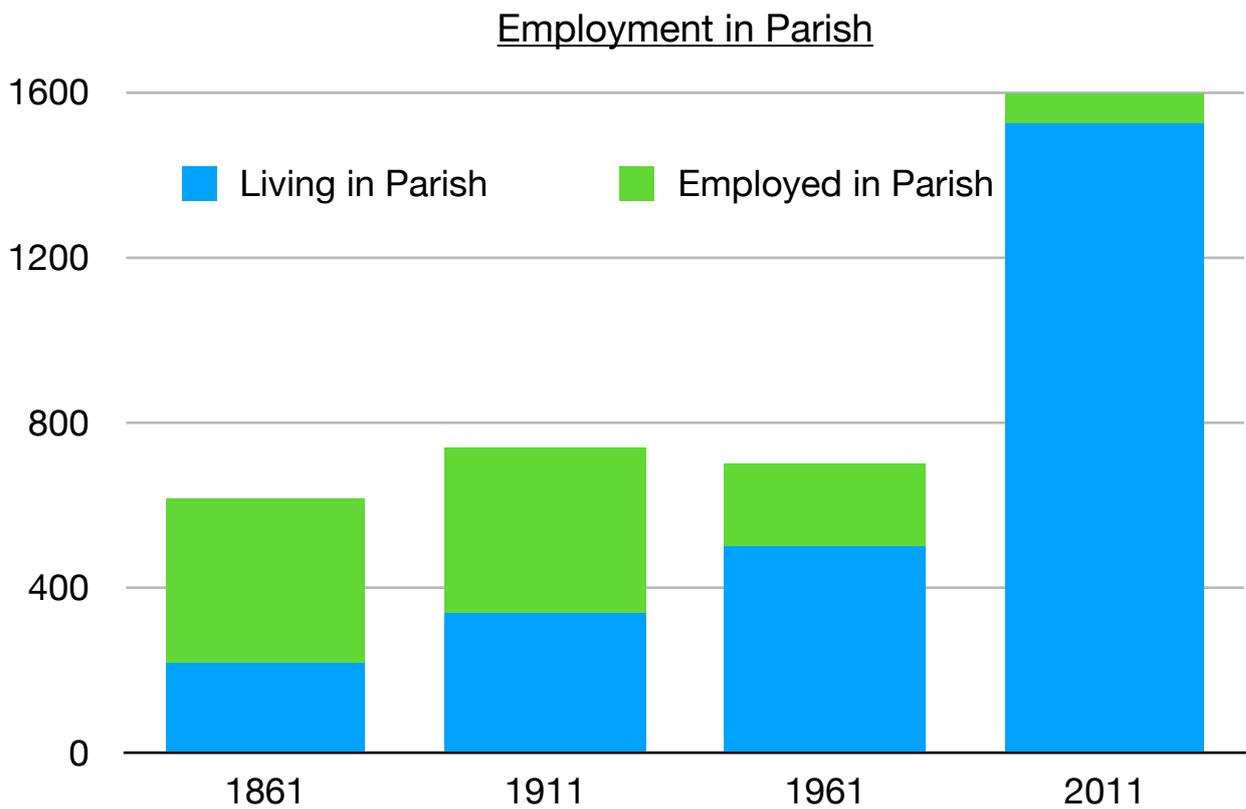
1988 - Thomas Turner Drive built on the site of Trills Builders.

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.

This Application offers no employment opportunities to the village. The following graph shows how the number of people employed in the Parish has reduced in the last 150 years.



**NPPF Sustainability Objectives**

49. This application fails to satisfy the NPPF sustainability requirements. The specific reasons for this are detailed in the paragraphs above and particularly in the sections on Transport and Employment. This section shows how this fundamental lack of sustainability is measured against the NPPF sustainability objectives:

**Economic Objective**

“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;”

This land is greenfield quality agricultural land many miles from the services and facilities that are needed to sustain housing. It is clearly not the right land in the right place. It proposes no new employment and no evidence to show that local people will be used in the construction phase. It identifies no infrastructure needed by this community and seeks to build over the main village sewer which is known to be in need of upgrading even without the burden of extra homes. It proposes no innovation by such things as the use of low

carbon housing, alternative energy sources or electric vehicle charging points.

### **Social Objective**

“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;”

It is difficult to see how communities that are destined to spend their lives in cars to get to jobs, schools, shops and leisure destinations will be strong, vibrant or healthy. They will effectively be sleeping here and living somewhere else. The services that people need are not accessible in East Hoathly without getting into a car.

### **Environmental Objective**

“to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

The Officer’s Report states that “Ecological mitigation and enhancements will be provided within the site. The development will therefore meet the environmental role.” This conveniently ignores significant parts the NPPF Environmental Objective – This application does not meet the environmental objective because it is totally car dependant and would therefore add to pollution, not mitigate or adapt to climate change or move to a low carbon economy. It will not help to address the WDC Climate Emergency Plan or national targets.

This view is supported by the Planning Inspector in Refusing the Appeal of the previous application for this site: “Incoming residents would add towards some economic spend within the area and there would also be shorter term economic benefits from the construction phase of the development albeit these are considered to carry only limited weight. 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”

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. Again, it has proposals for the use of low carbon housing, alternative energy sources or electric vehicle charging points.

### **NPPF Presumption in Favour of Sustainable Development**

50. There is a clear presumption in favour of Sustainable Development in NPPF 2019 Paragraph 11. Measured against the NPPF standard for sustainable development, the benefits of this Application would not significantly or demonstrably outweigh the adverse impacts, when assessed against the policies of the NPPF 2019 taken as a whole.

51. 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.”

52. 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.”

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

### **Appellant's Claims in regard to Sustainability**

54. The Appellant claims that the Application accords with the three objectives of sustainable development. These claims are baseless and

merely repeat the phraseology of previous developers in countless other applications. They mean nothing. For example, they claim that it will provide spin off economic benefits to other businesses in the area and support local services. This did not happen with the developments in East Hoathly in 2007. No local tradesmen were employed on the sites, there was no visibility of builders using the village shop. It is a kilometre from the shop to the centre of the site so we doubt that the builders will bother to walk to the shop during their breaks. None of the builders used the Tea Rooms, Hairdressers, Book Shop, Dressmakers or Homeopathic Vets. It is hoped that none used the Pub during working hours or prior to driving home.

55. The claim that the Application meets the Social need by providing Affordable homes is spurious. The Affordable homes are on the back of 65% of luxury homes that are not needed. None of the homes are needed in this part of Wealden. There are no jobs, shops, schools or leisure facilities in this village that will sustain the new residents. The need is to build where the facilities exist. The very small requirement for Affordable homes in this community would be better addressed by a Community Land Trust and one has accordingly been set up.

56. The proposed development will have an impact on the traffic using the A22. This is being wilfully ignored by ESCC and WDC who have no strategic plan to improve this major route. The Planning and Development Portfolio Holder for WDC was recently interviewed on local radio. She stated that the only improvements planned for the A22 were to put in additional roundabouts. She maintained that these would improve traffic flow although she did agree that she was not a highways expert. She seemed oblivious to the reality that the new roundabouts were all to permit access for new housing developments. So, the effect on traffic flow would be much worse. A roundabout by itself will slow traffic and reduce flow, but if it is also adding extra vehicles onto the road then it will have a significant adverse impact on traffic flow. To increase traffic flow you need to increase the capacity of the road, or in an extremely unlikely scenario, reduce the amount of traffic (not building new homes would be a start) or remove things that slow down traffic such as junctions and roundabouts. The traffic congestion is already a serious problem at peak periods. These peak periods are extending as people try to avoid the worst of the traffic but increasing car usage is causing the situation to worsen year on year. This has led to an increasing amount of traffic using the rural side roads as "rat runs" to avoid the traffic. This has resulted in more traffic on these smaller roads leading to carriageway erosion particularly on the verges where passing is difficult, excessive speeds and a danger to pedestrians, cyclists and horses. Wealden are continuing to give planning approvals adjacent to the A22 that will disgorge onto this route and to give planning approvals to rural villages that have inadequate facilities which in turn forces residents into cars and

onto the A22 to commute for jobs, schools, shopping and leisure. WDC and ESCC look at each application in isolation and determine that the road network can cope. This is palpably not the case and is a clear failure of strategic planning.

57. The Appellant claims that it meets the Environmental Role because it proposes ecological mitigation and enhancements. This is hugely disingenuous. The habitats and open space that has existed on this site for at least 400 years has allowed biodiversity to evolve places to breed, places to forage, places to grow and routes to transit between them. This “life” does not need any mitigation or enhancements it just needs to be left alone. The proposal intends to relocate anything that is inconveniently placed, remove the open space that is used for foraging and transit and rely on the new inhabitants not introducing pets, dog walkers or children that will have an impact on any biodiversity that survives. The site is a major route for wildlife transmitting from the Ancient Woodland to the West and the open farmland to the East of the village. This is particularly the case for bats roosting to the West and transmitting to feeding areas around the Sewage Plant. To interrupt this transit route with housing and light pollution will have a significant effect on biodiversity.

58. The Appellant keeps repeating the claim that the NPPF places great weight on increasing the delivery of homes. This ignores the whole premise of the NPPF which is that development must first be Sustainable Development.

### **Appellant’s Position in relation to Wealden Planning Committee South (PCS)**

59. The Appellant is critical of the members of PCS for going against the advice of the Planning Officer and clearly threatens to extract financial retribution on WDC as a result of this. The committee members had an informed view of the effect of this proposal on this village. It is shameful that a Developer whose sole reason for pursuing this case is to make millions of pounds profit should make such threats. The original Appeal made its decision based on the 3 main grounds on which the original planning application was rejected. The Planning Inspector chose not to address the significant amount of other information presented to the Appeal that covered other issues that were also presented to the original planning meeting. These issues covered such matters as Sustainability, Scale, Transport and the Climate Emergency. It was largely a consideration of these matters that led PCS members to vote against this Application. Had the original Inspector examined these issues he may well have included them in his grounds for dismissing the Appeal. We urge that these matters are

considered as part of this Appeal as they have a significant bearing on the merits of the proposed Application.

60. The Appellant makes reference to the recent approval of another application in East Hoathly for 205 homes at Hesmonds Stud. We are still awaiting a Decision Notice for this application and it is probable that Judicial Review proceedings will then commence. A complaint is also being submitted to the Local Government Ombudsman regarding the conduct of the PCS meeting. It should also be noted that if the Hesmonds application does get final approval, it will require the whole of the main village sewage pipe to be replaced and upgraded. This pipe passes under the proposed site for this Application. We have asked that a specific condition should be required for any development to require a full examination of this work and its cost. We have also asked that the work be completed before any houses are constructed. Condition 10 on the Application might be considered to have covered this but we feel that the specific requirement to re-route the village sewer should be detailed. WDC and the Developers have ignored these requests.

## **Comments on S106 Conditions attached to the Application**

### **Lights**

61. Condition 15 covers lights at the site but does not make it clear that this is not just for the construction phase. This condition should specifically cover any construction phase and thereafter for the residents. This should be included as a covenant on any new property.

### **Odour**

62. Many of the existing residents of South Street complain of odours when the wind comes from the Sewage Plant. Many of the homes in the proposed development would be considerably closer to the Sewage Plant.

WDC Pollution Control state that they do not have the expertise to comment on matters of Odour and asked that Southern Water provide this assessment. Southern Water did not respond as a consultee to this application but did so for the previous application on the same site. They clearly asked for various Conditions to be attached to any approval and should have done so again for this new Application. One of these Conditions related to Odour but this was omitted from the Officer's Report. The Case Officer chooses to ignore the Condition requested by Southern Water and the fact that one property would fall inside the area where the level of 1.5 ouE.m<sup>-3</sup> would be exceeded. The Southern Water Condition

relating to Odour should be attached to any approval and nothing should be built within the area that exceeds the threshold.

### **Climate Emergency Plan**

63. It is very difficult to see how building car dependent developments satisfies the aims of Wealden's Climate Emergency Plan.

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

## **Ashdown Forest**

### **Traffic Generation that Affects Ashdown Forest**

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

66. 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 \[East Hoathly\] 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)

67. The demise of the Local Plan does not change these facts. The Officers Report dismisses such concerns by stating that ["the development proposed is considerably less than the quantum of growth promoted in the Submission Wealden Local Plan 2019 .... when considered on its own or in combination, the proposed development would not adversely impact on the integrity of the protected European Sites."](#) It is very difficult to take this statement seriously. Wealden have not abandoned their intention to bring

forward the sites for the 14,228 homes identified in the 2019 Plan. The statement also implies that there is no level of housing that would cause harm to the SACs. Natural England have clearly said that 14,228 homes would cause no harm. What if 24,228 homes were built, surely Natural England would concede that this level would cause harm. It is wrong to take the view that building anything in excess of 14,228 is acceptable, be it 55 or 10,000. WDC and Natural England should establish what the safe threshold is before they proceed to develop in excess of their intention to develop the 14,228 homes identified in the 2019 Plan.

### **Vehicle Fleet and Air Quality**

68. The Planning Inspector for the 2019 Local Plan indicated that Wealden should have adopted Air Quality Model B and that is based on assumptions about the reduction of diesel vehicles and a switchover to electric vehicles. The plan period was only until 2028 and this community still has no public electric vehicle charging point as is the case in the majority of local villages and towns (Wealden only has 12 public electric charging stations) National Building Regulations and WDC policy is that vehicle charging points are not required for new developments. The grand aspirations towards a cleaner vehicle fleet may be admirable and necessary but they are highly likely to fail by the deadlines that have been set. It is therefore ludicrous for Natural England to still persist in the expectation that the vehicle pollution issue will all be solved by 2028 or 2040 or beyond. To add more vehicles to the problem by building additional homes in car dependant locations will make things worse.

69. The UK had 32.5 million cars in 2018 of which 0.14% were hybrid and 0.0005% were electric. The contribution of these electric/hybrid vehicles to impacting air quality is therefore insignificant. Sales of new hybrid/electric cars in 2019 had increased by 3.4% to 80,000. The Wealden Climate Emergency Plan indicates that only 0.005% of vehicles in Wealden were ultra low emission in 2019. Even if prices dropped and demand soared, the production rates cannot increase fast enough to have a significant effect on the enormous legacy of diesel/petrol vehicles for many decades.

### **Appellant's Report to inform a HRA**

69. The Appellant's "Report to Inform a HRA" is woefully inadequate. In assessing the potential impact on the SACs it states that the effect of atmospheric pollution would be uncertain. We believe that this is disingenuous. The effect is certain. The Applicant's Report repeatedly accepts that there is an effect on the SACs but then indicates that it can be ignored because it is small. It seems content to base this assessment on the hope that "there is a clear trend for improvement in background emissions".

It offers no analysis to support this trend or question if this is realistic for Wealden in particular. It is embarrassing that an Ecology company can have such a naively optimistic approach to pollution. The Applicants calculation of the Annual Average Daily Traffic (AADT) figures is also questionable. This rurally isolated development would be wholly car dependant and would create a higher level of AADT than those using standard trip generation figures. The Applicant's Report also states that the effects of Recreational Disturbance on the Ashdown Forest SAC can be screened out because it is outside the 7 Km zone. This displays a worrying ignorance of the reality that exists in Wealden and the draw that the Ashdown Forest has to people throughout the District. The Appellant's Report was submitted in August 2019 and effectively made irrelevant by the withdrawal of the 2019 Local Plan. It has not been updated.

### **Lack of Evidence from Natural England**

70. It is also important to note that Natural England have offered no evidence to support their claim that the 2019 Plan was wrong, they merely disagreed with the evidence put forward by WDC. Having abandoned the old HRA, WDC will have to prepare a new one and it is inconceivable that they will ignore the evidence base they already have. Much of the argument to adopt Scenario B was based on assumptions of vehicle fleet improvements and predictions of air quality improvements that have always fallen well short of expectations. The arguments in the Camberlot Stables Appeal (APP/C1435/W/18/3197286), supported by the Secretary of State and the High Court indicate that WDC do not really agree with the statements produced in the Case Officer's Report for this Application.

### **Visitors to Ashdown Forest**

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

### **WDC Ignoring Harm to SACs**

72. Wealden's Sustainability Appraisal Report states in Appendix B1, Page 26 for East Hoathly MSOA 13 South:

“Development has the potential to have a likely significant effect on the Ashdown Forest SAC, Lewes Downs SAC and Pevensey Levels SAC. Any development will require a Habitat Regulations Assessment to determine its impact. 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. Overall the settlement contributes a high level of traffic from new housing development within the District. In terms of the A22, the contribution for each MSOA is one of the highest within the District (but less than MSOAs 7 and 12). In relation to the A26 it contributes a moderate amount of movements compared to the highest contributor (MSOA 4). Development within and around this settlement contributes to nitrogen levels and nitrogen deposition on Lewes Downs SAC. MSOA 13 is one of the higher contributors to roads relevant to Lewes Downs SAC.”

73. Whichever Air Quality Model is used, the impact on the Ashdown Forest SAC will be the same. Building homes in East Hoathly will have a significant effect. The polluting vehicles are still here and they mostly drive across the SACs. WDC have abandoned their 2019 HRA and not produced a new one. They are permitting development with a total disregard to the impacts on the SACs. The harm cannot be disputed nor the evidence that shows that MSOA 13 South generates a significant amount of traffic that causes that harm. The failure to have a valid HRA to assess this is unacceptable. The failure to assess the in combination effect of developments that are in excess of the 14,288 rejected by the Planning Inspector is wrong. It effectively allows WDC to permit an unlimited amount of development, knowing that it is causing harm and without a HRA in place.

## **Environmental Impact Assessment**

74. The proposed site is 5.7 Hectares and as such requires an EIA to be completed by WDC in accordance with EIA Regulations 2017 Schedule 2 Serial10 (b) (iii). This has not been done and should have prevented the Application being heard by PCS. WDC have been very dismissive of the impact of development on the environment since the Planning Inspector rejected their 2019 Local Plan but they are the Competent Authority and should take a more responsible position in protecting the environment. A good start would be to carry out effective and honest EIAs on developments that require them.

75. The cumulation of the proposed developments in East Hoathly should also require an EIA that examines the In Combination Effects. In addition, we feel that any development in Wealden or surrounding Authorities that

contribute to the pollution of the Wealden SACs should form part of a wider EIA.

## **RELATED APPEALS/APPLICATIONS**

### **Appeal Decision APP/C1435/W/19/3235754**

#### **Land adj Old Orchard House, Horebeech Lane, Horam TN21 9DZ**

76. The Appeal regarding the Application for Horebeech Lane, Horam was for Non Determination. The Planning Inspector determined that notwithstanding the situation regarding the provision of a Five Year Land Supply, that: “I have identified significant harm in relation to suitability of location, the character and appearance of the area, and living conditions of neighbouring occupants.” We contest that the suitability of the site proposed in East Hoathly is even less suitable and that Horam is considerably more sustainable than East Hoathly. Horam benefits from a range of local shops including a supermarket, petrol station selling a range of goods, Dentist, Hardware store, Butchers, Village Store, Post Office, Fish and Chip Shop, Delicatessen and many other retail outlets.

77. The emphasis of the Planning Inspectors decision is that the site was unsuitable notwithstanding the Five Year Land Supply situation.

#### **Ninfield 70 Dwellings Land South of High Street WD/2020/1166/MAJ**

78. This Application was determined by Delegated Decision.

#### **Ninfield Parish Council Objection**

79. Ninfield Parish Council made an Objection to this Application and stated:

“3.2 As will be set out within this objection, there are significant social and environmental harms that clearly and demonstrably outweigh the public benefits of the proposal. These include landscape harm and harm to the character and appearance of the area, harm to the setting of heritage assets and harm to pedestrian safety resulting from increased traffic on Church Lane. Furthermore, the proposal would be dependent on the use of the private car and would fail to promote sustainable transport modes. For this reason, the application proposal does not represent sustainable development and should be refused.”

80. Comment: Village Concerns argues that exactly the same situation applies to the South Street Application.

81. Ninfield Parish Council also stated:

“3.6 **Paragraph 122 [NPPF]** outlines that planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

3.7 Comment: Whilst it is accepted that there is a need to use land more efficiently in order to address the current housing shortage across the country, the National Planning Policy Framework is clear that this is not done in a way that would lead to unacceptable adverse impacts. In relation to infrastructure and services, it is noted that Ninfield Church of England Primary School is currently operating over capacity (Census, March 2019). There is insufficient information submitted with the application to conclude that additional capacity can be provided on the current school site. As such, the proposal does not meet the requirements of Paragraph 122(c) of the NPPF. In relation to character and setting, it is our view that the proposed development would fail to preserve the area’s prevailing character and appearance, also contrary to Paragraph 122(d) of the NPPF.”

82. Comment: Village Concerns argues that exactly the same situation applies to the South Street Application. We would add to this that the traffic generated from development in East Hoathly would have a much more significant adverse impact on the SACs and A22 congestion.

83. Ninfield Parish Council also stated:

**“7.9 Material consideration: sustainable development:**

Sustainable development is a cornerstone of Government policy and is always a material consideration. It was held in *Aldi Stores Ltd and British Gas plc v Secretary of State for the Environment and Daventry DC* (1996) J.P.L B93 that an inspector was entitled to find that there would be demonstrable harm in respect of proposals contrary to sustainability policies and the effects on local amenity. As laid out at Section 3 and 4, the development fails to demonstrate a sustainable form of development and as such should be refused outright.”

84. Comment: Village Concerns agrees and believes that the same should apply to the South Street Application.

**Planning Officer Report**

85. The following is an extract from Paragraph 1 of the Planning Officer’s Report:

“The site lies outside the development boundary for Ninfield, within open countryside. The principle of residential development would therefore not be acceptable having regard to local planning policy as it would be contrary to policies GD2, DC17 and EN27 of the Wealden Local Plan 1998 and Policy WCS6 and WCS9 of the Wealden District Core Strategy Local Plan (2013) (CS). These, taken together and amongst other objectives, preclude development within open countryside, set a classification of settlements suitable for additional housing and the quantum of housing and also seek development that respects the character of the area.

The proposed development would be detrimental to the visual and rural setting of the village of Ninfield and cause harm to the character and appearance of this part of village. The application site comprises two fields abutting the southern edge of the village and whilst not in agricultural production reads clearly as the beginning of the countryside. Any residential development on this site will inevitably and irrevocably change the character and appearance of the countryside by extending the spread of development southwards, unacceptably eroding the traditional character of the settlement typified by linear development along the High Street.

The development does not therefore meet the definition of sustainable development within the National Planning Policy Framework and the harm identified would significantly and demonstrably outweigh the benefits of the proposal. The development would therefore be contrary to Policies GD2, DC17,

EN1, EN8, EN12, EN14 and EN27, HG6, LR3 and LR5 of the Wealden Local Plan, Policies WCS6, WCS9 and WCS14 of the Core Strategy and National Planning Policy Framework policies relating to sustainable development including Paragraphs 7, 8, 9, 10 and 11, those requiring good design in particular Paragraphs 91, 92, 95, 96, 98, 108, 110, 122, 124, 127, 130 and those that seek to ensure that development protects and enhances the natural and built environment in particular Paragraph 170.”

86. The Conclusion of the Planning Officer’s Report states:

“The development lies outside of any development boundary, causing harm to the countryside setting of this village, due to the important landscape character and sensitivity of this particular site. The layout, scale and siting of development is considered to lead to development in an unacceptable form. There are no identifiable reasons to make an exception to policies of strict control, or other material consideration to outweigh this, based on the material considerations and policy position applicable at this time. The significant and demonstrable harm caused by development is therefore not outweighed by benefits and it is recommended that the application is refused.”

87. Comment: Village Concerns believes that this Application has many comparisons with the South Street Application. In this matter the Planning Department made a delegated decision to refuse the application. The grounds on which they did so should equally apply to the South Street Application.

**Appeal Decision APP/C1435/W/19/3223599**  
**Land South of South Street, East Hoathly WD/1508/2018/MAO**

88. The Planning Inspectorate Dismissed an Appeal APP/C1435/W/19/3223599 for development of Land South of South Street on 29 November 2019. The Inspectors reasons for Dismissal apply equally to this new Appeal and are summarised in the following extracts from the Inspectors Appeal Decision:

**Impact on Ashdown Forest Air Quality**

**Paragraph 16** “Therefore, as the proposal is not directly connected with, or necessary to site management for nature conservation, without an objective demonstration, with supporting evidence, that there will be no adverse effects on the integrity of the European sites, in combination with other plans and projects, the precautionary principle should be applied and adverse effects must be assumed.”

**Paragraph 17** “Given the increase in population and likely vehicle movements, this is likely to contribute to air pollution and the associated effect of the change in composition of the nutrients of the soil at both SACs. The increased population and proximity, and draw, of Ashdown Forest is also likely to increase visitor pressure and affect the internationally protected bird species present.”

**Paragraph 24** “I note that the appellant is concerned that undue prominence has been placed on this indicative plan and that the proposal intends carefully selected tree removal and can offer biodiversity mitigation. However, in its current form, the proposal indicates a loss of biodiversity features and therefore is contrary to policies SPO1, SPO13, WCS12 and WCS13 of the CS and Policy EN12 of the Wealden District Council Local Plan 1998. Taken together, and amongst other objectives, these require development to protect and enhance biodiversity, preventing a net loss, and to promote local distinctiveness and green infrastructure.”

**Appeal Decision APP/1435/W/19/3226973**  
**Hop Garden, Halland WD/2017/0331/MAJ**

89. The Hop Garden, Halland lies within the Parish of East Hoathly with Halland. An Appeal for 21 Houses was dismissed under APP/1435/W/19/3226973. Many of the reasons for dismissal also apply to the current application for 55 houses in East Hoathly.

90. The key points made in the Appeal Decision were:

*Paragraph 7. “The Council state that the site is not located within any defined development boundary (DB) in the adopted development plan. The DB for Halland was removed by Policy WCS6 of the Wealden District Council (incorporating part of the South Downs National Park) Core Strategy Local Plan, 2013 (CS). The DB was removed to restrict further growth in this settlement, because the village was designated as one where further development was considered unsustainable.”*

The Development boundary was also removed for East Hoathly in Core Strategy 2013. This had followed the building of 75 homes in 2004. East Hoathly was designated as an Neighbourhood Settlement and further development was deemed unsustainable. In the Emerging Local Plan this site was outside the proposed Development Boundary for East Hoathly.

Paragraph 9. *“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.”*

This site is also on the edge of East Hoathly and outside the Development Boundary.

Paragraph 12. *“Policies SP07 and SP08 of the CS encourage the reduction in the need to travel by car and a network of villages to support the day-to-day needs of rural communities and accord with the National Planning Policy Framework (Framework) policies on rural housing.”*

Paragraph 13. *“There is little in the way of day to day services and facilities within Halland, which includes Staverton Nursery (a garden nursey and farm shop), two public houses (one includes a restaurant and B&B accommodation), a garage and a chapel. The village of East Hoathly, approximately 2km away, has a primary school, and the nearest station is Uckfield Railway Station, situated around 3.2 miles from the site. Although there are bus services to larger local towns, given the relative distances to nearby larger settlements, and the limited range of services and facilities in Halland, future occupiers of the development would nevertheless be largely reliant on the private motor car to access shops, services, facilities and employment. This is supported by the appellant’s Transport Report which states that the development would likely give rise to increased traffic to/from the site with 86 daily two way trips over a typical 12 hour day (0700-1900 hours).”*

East Hoathly has similar facilities to those of Halland. East Hoathly only has one pub compared with the 2 in Halland Both have a shop with limited essentials and whereas East Hoathly has a Post Office, Halland has the Garden Centre and a wide range of fresh greengrocery. East Hoathly does have a Primary School but this is little importance to potential new developments as it has been full for the last decade with no plans to expand. New residents in East Hoathly would be equally reliant on the private

motor car to access schools, services, shops, leisure and employment.

Paragraph 16. *“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.”*

Exactly the same arguments also apply to the proposed development in East Hoathly.

Paragraph 22. *“The Council consider that the ‘tilted balance’ under Paragraph 11d(ii) of the Framework should not apply due to the likely effect on SPA and SACs. However, even when applying the tilted balance, the development would be contrary to the development plan and the adverse impacts of the proposed development would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework when taken as a whole. 23. For the reasons given above and having regard to all other matters raised I conclude that the appeal should be dismissed, and planning permission refused.”*

Exactly the same arguments also apply to the proposed development in East Hoathly.

**Appeal Decision APP/C1435/W/18/3214340**  
**Moorings, High Street, Buxted WD/2017/1500/O**

91. Village Concerns wishes to cite the precedent set in the Buxted appeal decision relating to the Effect on Neighbouring Properties. The key point made in the Appeal Decision was:

Paragraph 12. *“In consequence, the proposal would relate poorly to its surroundings and would lead to harm to the character and appearance of the area. Whilst the falling land levels and screening offered by trees mean that the development would be unlikely to be visible from public views, it would be clearly visible from the residential properties along High Street.*

*The harm relates to the principle of development and could not be mitigated by proposals for landscaping being advanced at the reserved matters stage. The proposal conflicts with saved policy EN27 of the Wealden District Council: Wealden Local Plan (1998) (“Local Plan”) which requires that, amongst other things, new development respects the character of adjoining development. It also conflicts with the Wealden Design Guide (2008), which is a supplementary planning document that has similar objectives to this development plan policy.”*

Paragraph 17. *“In conclusion, there would be unacceptable harm through noise and disturbance and a loss of privacy to Acorn House, and the effect on the living conditions of neighbouring residents would therefore be unacceptable. The proposal conflicts with saved policy EN27 of the Local Plan which requires that, amongst other things, new development should not have an unacceptable adverse impact on the privacy and amenities of adjoining developments.”*

Paragraph 32. *“However, the proposal would relate poorly to its surroundings, and would also harm the living conditions of neighbouring residential occupants. It would therefore fail to achieve development that functions well and adds to the overall quality of the area. It would conflict with the objective, set out in the Framework, of achieving well-designed places and I attach substantial weight to the harm that would arise, in consequence. Overall, even taking account of the significant shortfall in housing land supply, the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. Consequently, the presumption in favour of sustainable development does not apply. This would be the case even if I were to find that the effect on nearby habitats sites does not provide a clear reason for refusing the development and that the circumstances set out in paragraph 177 of the Framework do not obtain.”*

92. The situation in the South Street application is similar to that of the Buxted Appeal Decision and would cause the same harm. The proposed development would not match the existing properties in terms of the size of their gardens which is an important feature of this rural village. It would also have a significant adverse impact on the privacy and amenities of the South Street homes. These matters apply equally to the new application and Wealden should reject it accordingly.

## **Appeal Decisions related to the Effect on SACs**

93. Two recent appeal decisions provided evidence to support the dismissal of the Appeal for this Application. They were all for small numbers of houses(1 to 4) and were both situated much further from the Ashdown Forest than the South Street application for 55 houses. These were for developments at Magham Down (APP/C1435/W/18/3219463) and Robin's Nest (APP/C1435/W/18/3213892). Wealden traffic modelling data has shown development in East Hoathly would create significant traffic movements affecting the Ashdown Forest SAC and Lewes Downs SAC. The damaging effect of the emissions on the SACs would therefore be much more significant to those cited as reasons for rejecting the appeals for Magham Down and Robin's Nest.

94. The key points made in these Appeal Decisions were:

Paragraph 15. *“The proposed development would result in a net increase in traffic movements: Whilst there is no certainty that such movements would be on roads through or adjacent to the SACs there is a fair likelihood that some of them would be, for example on the A26 and/or A27. In any case, under the precautionary principle, it cannot be concluded that such increased traffic movements will not affect the integrity of these SACs.”*

Paragraph 18. *“Whilst I attribute little weight to the eLP because of the limited stage it has reached, such a likely impact and breach of the Habitats Regulations, is a significant material factor weighing against the proposal. The conflict with the above eLP Policies therefore assumes significant importance in the determination of this appeal. It also has the effect, as set out in NPPF paragraph 177, of displaying the tilted balance in paragraph 11 d) ii), which would have applied given the current undisputed lack of a five-year housing land supply in the District.”*

Paragraphs 19/20. *“It would significantly harm the character and appearance of the area and would be likely to adversely affect the integrity of the Ashdown Forest and Lewes Downs SACs, contrary to the development plan and the NPPF and as such would not be sustainable development.”*

95. These points apply equally to the South Street Application. The demise of the 2019 WLP does not mean that the harm cannot be

ignored. It requires a new HRA and EIA to prove that the in combination effect of the harm is not significant.

## **CONCLUSION**

96. The infrastructure of this village is already failing and its sustainability has been eroding continually with the building of housing on the sites of businesses, closure of a pub, degraded Doctors Surgery, loss of bus services and an over subscribed school. This Application proposes to add 55 homes to the recently approved 205 homes and represents a grossly out of proportion increase in the size of a historic rural village.

97. This Application adds no new employment and provides no alternative to using motor cars to get to the jobs, school, shops and facilities that sustain a community. It proposes unsustainable development and the benefits of the Application would not significantly or demonstrably outweigh the adverse impacts, when assessed against the policies of the NPPF 2019 taken as a whole. It ignores the WDC Climate Emergency Plan.

98. It would diminish the Green Gap that is an important part of the Landscape Character of this community and the critical wildlife corridor connecting the Ancient Woodland of Moat Wood with the open countryside to the East. It threatens flooding of the Sewage Treatment Plant and makes no proposal to upgrade the main sewer for the village which passes under the site.

99. This Application ignores the impact that this development would have on the Lewes Downs and Ashdown Forest SACs. It provides no EIA despite the scale of the proposal and the clearly known impact that housing in this area has on the SACs.

100. It proposes housing that is not needed by this community and cannot be sustained. It underestimates the amount of additional traffic that would be forced through the Conservation Area onto the already congested A22 and ESCC and WDC seem oblivious to the daily problems faced by users of this car park.

101. Many Appeal Decisions have provided examples of similar situations that apply equally this Application. WDC based their recommendation to approve this Application on an out of date Five Year Land Supply figure despite having granted several thousand approvals since the last publication.

102. In relation to the Decision Notice, it would be a significant greenfield development in this village that would not respect the character of adjoining developments nor promote local distinctiveness. It would be unacceptable backland development in open countryside and be contrary to policies GD 2, DC 17, EN 27, WCS 6 and Paragraphs 8 and 127 of NPPF 2019. Village Concerns also believes that it fails to comply with WDC saved policies EN1, EN2, EN8, EN12, EN27, SPO1, SPO3, SPO7, SPO8, SPO13, WCS7, WCS12, WCS13, WCS14 and Paragraphs 34, 77, 83, 103, 108 and 110 of NPPF 2019.

103. We urge you to Dismiss this Appeal.

Katherine Gutkind and Tania Freezer  
Co Chairs  
Village Concerns

Annexes:

Annex A - Transport Study

Annex B - Car Parking in East Hoathly

# 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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## 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 85<sup>th</sup> 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

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

**Green** (✓): Journeys possible by this mode

**Orange** (?): Some journeys difficult by this mode

**Red** (×): 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 areas<sup>1</sup>. The High Street and South Street are sensitive not only because of the presence of the

<sup>1</sup> *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)

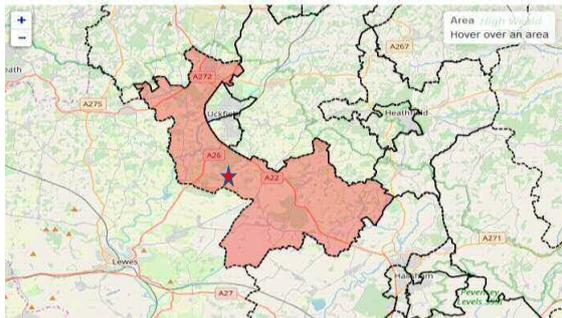
## WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)

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									Car Driver					
	Train	Bus	m/cycl e	car driver	car pass	Bicycle	walk	% (car)	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%		
<b>Wealden 013 E Hoathly</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>113</b>	<b>12</b>	<b>6</b>	<b>58</b>	<b>7.1%</b>	<b>0.5</b>	<b>0.3</b>	<b>0.2</b>	<b>3.5%</b>	<b>2.1%</b>	<b>1.4%</b>
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%		
<b>TOTAL</b>	<b>155</b>	<b>34</b>	<b>13</b>	<b>1,596</b>	<b>95</b>	<b>20</b>	<b>94</b>	<b>100.0%</b>				<b>78.2%</b>	<b>15.2%</b>	<b>6.6%</b>
	<b>7.7%</b>	<b>1.7%</b>	<b>0.6%</b>		<b>4.7%</b>	<b>1.0%</b>	<b>4.7%</b>					<b>55.0%</b>	<b>35.0%</b>	<b>10.0%</b>

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)

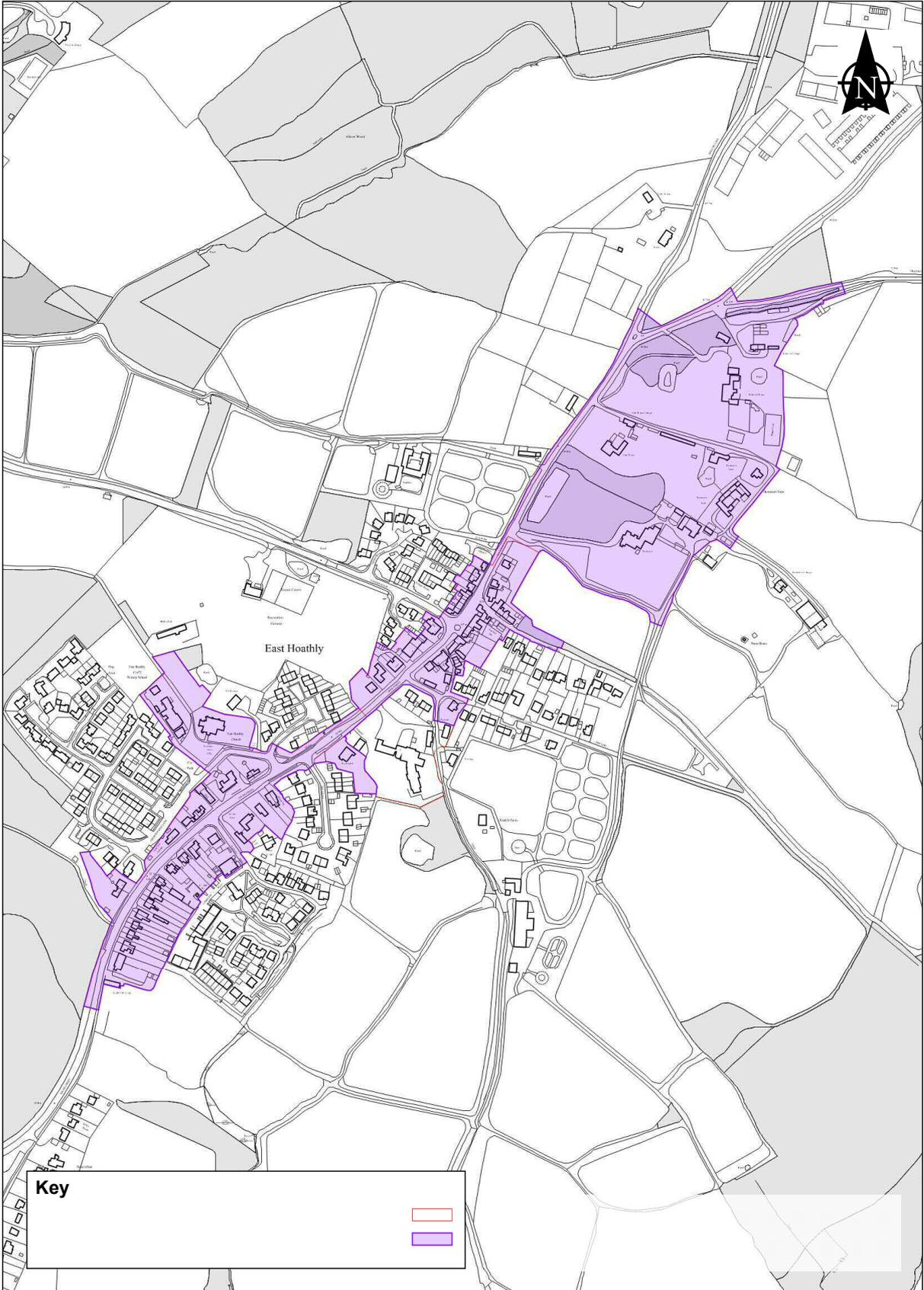
### QS701EW - Method of travel to work

ONS Crown Copyright Reserved [from Nomis on 12 February 2020]

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%
<b>Wealden 013 E Hoathly</b>	<b>4,497</b>	<b>194</b>	<b>36</b>	<b>18</b>	<b>2,053</b>	<b>106</b>	<b>22</b>	<b>201</b>	<b>2,630</b>	<b>7.4%</b>	<b>1.4%</b>	<b>78.1%</b>	<b>4.0%</b>	<b>0.8%</b>	<b>7.6%</b>	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



## Annex B - Car Parking in East Hoathly

### Car Parking

Based on the 2011 census car ownership is usually cited per household as 1.9 but this is considered to significantly underestimate the reality in 2019 in a rural community such as ours. The East Hoathly Survey in 2016 produced a figure of 2.02 and this is now likely to have been exceeded.

It is very difficult to extract what this Application proposes for Car Parking. Both of the Indicative Site Plans submitted in January 2020 that were Determined at the PCS Meeting showed a layout for 59 homes. The Amended Application Form submitted in February 2020 was for 74 homes but gave no breakdown on house sizes. However it did indicate that for the 74 homes they proposed to provide 160 car parking spaces. Given that this would provide at a their quoted rate of one visitor space per 3 homes, there would be 25 visitor spaces. This would leave 135 spaces for the homes giving a ratio of 1.82 spaces per home. This is insufficient. Village Concerns has surveyed the number of vehicles in the East Hoathly (Development Boundary) overnight and the latest figures are:

Vehicles parked in garages or on driveways.	526
Vehicles parked in roadways/pavements, car parks or medical centre car park.	222
Number of Homes in East Hoathly	334
Real Ratio of Cars/Home.	2.24

The amount of on street parking is increasing and this is largely because car ownership is increasing in unsustainable rural villages and new housing does not provide sufficient car parking spaces. We believe that any new development should provide a car parking ratio of at least 2.5 spaces/home without including disabled or visitor spaces.

The newest developments in East Hoathly of Juziers and Nightingales (75 homes) should have no on-street parking as they supposedly provided the correct number of parking spaces. However, 28 vehicles are regularly parked overnight on the roadways/pavements, visitor parking spaces or in the medical centre car park. This is a clear example of new developments not being built with enough car parking for an unsustainable rural village that is car dependent.

On-street parking causes a dangerous hazard for emergency vehicles and a serious obstruction for refuse vehicles and delivery vehicles. The hazard and obstruction of on-street parking in confined residential areas will get worse until developers provide at least 2.5 spaces/home.

It is likely that the size of the parking spaces is the minimum required by building regulations. These are inadequate for many modern vehicles and many leisure vehicles. This promotes on street parking which renders the access for emergency vehicles and refuse vehicles impossible.























