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Wednesday, 4 March 2020

Dear Stacy Robins,

We, the Steering Group of the Village Concerns Action Group, represent the views of over 200 supporters from our community and we object to Planning Application WD/2016/2796/MAO. We commissioned an independent Transport Study by Mr Bruce Bamber of Railton TPC Ltd. Our concerns are:

The proposed development would result in a 118% increase in the size of this village since 2009. We believe that facilities available in this village cannot cope such that it is no longer sustainable. The proposed level of development is therefore unsustainable.

The access proposals onto the London Road have not been supported with adequate speed surveys and the safety of the proposal cannot therefore be assessed from the evidence provided.

ESCC Highways Department have indicated that speed reductions on the London Road are necessary for safe access. However, they have removed their objection despite it remaining unclear how the applicant proposes to achieve this.

This is an isolated rural location and the proposed development would be almost totally car dependent and therefore fails to meet the NPPF requirements to offer a genuine choice of transport modes.

Please give serious consideration to the attached Report and reject this application at the earliest opportunity.



Kathryn Richardson  
Chair  
Village Concerns



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
Author:	Bruce Bamber BSc MA MSc MCIHT

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

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

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

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

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

### Conclusion on Sustainable Travel

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

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

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

#### 4. ENVIRONMENTAL IMPACT

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

*Table 4.1: Increase in Vehicle Trips within Conservation Area*

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

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

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

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

## Appendices

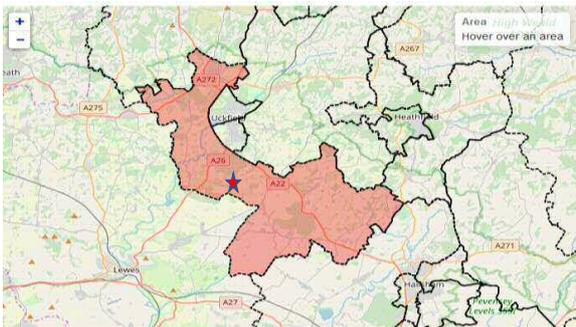
## **Appendix 1: Census Travel to Work Data (Distribution)**

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

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

place of work	Train	Bus	m/cycl e	car driver	car pass	Bicycle	walk	% (car)	Car Driver						
									Route assignment			% assignment			
									A22 N	A22 S	Waldron Road	A22 N	A22 S	Waldron Road	
Wealden 001	0	2	0	13	1	0	3	0.8%	1.0			0.8%			
Wealden 002	1	1	0	9	0	0	1	0.6%	1.0			0.6%			
Wealden 003 Crowborough	0	0	0	15	0	0	1	0.9%	1.0			0.9%			
Wealden 004 Crowborough	0	0	0	32	1	1	3	2.0%	1.0			2.0%			
Wealden 005	0	1	0	6	3	0	0	0.4%	1.0			0.4%			
Wealden 006 Crowborough	0	1	0	15	4	0	1	0.9%	1.0			0.9%			
Wealden 007	0	0	0	38	3	1	2	2.4%	1.0			2.4%			
Wealden 008	0	0	0	65	6	0	1	4.1%	1.0			4.1%			
Wealden 009 Uckfield	0	5	3	128	17	1	4	8.0%	1.0			8.0%			
Wealden 010 Heathfield	0	2	0	30	1	0	0	1.9%			1.0			1.9%	
Wealden 011	0	0	0	26	1	0	2	1.6%			1.0			1.6%	
Wealden 012 Uckfield	2	1	0	44	2	1	0	2.8%	1.0			2.8%			
<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%			
	155	34	13	1,596	95	20	94	100.0%				78.2%	15.2%	6.6%	
	7.7%	1.7%	0.6%	79.5%	4.7%	1.0%	4.7%	2,007				used in TA	55.0%	35.0%	10.0%



15.2% A22 North through Ashdown Forest

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

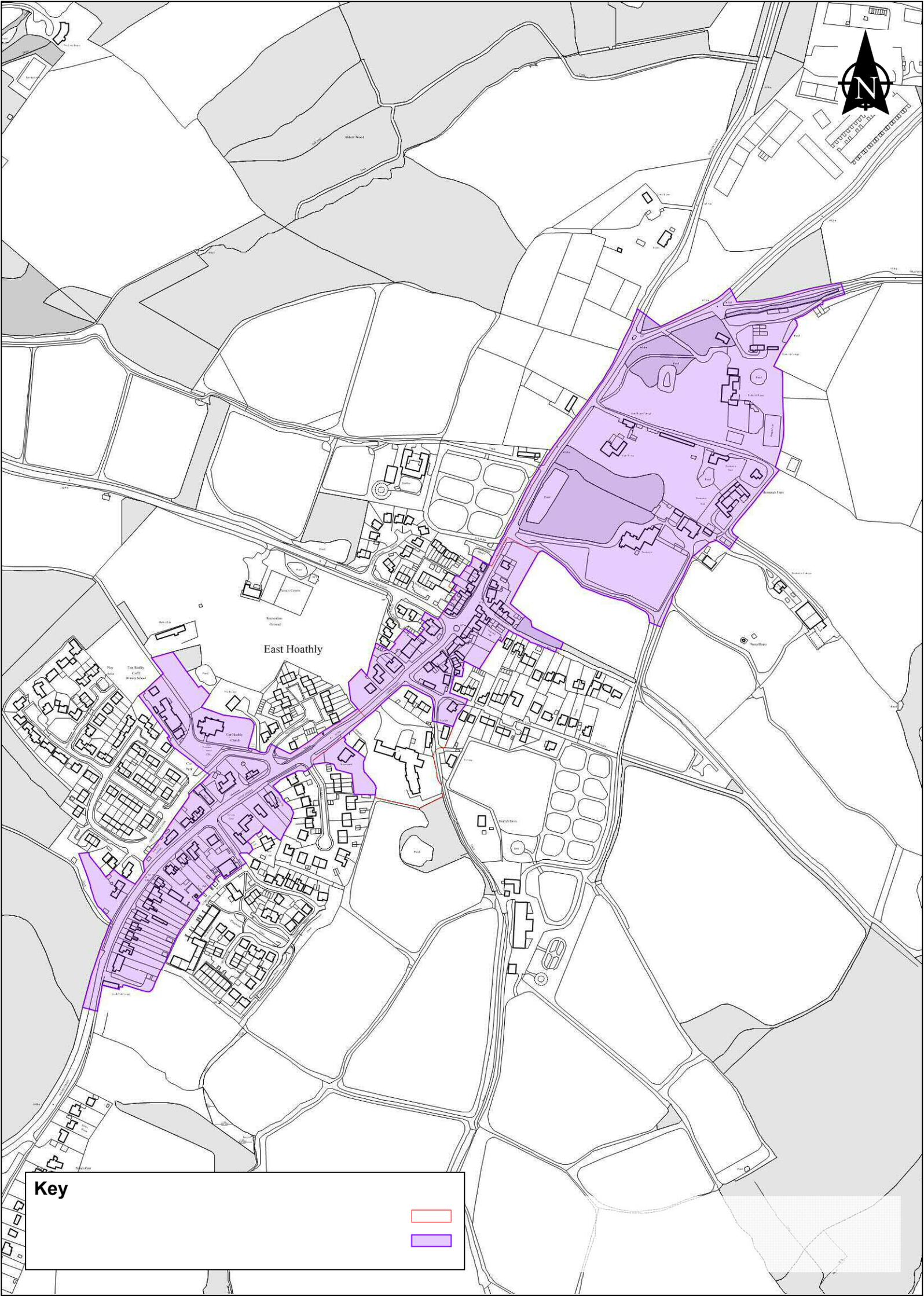
## QS701EW - Method of travel to work

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

Area	No.									%						
	all	train	bus	m/cycle	car driver	car pass.	bicycle	walk	total	train	bus	car driver	car pass.	bicycle	walk	total
Wealden 001	4,653	327	59	12	1,828	89	42	352	2,709	12.1%	2.2%	67.5%	3.3%	1.6%	13.0%	100.0%
Wealden 002	4,526	451	34	10	1,878	97	21	172	2,663	16.9%	1.3%	70.5%	3.6%	0.8%	6.5%	100.0%
Wealden 003 Crowborough	4,101	224	52	16	1,923	127	16	262	2,620	8.5%	2.0%	73.4%	4.8%	0.6%	10.0%	100.0%
Wealden 004 Crowborough	5,082	270	77	9	2,198	133	17	289	2,993	9.0%	2.6%	73.4%	4.4%	0.6%	9.7%	100.0%
Wealden 005	5,516	570	40	16	2,038	115	29	294	3,102	18.4%	1.3%	65.7%	3.7%	0.9%	9.5%	100.0%
Wealden 006 Crowborough	5,923	231	183	21	2,878	283	24	325	3,945	5.9%	4.6%	73.0%	7.2%	0.6%	8.2%	100.0%
Wealden 007	3,948	259	24	17	1,588	100	14	229	2,231	11.6%	1.1%	71.2%	4.5%	0.6%	10.3%	100.0%
Wealden 008	5,750	353	34	18	2,466	116	25	179	3,191	11.1%	1.1%	77.3%	3.6%	0.8%	5.6%	100.0%
Wealden 009 Uckfield	6,148	183	98	26	2,850	197	60	616	4,030	4.5%	2.4%	70.7%	4.9%	1.5%	15.3%	100.0%
Wealden 010 Heathfield	5,524	173	47	29	2,739	184	33	322	3,527	4.9%	1.3%	77.7%	5.2%	0.9%	9.1%	100.0%
Wealden 011	4,992	179	38	18	2,330	148	12	205	2,930	6.1%	1.3%	79.5%	5.1%	0.4%	7.0%	100.0%
Wealden 012 Uckfield	4,394	174	97	21	2,227	141	31	369	3,060	5.7%	3.2%	72.8%	4.6%	1.0%	12.1%	100.0%
<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**



East Hoathly

Key





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

**Railton TPC Ltd**

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Railton TPC Ltd ref:	East Hoathly Transport Objection
Planning Inspectorate	Ref: N/A
Planning Authority	Ref: WD/ 2016/2796/MAO
Date:	February 2020
Author:	Bruce Bamber BSc MA MSc MCIHT

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## Appendices

**Appendix 1:** Census Travel to Work Data (Distribution)

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

**Appendix 3:** East Hoathly Conservation Area

## **1. INTRODUCTION**

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

## 2. PROPOSED ACCESS ARRANGEMENTS

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

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

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

- 2.5. It is noted that the latest access plan shows the visibility splay to the west from the western junction crossing hedges. The proposed landscaping (or other built features) need to be revised to keep this visibility splay clear.
- 2.6. At present the section of London Road adjacent to the site is wide (over 7.0m), with verges on both sides and a generally straight alignment although the road to the west of the western access bends to the north thus limiting visibility between vehicles emerging from the site and vehicles approaching from the west. It was clear during the site visit that many vehicles travel at considerable speed along this section of road. There has been only one speed survey undertaken by the applicant, approximately 50m inside the 30mph speed limit (approximately 180m east of the more easterly of the two access points). This showed 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	x	x	x
Employment (Uckfield – 10.8% work trips)	8km	x	x	?
Employment (Brighton and Hove – 8.0% work trips)	27km	x	x	x
Employment (Eastbourne – 5.3% work trips)	26km	x	x	√
Employment (mid-Sussex – 7.6% work trips)	30km	x	x	x
Top-up shopping/post office	0.65km	√	√	n/a
Food shopping (Uckfield, Heathfield)	8-11km	x	x	?
Comparison shopping (Uckfield, Lewes, Eastbourne)	8-25km	x	x	?
Personal business (Uckfield, Heathfield, Lewes, E'bourne))	8-25km	x	x	x
Primary education (Church Marks Lane, East Hoathly)	1km	√	√	n/a
Secondary education (Ringmer)	8km	x	x	√
Tertiary education (Lewes, Brighton)	14-27km	x	x	x
GP surgery (Juziers Drive, East Hoathly)	0.85km	√	√	n/a
GP surgery (Buxted)	11km	x	x	x
Hospital (Uckfield Community Hospital)	8km	x	x	x
Leisure (pub)	0.45km	√	√	n/a
Other leisure (Uckfield, Lewes, Eastbourne)	8-26km	x	x	x
Recreation ground	0.5km	√	√	x

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

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

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

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

## Conclusion on Sustainable Travel

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

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

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

#### 4. ENVIRONMENTAL IMPACT

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

*Table 4.1: Increase in Vehicle Trips within Conservation Area*

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

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

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

- 4.3. The distribution adopted by GTA differs significantly from that derived from Census data as shown in **Appendix 1**. GTA does not supply its working and assumptions so it is not possible to identify the reasons for the differences. It is, however, clear that GTA assign a much higher proportion of the traffic generated by the development to the south.
- 4.4. The information in the table above indicates that between 169 and 390 new daily trips will be generated by the proposed development on South Street and the High Street. This represents an increase of between 16.9% and 39.0% on a daily basis. In transport environmental terms any increase of more than 30% is considered potentially significant and any increase more than 10% is considered significant in sensitive 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. I-Transport has prepared a Technical Note assessing the impact of the proposed development on Ashdown Forest (i-Transport, October 2018). The Technical Note draws no conclusions on the significance of the traffic generated by the proposed development that impacts on Ashdown Forest.
- 5.2. It is noted that the derivation of the distribution of work trips set out in the i-Transport Technical Note 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).
- 5.3. **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 indicates 15.2% of work trips travelling through Ashdown Forest. If this figure were extrapolated to include all trips and applied to the daily car trips generation of the development, it would imply 169 additional car trips through Ashdown Forest per day.
- 5.4. The i-Transport work identifies an increase in trips on roads within Ashdown Forest of 213. 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. The figure is not, therefore, directly comparable with the 169-trip figure derived above using the data in **Appendix 1**. It is, however, clear that whichever methodology is applied, the proposed development would lead to an increase in traffic in Ashdown Forest that is not insignificant. This is 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 around 200 additional vehicle trips through Ashdown Forest per day.
- 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.

## Appendices

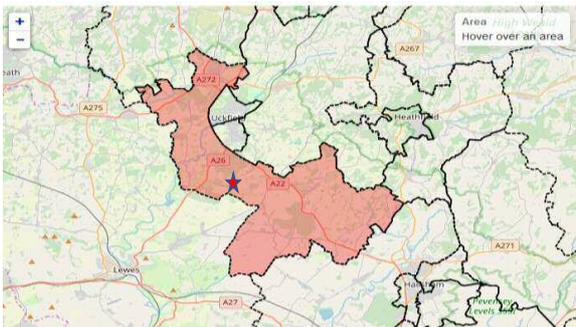
## **Appendix 1: Census Travel to Work Data (Distribution)**

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

ONS Crown Copyright Reserved [from Nomis on 7 February 2020]

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

place of work	Train	Bus	m/cycl e	car driver	car pass	Bicycle	walk	% (car)	Car Driver						
									Route assignment			% assignment			
									A22 N	A22 S	Waldron Road	A22 N	A22 S	Waldron Road	
Wealden 001	0	2	0	13	1	0	3	0.8%	1.0			0.8%			
Wealden 002	1	1	0	9	0	0	1	0.6%	1.0			0.6%			
Wealden 003 Crowborough	0	0	0	15	0	0	1	0.9%	1.0			0.9%			
Wealden 004 Crowborough	0	0	0	32	1	1	3	2.0%	1.0			2.0%			
Wealden 005	0	1	0	6	3	0	0	0.4%	1.0			0.4%			
Wealden 006 Crowborough	0	1	0	15	4	0	1	0.9%	1.0			0.9%			
Wealden 007	0	0	0	38	3	1	2	2.4%	1.0			2.4%			
Wealden 008	0	0	0	65	6	0	1	4.1%	1.0			4.1%			
Wealden 009 Uckfield	0	5	3	128	17	1	4	8.0%	1.0			8.0%			
Wealden 010 Heathfield	0	2	0	30	1	0	0	1.9%			1.0			1.9%	
Wealden 011	0	0	0	26	1	0	2	1.6%			1.0			1.6%	
Wealden 012 Uckfield	2	1	0	44	2	1	0	2.8%	1.0			2.8%			
<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>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>79.5%</b>	<b>4.7%</b>	<b>1.0%</b>	<b>4.7%</b>	<b>2,007</b>				<b>used in TA</b>	<b>55.0%</b>	<b>35.0%</b>	<b>10.0%</b>



15.2% A22 North through Ashdown Forest

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

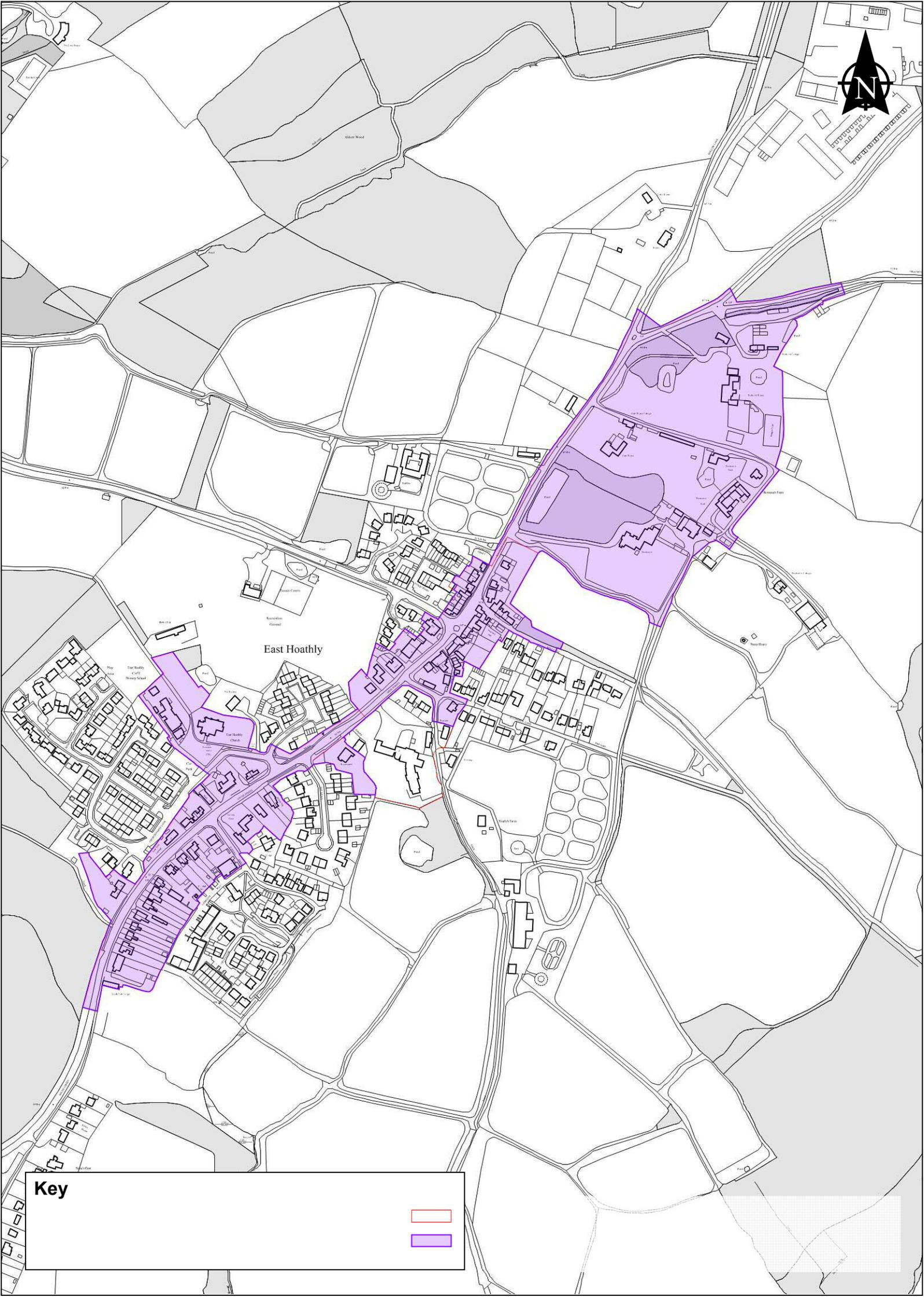
## QS701EW - Method of travel to work

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**



East Hoathly

Key

