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**To:** 



## Wealden Local Plan 2024

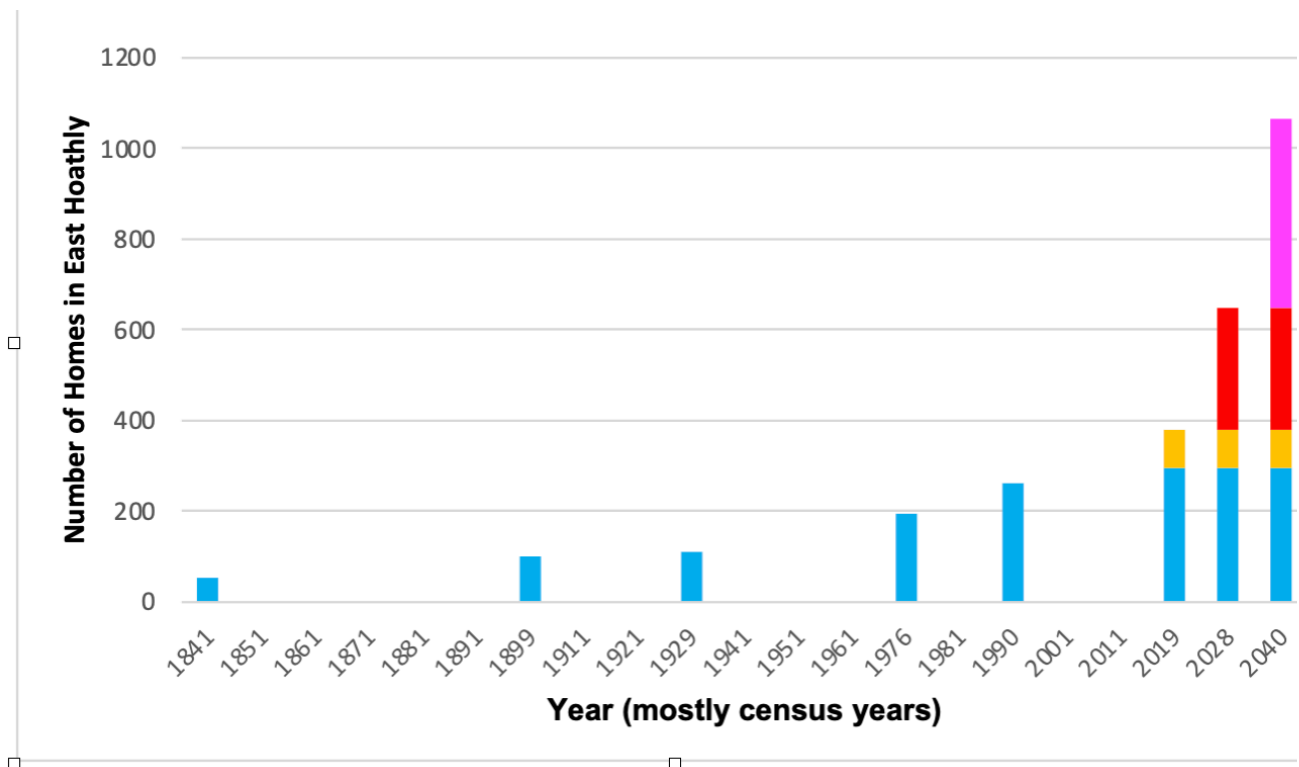
The Wealden Local Plan (WLP) 2024 is currently undergoing Public Consultation. It comprises many thousands of pages of documents that can be accessed on the WDC website at: [Wealden \(Regulation 18\) Local Plan Consultation](#). This summary may help, if you wish to comment.

The WLP has been prepared in the knowledge that 267 additional homes have already been approved for the Parish and will be built during the plan period. The WLP proposes 419 more homes in East Hoathly - growth from 2009 to 2040 of 308%:



**If you cannot bear to read on, please skip to the end for details of how to make a comment and your personal views clear to WDC:**

**Do not build an additional 419 homes in East Hoathly, it is unsustainable, it is too much, it will cause significant harm to the environment, increase pollution and traffic congestion.**



### **No Infrastructure Improvements**

Despite this quadrupling in the size of East Hoathly, the Interim Infrastructure Development Plan (IIDP) identifies no definite improvements to Infrastructure in this Parish and whilst the WLP recognises that car dependency is a problem, it has no plan to reduce it for East Hoathly:

The WLP recognises that: “Several key junctions and roads on these corridors [A22] are currently at, or reaching capacity, and experience congestion and delay during peak hours”. The IIDP indicates that congestion at the Halland and Shaw roundabouts will worsen by 2040 from their current Yellow status (90-110% capacity) to Red (greater than 110% capacity). The IIDP talks about planned “Critical” improvements but none of these are funded.

The IIDP recognises that the highway network getting to Uckfield Station is already very near capacity and “will struggle to accommodate a further increase in traffic”

The IIDP also states “When main roads become congested, traffic migrates onto the rural lanes to bypass the congestion”. The WLP provides no solution to this other than to add 419 more homes to an already car dependent community.

The IIDP identifies that East Hoathly has “very low accessibility to public transport”. It identifies 3 “Critical” bus improvement schemes affecting this Parish, two of which it specifies are at risk of not being delivered and none are funded. However, this is only part of the problem. Bus accessibility may be an issue but the more important issue is the very low level of bus usage in rural areas. Realistically, this is likely to remain the case, no matter how many more bus services are added. WDC focusses on labelling settlements as sustainable because they have an hourly bus service rather than looking at how often a car journey is chosen ahead of a bus trip. WDC do not know how many people use each bus service and can therefore not assess the ineffectiveness of their transport policy.

The IIDP notes that early years education and school places will be a problem. It assesses a school expansion scheme as “Essential” but with a high risk that it will not be delivered. The inducement made by Parker Dann of land for a new school is therefore a hollow offer, as without the likelihood that ESCC will fund the building of a new school, it will not happen.

The IIDP does not fully consider this Parish in terms of sports and recreation. It fails to mention the existence of East Hoathly’s Sports Ground, Pavilion, football pitch rifle range. These facilities are invisible

to WDC and the WLP therefore proposes no improvements to these already inadequate facilities.

### How did WDC choose this Growth Option ?

The WLP considers several growth options and its choice is Spatial Option F. The commentary on this option can be summarised as: ***It is acceptable because the growth is focussed on sustainable settlements. It recognises a Minor Negative impact in terms of increased use of vehicles leading to increased greenhouse gas emissions and the loss of agricultural land.*** However, this commentary ignores increased traffic congestion, the carbon cost of building new homes and new roads, the increased pressure on existing infrastructure for sewage, water, electricity, school places and GP appointments. It may be well intentioned, but it paints a wholly unrealistic picture of the prospects of this plan producing sustainable growth.

The WLP describes a potential site for housing to the West of Uckfield (Owlsbury - map below). WDC are still assessing the viability of this site and have not included it as part of their housing plan. If they were to do so, it might alleviate the need to build 419 homes in our unsustainable Parish. WDC have asked for public comment on this site.



### Settlement Hierarchy

The Settlement Hierarchy is a background paper to the WLP and it is here that the fate of our Parish is condemned. The Settlement Hierarchy produces a binary result, either sustainable or unsustainable. Once labelled, the planning system takes a position where, if you are labelled sustainable, there is no ceiling on future development.

It provides a detailed analysis of the services/facilities of each settlement and ranks them



it provides a detailed analysis of the services/facilities of each settlement and ranks them accordingly. However, our consistent criticism of this methodology is that it takes no account of the existing use of the services/facilities:

It takes no account of the capacity of a facility such as a school that is already full.

It takes no account of a facility that has no space to expand, such as East Hoathly School.

It takes no account of the absence of any plans or funding for the School, the Sewage System or the Recreation facilities.

It does not establish the current levels of usage of services such as the bus service, but it assumes, that following decades of the reducing use of buses, that building new homes in remote rural villages will increase bus usage.

It takes no account of the gaps in mobile phone coverage in this Parish (where indoor reception is often not possible) or the almost total lack of full-fibre broadband in this Parish.

The fundamental problem with the settlement hierarchy is that it mistakes the existence of a bus service (with a frequency of only one bus per hour) as making a settlement sustainable. It is not sustainable if very few people use the service because it is too infrequent, too inconvenient, does not cover the times they need or because of personal preference. WDC have no examples of transport plans for rural areas that have increased bus usage. If the people in the new development do not use the bus, then the new development does not meet the sustainable development standard. New housing in East Hoathly will generate very few additional bus trips but significant additional car trips yet the premise for granting planning approval is that the village is sustainable because it has a bus service.

### **The Reducing Sustainability of East Hoathly**

The Sustainable Settlement Study (Appendix H) fails to correctly recognise the history of East Hoathly within the Settlement Hierarchy. The WLP 1998 concluded that “[East Hoathly was a location where limited new development was considered to be acceptable](#)”. Despite this, 85 homes were added by 2009. Between 1998 and 2013, the village lost a shop, several businesses and a significant commercial site providing employment. The 2013 Core Strategy concluded that “[the absence of a sustainable transport system and recent housing developments meant that the village was not selected to grow further](#)”. Despite this, the village has had planning approvals granted for 267 additional homes. Since then the village has lost one of its pubs. Appendix H fails to show how the village was described in the Withdrawn WLP 2019 where it had no allocation of housing sites and a very tightly drawn development boundary around the existing built area. Notwithstanding all of this history and despite the reductions in services and facilities since 1998, WDC have now decided that we are suitable for an additional 419 homes.

### **Other Shortcomings of the WLP**

The WLP provides no plans for new employment in the Parish.

The WLP provides no plans for visitor EV charging in residential areas.

The WLP promotes “[the concept of '20-minute neighbourhoods' or 'complete, compact and connected neighbourhoods' has been put forward as an approach to help local plans deliver sustainable development. The 20-minute neighbourhood is about creating attractive, interesting, safe, inclusive, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to the destinations that they visit and the services they need to use day to day. This could include accessing schools, shopping, work, healthcare, recreation, or community facilities. The concept is that these places need to be easily accessible on foot, cycling or via public transport. They also need to be accessible by everyone, whatever a person's budget or physical ability and without having to use a car](#)”. It is self evident that this does not work now for this Parish and will be worse after the addition of the 267 + 419 new homes.

The WLP only mentions Halland once and that is to categorise it as a Type 5 Neighbourhood settlement. The implication being that for Halland, there will be no growth, no improvements to infrastructure or facilities except for the increase in pollution and vehicle congestion within the settlement.

The WLP has wonderful, well intentioned policies on: Climate Change, Health, Well-being and Quality of Life, Green Infrastructure, Natural Environment and Historic Environment. However, our experience is that the planning department and the wider planning system can sidestep these policies whenever it suits them

by providing “mitigation”. The “mitigation” is mostly ineffective, temporary and not does not outweigh the harm caused.

The Sustainability Appraisal indicates that the Cumulative Effects of multiple developments should be examined and considered. There is no evidence that this has been done for the developments already approved or planned for East Hoathly.

WDC challenged the Government’s Housing Target (1221 homes per year for Wealden) but we are not aware of any public statement of the Government’s response, nor an explanation of why the challenge failed. There was much public support for this challenge and it is wrong that it is not mentioned in the WLP. Some of you may have received a letter from our Nus Ghani MP. She is likely to have nothing of value to say about the WLP but you could ask her what response her Government made to Wealden’s challenge.

### **Please Comment**

We encourage you and your family/friends to complete as many representations as possible. Go to the online portal at: [Consultation Portal](#). The Consultation Portal page gives you information about the consultation process and events. When you are ready to make you comments, select the **GO TO EVENT** button at the top of the page. You have until **10th May 24** to provide your comments. WDC have provided [Guidance Notes](#) and a [video](#) to explain how to use the portal.