

White Cottage
East Hoathly
East Sussex
BN8 6RA

Telephone:01825 841004

E-mail: villageconcerns2016@gmail.com

Wednesday, 31 January 2024

Draft Local Plan 2024

1. We, the Steering Group of the Village Concerns Action Group, represent the views of over 250 supporters from our community and wish to express our initial reaction to the draft Wealden District Council (WDC) Local Plan (LP) 2024.
2. We welcome the publication of the draft LP and commend the considerable amount of work that has been required.

Proposed New Development

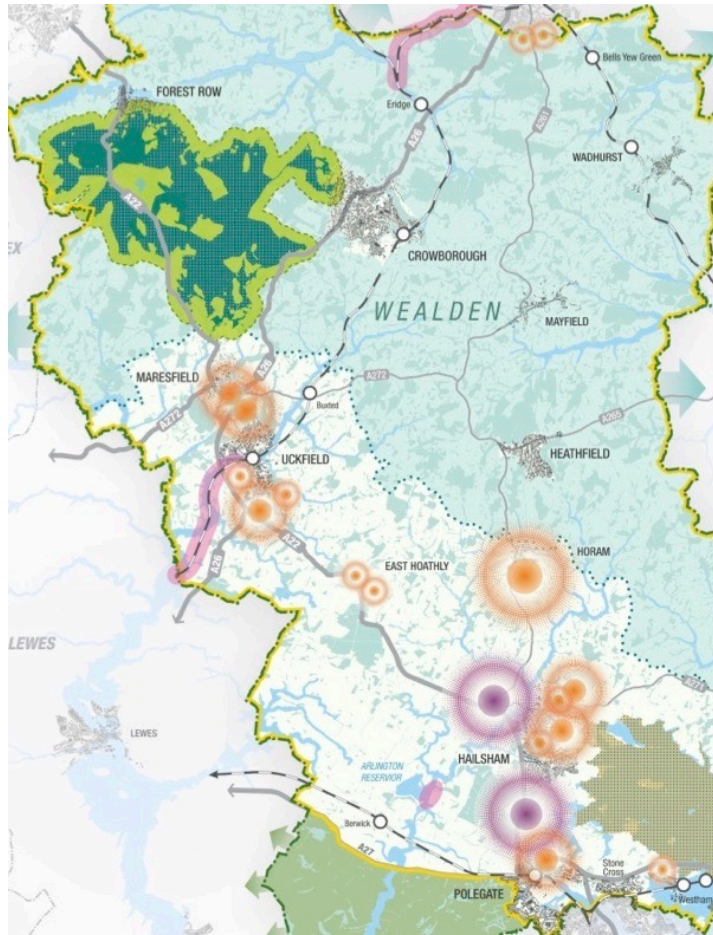
3. We would like to comment on the Spatial Options you have presented in the draft LP but this is impossible until we can see the methodology that you used to create them. The same applies to the methodology that you have used to create the Development Boundaries and Settlement Hierarchy. You have referred to the following three supporting papers but not published them:
 - a. Spatial Strategy Topic Paper (XXX)
 - b. Sustainable Settlements Study (XXX)
 - c. Housing Supply Topic Paper (XXX)

4. It would be helpful to know why these have not been published as they should not be iterative papers. They should be fixed before you draw the Development Boundaries, create the Settlement Hierarchy and create the Spatial Options. We need to see these papers to understand the methodology you have used and see if it has been applied consistently. We therefore reserve comment from what is clearly a considerable part of the whole draft LP.

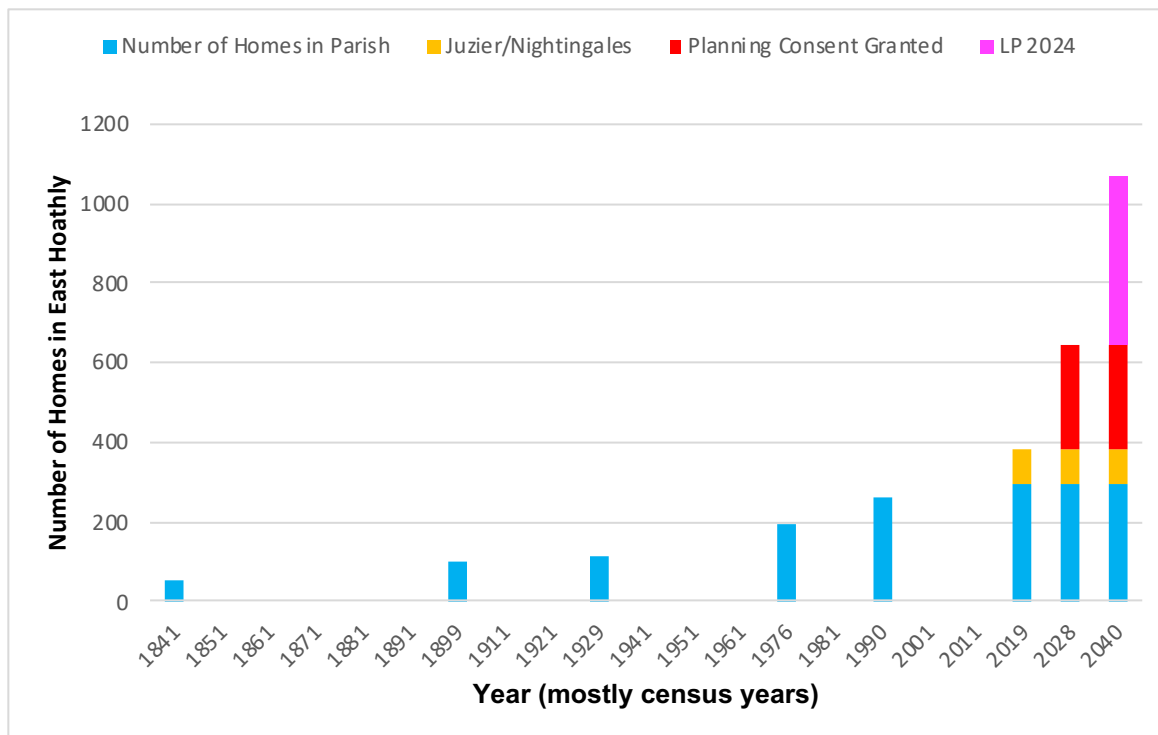
5. WDC does not appear to have published a complete and separate Strategic Housing and Economic Land Availability Assessment (SHELAA). It has included SHELAA for some sites as part of its Sustainability Appraisal but this does not provide assessment for all the sites submitted in this Parish and listed on the WDC website (14 sites in Halland are missing, plus 1157/2030 Boyne and 060/1950 Moat Wood in East Hoathly). It also includes a SHELAA for one site that is not included on the WDC website (1202/1950 Old Whyly). We would very much like to comment on these assessments but we need to see them all first. It would also be helpful to have an explanation of why you have chosen to consider them against your Sustainability Objectives as this is a departure from how you have carried out this exercise previously. The analysis of Site 773 is confusing as when it was assessed in 2017 it was subdivided into eleven parts 773/1950(1) to 773/1950(11). This included the land that is now the 205 home development and the 5 paddocks to the East of the village which are 773/1950(6) to (10).

6. We are left in the position that we cannot effectively comment on the most important part of the draft LP but are left with the devastating consequences that you are putting forward a Settlement Hierarchy decision, a Development Boundary that is hugely expanded from the last one you placed on East Hoathly and a Spatial Option that will continue the devastation of this historic rural village.

7. One observation that we will make now is that East Hoathly is different from all the other allocations. It can clearly be seen that it is not near the facilities of a town. We also feel that it would be more honest to show East Hoathly as one development of over 400 homes not two smaller ones.



8. We have consistently presented WDC with the facts about how they have granted permission to expand this village without any strategic infrastructure plan to mend its broken sustainability. WDC are now proposing to build a further 419 homes, leading to a growth from 2009 to 2040 of 308%. This is not sustainable planning but destructive planning.



Interim Infrastructure Development Plan

9. Having read this horrific allocation of additional housing we turned to the remainder of the draft LP to see how WDC propose to enhance our infrastructure and sustainability to cope with the proposed **quadrupling** in the size of our village.

Car Dependency

10. The draft LP does acknowledge that: “there is a heavy reliance within the district on the use of private vehicles for journeys” (Paragraph 2.11). It also states that: “The NPPF states that if a local planning authority is to set local parking standards for new development, then the policy should take into account the accessibility of the development; the type, mix and use of the development; the availability of and opportunities for public transport provision, local car ownership” (Paragraph 9.46). However, it does not go on to say how WDC will assess local car ownership levels. It also should expand this to include other vehicle ownership at a local level. This should include work vehicles which are often large vans, leisure vehicles which can often be motor homes and caravans and trailers for leisure vehicles or boats. All of these things exist but at present WDC ignores their existence and where they will be parked.

11. The draft LP acknowledges that: “within Wealden 89.4% of households have access to one or more cars, which is significantly greater than the UK average of 74%. This is reflective of the rural nature of the district and the poor public transport infrastructure meaning that many residents currently have no alternative but to travel by car on a day to day basis”. For East Hoathly the situation is even worse because of an even greater proportion of vehicles per household with local surveys showing this to be 2.24 per household.

12. The only real way of reducing car dependency in East Hoathly is to improve access to public transport. This is currently inadequate in this village and even if it was substantially enhanced there is no evidence to suggest that its use will significantly increase or that it will reduce the level of vehicle ownership. In short, we do not believe the draft LP produces any proposals to reduce car dependency in this community. Building 419 more homes will add to the level of car dependency within Wealden as a whole.

Traffic Congestion

13. The draft LP acknowledges that: “Several key junctions and roads on these corridors [A22] are currently at, or reaching capacity, and experience

congestion and delay during peak hours” (Paragraph 2.12). The Interim Infrastructure Development Plan (IIDP) states: “In relation to the preferred growth strategy set out in the Regulation 18 Local Plan, the transport modelling research confirms that there are already existing link capacity issues. Whilst several junctions will be subject to future upgrades, the capacity of the A27, A22 and A26 corridors to accommodate additional traffic growth would require mitigation in order to facilitate the growth proposed. Within these assessments a 10% modal shift²⁵ was applied for more urban areas of the district with a 5% modal shift applied to the rural areas” (IIDP Part 2, Page 17). Village Concerns contests that a 5% modal shift is realistic for rural areas and would like to see the evidence to support these modal shift estimates.

14. The IIDP includes details of improvements to the A22 Corridor from Hailsham to Uckfield (IIDP Part 2, Page 13, Projects N3a and N3b). The Transport for the South East Strategic Infrastructure Plan 2023 also includes Project N18 - A22 Uckfield Bypass Dualling although this does not appear to be directly referenced in the WDC documents.

15. The IIDP also provides details of potential changes to the Halland and Shaw roundabouts (IIDP Part 2, Page 18). It indicates that congestion for both the Halland and Shaw roundabouts will increase from its current status of Yellow (indicating congestion is at or approaching 90-110% capacity) to Red (indicating that congestion will be greater than 110% capacity) by 2040.

16. The problem with all these schemes is that the IIDP Part 3 provides an assessment of the risk to the delivery of these items of infrastructure. It finds that the need for the Projects N3a and N3b including the roundabout enhancements are of Critical (the highest level) importance to the LP but that there is only a medium chance that they can be delivered. This is because they are uncertain, unfunded and the necessary land may not be available. It is also disappointing that Policy INF 5 seeks to prevent development that would compromise improvements to the A27 but has not included the A22. Village Concerns regards this as short-sighted for one of the districts most important strategic routes.

17. To reflect how important these unfunded schemes are, the Transport for the South East Strategic Infrastructure Plan 2023 states that:

“if nothing is done to tackle these challenges in the south east the following outcomes are inevitable by 2050:

- The number of car trips will grow 23%;
-

- the number of rail trips will (only) grow 31%;
-
- the number of bus trips will (only) grow 26%
-
- the number of active travel trips will decline 10%
-
- carbon emissions will (only) decline 35%; and
-
- structural inequalities and areas of deprivation will persist and restrict economic growth”.

18. The closet rail link and town centre to East Hoathly is Uckfield. The IIDP states that: “Uckfield - highway network within the town is already very near capacity, resulting in town centre congestion issues, and it will struggle to accommodate a further increase in traffic” (IIDP Part 2, Page 16).

19. The IIDP also states: “Further consideration will also need to be given to the minor road network” (IIDP Part 2, Paragraph 7). This issue needs much greater consideration and should be covered in the draft LP. When main roads become congested, traffic migrates onto the rural lanes to bypass the congestion. The number of vehicles moving off the main roads to use “rat runs” may be small in terms of highways infrastructure but the effect can be devastatingly disproportionate.

20. The in-combination implications of Paragraphs 13 to 19 above are that the critical improvements to the roads are unlikely to materialise and with increasing car dependency, the road network and nearest town of Uckfield, cannot sustain the addition of any further housing in East Hoathly.

Bus Services

21. The IIDP specifies the levels of bus service (IIDP Part 3, Page 41) as:

- a. 30% of settlements have very frequent bus service - 7 days a week, evening service and 30 min frequency and journey time to nearest town.
- b. 25% of settlements have frequent bus service - 5 days a week and one hour frequency and journey time to nearest town.
- c. 45% of settlements have extremely restricted bus service or no service at all.

22. Village Concerns believes that the language used in these descriptions is overly positive and mis-represents the situation. We advocate replacing very frequent with good, frequent with moderate and extremely restricted with poor. Using overly positive language is perpetuated by developers and allows phrasing of service availability that is not supported by reality or the views of the public.

23. The problems with the existing bus services are clearly laid out in the IIDP Part 2, Paragraph 5. It is hugely problematic that this starting point for bus travel is in such a parlous position before the impact of the draft LP is even considered. The IIDP states (IIDP Part 2, Page 55) that:

“Early testing of the Regulation 18 Local Plan has identified the following key issues for public and sustainable travel:

- The larger strategic sites on the A22 corridor between Hailsham and Uckfield, all have low to very low accessibility to public transport.
- The accessibility along key transport corridors – A22, A27 and A259 – varies depending on the proximity to urban and local centres, such as Uckfield and Crowborough, the availability of rail connection and frequency of bus services”.

24. The IIDP then goes on to propose suggested mitigations for the problems of inadequate bus services. Unfortunately, of the three Critical schemes covered in the IIDP Part 3, one is assessed as a high risk of not being delivered and another has a medium risk of not being delivered. Both are unfunded.

Active Travel

25. Enabling a modal shift to sustainable travel is included as a key objective within the draft LP. For a remote rural village such as East Hoathly the only options for sustainable travel are:

Bus Travel

a. Bus usage in this village is very low. For those who use bus travel, it is really important, the problem is that very few people need or choose to use it. Local surveys showed that in a whole day (averaged for School Terms/Holidays), only 19 people from the Parish used the 54 Bus. The average number of people on the buses that passed through the Parish was 3 per bus (the majority of the buses

were double decker with an average bus capacity of 66). Improving the bus service frequency, destinations and covering evenings and Sundays would improve matters marginally but we strongly believe that it will not amount to a modal shift for more than a few individuals.

b. Travel Plans are supposed to be audited to show if they have had any effect. Village Concerns does not believe that the Travel Plans that have been produced for this village have been audited and requests to see them have not been met. Village Concerns believes that Travel Plan audits should be sent to Parish Councils and made public. Only then can it be seen if the claims made by developers and accepted by planning departments have come to fruition. The existing level of bus usage suggests that they have failed spectacularly and should put into question the reliance on demanding yet more Travel Plans as a path to sustainable travel.

Walking

c. Walking to other villages or our nearest town is unlikely to be possible other than for a few people and use of roads would be unsafe. Irrespective of this, nothing is included in any ESCC or WDC plans to enhance local footpaths.

Cycling

d. Cycling to other villages or our nearest town is possible but again, only for a few people and the general view is that it would be highly unsafe either on the A22 and even on the smaller rural lanes. Irrespective of this, nothing is included in any ESCC or WDC plans to provide any cycle lanes in this Parish or between this village and our nearest town.

26. The IIDP identifies four schemes for Active Travel in relation to this Parish, all of which are assessed as Essential but having a high risk of not being delivered. It is therefore futile to portray Active Travel as a solution to sustainable travel for this village. There is no credible pathway to a modal shift and WDC should accept this. This is not to say that it should not be promoted as a sensible idea, but it should not be allowed as a justification to permit development based on an argument that an Active Travel policy will make the proposed development sustainable.

Local Employment

27. Non of the proposed sites for development in the Parish provide any new employment, in fact, only one site in Policy SA1 Housing and Mixed-Use Site Allocations includes a mixed-use development. Most of the village employment sites have already been converted to housing. Failing to provide any new employment for the new homes in the Parish means more commuting, more pollution, more congestion and decreasing sustainability.

Education

28. The IIDP identifies that there will be a shortfall of places for Early Years and Primary Education within the plan period (IIDP Part 2, Page 75). It proposes a possible expansion of the existing provision. Part 3 of the IIDP indicates that this scheme is assessed as Critical but that it only has a medium risk of being delivered (IIDP Part 3, Page 15). However, in another section, it also indicates that there will be a shortfall of 5 places per year group emerging from around 2030/31. It notes that the existing school is on a very constrained site with limited scope for expansion. It assesses the scheme as Essential but with a high risk of not being delivered (IIDP Part 3, Page 40).

Sports/Recreation

29. The IIDP completely ignores this Parish in terms of sports and recreation. It fails to mention the existence of East Hoathly's Sports Ground, football pitch, tennis courts, rifle range and cricket pitch. Our Neighbourhood Plan Steering Group have previously raised this matter with WDC and ESCC and notified them of the gaps in the depiction of this Parish in the WDC Playing Pitch and Outdoor Sports Strategy Report 2022. It is unacceptable that our facilities and the problems that exist with them are not covered in the IIDP as it means that WDC have proposed no infrastructure improvements to rectify the shortcomings in our facilities. The situation is well explained in the Submission Neighbourhood Plan which is currently undergoing Regulation 16 Consultation under the control of WDC.

Infrastructure Summary

30. In summary, almost all of the Infrastructure changes that are proposed that would affect this Parish are assessed as Critical or Essential but carry a High or Medium risk of not being delivered. To propose any more development in East Hoathly would be irresponsible and unsustainable.

Administrative Matters

31. East Hoathly has been designated as a venue for a LP Exhibition but we have not been designated (Table 1 of the draft LP) as a venue where documents will be lodged for public examination. It is probable that the draft LP will arouse significant public interest and we ask that you designate East Hoathly as a Document Venue.
32. We would also appreciate it if you could spell the name of our village correctly, see Map 7.
33. Why did you change the time-span for the draft LP to 2040 when you specifically told our NP team to align the Submission NP to 2039 so that it would conform with the evidence base for your LP ?

Conclusion

34. We look forward to the publication of the missing documents so that we can properly examine the draft LP. There are many other matters contained in the draft LP and its supporting papers but we reserve comment on them at this stage.
35. We are also concerned that the draft LP seems to have nothing to say to the people of settlements such as Halland.
36. Village Concerns urges you to reconsider your allocation of 419 homes for this Parish. We strongly believe that the development you have already approved for this Parish is unsustainable and to add more without substantial improvements to local infrastructure is contrary to your LP Vision and the wording of your planning policies. If you do proceed with this Spatial Option, then we urge you to review the provision of infrastructure improvements to make such an increase in housing sustainable.

Victoria Aldridge and Katherine Gutkind
Joint Chairs
Village Concerns