

## Question 1

Do you agree with our overall vision for the district? No  
Do you agree with our 'mini' visions for the district? No  
Do you agree with the objectives for the district? No

Should we change anything? If so, what should we change and why?

Village Concerns commends Councillor Tysh and the team that have prepared this massive undertaking. We welcome the publication of the draft LP and commend the considerable amount of work that has been required. We welcomed the words used by Councillor Tysh when he introduced these documents to WDC on 8 Feb 24, when he made it clear that: “[this is a Draft Plan, not the final version, it will not be in the form it is now](#)”. It is therefore disappointing that the feedback received from subsequent meetings with councillors and planning officers at consultation events gave the distinct impression that there would be no change to the fate of our community in East Hoathly.

Councillor Tysh made it clear in his statement to WDC that the housing to be delivered as part of the plan (15,729 homes) was the minimum that would satisfy a government inspector. He explained the “[political chicanery and spin](#)” being used by central government to protect their housing targets and avoid any consideration of “[exceptional circumstances](#)” for Wealden. It is disappointing that the WLP 2024 makes no reference to these matters. There was much public support when 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 from WDC of why the challenge failed. Village Concerns believes that it is wrong that the challenge to the housing target and the lack of formal response is not mentioned in the WLP.

East Hoathly was designated as a venue for a LP Exhibition but were not designated (Table 1 of the draft LP) as a venue where documents will be lodged for public examination. The draft LP aroused significant public interest and the members of this community should not have had to drive to other communities to view the documents. Village Concerns raised this matter with WDC on 31 Jan 24 but received no response.

## Section 2 - Key Characteristics

Village Concerns strongly supports your proposal to limit the proportion of 4 and 5 bedroom homes that are built. However, we believe that you should go further and allow settlements to have their own housing mix assessments

to examine their existing housing stock and their own needs. In the case of our parish this has clearly been shown by the East Hoathly with Halland CLT Housing Needs Survey 2019. This showed a need for only one and two bedroom homes.

The NPPF does not intend to achieve development, it's intention is to achieve **sustainable** development. If you build 15,729 homes, they must be built in sustainable locations. The WLP 2024 policies will minimise the harm to the environment with the clear exception of the harm caused by cars. If you build homes in locations that are separated from the jobs, services and facilities that they need to sustain them, then the residents will get into cars and drive to the places that sustain them. It does not matter that it is a 3 bed home (rather than a 5 bed home), that it is well insulated, that it has a 25 metre buffer to ancient woodland and provided some biodiversity net gain, if it is built in a remote rural location then it will not be sustainable and will require the constant use of cars to get residents to work, to school, to shops, to leisure facilities and services.

The Transport and Accessibility section 2.9 to 2.16 does not spell out a realistic position and these paragraphs are not summarised in a coloured "box" in the same way as "The Economy". It does not indicate how many additional vehicles the plan is likely to introduce to the road network. Paragraph 2.12 states that you will not know the results of the MRN bid until 2025. It is irresponsible to propose housing development in rural villages when you have no funding plan in place to provide the critical infrastructure improvements.

### **Overall Vision**

The Overall Vision does not indicate that the right homes will be built in the right places. This is critically important as your housing allocations propose to build a significant proportion of homes in villages that are not genuinely sustainable and will result in considerably increased traffic, congestion and pollution to sustain them.

Your Overall Vision does not mention transport and it is only included in the Mini Visions in relation to "Living Safe, Inclusive and Healthy Lives". Transport should have a much more prominent position in a development plan because of its significant effect on sustainability, pollution and quality of life. The draft WLP 2024 proposes 15,729 additional homes and this will come with an additional 40,000 cars (2.5 per home). How often these are used on the road network to achieve sustainability will have a massive effect and should be part of your vision.

The proposal to build 686 homes in East Hoathly (in addition to those already built since 2009) will not satisfy most of the elements identified in your Overall Vision:

East Hoathly is already a distinctive historic rural village, burying it in car dependent housing estates will destroy that distinctiveness.

Building 686 homes remote from employment, shops, schools, trains, services and facilities will add to car usage, pollution and exacerbate the Climate Crisis.

The already broken infrastructure of East Hoathly will be put under additional strain by more housing and there is no evidence from history or the WDC chief planning officer that there will be any improvement.

The lives of the proposed new residents are likely to be blighted by the drudgery of commuting to work on increasingly congested roads and overloaded local services. This cannot be conducive to Healthy Lives.

The Natural Environment will be irrevocably harmed by building on greenfield sites most of which is currently used for food production or has been in the past. It proposes to build on land providing views from the Conservation Area out to the South Downs and out to the perimeter of the surrounding woodlands, much of which is Ancient Woodland. This will increase the pressure on these fragile environments from residents, their children and pets.

The new housing will not benefit the economy of this parish. Recent new developments have not shown any increased use of the local shop or pub (we have lost a pub and many local businesses since the recent developments). The ongoing development of 205 homes has resulted in no local contracts or employment during the building phase and Redrow are directing potential customers not to use the local pub for refreshments as they are concerned that local people may provide a negative impression of the future of this parish.

The only element that your Vision will satisfy, is it that of new homes. This should demonstrate that you are proposing these new homes in the wrong place.

### **Mini Visions**

Village Concerns supports all the Mini Visions with the exception of “Supporting the Delivery of Infrastructure”. Many Wealden residents would

describe the existing infrastructure as inadequate and getting worse. This is certainly the situation in the Parish of East Hoathly with Halland. Village Concerns believes that this Mini Vision should describe the existing parlous position and the reflect that the proposed additional housing will likely exacerbate this situation. At the WLP Public Exhibition in East Hoathly on 22 Apr 24, the chief planning officer accepted that the currently approved housing schemes in our parish would create significant overload and problems onto the local infrastructure for sewage, electrical supply and roads.

Village Concerns supports all the objectives but has the same reservations noted above in relation to the objectives for “Supporting the Delivery of Infrastructure”. We are also concerned by the omission of any objective related to reducing car dependancy. Sustainable transport is included in the “Healthy Lives” mini vision but it is far more important than improving peoples health. Sustainable transport is about building homes in places where walking and cycling is possible and credible to achieve sustainability and reducing car dependancy with its associated impact on congestion, road safety, pollution and quality of life.

This view is supported by examination of your Sustainability Appraisal from the chart shown below:

Draft Wealden Local Plan (Regulation 18) for Local Plan Sub Committee

SUMMARY OF RESULTS	Policy No: VO1		Policy: Vision and Objectives – Net Zero																		
	SO1 Climate Change Mitigation	SO2 Climate Change Adaptation	SO3 Flood Risk	SO4 Water resources/Quality	SO5 Soil, Land & Minerals	SO6 Waste	SO7 Pollution	SO8 Green & Blue Infrastructure	SO9 Biodiversity	SO10 Landscape & Townscape	SO11 Historic & Cultural Heritage	SO12 Digital Infrastructure	SO13 Travel & Accessibility	SO14 Housing	SO15 Health & Wellbeing	SO16 Quality of Life & Place	SO17 Social Deprivation	SO18 Economy & Employment	SO19 Town & Village Centres	SO20 Education & Skills	
SA EFFECTS																					
Major Positive																					
Minor Positive																					
Not Significant																					
Minor Negative																					
Major Negative																					
Uncertain																					
COMMENTARY:																					
Duration/Reversibility	The majority of effects are likely to be <b>minor positive</b> in the short to medium term but increase to <b>major positive</b> in the long term as the measures to respond to the climate crisis are implemented and technological advances are made.																				
Mitigation Measures	Specific mitigation measures to respond to the climate crisis are provided through the Local Plan policies.																				
Cumulative Impacts	The cumulative impact is positive and effects the majority of the objectives.																				
Summary	<ul style="list-style-type: none"> <li>The vision and objectives propose that the District will have made significant progress in the move to become a Net Zero district by 2040 in response to the climate crisis and the need to be more prepared for the effects of climate change prevention, adaptation and mitigation.</li> <li>The objectives support the need to: respond to the challenges of the climate crisis; transition to a low carbon society by minimising carbon emissions; reduce energy consumption and ensure resources are used effectively; increase the use of renewable and low carbon energy; and protect and ensure the sustainable use of natural resources and minimise waste.</li> <li>The effect is likely to be <b>minor positive</b> in the short to medium term but increase to <b>major positive</b> in the long term as the measures to respond to the climate crisis and net zero are implemented.</li> </ul>																				

This paints a wholly untrue assessment of the future. The new development proposed by the WLP 2024 will have a detrimental effect on carbon emissions, loss of agricultural land, increase in car congestion and energy consumption. Yet this plan shows not one negative impact. The evidence of all post 1960s development has resulted in increased car dependency and increased pressure on infrastructure. The WLP 2024 cannot possibly correct the existing problems and will add more people, housing, vehicles and the demands they will all place on services and infrastructure. The WLP 2024 cannot therefore claim that all its effects are positive.

Have we missed anything? If so, what have we missed and how should it be included?

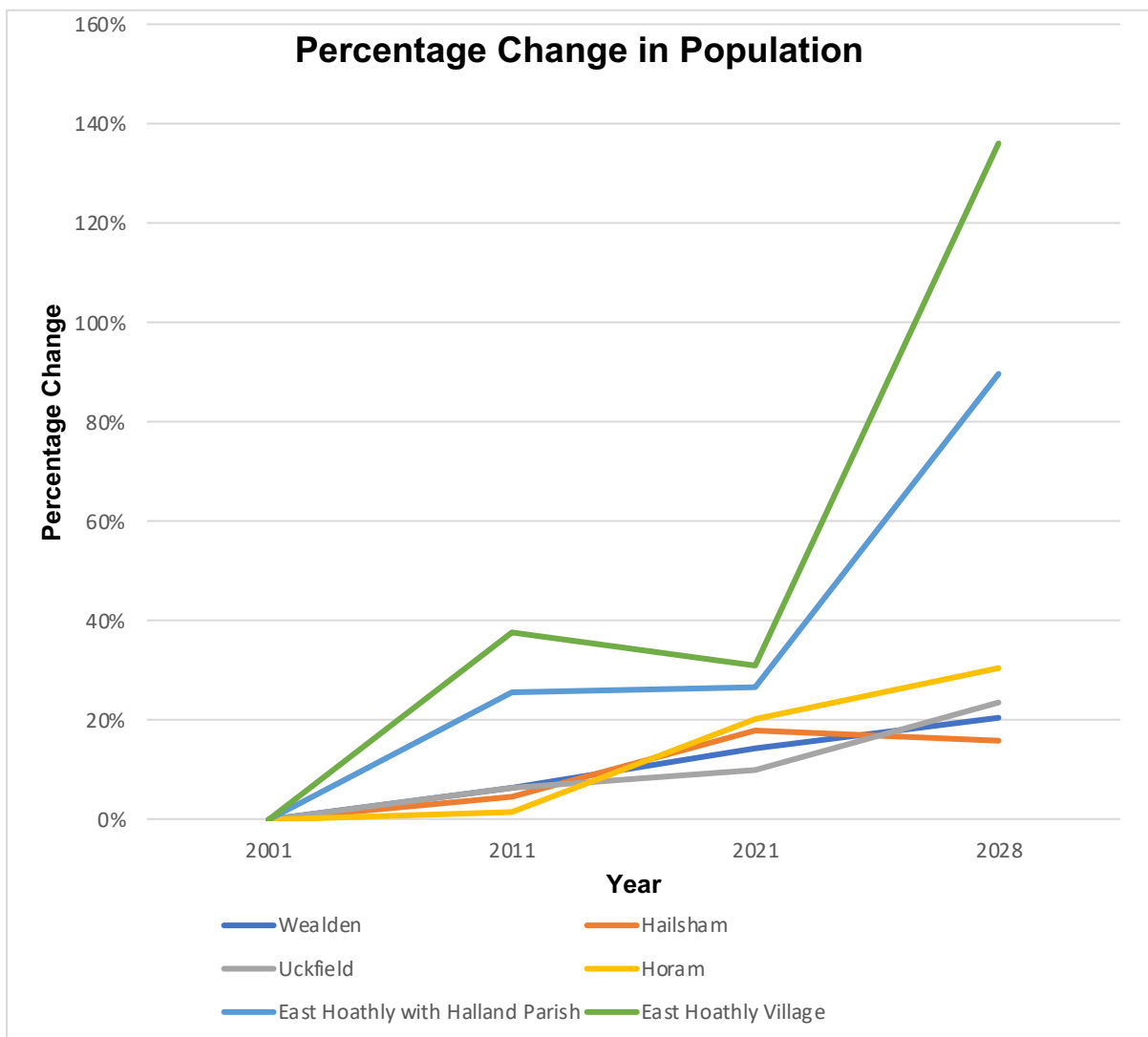
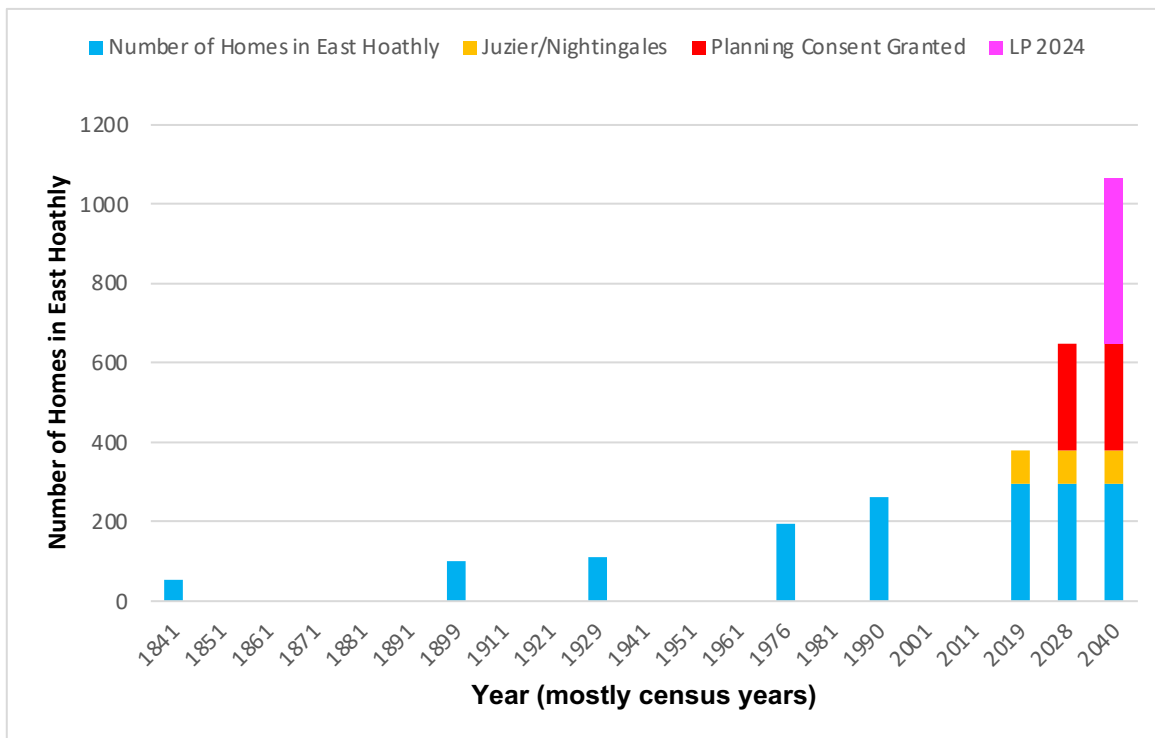
## Question 2

Do you agree with draft policy SS1 Spatial Strategy? No

Is there an alternative strategy that we should be considering through this Local Plan? If so, please set out what the alternative strategy should contain and why.

Figure 4 shows 2 strategic housing allocations for East Hoathly indicated by small symbols. The combined effect of these allocations amounts to the larger symbol for a strategic housing allocation. Village Concerns feels that the use of 2 smaller symbols reduces the impact that this significant allocation has on our community. Of all the housing allocations in the district, those for East Hoathly are visibly isolated in the rural heart of the district and separated from all the urban centres that provide sustainability for our community. This map should show this unsatisfactory situation more clearly.

Policy SS1 uses the phrase: “Contribute to the continued sustainability of our towns and villages”. Paragraph 4.11 states: “Some growth within our most sustainable towns and villages will support our existing communities”. No one could argue with these statements but your translation of these words into a housing allocation is grossly distorted. The allocation of housing to East Hoathly will quadruple the size of this village since 2009 as can be seen in the charts below:



Rural villages are delicate and special and to impose such a grotesque amount of housing with no employment or infrastructure improvements is not sound strategic planning.

You ask for an alternative strategy. Village Concerns is not qualified to propose an alternative strategy or able to pay for professionals to carry out such work. We can suggest that housing should go in locations where there is employment and a full range of schools and services so that travel needs are reduced and active travel options are genuinely viable. The new homes should mostly be 1 to 2 bedroom starter homes and apartments building upwards to reduce the pressure on land availability. We suggest 1 to 2 bedroom homes, not because people do not want larger homes, it is because these homes will be cheaper and enable the generation who currently cannot get onto the property ladder, a chance. New homes should form communities with identity and shared spaces rather than anonymous sprawling housing estates where each house is an island in a sea of mediocrity.

Village Concerns supports the concept of “20 Minute Neighbourhoods” and would ask that you review your housing allocation for East Hoathly because the majority of this community cannot currently benefit from this concept for almost all of their daily needs or their occasional needs. Our evidence is that this will worsen by the end of the plan period. We will remain car dependent with an inadequate bus service that is only used by a few people. Walking, wheeling and cycling will be impractical for all but a few things and most sustainability will be accessed by car for employment, schools, shopping, healthcare, recreation and leisure facilities.

The Interim Infrastructure Development Plan (IIDP) states:

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.

The closest 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).

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.

The in-combination implications are that with increasing car dependency, the local road network and nearest town of Uckfield, cannot sustain the addition of any further housing in East Hoathly and will make the concept of East Hoathly being a “20 Minute Neighbourhood” even more remote.

Village Concerns notes Paragraph 4.23 which introduces the idea of “creating a network of villages that collectively provide for the needs of people’s everyday lives, joined by active travel arrangements”. You have provided no framework to implement this plan for East Hoathly and we do not consider that it could work. The idea that residents of East Hoathly might use active travel methods to get to a neighbouring village to access their needs is risible. Walking 3 miles to Chiddingly to visit their pub or community shop, thereby ignoring our own pub and shop ? Cycling to Laughton to visit their GP - they don’t have one. What possible network of villages could benefit East Hoathly ?

Village Concerns cannot support the application of Policy SS1. The wording of the policy is fine, but it does not propose sustainable development in East Hoathly. It proposes no employment opportunities in this parish but seeks to add 686 additional homes onto an already broken infrastructure and almost 2,000 additional vehicles onto the already congested and polluted road network. It proposes no infrastructure improvements that the IIDP considers likely to happen or that have funding allocated. East Hoathly is car dependent now with almost all sustainability provided from outside the parish and Policy SS1 proposes nothing that will reduce this dependency on car usage.

Policy SS1 sets out the approach for development boundaries. Do you agree or disagree with the settlements that are identified to have development boundaries? Please set out your reasoning.

No Comments

The policies maps set out the extent of development boundaries for each settlement identified. Do you agree with the boundaries as drawn? Should any changes be made, if so, what changes would you make to which settlement boundary and why?



Village Concerns believes that East Hoathly has already had enough housing approved (267 new homes). The proposed development boundary for East Hoathly should be redrawn to remove the proposed additional 419 homes.

Village Concerns acknowledges the benefits of proposing development boundaries but equally notes that these are drawn up after you have identified your proposed development sites. They define the area outside the development boundary as “open countryside” and ignore the fact that, in the case of East Hoathly, prior to your proposed plan, the proposed development sites were “open countryside”. The boundaries therefore arbitrarily specify what is “open countryside” and we are cognisant that as soon as it suits you, you will redefine additional areas of “open countryside” as no longer being “open countryside”. We would prefer you to look at the landscape setting of settlements and to take a strategic view when determining development boundaries. For historic rural villages you should consider:

Not building up to surrounding woodland in every possible direction. This puts untenable pressure on woodland from residents, their children and pets. It degrades the habitats and removes the open spaces surrounding the woodland on which its fauna feed and hunt. It also devalues the rural views which exist in rural communities and make them special places to live.

Protecting green gaps between parts of settlements to preserve their rural character and provide wildlife corridors through the built environment.

Protect Conservation Areas from being subsumed within sprawling housing estates.

Maintain some of the important views into and out of settlements but more importantly the Conservation Areas.

**Is there anything else within Policy SS1 that we should change? If so, what should we change and why?**

Paragraphs 4.22 to 4.26 contain important ideas for rural areas, particularly Paragraph 4.24. However, it is not clear that there is anything in Policy SS1 that will implement these ideas.

Much of policy SS1 is driven by work done in the SHELAA and Sustainable Settlement Study. Please see our separate comments on these at Questions 85 and 89.

Have we missed anything? If so, what have we missed and how should it be included?

### Question 3

Do you agree with draft Policy SS2 Provision of Homes? No

Should we change anything? if so, what should we change and why?

You have allocated 686 homes to this parish and Policy SS2 states that: “development is supported in the district’s most sustainable settlements”. Village Concerns strongly contests that East Hoathly is one of the district’s most sustainable settlements. Village Concerns contests your categorisation of East Hoathly as a Type 4 Settlement but regardless of this, a Type 4 Settlement is the lowest level of sustainable settlement in the district and therefore not the most sustainable.

See Question 89 for a detailed explanation of why East Hoathly should not be categorised as a Type 4 Settlement.

East Hoathly has been a car dependent community for several decades and this trend is increasing as time progresses. Every addition of more housing to the village adds more vehicles to the road network. Initiatives to promote the use of the single and infrequent bus service continue to fail and the idea of active travel methods replacing the car journeys is hopeless. To allocate 686 homes to an already car dependent community is a failure of strategic planning. It is the epitome of unsustainable development, the wrong homes in the wrong place.

You should allocate housing to the places that have the jobs, services and facilities that will sustain them. You should coalesce development on places with access to multiple sustainable transport links and where active travel to get to jobs, services and facilities is possible. You should stop building sprawling housing estates and build better designed, compact communities with shared facilities at prices that are genuinely affordable. Where land availability is an issue, you must build upwards.

Have we missed anything? If so, what have we missed and how should it be included?

No Comments

#### **Question 4**

Do you have any comments at this stage in relation to the site at Land at West of Uckfield – Owlsbury?

Village Concerns will not comment on sites in the WLP that are outside our Parish. We have indicated our general views on Policy SS1. We are disappointed that this site has not been sufficiently well assessed for you to make a decision and either incorporate it into the plan or exclude it.

#### **Questions 5**

Do you agree with draft Policy SS3 Gypsy, Travellers and Travelling Showpeople – Accommodation Needs?

No Comments

Should we change anything? if so, what should we change and why?

No Comments

Have we missed anything? If so, what have we missed and how should it be included?

No Comments

#### **Question 6**

Do you agree with draft Policy SS4 Retail Provision and Town Centres?

No Comments

Should we change anything? if so, what should we change and why?

No Comments

Have we missed anything? If so, what have we missed and how should it be included?

No Comments

#### **Question 7**

Do you agree with draft Policy SS5 Provision of Employment Space?

No

Should we change anything? if so, what should we change and why?

Village Concerns believes that if housing is to be imposed on rural villages then it should be mixed developments that bring employment opportunities into the communities. This would enhance sustainability, reduce car dependancy and promote active travel. None of your proposals appear to consider this.

Have we missed anything? If so, what have we missed and how should it be included?

No Comments

### **Question 8**

Do you agree with draft Policy SS6 Strategic Employment Allocations?

Village Concerns notes that many of these allocations will affect the A22 and are concerned that the road infrastructure will not cope. This will have major implications for traffic congestion and the diversion of traffic onto “rat runs” through rural villages.

Should we change anything? if so, what should we change and why?

Do not implement Policy SS6 until the required road infrastructure is funded and built.

Have we missed anything? If so, what have we missed and how should it be included?

No Comments

### **Question 9**

Do you have any comments at this stage in relation to the site at Ashdown Business Park, Maresfield?

Village Concerns will not comment on sites in the WLP that are outside our Parish.

## Question 10

Do you agree with draft Policy SS7 Ensuring Comprehensive Development and Housing Delivery?

No

Should we change anything? if so, what should we change and why?

At present your philosophy for strategic masterplanning seems to be to leave it in the hands of developers and for them to only consider development sites separately. This is evidenced in this parish by:

During the WLP 2024 development process, one part of your planning department was liaising with a developer regarding pre-planning applications for land which appeared in WLP 2024 which was not referenced in Planning Application WD/2023/2516/MAJ despite this site providing the access road for the land allocated in the WLP 2024. During the same period, another part of your planning department was separately directing the parish through its Neighbourhood Planning process. The Neighbourhood Planning Steering Group were given no insight into any masterplan for this community and yet the sites have now been chosen and housing allocations determined. The community is now being “consulted” but we get the very clear message that the sites and housing numbers are fixed. The message to this community seems to be that we cannot contribute to the masterplan but we might be able to give you our opinion on what colour the front doors should be.

The present strategic planning process seems to be led by developers putting forward land in which they retain an interest. No genuine consideration as to the suitability of this land or its strategic positioning seems to take place. East Hoathly is a perfect example of this. A foreign billionaire bought a Stud Farm but appears to have now chosen to relocate to another country. His solution to dispose of this prime agricultural land is to put the whole 250 hectares up for housing development. The planning department have already approved 205 homes on Hesmond’s Stud land and disregarded a planning condition that was imposed by their own Planning Committee South (PCS) to prevent the break up of the Hesmond’s Stud estate. They did this by the delegated decision of a desk officer without referring the matter back to PCS. The planning department have grasped this offer from the billionaire and decided that it is now their strategic plan.

A new settlement in this Parish was considered in the Landscape and Visual Appraisal for New Settlements and Large Scale Urban Extensions dated November 2023. This paper made no recommendations but the site was assessed as not suitable for housing or employment in the 2024 SHELAA. Village Concerns supports this assessment but is concerned that much of the reasoning and evidence cited in the Landscape and Visual Appraisal could equally be applied to other SHELAA sites in this parish but which seem to be ignored in these instances. This shows a lack of consistency in making the assessments. Village Concerns believes that a critical factor in the assessment of sites for New Settlements or Large Scale Urban Extensions should be access to existing (or permanently funded) comprehensive and multiple bus services and rail services thereby providing the potential for genuine modal shift from car dependency.

**Have we missed anything? If so, what have we missed and how should it be included?**

You have allocated 6 separate sites in East Hoathly amounting to 686 homes for which there is no overall Masterplan. There is no strategic plan to upgrade any infrastructure or services other than bland assurances from the planning department that something unspecified will be provided. The plans contained in the WLP 2024 were not discussed with the East Hoathly with Halland Neighbourhood Plan team and only the developers have been party to any discussions with the planning department. Policy SS7 is meaningless unless you engage with communities at an early stage (as required by the NPPF). When plans are concocted between developers and the planning department with no involvement of local communities is creates distrust and conflict.

### **Question 11**

**Do you agree with draft Policy SS8 Responding to Climate Change?**

Yes

**Do you feel the strategic policy covers the key issues we need to address in our approach to climate change adaptation and mitigation?**

Yes

**Should we change anything? if so, what should we change and why?**

You should add a requirement to consider the siting of development to reduce vehicle use. Building a home that satisfies all of the factors you have included will be hugely degraded if the occupants have to

constantly travel by road to access employment, schools, shops, leisure and services. You should also consider site location in relation to the delivery vehicles that will need to visit the new home. Rural villages are now awash with delivery vehicles of all shapes and sizes.

Have we missed anything? If so, what have we missed and how should it be included?

It is extremely frustrating that the planning department have not implemented some of these ideas already. The approval of planning application WD/2022/0341/MAJ approved the demolition of an existing house and other buildings all of which could have been re-used and adapted. Village Concerns raised the matter repeatedly with the planning department and PCS but received no response and we doubt that it was ever discussed with the developer. If you progress Policy SS8 then you must ensure that the planning department do not choose to ignore it when it is inconvenient.

### Question 12

Do you agree with draft Policy SS9 Health, Wellbeing and Quality of Life?

Yes

Do you agree with the threshold levels set out within the policy for undertaking a Health Impact Assessment (HIA) in the Wealden context?

Yes

If you disagree with the threshold levels set out in the policy, at what level do you think an alternative threshold should be set and why?

No comments

Have we missed anything that may impact on the health and wellbeing of our residents? If so, what have we missed?

No comments

Should we make changes to this policy, and if so, what changes should we make?

Village Concerns is conscious that some residents in rural environments can suffer from isolation and loneliness. The services and opportunities for social contact in rural communities are often sporadic in comparison to urban

environments. We would welcome some recognition of this in Policy SS9 and for it to be included in Paragraph 2.

### **Question 13**

Do you agree with the Council's draft Policy SS10 for Green Infrastructure?

Yes

Do you feel the strategic policy covers the key issues we need to address in our approach to the retention, protection, enhancement and creation of green infrastructure?

No

Should we change anything? if so, what should we change and why?

Village Concerns believes that a specific issue in the protection of green infrastructure has been overlooked. The rural environment of Wealden contains a significant number of woodland that surround its villages. There is a tendency to infill development up to the surrounding woodland (notwithstanding any mandatory buffer zone). This removes the perspective and setting of the woodland and damages its amenity and landscape value. Village Concerns believes that you should incorporate some protection in Policy SS10 to prevent rural villages becoming housing estates that stare into woodlands with no open countryside.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 14**

Do you agree with draft Policy CC1 Net Zero Development Standards – New Build?

Yes

Given the recent Ministerial Statement, how should we address net zero development standards through planning policy?

Village Concerns supports the wording of Policy CC1 and would oppose any intent to disallow separate energy-related targets.



Should we change anything? if so, what should we change and why?

Village Concerns is disappointed given your comments in Paragraph 5.6, that you have proposed 686 homes in East Hoathly which has no rail link, an inadequate single bus service and is demonstrably a car dependent location. We urge you to revisit this decision.

Village Concerns is disappointed with some of the wording in Policy CC1. It is well intentioned but includes phrases that will provide developers the opportunity to avoid such commitments, such as:

“consider opportunities to provide solar PV and battery storage”.

“demonstrate that where financial viability”

Have we missed anything? If so, what have we missed and how should it be included?

Village Concerns believes that Policies such a Paragraph 9 of CC1 should not simply be a document produced by a developer to gain planning approval but should form part of a cumulative performance indicator for the plan as a whole

### **Question 15**

Do you agree with draft Policy CC2 Reducing Energy Consumption in Existing Buildings ?

Yes

Do you consider there to be any other reasonable and viable measures for improving the energy efficiency of existing buildings?

No

Should we change anything? if so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 16**

Do you with agree draft Policy CC3: Sustainable Design and Construction?

Yes

Should we change anything? if so, what should we change and why?

Village Concerns support the inclusion of grey water recycling in Policy CC3 along with many other ideas. However, we would prefer it to be separated from water recycling. To combine them together will allow developers to claim to have addressed Paragraph 1.e of Policy CC3 by installing cheap water butts but not addressing grey water recycling.

Have we missed anything? If so, what have we missed and how should it be included?

It is extremely frustrating that the planning department have not implemented some of these ideas already. The approval of planning application WD/2022/0341/MAJ approved the demolition of an existing house and other buildings all of which could have been re-used and adapted. Village Concerns raised the matter repeatedly with the planning department and PCS but received no response and we doubt that it was ever discussed with the developer. If you progress Policy CC3 then you must ensure that the planning department do not choose to ignore it when it is inconvenient.

### **Question 17**

Do you agree with draft Policy CC4 Carbon Sequestration?

Yes

Should we change anything? if so, what should we change and why?

Village Concerns will be interested to see if this has any effect on the approval of development on greenfield sites. We are aware of no instances where the loss of greenfield sites have ever influenced a planning decision. If its only effect is to force developers to contribute to some off site mitigation then we suggest that you include some guidelines for this within Policy CC4.

If the proposed mitigation is to plant some trees on another greenfield site, then the long term viability of such Carbon Storage must be proven and funded. Mitigation schemes are too often agreed to justify a development and within a few years they fail and are never rectified. Trees and shrubs are planted as part of biodiversity mitigation on new housing estates and they often do not survive. We suggest that guidelines are included to limit how far away mitigation can be from the original development. We suggest that 5 yearly audits are mandatory for mitigation schemes for at least 30 years. Funding for the audits should be set aside in a fund controlled by the LPA but provided by the developers.

When calculating the the carbon storage capacity of a piece of land as described in Paragraph 5.68, some consideration should also be given to the loss of carbon capture in annual cropping of agricultural land which is also lost when greenfield sites are turned into housing estates.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 18**

Do you agree with draft Policy CC5: Renewable and Low Carbon Energy?

Yes

Subject to the Council's renewable energy study, would you support the identification of areas within the district for locating solar farms? Please explain your answer.

Yes, this parish already has a solar farm and would support additional facilities providing they are not using agricultural land that is graded 1, 2 or 3a.

Should we change anything? if so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 19**

Do you agree with draft Policy CC6: Water Efficiency?

Yes

Should we change anything? if so, what should we change and why?

Policy CC6 should include the use of grey water recycling as covered in Policy CC3.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 20**

Do you agree with draft Policy CC7: Managing Flood Risk ?

Yes

Should we change anything? if so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 21**

Do you agree with draft Policy CC8: Sustainable Drainage?

No

Should we change anything? if so, what should we change and why?

Paragraph 3.c of Policy CC8 indicates: “that arrangements are in place for the ongoing maintenance of SuDS schemes”. Village Concerns does not believe that this is sufficient. Our experience is that the “arrangements” are that the SuDS scheme becomes the responsibility of a resident’s management company. The maintenance costs are never assessed and the residents are therefore taking on an unknown future cost. These are combined with the estate costs for a whole range of things including: sewage plant machinery and treatment, landscaping and planting scheme maintenance, play area maintenance, communal lighting schemes, private

roads. This results in significant service charges being raised by resident's management companies. There is a significant risk that they will minimise expenditure, to keep charges low, and thereby not carry out essential maintenance. If SuDS schemes are not maintained, they will fail. Who will inspect them and ensure that essential maintenance is being done? Policy CC8 should have measures that ensure someone has responsibility for the ongoing effectiveness of SuDS schemes.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

## **Question 22**

Do you agree with draft policy NE1 Biodiversity, Geodiversity and Nature Recovery?

Yes

Should we change anything? if so, what should we change and why?

Please spell East Hoathly correctly in Figure 19.

Any proposed mitigation must be proven and funded. Mitigation schemes are too often agreed to justify a development and within a few years they fail and are never rectified. Trees and shrubs are planted as part of biodiversity mitigation on new housing estates and they often do not survive. We suggest that guidelines are included to limit how far away mitigation can be from the original development. We suggest that 5 yearly audits are mandatory for mitigation schemes for at least 30 years. Funding for the audits should be set aside in a fund controlled by the LPA but provided by the developers.

Have we missed anything? If so, what have we missed and how should it be included?

It is a great pity that the planning department support the loss of a vital wildlife corridor in East Hoathly in relation to planning application WD/2023/2516/MAJ. It is likely that they will determine this application before this policy takes effect. Village Concerns has asked that the application is not determined until the WLP 2024 has been through its Examination in Public but we have not had a response. It is particularly disappointing to read Paragraphs 6.10 to 6.12 to see how you are considering Nature

Recovery Strategies whereas we are facing a Nature Loss Situation right now.

### **Question 23**

Do you agree with draft Policy NE2 Biodiversity Net Gain?

Yes

Is the policy correct to require a blanket minimum 20% BNG requirement across the district or should distinctions be made i.e. higher % requirement when sites are within BOAs or other designated sites? Or should the Council have a lower or higher than 20% BNG target? Please explain your answer.

Village Concerns support Policy NE2 as written.

Should we change anything? if so, what should we change and why?

Village Concerns believes that guidelines should be included to limit how far off-site BNG can be from the original development. We suggest no more than 1km in order to retain biodiversity and habitats close to the original sites.

Village Concerns is also conscious that providing all the BNG on-site does impose a burden on the new residents. The maintenance of the on-site planting and habitats will fall on the resident management company and passed on to residents with significant service charge. Our experience is that although a maintenance schedule might form part of a planning application, there is no accompanying maintenance cost estimates (we have requested these but not had any response). We believe this should be mandatory and specified in your policy. There is a significant risk that resident management companies will minimise expenditure, to keep charges low, and thereby not carry out essential maintenance. If BNG schemes are not maintained, they will fail. Who will inspect them and ensure that essential maintenance is being done? Policy NE2 should have measures that ensure someone has responsibility for the ongoing effectiveness of BNG schemes.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 24**

Do you agree with draft Policy NE3 Woodland, Trees and Hedgerows?

Yes

Are the thresholds for tree provision, to increase tree cover, set out in point 7 appropriate? Please explain your answer.

No.

Paragraph 7 specifies that: “an appropriate number of suitable replacement trees” should be planted. The policy should be specific and expect a high level of failure for the newly planted saplings. The policy should guarantee that if a mature tree is lost then the replanting policy must ensure that at least one tree survives to maturity. Village Concerns does not have the data to support this but we feel that at least 10 saplings will be required to ensure that one survives to maturity.

Should the policy look to set a minimum buffer for protecting woodland and trees? Please note there is a separate policy for Ancient Woodland and Veteran Trees below. Please explain your answer.

Yes.

Village Concerns believes that all woodland should have a minimum buffer of 20m.

There is a tendency to infill development up to the surrounding woodland (notwithstanding any mandatory buffer zone). This removes the perspective and setting of the woodland and damages its amenity and landscape value. Village Concerns believes that you should incorporate some protection in Policy NE3 to prevent rural villages becoming housing estates that stare into woodlands with no open countryside. We would support a 20m buffer for all woodland.

Building too close to woodland puts untenable pressure on the woodland from residents, their children and pets. It degrades the habitats and removes the open spaces surrounding the woodland on which the woodland fauna feed and hunt. It also devalues the rural views which exist in rural communities and make them special places to live.

Should we change anything? if so, what should we change and why?

It is a great pity that although many of the protections included in this policy are already in place, they are often not enforced by the planning department. It is one of the areas where the public have the greatest disaffection with the planning system. Village Concerns fought to save hedgerows and trees in relation to planning application WD/2022/0341/MAJ but our pleas were ignored and these habitats have been lost forever. We are trying to protect a vital wildlife corridor in East Hoathly in relation to planning application WD/2023/2516/MAJ. The planning department support the loss of this corridor regardless of the harm it will cause to the woodland it serves. A significant mature and healthy oak tree has been felled without permission on the site to prepare an access route to land beyond the site. We have asked for enforcement action to be taken against the landowner and have received no response.

### **Question 25**

**Do you agree with draft Policy NE4 Ancient Woodland and veteran Trees?**

**Should the policy set a minimum buffer zone to protect ancient woodland?  
Please explain your answer.**

The recent experience of Village Concerns in relation to how developers treat buffer zones and how little support has been obtained from the planning department to enforce the buffer zones has changed our view on this matter. We recommend a minimum buffer zone of 50m for Ancient Woodland (as recommended by Councillor Gadd in his statement to WDC on 8 Feb 24). This extra buffer might mitigate the blatant disregard that has been shown by developers in this parish.

**Do you agree our approach should expect deeper buffers on sloping sites, land with ghyll streams or where woodland is a remaining fragment from a long removed historic block of ancient woodland? Please explain your answer.**

Agreed. Village Concerns would support wording to this effect being incorporated into Policy NE4. These types of woodland are specialised habitats with often rare flora and fauna that should have greater levels of protection.

**Should the policy leave the determination of a buffer zone, to protect ancient woodland from development, to a case-by-case basis? Please explain your answer.**

No, a statutory minimum should be part of the policy which could then be increased on a case-by-case basis.



Should we change anything? if so, what should we change and why?

Most of the existing Ancient Woodlands that survives has been mapped to show their outline but very few have been internally surveyed and assessed. The majority of Ancient Woodland in Wealden is privately owned and not accessible to the public or public view. The management of these habitats is therefore largely invisible to those who might wish to protect these habitats. Government guidance (<https://assets.publishing.service.gov.uk/media/5b35fa57ed915d0b53021ae1/FCPG201.pdf>) states that ancient woodland should be surveyed and a management plan put in place to ensure that its most sensitive and historic features are recorded and protected. This is the responsibility of the landowners who are usually not interested in spending money on such matters. Village Concerns believes that if development is proposed adjacent to any Ancient Woodland, then the developer should pay for the woodland to be surveyed in order to determine a baseline against which any future deterioration can be assessed. The owner of the woodland would remain responsible for the continued management of the ancient woodland but the LPA should monitor the future health of the woodland and the impact the development is having on the woodland. Village Concerns believes that this requirement should be incorporated into Policy NE4.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 26**

Do you agree with draft Policy NE5 Protecting Ashdown Forest SPA?

Yes

Should we change anything? if so, what should we change and why?

Please spell East Hoathly correctly in Figure 20.

You need to define what is meant by “adjacent or close” in Paragraph 5 of Policy NE5. Presumably, larger proposed developments will attract more scrutiny than smaller ones at any given distance from the 7km boundary. You must have criteria for the “case-by-case basis” so you should publish it.

In order to protect the Ashdown Forest SPA and SAC you are requiring applicants to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. This implies that there is an

unacceptable level of harm that would cause adverse effects and therefore trigger the need for mitigation. You have not specified what the unacceptable level of harm is. It would be useful to know if this unacceptable level of harm would be caused by, for example, a certain additional number of car journeys across the Ashdown Forest. Village Concerns would like you to publish the estimated number of additional car journeys that would be likely to result in an unacceptable level of harm.

Have we missed anything? If so, what have we missed and how should it be included?

It is disappointing that information on the initial effects of visitor parking charges and how the new SANGS have affected visitor numbers has not published to show the efficacy of these existing policies.

### Question 27

Do you agree with draft Policy NE6 Landscape Character?

No

Have all of the landscape elements which development could have an impact on, either alone or cumulatively with other development, been identified at point 3 of the policy? If you consider any are missing, please state these.

Village Concerns thinks that you mean Paragraph 4 of Policy NE6 ?

Village Concerns is not sure as to the purpose of this policy. It seems to us that developers do demonstrate that they have considered the impact of these elements and then disregard them. We have put forward many objections to developments in East Hoathly and are not aware that consideration of Landscape Character has carried any weight with the planning department. The imperative to build homes at scale seems to override any Landscape Character issues. We would be interested to know of any planning application where Landscape Character has had a material effect on the outcome.

Should we change anything? if so, what should we change and why?

Provide the Policy with some teeth.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 28**

Do you agree with draft Policy NE7 High Weald National Landscape?

No comments

Should we change anything? if so, what should we change and why?

Have we missed anything? If so, what have we missed and how should it be included?

### **Question 29**

Do you agree with draft Policy NE8 Setting of the South Downs National Park?

No comments

Should we change anything? if so, what should we change and why?

Have we missed anything? If so, what have we missed and how should it be included?

### **Question 30**

Do you agree with draft Policy NE9 Agricultural Land?

Yes

Should we change anything? if so, what should we change and why?

Paragraph 6.139 states that: “Site specific surveys on agricultural land within the district carried out since 1988 shows the vast majority is classified as Grade 3b or lower”. Village Concerns believes that this statement is misleading and should be reworded. The Agricultural Land Classification maps available from Natural England show that only a tiny fraction of the land in Wealden has been surveyed. The percentages that you cite are correct but the statement can easily be misconstrued to mean that the vast majority of land in Wealden is Grade 3b or lower but this only applies to the tiny fraction that has been surveyed.

This was part of WDC planning policy in the WLP 1998 Policy DC1 and it is not clear why this did not become a saved policy. Village Concerns has raised this issue with the planning department in relation to the greenfield agricultural land that has been put forward in East Hoathly but we have not received any response. Note 62 to Paragraph 181 of the NPPF 2023 indicates that it must be demonstrated that areas of poorer quality land should be preferred to those of a higher quality. Introducing Policy NE9 is fine but we ask again, why does the planning department not now require an ALC survey for all planning applications for existing agricultural land ?

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 31**

Do you agree with draft Policy NE10 Light Pollution and Dark Skies policy?

Yes

Should we change anything? if so, what should we change and why?

Yes. Village Concerns are aware that many residents of rural villages treasure the dark skies and oppose the introduction of street lighting and illuminated housing estates. Developers should establish what the community wants before they conform to urban planning norms. You should link this policy to Policy DE3 and ensure that they are not in conflict, particularly for rural villages and rural areas.

Have we missed anything? If so, what have we missed and how should it be included?

### **Question 32**

Do you agree with draft Policy NE11 Noise Pollution?

No comments

Should we change anything? if so, what should we change and why?

Have we missed anything? If so, what have we missed and how should it be included?

### **Question 33**

Do you agree with draft Policy NE12 Air Pollution?

No comments

Should we change anything? if so, what should we change and why?

Have we missed anything? If so, what have we missed and how should it be included?

### **Question 34**

Do you agree with draft Policy NE13 Water Environment and Water Infrastructure?

No

Should we change anything? if so, what should we change and why?

Village Concerns experience of this issue has resulted in a planning applications for 267 homes being approved in East Hoathly to be added to a sewage network that is already overloaded and resulting in frequent overflows (1425 hours in the last 3 years) into the River Cuckmere Catchment area. No upgrading of the sewage network has been put in place and none is planned, yet the planning conditions on this issue have now been lifted. It really is a farce. At the WLP 2024 East Hoathly Public Exhibition, the WDC chief planning officer was asked his opinion on the matter. He accepted that sewage remained a major issue and that it was not resolved.

The only plans published for the East Hoathly Wastewater Treatment Works are not planned to commence until after 2030. They comprise: “Sustainable drainage solutions in the community and increased & optimised storage capacity. We estimate we need to manage approximately 1 hectares of impermeable land in the area, by installing sustainable drainage systems (SuDS) (e.g. planting trees, installing raingardens, etc.). This may include the installation of at least 76 household water butts and similar solutions for businesses and public buildings”. This seems to be a staggeringly inadequate plan and will certainly not cope with the additional 686 home proposed in this plan.

Policy NE13 is likely to fail if it remains as written and the planning department continue to lift planning conditions when no plans have been published to deal with additional housing.

A more recent issue has also arisen in East Hoathly with many residents now reporting low water pressure. Some have been informed that their planned new boiler cannot be installed because the water pressure is too low. We are investigating this matter but fear this will be another example of our infrastructure not being adequate with the existing number of homes.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 35**

No comments

### **Question 36**

Do you agree with draft policy HE1: The Conservation, Protection and Enhancement of the Historic Environment?

Yes

Should we change anything? if so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

It is hugely worrying that the planning department have the power to ignore policies such as HE1 and the objections of Historic England and the objections of their own Conservation Officer. They did this when they recommended planning application WD/2022/0341/MAJ for approval. It would be helpful if something could be added that would prevent them doing this in the future. Can Sub-paragraph g of Policy HE1 be made stronger.

### **Question 37**

No comments

### **Question 38**

Do you agree with draft policy HE3 Conservation Areas?

Yes

Should we change anything? if so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

It is hugely worrying that the planning department have the power to ignore policies such as HE3 and the objections of Historic England and the objections of their own Conservation Officer. They did this when they recommended planning application WD/2022/0341/MAJ for approval despite it causing harm to the East Hoathly Conservation Area. It would be helpful if something could be added that would prevent them doing this in the future.

### **Question 39**

No comments

### **Question 40**

No comments

### **Question 41**

No comments

### **Question 42**

Do you agree with draft Policy HO1 Housing Mix and Type?

No

Is the housing mix required for both market and affordable homes in Wealden correct in our context? If not, is there evidence to support an alternative housing mix within the district? Please explain your answer. The housing mix still proposes a significant proportion of homes with 4 or more bedrooms. The district already has too many of these and Policy HO1 will exacerbate this imbalance.

Should we change anything? If so, what should we change and why?

Policy HO1 is a compromise that is biased towards the wishes of developers to build the most profitable homes. The housing needs assessment is based on the housing market viability. The result is that homes are built that are more expensive than people can afford. Those that manage to get onto the housing ladder are usually overstretched financially and the pressure that this imposes on family life and their personal lives is often ruinous. If you ask people what type of house they would like, it is a “do you like chocolate” question. The response is usually they would like a new shiny house with a garden for the children and entertaining with a spare bedroom. There is nothing wrong with this aspiration unless it is unattainable for those in genuine need and too much of a burden for those able to hurdle the mortgage bar. Village Concerns favours genuine low cost housing for local people. The entry level cost must be genuinely affordable by those who need it.

Paragraph 8.2 talks about local needs yet WDC are insistent that everywhere in the district must adhere to the district needs. Village Concerns believe that within the district, parishes and towns should be able to assert their own local needs. The East Hoathly with Halland Neighbourhood Plan presented evidence of our parish Housing Needs Assessment but it was dismissed by WDC. This parish has been trying to initiate a Community Land Trust housing scheme so that genuinely affordable housing can be retained in the parish but it has attracted no interest from developers. Village Concerns notes that this is mentioned in Paragraph 8.10 but believe that it should be a directive to the planning department that CLT housing should form part of every major housing application in rural locations.

Village Concerns understands the logic of Paragraph 8.16 but ask that it is explained further to aid clarity. In addition to the issue of subdivision we suggest that you should deter the inclusion of additional rooms that are specified as “study” or “utility” but are more likely to be used as additional bedrooms.

Policy HO1 proposes that 25% of new homes will be 4+ bedrooms. This does not connect with the statement of Councillor Tysh when he proposed the draft WLP 2024 at the Full Council Meeting on 8 Feb 24 in which he stated: “that there would be a policy that restricts the percentage of 4 and 5 bedroom houses”. We strongly believe that you should honour the words of Councillor Tysh and one quarter of all new homes should not further distort the housing mix in Wealden.

**Have we missed anything? If so, what have we missed and how should it be included?**



No comments

### **Question 43**

Do you agree with draft Policy HO2 Density?

No

Is the Council's preferred approach of considering housing density on a case-by-case basis subject to the criteria listed the correct approach? Please explain your answer.

Planning Authorities are caught in an endless struggle to find land on which to build homes. A planning system that is led by the greed of developers and avarice of landowners will only ever repeat the failures of the past and create never-ending suburban sprawl that blights the landscape and communities. When land in cities becomes constrained, they start to build upwards. Village Concerns believes that Wealden should adopt this policy now. New developments in urban settings should primarily be apartment style housing supported by well designed social and green spaces. Densities should be high enough to meet the district's housing needs whilst building on sites that are genuinely sustainable and where all day-to-day needs are met and can be accessed by active travel methods.

Should this policy instead set out minimum density standards across the district? If so, what should this be? Please explain your answer.

No

Should we change anything? If so, what should we change and why?

See above

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 44**

Do you agree with draft Policy HO3 Brownfield Land?

Yes

Should this policy consider supporting the redevelopment of 'brownfield sites' for housing in less sustainable locations (i.e. beyond development boundaries)? Please explain your answer.

Yes, on a case-by-case basis.

Have we missed anything that we should include in this policy, if so, what have we missed?

Developers frequently try to incentivise communities to support their proposals to build on greenfield sites by cash inducements. Would it be possible to incentivise developers to use brownfield sites by offering a quid pro quo by linking brownfield sites with greenfield site allocations within the WLP 2024. If they want to develop on a greenfield site, they must also bring forward a brownfield site proposal.

Should we make changes to this policy? If so, what changes should we make?

See above

#### **Question 45**

Do you agree with draft Policy HO4 Small and Medium Sized Housing Sites?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

#### **Question 46**

Do you agree with draft Policy HO5 Self-Build and Custom Housebuilding?

Yes

Should the policy set the threshold to require self-build and custom build plots above or below 20 dwellings (gross)? What should the threshold be?

Please explain your answer.

20 is correct

Should the marketing period for the sale of self-build and custom build housing plots be at least 12 months or should this be a longer period (i.e. 18 months)? Please explain your answer.

No comments

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

#### **Question 47**

Do you agree with draft Policy HO6 Houses in Multiple Occupancy (HMO) and Subdivision of Existing Dwellings?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

#### **Question 48**

Do you agree with draft Policy HO7 Rural Exceptions Sites to meet Local Housing Need?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 49**

Do you agree with draft Policy HO8 Affordable Housing?

No

Is the proportion of affordable housing to be provided (at 35%) appropriate in the district? If not, should a higher proportion (i.e. 40% or 45%) be sought? Please explain your answer.

Yes

Is the Council's preferred tenure mix for affordable housing, including First Homes, correct, and if not, is there evidence to suggest an alternative tenure mix for affordable housing? Please explain your answer.

Yes

Where First Homes are provided, is the minimum 30% discount appropriate and if not, should this be at 40% or 50%? Please explain your answer.

Yes

Where First Homes are provided, is a maximum price of £200,000 after discount an appropriate maximum sales value (noting that the maximum sales value nationally that can be applied is £250,000)? Please explain your answer.

Yes

Where First Homes are provided, is an income cap (for individual households) of around £50,000 appropriate and if not, where should this be set (noting that the maximum national income cap is £80,000)? Please explain your answer.

Yes

In terms of the design of affordable housing and support for 'smaller clusters' of affordable housing within a housing scheme, should the scale of these clusters be defined by a number and in line with the scale of the wider scheme (i.e. small, medium and large schemes)? Please explain your answer.

Yes

Should we change anything? If so, what should we change and why?

Village Concerns do not agree with the Exceptional Circumstances policy. Planning Applications are heralded by developers with the justification that they are providing the much needed (but only ever the bare minimum imposed by planning policy) 35% of affordable housing. The planning department fall into line and recommend approval of the scheme. It is all too often the case that once approved, the house-builders will return to the planning department to claim exceptional circumstances and seek to wriggle out of their previous commitment to provide the less profitable affordable housing.

East Hoathly is currently watching the construction of 205 homes on a greenfield site of which 72 homes (35%) should be affordable homes. The house-builder commenced building in February 2023. None of the homes have been occupied and although virtually the whole site was stripped of its topsoil, most has now been "mothballed" and they are only intending to build out 50 homes. They have informed the parish that they have not received any interest from housing associations for the affordable housing. The reasons cited have been that East Hoathly is too far from the local towns and has inadequate local services. The house-builder is intending to submit an amended planning application to change the social housing element and remove the apartments.

Firstly, this should not be allowed - none of this amounts to Exceptional Circumstances. Secondly, it happens almost every time a major planning application is built out (by definition making it not exceptional). You should learn from this and make sure that an affordable housing viability assessment is carried out before the planning application is considered and determined. Unless a developer can prove that they have housing association interest in the specific site, then they should not be allowed to repeat this cycle of failure to deliver affordable housing. As a planning authority you should accept that large amounts of affordable social housing do not work in rural villages. Small amounts of affordable housing under the control of Community Land Trusts is what is needed and workable in rural villages. Policy HO6 should be changed to ensure that Paragraph 6 is proven prior to determination of planning applications. Thirdly, the track

record of developers and house-builders should be catalogued and those that consistently claim exceptional circumstances should be held to account and this should be a material consideration allowing the deferment of planning applications until the necessary interest of a housing association is secured.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 52**

Do you agree with draft Policy HO11 Specialist Housing for Older and Vulnerable People?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 56**

Do you agree with draft Policy HO15 Conversion of Rural Buildings to a Residential Use?

Yes

Do you agree that the conversion of agricultural buildings should first consider business and tourism uses first before residential development? Please explain your answer.

Yes, it is important to try and retain employment opportunities in rural areas.

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

**Question 57**

Do you agree with draft Policy HO16 Park Homes and Residential Caravan Sites?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

**Question 58**

Do you agree with draft Policy HO17 Replacement Dwellings in the Countryside?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

**Question 59**

Do you agree with draft Policy HO18 Extensions and Alterations to Existing Dwellings, Outbuildings and Annexes?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 60**

Do you agree with draft Policy HO19 Extensions to Residential Gardens?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 61**

Do you agree with draft Policy INF1: Infrastructure provision, delivery, and funding?

No

Should we change anything? if so, what should we change and why?

The wording of Policy INF1 states that: “**New development will be required to consider ...**” This avoids identifying who is responsible. It is clear from discussions with the WDC Chief Planning Officer that it is the utility/service providers who are responsible for providing any necessary infrastructure improvements. The experience of Village Concerns is that the developer is totally disinterested in this matter and the planning department merely deflect the responsibility to the service providers. You are therefore writing a policy that attempts to control bodies over which you have no control. The service providers are generally obliged by law to provide their service so they have no alternative other than to say that they can provide. What is missing



when they say this, is any assurance that they have actually assessed the issue, or, when it will be provided.

For example: East Hoathly has a significant issue regarding the capacity of its sewage system now and this is before the addition of the 267 homes already approved or the 419 additional homes in the WLP 2024. Neither the developer, the house-builder, the planning department, nor PCS have any idea of the capacity of the East Hoathly Wastewater Treatment Works such that they can form an opinion as to any upgrade that is required. We believe INF1 should be rewritten to make this clear.

Village Concerns would also like the issue of capacity for all infrastructure and services to be determined prior to a planning application being determined. Paragraph 2 of Policy INF1 suggests that this will be demanded in future but we would like more detail as to how you will establish this with third party service providers. Will they be revealing the design capacity of their sites and networks ?

See our additional comments at Question 34.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

## **Question 62**

Do you agree with draft Policy INF2: Active and Sustainable Travel?

Yes

Should we change anything? if so, what should we change and why?

Policy INF2 is positive and sensible but Village Concerns has several observations:

Paragraph 9.35 assures us that impacts on the transport network will be considered. However, the planning department usually dismiss additional traffic impact on the road network claiming that there is sufficient capacity. This misses the point that we should be seeking to prevent the need for any additional road journeys because they are all polluting and damaging to sustainability. We should be building homes where active travel is possible to get to employment and services.

Paragraph 3.a. of Policy INF2 is at odds with your housing allocation of 686 homes in East Hoathly. This parish is car dependent now and this will worsen in the future.

Paragraph 4 of Policy INF2 concerns design. In the most recent developments in East Hoathly, the parking provision is inadequate, such that vehicles are regularly parked on the streets. The streets are generally too narrow and as a result, vehicles park on the pavements. This creates an unappealing sense of clutter and vehicle dominance as well as inhibiting all forms of active travel. It is our experience that new housing is being designed to fail because planners do not want to accept that rural villages are car dependent and have higher levels of vehicle ownership than other areas.

Travel Plans in unsustainable rural locations are a waste of time and money. Village Concerns has seen no evidence to show that they improve the use of public transport or result in more active travel. Travel Plans are supposed to be followed up with an audit, presumably to assess their efficacy. The WDC chief planning officer was not aware of having seen an audit and Village Concerns has asked for them but received no response. We would like to see something in Policy INF2 to make sure that audits are carried out, assessed and published.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 63**

Do you agree with draft Policy INF3 Parking Provision?

No

Should we change anything? if so, what should we change and why?

Paragraph 9,48 suggests that moving to electric vehicles lessens the need to worry about moving away “from the reliance of the private vehicle”. We caution against this idea:

The move to fully electric vehicles is slow and uncertain and is unlikely to be completed in the plan period.

Electric vehicles still use energy and its generation will not be carbon neutral for many years to come.

The use of an electric vehicle and particularly its battery imposes a cost on the environment of energy, materials and disposal. If a journey is unnecessary because a home has been built in a genuinely sustainable settlement, then the harm of using (or even having) an electric vehicle could be avoided. If you continue to build in unsustainable locations, we will remain reliant on private vehicles and even electric vehicles will continue to cause harm.

In the most recent developments in East Hoathly, the parking provision is inadequate, such that vehicles are regularly parked on the streets. The streets are generally too narrow and as a result, vehicles park on the pavements. This creates an unappealing sense of clutter and vehicle dominance as well as inhibiting all forms of active travel. It is our experience that new housing is being designed to fail because planners do not want to accept that rural villages are car dependent and have higher levels of vehicle ownership than other areas. We note Paragraph 4 of Policy INF3 but believe that the reference to on-street parking should be removed. Designs should be such that on-street parking should never be required. If on-street parking is to be allowed, designs should be reviewed to ensure access for emergency/refuse vehicles and the safety of pedestrians, cyclists and wheelers.

We note Paragraph 3.c of Policy INF3 but our experience of developers and the planning department is that this is not assessed or considered. Village Concerns would prefer the applicant to be required to assess the level of local car ownership and then act on it.

The ESCC Guidance has not in the past given any consideration to work vehicles of which there are now many in addition to a “family” vehicle. These are often large and are sometimes vehicles that are not appropriate for a residential area. In East Hoathly these are often parked on the streets of the residential areas or on the approach roads to the village. This is a growing problem and ESCC and WDC should visit some of the existing new developments and see how this is affecting them and adversely affecting the character of these areas. The ESCC Guidance also fails to take account of leisure vehicles such as caravans, trailers, boats ... all of which have to be parked somewhere. Policy which ignores the existence of these additional parking requirements is planning to fail.

Car parking spaces are too small and this creates problems in all car parks. Until the specification for parking spaces and garage sizes is increased to account for the size of modern vehicles, all designs are doomed to fail.

Cycle Storage should be accessible without the need to bring cycles through homes. Planning Application WD/2023/2516/MAJ is repeatedly showing designs that require this.

Visitor Parking must be signed. The recent developments in this village are not signed, the visitor bays are used by residents because their parking is insufficient and visitors do not know where to go.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

#### **Question 64**

Do you agree with draft Policy INF4 Utilities?

Yes

Should we change anything? if so, what should we change and why?

Village Concerns is conscious that recent planning applications in this parish are requiring complex SuDS systems and Sewage systems that require on-site sewage storage and pumping operations. These are costly to operate and maintain.

Our experience is that the SuDS schemes becomes the responsibility of a resident's management company. It is unclear if the Sewage schemes will be taken on by Southern Water or if they will become the responsibility of a resident's management company. The maintenance costs are not assessed during the planning phase and the residents therefore take on an unknown future cost. The combined estate costs for: sewage plant machinery and treatment, landscaping and planting scheme maintenance, play area maintenance, communal lighting schemes, private roads will be considerable. This results in significant service charges being raised by resident's management companies. There is a significant risk that they will minimise expenditure, to keep charges low, and thereby not carry out essential maintenance. If these SuDS and Sewage schemes are not maintained, they will fail. Who will inspect them and ensure that essential maintenance is being done ?

We believe that Policy INF4 should include a requirement that all on-site SuDS schemes and Sewage schemes should have costed maintenance estimates prior to determining planning applications. Agreement for the service provider to adopt Sewage schemes should be a legally enforceable planning condition. We also believe that WDC should review the implications of the plethora of unadopted SuDS schemes and roads that are being created with no guaranteed levels of maintenance or control and the impact that this might have on flood risks in the future.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 65**

Do you agree with draft Policy INF5 - Safeguarding of Infrastructure?

Yes

Should we change anything? if so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 66**

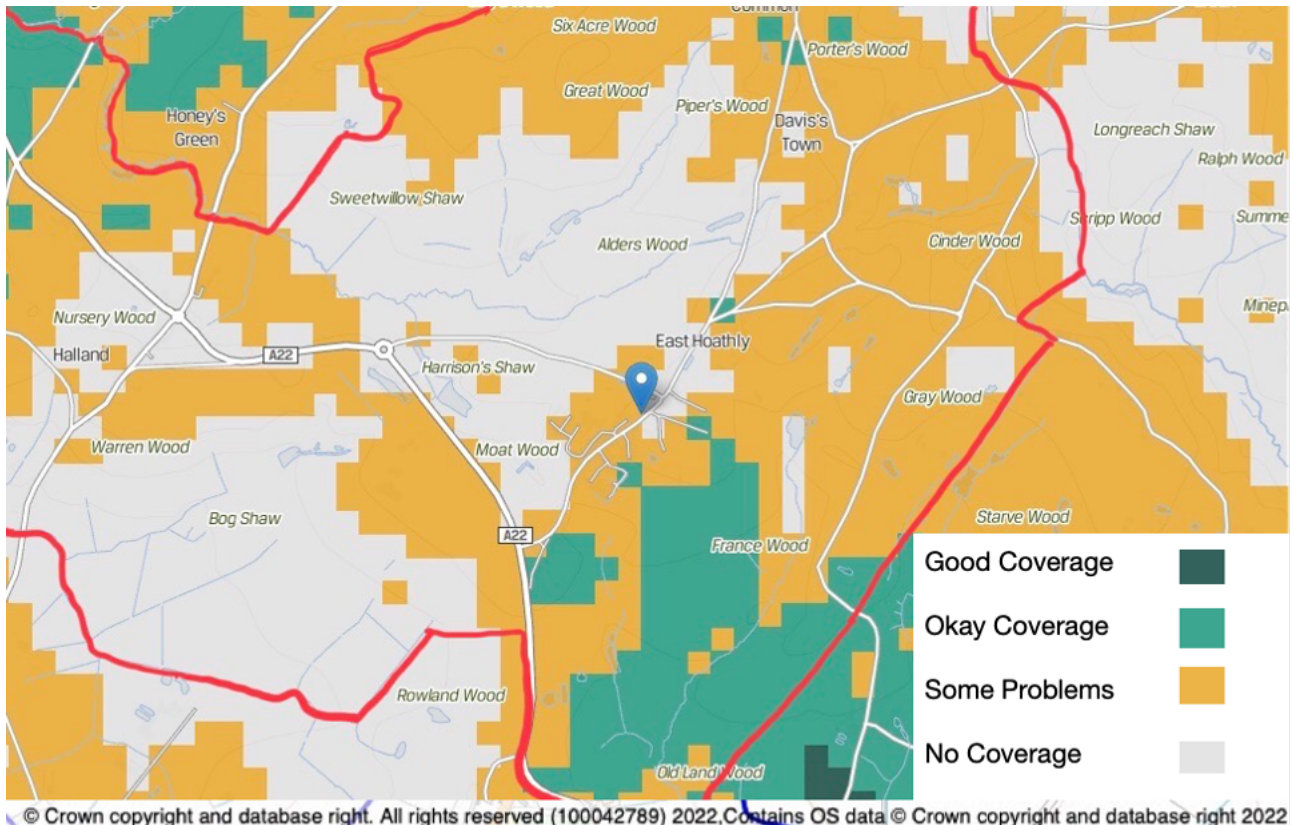
Do you agree with draft Policy INF6 - Digital and Communication Infrastructure?

Yes

Should we change anything? if so, what should we change and why?

Mobile phone network coverage varies widely across the district. The Sustainable Settlement Study (See Question 3) asserts that the whole district is covered by 4G by at least one provider. It is not a valid argument to suggest that the whole district therefore has an equitable level of mobile

phone service. Mobile phone coverage is mostly centred on urban centres. In rural areas the coverage is patchy and incomplete. It is of little help if, for example, a rural residents mobile provider provides excellent coverage at home but no coverage at their place of work. More importantly, rural phone coverage may be available outside but the signal is often not strong enough to provide indoor reception. The mapping of mobile phone coverage is readily available and should form part of any assessment. This is an example for East Hoathly:



Broadband access varies widely across the district and the disparity between the urban centres and the rural areas is stark. Most urban areas will have access to Ultra Fast Full Fibre Broadband. Rural areas have virtually no Full Fibre cabling in place and therefore cannot access Full Fibre Broadband. A parish survey recorded the average download speed in this parish at 36 Mbps, the UK average is 50 Mbps and the government target by 2030 is 1000 Mbps. Broadband access is already vital to many households for daily life, home businesses, education, GP access, entertainment and social contact.

Paragraph 6 of Policy INF6 should specify for both internal and external reception. You should also make this difference clear in Paragraph 9.72 and explain with greater clarity and emphasis, the huge difference in access

that is faced in rural areas. Many people describe this a digital poverty. It is a real issue and a significant impediment to home working, rural businesses and the social lives of residents.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 67**

Do you agree with draft Policy INF7: Local services and Community Facilities?

Yes

Should policy EC8 apply to all local services and community facilities including publicly owned services and facilities (such as public schools, public libraries, public medical facilities or should Policy EC8 just apply to commercial local services and facilities, such as public houses and shops?

Policy EC8 should apply to all local services and community facilities. The principal benefit would be the requirement to take time to explore alternatives and give the community the opportunity to be involved in the process. It would be helpful if Policy INF7 and Policy EC8 could compel the responsible authority to effectively communicate such processes with the relevant community.

Should we change anything? if so, what should we change and why?

See above

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 68**

Do you agree with draft Policy INF 8 – Open Space, sports and recreation provision?

No



Should we change anything? if so, what should we change and why?

The WDC Playing Pitch and Outdoor Sports Strategy Report 2022 does not include mention of the East Hoathly with Halland Memorial Sports Ground, its football pitch, rifle range or pavilion. These facilities are therefore excluded from consideration for improvements.

Have we missed anything? If so, what have we missed and how should it be included?

Children's play areas are often installed as part of new developments, which is good, but they can be problematic. The ongoing maintenance and inspection requirement is expensive. Initially this becomes the responsibility of the resident's management company but they sometimes choose to reduce their costs and remove the play equipment. It is not a problem if the responsible council adopt the facility but this is not always the case. Village Concerns would like this to be specified in Policy INF8. If the inclusion in a planning application was to satisfy the requirements to provide facilities as part of Paragraph 9.94 then they should be retained. The policy should compel the relevant council to adopt the facility and maintain it.

### Question 69

Do you agree with the Council's draft Policy DE1 Achieving well designed and high quality places?

No

Have we missed anything that we should include in this policy, if so, what have we missed?

Village Concerns has made detailed suggestions to developers regarding most of the elements covered in Policy DE1 but they have not been taken up. The most recent incarnation of this can be seen emerging on London Road, East Hoathly. The layout of this initial batch of homes is a cramped line of uniform homes that gives no impression of character or distinctiveness. The designs bear little resemblance to local vernacular and the material finishes and colours are not typical of this village. The designs were taken directly from the home-builders national catalogue and have little to do with the existing character of this historic rural village. It is particularly disappointing as these are the house-builders show homes.

It is the experience of Village Concerns that the developers and the planning department are the arbiters of the design process and that the community



are only consulted when the decisions have been made. Our experience is that the first time the community are consulted, it is when the planning scheme is first announced. Their primary concern is whether the principal of the development is right and understandably they often want to say no. However, by this stage, the developer and the planning department have had many discussions and essentially decided that the scheme is appropriate. They consider that this first consultation with the public is about the details of the design rather than the principle of the scheme. The result is that the public are simply annoyed that they are now being told that there is to be another planning application whereas the developer considers this to be the first and only contact with the public. The result is beneficial to no one, even if the developers were minded to listen to the community.

An example of how little developers listen to the community is that for one planning application in this community the design includes storing refuse bins inside garages where there is barely enough space to fit the bins let alone move around them. The developer would no doubt claim they are complying with Paragraph 3.i of Policy DE1 but we have asked that they produce a practical solution to which they have so far failed to respond.

Should we make changes to this policy? If so, what changes should we make?

It would be great if Policy DE1 could be changed so that it would force developers and the planning department to sometimes do what the community want rather than keep repeating the design failures of the past.

### **Question 70**

Do you agree with the Council's draft Policy DE2 Achieving well designed and high quality places?

Yes

Do you agree with the size of development on which we are requiring the use of Design Codes and Masterplans?

Yes

Have we missed anything that we should include in this policy, if so, what have we missed?

When a community is subject to several planning applications in a specified area within an overlapping period of time, Village Concerns believes that if

the combined amount of housing is more than 100 houses, then the planning department should coordinate a masterplan for the combined applications.

Should we make changes to this policy? If so, what changes should we make?

No comments

### **Question 71**

Do you agree with draft Policy DE3: Spaces for people, nature and the public realm?

Yes

Is there anything we have missed that we should include in this policy? If so, what have we missed?

Village Concerns are aware that many residents of rural villages treasure the dark skies and oppose the introduction of street lighting and illuminated housing estates. Developers should establish what the community wants before they conform to urban planning norms. You might consider amending Paragraphs 2.f.iv and v.

Should we make changes to this policy? If so, what changes should we make?

See above

### **Question 72**

Do you agree with draft Policy DE4 Shop Fronts and Advertisements?

Yes

Have we missed anything that we should include in this policy? If so, what have we missed?

No comments

Should we make changes to this policy? If so, what changes should we make?

No comments

### **Question 73**

Do you agree with draft Policy EC1 Sustainable Economic Prosperity and Investment?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 74**

Do you agree with draft Policy EC2 Existing Strategic Employment Sites?

Yes

Do you agree with the list of existing strategic employment sites defined in this policy? Are there any missing, or are there any others that should be included?

No comments

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 75**

Do you agree with draft Policy EC3 Retention and/or Loss of Non-Strategic Employment Sites, Premises or Floorspace?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

**Question 76**

Do you agree with draft Policy EC4 Rural Economy?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

**Question 77**

Do you agree with draft Policy EC5 Equestrian Development?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

**Question 78**

Do you agree with draft Policy EC6 Tourism Facilities and Attractions?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 79**

Do you agree with draft Policy EC7 Visitor Accommodation?

Yes

Should we change anything? If so, what should we change and why?

No comments

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 80**

Do you agree with draft Policy EC8 The Retention of Sites in Economic or Tourism Use and Commercial Community Facilities?

Yes

Should we change anything? If so, what should we change and why?

The asterisks used in this Policy are not explained ?

Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 81**

Do you agree with draft Policy TC1 District, Service and Local Centre Hierarchy and 'Town Centre' First Principles

Yes

Do you agree with the 'centres' included with the District, Service and Local Centre Hierarchy and their position within the hierarchy? Please explain your answer.

Yes

Should we change anything? If so, what should we change and why? Have we missed anything? If so, what have we missed and how should it be included?

No comments

### **Question 85**

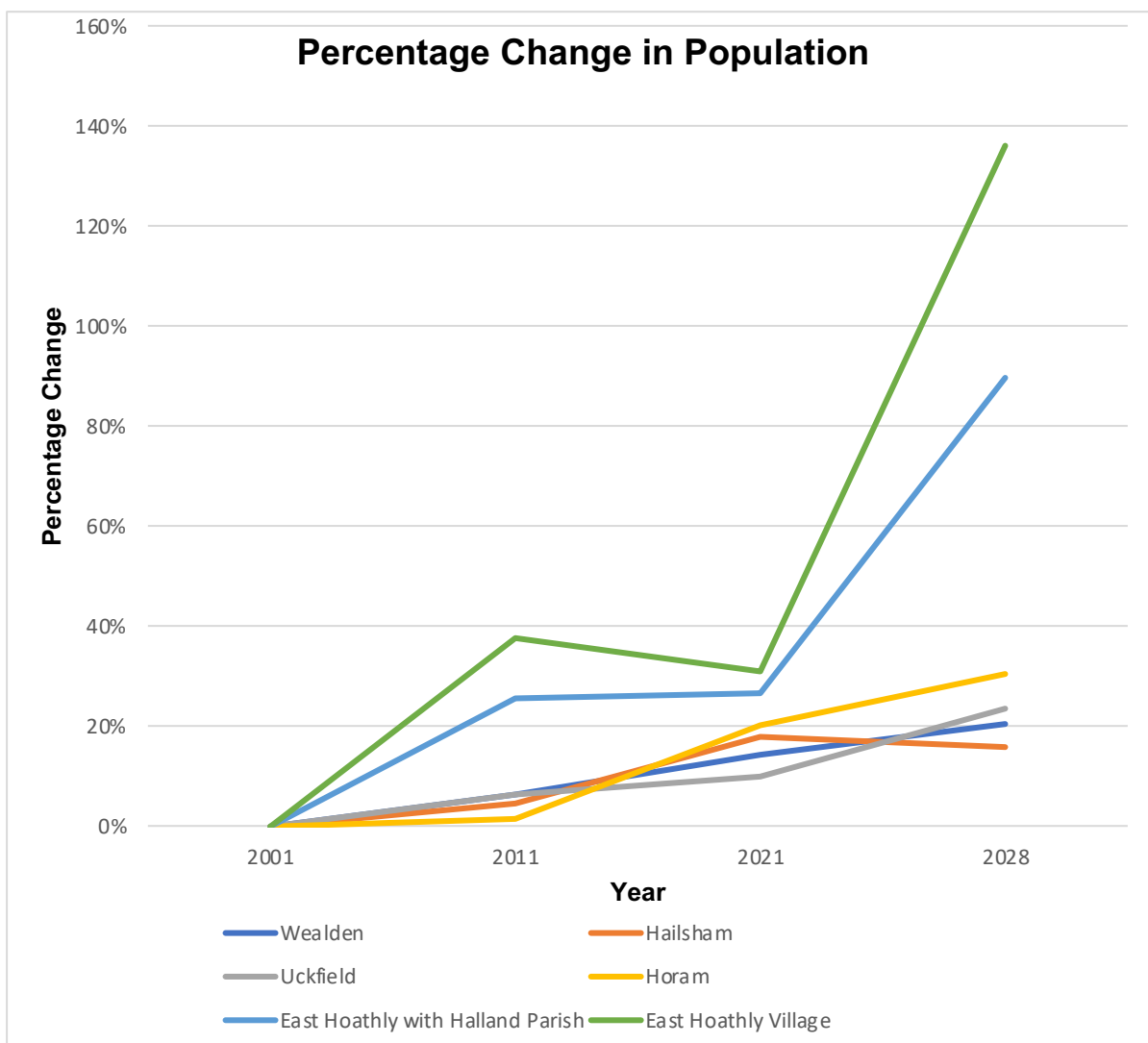
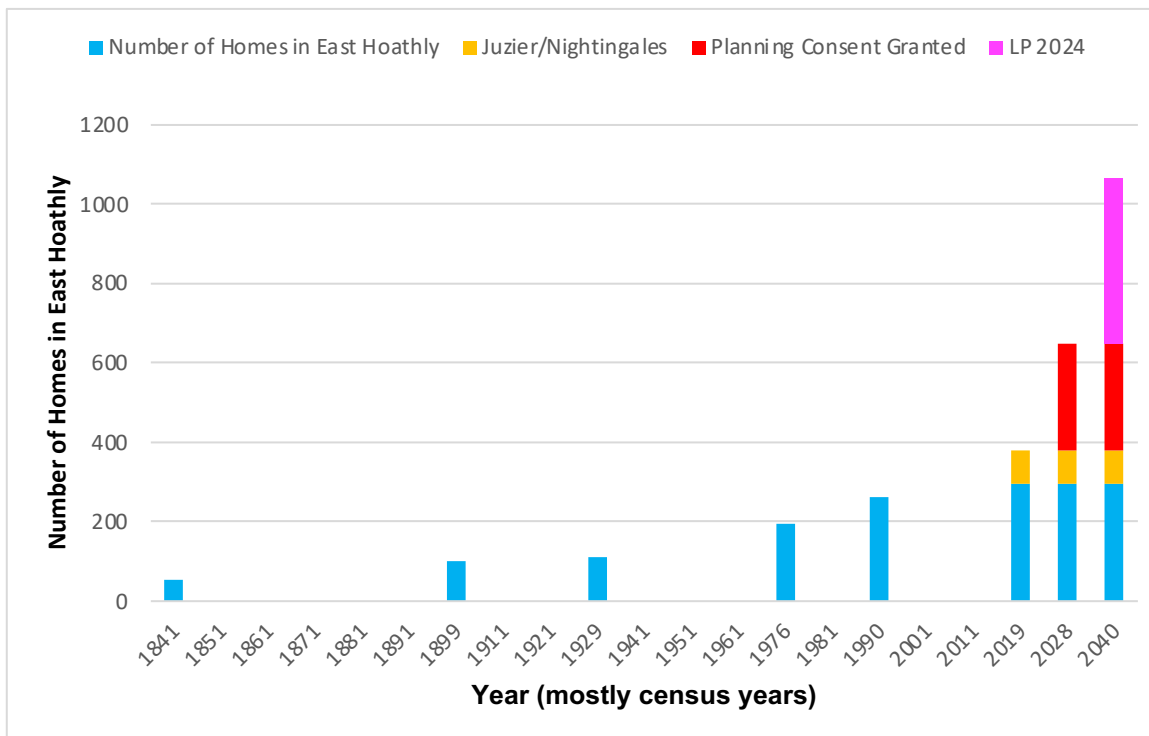
Do you agree with draft Policy SA1 Housing and Mixed-use Site Allocations?

No

Do you agree with the site allocations listed within the policy and if not, what are the reasons for this? Please explain your answer.

Policy SA1 is titled Housing and Mixed Use Site Allocations. However, only one of the 101 proposed sites is put forward as a Mixed Use Site. The village of East Hoathly used to have many commercial and business areas which helped to create a thriving and sustainable community. However, since the 1950s they have gradually been lost to housing developments. Village Concerns has repeatedly suggested that new development in all rural villages should be mixed use so that employment opportunities are provided alongside new housing. The WLP 2024 seems to prefer a monoculture of sprawling housing estates and have completely ignored the opportunity to provide sustainability for rural villages.

The allocation of housing to East Hoathly will quadruple the size of this village since 2009 as can be seen in the charts below:



Rural villages are delicate and special and to impose such a grotesque amount of housing with no employment or infrastructure improvements is not sound strategic planning. Village Concerns believes that the categorisation of this settlement as sustainable is not a rational or objective assessment and has been driven by the offer of land for development. If the village was genuinely sustainable then the level of vehicle dependency would be much lower than it is. The reality is that 81% of people travel to work by car.

Do you believe that there are potential site allocations missing from the policy, and if so, what site allocations are missing and what are the reasons for this? Please explain your answer.

No

Should we change anything? if so, what should we change and why?

You should remove the allocation of 419 homes for East Hoathly and accept that this community has already had more than enough housing for this plan period.

Have we missed anything? If so, what have we missed and how should it be included?

No comments

The Council has prepared a site selection methodology which has informed the site selection process. Do you agree with the site selection methodology that has been used?

Before the Site Selection Methodology is applied it is critical that the SHELAA provides valid assessments and that the Sustainable Settlement Study has provided a valid assessment of settlements. If there are flaws in these preliminary processes then the Site Selection Methodology will be flawed. Village Concerns have already expressed concerns that both the SHELAA and the Sustainable Settlement Study have not been completed prior to the consideration of the Site Selection process and the assessment of Spatial Options. We believe that this was wrong and they should have been published in advance of the WLP 2024 Regulation 18 Consultation. This would have allowed errors and issues with these documents to be addressed in advance of the construction of Spatial Options and the whole development plan.



The Site Selection Methodology does not mention the Sustainable Settlement Study but refers to a Sustainable Settlement Strategy. This is not just semantics over the wording but is indicative that the methodology may be muddled. The Flow Chart included at Figure 1 clearly shows that the Site Selection Methodology could not be carried out until the Sustainable Settlement Study was completed yet they were both published at the same time. Figure 1 should indicate that the beginning of the process is the SHELAA. Village Concerns has commented separately on the Sustainable Settlement Study at Question 89.

Village Concerns notes that the Sustainable Settlement Study does not actually state which settlement types are sustainable and we can find only one place where this is obliquely mentioned (Paragraph 4.36 of the Regulation 18 Draft Local Plan). Policy SS2 states: “development is supported in the district’s most sustainable sites” and this also reflected in Paragraph 4.1 of the Site Selection Methodology. However, all settlements in Types 1 to 4 are given housing allocations so there is no differentiation to locate development in the most sustainable sites. For example, no Spatial Option examines only allocating housing in Type 1 to 3 settlements which are defined as the most sustainable settlements. The Sustainable Settlement Study does not differentiate between the settlements within the Type 4 categorisation so no analysis has been done of their relative sustainability. Paragraph 4.45 of the Regulation 18 Draft Local Plan mistakenly asserts that the addition of a new school will improve the sustainability of East Hoathly and Horam. It will not improve sustainability. These locations already have a school so the new school is merely increasing capacity to cope with the proposed new residents. There is no net increase in sustainability.

In the absence of any other place to comment on the SHELAA we will do so here:

## **SHELAA**

Our experience of this in the previous draft WLP 2019 was that the call for sites and SHELAA process took place in advance of the publication of the draft WLP. The SHELAA was published in advance and communities could comment on the site assessments. As part of WLP 2024 you chose not to publish the SHELAA in advance and indeed it was not published as part of the documents you presented to the WDC Full Council seeking approval to progress the WLP 2024 on 8 Feb 24. As a result of this, no comments or corrections on the SHELAA could be submitted until now. The SHELAA Main Report states at Paragraph 2.2: “The SHELAA has been undertaken before any decision has been taken on the strategy to be included in the Council’s Local Plan”. As it was only dated February 2024 how can this be

believed ? This is a problem as you have potentially based your strategic housing allocations on erroneous information and we are concerned that you may now be reluctant to accept corrections or comment on the SHELAA. Some of our supporters are concerned that the reason the SHELAA was not published in advance is that you were adjusting your assessment of sites to provide an adequate number of sites to meet the final housing allocation rather than objectively assessing each site.

Village Concerns understands the process that a planning authority carries out a “call for sites” to begin the SHELAA process but we are concerned that you appear to solely rely on this to develop the strategic future of the district. Land put forward in a “call for sites” is only ever going to produce a list of opportunistic landowners and developers who wish to make a considerable amount of money. The land put forward may not represent the right strategic choices for the district but you seem compelled to pursue developing it. Where is the evidence that you have looked at maps and made decisions and strategy choices independently of the land put forward in the “call for sites”. Where is the evidence that you have gone to landowners of land that is better suited to sustainable development, even if this has ultimately been unsuccessful. At the moment the plan seems to be driven by the shape and location of the estates of those landowners that have chosen to put their land forward for development.

Village Concerns understands that the SHELAA process is controlled by the constraints of the NPPF and PPG but we believe that you ignore important factors when carrying out the site assessments. The Assessments comment on such things as Land Sensitivity, Topography, Views, Woodland, Ancient Woodland, Public Rights of Way, Tranquility, Access to Sustainable Transport, Services and Facilities. These are all valid factors but why are the following factors also not considered:

Loss of agricultural land.

Loss of employment for people currently employed on the land.

Distance to key services such as Employment Vacancies, Schools and higher level services.

Impact on Local Road Network.

Village Concerns have identified inconsistencies in the assessment of specific sites across the last decade that suggest that the land is not being assessed objectively. A detailed comparison will be submitted for each of

the East Hoathly sites in a separate document but an example of the inconsistencies in the Circle of Oaks site (154/1950) is shown below:

The 2014 Landscape Study categorised this site as part of Landscape Setting Area 4: “is considered to make a Major contribution to the Landscape Setting of the Settlement. This area is considered to have a strong strength of place as a result of the pockets of Ancient Woodland. There is also inter-visibility between this area and historic buildings within the historic core. The large areas of Ancient Woodland provide a strong sense of visual containment and enclosure to views north and eastwards from the settlement. They provide a wooded backdrop and interrupt long distance views across the landscape”.

The 2017 Landscape and Ecological Assessment Study described the site as: “The Site has a Low Landscape Capacity due to its high sensitivity and high landscape value. Its location adjacent to existing urban edge and a busy road gives a limited sense of remoteness/ tranquillity but balanced against this is the coherent ancient landscape pattern and good condition, giving the Site a high landscape value overall”. The landscape sensitivity had risen from Moderate in 2014 to High in 2017.

The 2019 SHELAA described the site as: “To the south and east, the site is bounded by shaws with open fields beyond. The site consists of managed grassland with a small group of mature trees at its centre. This site is accessible to local services and development should have a minimal impact on the wider landscape. A vehicular access can be achieved from South Street. Further transport investigations will be necessary to assess the likely impact of development on the village. The conservation area boundary extension incorporates part of this site. The land is archaeologically sensitive. This land abuts other land submitted in the SHELAA (782/1950 and 773/1950). There is an option to consider this site comprehensively with adjacent land and against an assessment of the overall impact that the scale of development may have on the village”. The site was assessed as suitable for 41 homes.

The 2024 SHELAA describes the site as: “The site is located on the southern edge of East Hoathly situated to the east of South Street and adjacent to existing residential properties along its northern edge. To the south and east, the site is bounded by shaws with open fields beyond. The site consists of managed grassland with a small group of mature trees at its centre. The 2023 Landscape Sensitivity Assessment states that this site has moderate to high sensitivity to new development, in part due to adjacent conservation area (which covers

a small part of the site), mature trees in-field trees and hedgerows, as well as its more open character. If development was to come forward, existing vegetation within the site and along its boundaries should be retained and enhanced to integrate the site into the landscape and to minimise the visibility to/from the East Hoathly Conservation Area. This site is accessible to local services at East Hoathly, and a vehicular access can be achieved from South Street. Further transport investigations will be necessary to assess the likely impact of development on the village. The conservation area boundary extension incorporates part of this site. The land is archaeologically sensitive. This land abuts other land submitted in the SHELAA (782/1950 and 773/1950). SHELAA site 782/1950 to the south of the site has been granted planning permission for 55 homes at planning appeal (planning reference WD/2019/1674/MAO).

Planning permission for up to 28 homes on this site was refused under reference WD/2018/2741/MAO and an appeal was made by the applicant, however this has now been withdrawn. The reason for refusal was the impact on the setting of the adjacent conservation area and harm to significance of non-designated heritage assets, although a reduced scheme may be suitable. A planning application for up to 20 (net) dwellings under reference WD/2023/2516/MAJ is pending determination. The group of trees at the centre of the site are subject to a Tree Preservation Order, which would be a constraint if development were to come forward". The landscape sensitivity has now been downgraded as Moderate to High. The site was assessed as suitable for 20 homes.

The 2024 SHELAA fails to mention that the land has been purchased by Hesmond's Stud and Planning Application WD/2023/2516/MAJ includes a road that would provide access to other Hesmond's Stud land submitted as part of the SHELAA process (part of 773/1950) (NB Hesmond's Stud have already cut down a healthy and mature significant oak tree to facilitate the future access route and WDC have taken no action to even reproach them for this behaviour. The planning application makes no mention that this road is intended to provide access to the land beyond and the SHELAA fails to make the link. This is at best a failure to carry out an effective SHELAA but appears, to this community, to be a deliberate obfuscation of the intentions of the developers and the collusion of the planning department who have been involved in detailed pre-application discussions with the developer.

The 2024 SHELAA is inconsistent in its assessment of the landscape sensitivity and the housing capacity for site 154/1950. It is also inconsistent in its consideration of adjoining sites and the in-combination impacts on the wider community and landscape. The in-combination impacts are particularly important in relation to transport. The 2024 SHELAA correctly identifies that further transport assessments will be necessary but does not connect this to all the adjoining sites, nor the other sites within East Hoathly that are put forward in the WLP 2024. You should note that Planning Application WD/2023/2516/MAJ fails to provide any transport assessment of the site or the in-combination effects with the adjoining sites and non appear to have been requested by the planning department.

Village Concerns also believes that this site forms an important green gap in the settlement and, when the development of South Street is completed (WD/2019/1674/MAO), a vital wildlife corridor linking the Ancient Woodland of Moat Wood with the open countryside to the East of East Hoathly. The parish Neighbourhood Plan proposed that this site be designated as a Local Green Space (the detailed justification can be seen in Annex L of the East Hoathly with Halland Submission Plan) but the Examiner was compelled to reject it because a planning application had been submitted and WDC did not support the designation. We strongly believe that the WDC opposition to this site being designated as a Local Green Space was not an objective assessment but biased by the desire of the developer to use this site to provide a road access to their land beyond the site.

**Should the approach to the site selection methodology be changed, if so, how do you suggest the methodology should be changed and why**

Village Concerns believes that you should review all the SHELAA sites and ensure that the reasoning and factors addressed are consistent across all sites. If assessments have changed over time then this should be explained and justified. When multiple sites are being considered in a settlement, the in combination effects of all sites should be considered as part of the assessment of each individual site.

Evidence should be provided to show that the planning authority have attempted to identify and secure the inclusion of land that would provide the most sustainable development rather than a plan based solely on land chosen and put forward by landowners and developers.

The Sustainable Settle Study should be reviewed to correct its errors and address any comments made.

When these 3 issues have been addressed, then the Site Selection Methodology can be processed again and put forward sites for the Sustainability Appraisal to appraise the Spatial Options and then make the housing allocations in Policy SA1.

## **Question 86**

**Do you have any comments on the Interim Sustainability Appraisal?**

It is disappointing that the Village Concerns comments on the Sustainability Appraisal Scoping Report were not included in Appendix 2 to the Initial Sustainability Appraisal Appendices A1 - A8 published March 2024. A copy can be provided if required.

Village Concerns recognises that the concept of displaying a summary of Sustainability Appraisal Effects in a table grading elements from Major Positive to Uncertain. Whilst this is a commonly used concept it is not without flaws. Principally, it only allows a single effect to be recorded for each element whereas the reality is that the effect is usually more mixed. For example the you show the effect on Biodiversity for Spatial Strategy SS1 in Appendix 9a as Major Positive. You may want and believe that the effect will be a Major Positive but the reality is that there is also huge uncertainty. The BNG concept is new and untested, the reliance on handing the construction of new biodiversity habitats to developers and house-builders is risky and unproven. Replacing an established greenfield habitat with its ancient wildlife rich hedgerows and mature trees with a field of weeds and tiny freshly planted saplings is a huge risk. Their may be a potential BNG in 50 to 100 years when the new habitats have reached some natural equilibrium but it is not certain. The interaction of the new development with its vehicles, people, children and pets to the new habitats is uncertain and probably lead to damage and harm. The ongoing commitment to fund and maintain the new habitats is not a given and there is no experience on which you can base your optimism.

If the same exercise had been carried out for WLP 1998 it would presumably been as optimistic and confident and predicted major positive effects. Why then is Wealden not living in a perfect world ? Village Concerns does not wish to dampen your enthusiasm and your plan may still be the best option but we would prefer a bit more realism and balance to be shown in the Sustainability Appraisal.

The analysis is generally overly optimistic about future outcomes. Tables VO1 and VO3 both show no negative effects. A development plan inevitably



involves the creation of new buildings which, irrespective of the potential for carbon efficient designs, will have a carbon cost in terms of the materials used and construction. The people and vehicles that will then occupy the new homes and businesses will then also impose a carbon cost. The car dependent nature of Wealden will impose a significant carbon cost. This must amount to negative effects. It may be that the plan is still sound and the cost is bearable but the way it is presented appears to be magic or slight of hand. In the Summary of each table you assume that the proposals for public transport and active travel will be totally successful. There is no evidence from previous initiatives that this is even remotely possible.

Table VO6 is also overly optimistic. Wealden villages have been losing places of employment, services, pubs, and shops for decades whilst generally having more housing imposed on them. Many of the proposed policies are very welcome but it is unrealistic to expect a turn around in the fortunes of rural villages. In Table VO6, Village Concerns believes that, for rural villages, there will be negative effects in relation to SO2, SO3, SO4, SO7, SO8, SO9, SO10, SO11, SO12, SO15 and SO16.

Policy SS2 states that: “development is supported in the district’s most sustainable settlements ...”. However, there is no Spatial Option which examines this. You should examine a Spatial Option for the most sustainable settlements which would be Type 1 to Type 3 settlements. With all the Spatial Options that you have considered, you allocate growth to all sustainable settlements ie. Type 1 to Type 4 settlements. You should be faithful to Policy SS2.

Spatial Option D examines but does not pursue all the development potential of the selected settlements.

Village Concerns makes this suggestion on the basis that you do not continue to build in the same pattern as you have done previously. In a situation where you do not have enough land in genuinely sustainable locations, you need to build differently. Build apartment based communities in urban settings with high quality community spaces and facilities. Achieve the housing targets by building at significantly greater densities but do so in the urban centres that have the transport connections, services and facilities and where active travel can actually work.

The Sustainability Appraisal 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). 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).

### **Question 87**

**Do you have any comments on the Habitats Regulations Assessment?**

Village Concerns has tried to absorb the contents of the Habitats Regulations Assessment (HRA) but found it to be confusing and only partially finished, particularly in the Appendices. The Appropriate Assessment makes it clear that for various pollutants the critical level of pollution is occurring already and will continue to do following the modelling of the WLP 2024 and the increased traffic flows that will result. It is very worrying that you go on to explain that this is all perfectly fine with Natural England. It makes us ponder as to what is the point of the costly monitoring if nothing seems to make Natural England take action.

In order to protect the Ashdown Forest SPA and SAC you are requiring in Policy NE5 that applicants demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. This implies that there is an unacceptable level of harm that would cause adverse effects and therefore trigger the need for mitigation. You have not specified what the unacceptable level of harm is and we cannot find it in the HRA. It would be useful to know if this unacceptable level of harm would be caused by, for example, a certain additional number of car journeys across the Ashdown Forest. Village Concerns would like you to publish the estimated number of additional car journeys that would be likely to result in an unacceptable level of harm. Compared with the WLP 2024 modelling, is it 5000 additional car journeys, 50,000 or 500,000. We might then be able to comprehend the potential impact of a building homes and increasing car usage in the district.

### **Question 88**

**Do you have any comments on the Infrastructure Delivery Plan?**

#### **Traffic Congestion**

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 shift<sup>25</sup> 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.

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.

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.

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.

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”.

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).

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.

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**

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.

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.

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”.

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**

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.

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**

None 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**

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**

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**

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.

## **Question 89**

Do you have any comments on the Sustainable Settlement Study?

## **Sustainable Settlement Study**

Village Concerns experience of this in the previous draft WLP 2019 was Settlement Study process took place in advance of the publication of the WLP. The Settlement Study was published in advance and communities could comment on the resulting Settlement Hierarchy. As part of WLP 2024 you chose not to publish the Sustainable Settlement Study in advance and indeed it was not published as part of the documents you presented to the WDC Full Council seeking approval to progress the WLP 2024 on 8 Feb 24. As a result of this, no comments or corrections on the Sustainable Settlement Study could be submitted until now. This is a problem as you have potentially based your strategic housing allocations on erroneous information and we are concerned that you may now be reluctant to accept corrections or comment on the Sustainable Settlement Study. Some of our supporters are concerned that the reason the Sustainable Settlement Study was not published in advance is that you were adjusting your designation of sustainable settlements to ensure that you could meet your housing targets rather than objectively assessing each settlement.

The Introduction to the Sustainable Settlement Study talks about how sustainability will be assessed but omits to consider the issue of capacity and usage. Having a service or facility in a settlement is only the starting point of assessing sustainability. For example:

A settlement may have a place of worship that has lost its congregation and is only attended by a handful of worshipers. It may also be a religious denomination that is not commonly worshiped in the settlement. It is therefore wrong to score the existence of a place of worship in a binary manner, it must be assessed to provide evidence of how many people make use of that facility and how beneficial it is to the settlement.

A bus service may exist in a settlement but it may not be regularly used by more than a handful of people. The level of bus usage should be assessed to provide evidence of how many people make use of that service in order to assess how beneficial it is to the settlement.

A school may exist in a settlement but it may be fully subscribed with no space for expansion. It therefore has zero capacity to sustain any additional children in that settlement. However, your binary approach will reflect that it has a school and give it the same score as a school that is not fully subscribed or has space to expand.

Once you have labelled a settlement as sustainable, developers and the planning department see this as justification for an unlimited addition to that settlement. Your sustainability labelling should be accompanied by some assessment of the settlements capacity to bear additional growth. For example, you might have labelled Settlement A as unsustainable but it might be considered sustainable if it had one missing service such as a primary school. Settlement B might already have a primary school that is full with no space for expansion and would need a new primary school to cope with additional housing. So, Settlement A and B are essentially in the same position. They could both be sustainable if a new primary school came with the additional housing. Your system takes no account of this.

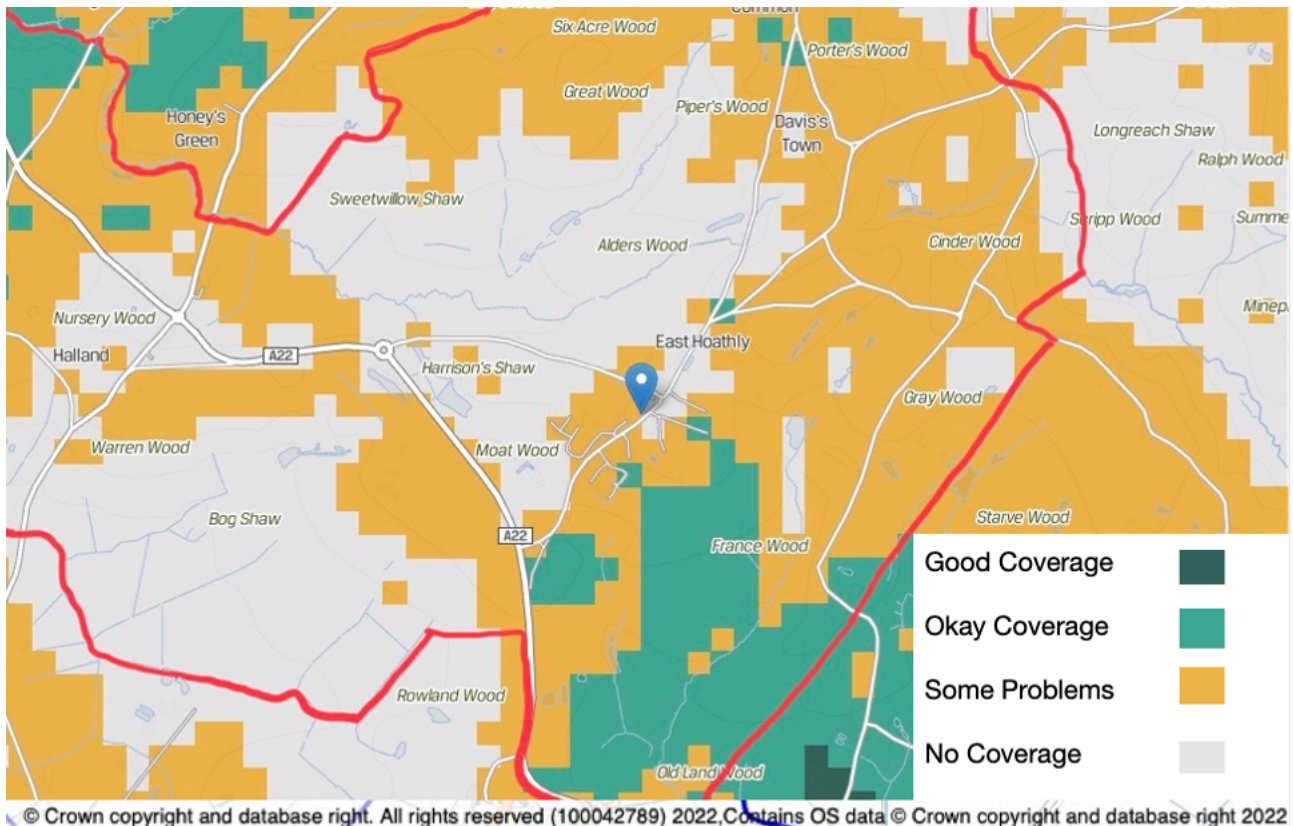
In Paragraph 5.7 you categorise the frequency of bus services as Very Frequent, Frequent and Limited. Village Concerns feels that these are poorly chosen words that imply that most existing bus services are frequent. This is overly positive and does not reflect a realistic assessment. Village Concerns suggests that you replace Very Frequent with Frequent and replace Frequent with Regular. In Paragraph 1.8 you use the term “good” to describe bus services and it would be helpful to be consistent with the words you use so that they relate to your bus service categorisation.

In Paragraph 5.14 you chose to discard Broadband connectivity from the services you assess. Village Concerns believes that this is a major error. In the same paragraph you state that the whole district is covered by 4G by at least one provider. This relates to mobile phone networks and not Broadband. Broadband and Mobile Phone services are without doubt the most commonly used services in your list of key and other services and facilities (Table 5). You should consider these 2 subjects separately and discard neither. This should be reinforced by the wording of Policy INF 6 and its supporting text (See Question 66). To not consider these essential services as anything other than key services is a major error and to discount them on the basis that they are uniform across the district would be an even greater error:

Mobile phone network coverage varies widely across the district. Your assertion that the whole district is covered by 4G by at least one provider is not a valid argument to suggest that the whole district therefore has an equitable level of mobile phone service. Mobile phone coverage is mostly centred on urban centres. In rural areas the coverage is patchy and incomplete. It is of little help if, for example, a rural residents mobile provider provides excellent coverage at home but no coverage at their place of work. More importantly, rural phone coverage may be available outside but the signal is often not strong enough to provide indoor reception. The mapping of mobile phone



coverage is readily available and should form part of your sustainability assessment. This is an example for East Hoathly:



Broadband access varies widely across the district and the disparity between the urban centres and the rural areas is stark. Most urban areas will have access to Ultra Fast Full Fibre Broadband. Rural areas have virtually no Full Fibre cabling in place and therefore cannot access Full Fibre Broadband. A parish survey recorded the average download speed in this parish at 36 Mbps, the UK average is 50 Mbps and the government target by 2030 is 1000 Mbps. Broadband access is already vital to many households for daily life, home businesses, education, GP access, entertainment and social contact. Access to Full Fibre Broadband is a significant issue in the viability of home businesses and this has a significant impact on sustainability. If people cannot work from home because of poor connectivity, they will seek other jobs that will involve car journeys outside this parish.

Paragraph numbering goes astray from 5.19 on Page 29 to Page 32.

Village Concerns is generally supportive of Table 7 but is concerned that no account has been taken of the level of usage of services and facilities. This



should have an effect on the relative position in Table 7. To assess sustainability, you need to determine how often a settlement resident gets into a car to drive to another place to satisfy their needs. This would be very difficult to determine but you could look at how often existing services are used. These matters need to be assessed and evidenced. We have the following comments on Table 7:

Table 7 does not include sources of employment despite you mentioning it in Paragraph 1.21 on Page 30 and 1.25 on Page 31. One of the most significant reasons that residents get into cars to drive out of settlements is to get to their place of employment. If the settlement has some places of local employment this can aid sustainability. If there are local centres of employment that can be accessed using active travel modes and that have job vacancies, then this can aid sustainability. If neither of these is possible, then the lack of sustainably accessible employment should be a key “facility” within Table 7. A measure of this is available in ONS census data which records the number of people who travel to work and the methods used. For East Hoathly the 2011 census figures are shown below (2021 figures not yet available at parish level). This reflects the high number of people in the parish that travel to work by car. This shows that fewer people use public transport to get to work in this parish (6.8%) in comparison to Wealden (10.3%) and the South East (8.7%). It also shows that the main method of getting to work is by car/van/ taxi/motor-cycle amounting to 81.2% for this parish.

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

Village Concerns notes the content of Paragraph 1.21 on Page 30 but does not see any evidence of how this was quantified and evidenced in the assessments. The proximity to some services is covered but there

are no criteria to indicate what is too far and how long is too long. The assessment seems to dismiss any lack of service or facility providing that a bus service of one per hour is available, irrespective of the level of use of the bus service.

Village Concerns opposes the downgrading of Allotments to “Other community services” We feel that in addition to their value for amenity and leisure, they also provide health and mental wellbeing benefits, the opportunity for healthy food production and most importantly an active community group.

Table 7 does not assess the usage of such things as the Pharmacy, Dentist, Leisure Centre, Place of Worship, Vets, Convenience Store. It is possible that more residents visit the Vets in a year than attend a Place of Worship but the Place of Worship is more highly rated in Table 7. It is possible that more residents visit a Takeaway in a year than access a Household Waste Recycling Centre but the Household Waste Recycling Centre is more highly rated in Table 7.

The level of usage of Convenience stores may be high in urban settings but the level of use in rural communities is often limited. A specific group of people tend to use rural convenience stores but the majority of residents generally do not use them.

Village Concerns believes that you should define the term Pharmacy so that it is clear how it is being used. Some GP Surgeries have a Dispensary, some urban centres have Pharmacies. There are distinctions regarding the medical advice that can be given and if they are open to the general public. Dispensaries do not generally stock non prescription medicines and products. A GP Dispensary does not provide the sustainability as a high street pharmacy that provides both a dispensary service, advice and none prescription medication and products.

Village Concerns notes that you include consultee responses to the scoping paper at Appendix B. However, this does not include the response submitted via the Cluster Group system for East Hoathly. A copy can be provided on request.

Notwithstanding our comments above, you have gone to great lengths to create a table of services and facilities for each settlement and then carried out a detailed appraisal of different scoring and weighting methods. Then in Paragraph 6.14 you completely devalue that work and indicate that another methodology will be used to place settlements into your hierarchy. This new methodology seems to be only described in Paragraph 6.17. What objective

evidence is provided for each element of this methodology for each settlement and where it is detailed. You introduce the NPPF requirement that “[planning policies should identify opportunities for villages to grow and thrive](#)” but where is your assessment of how this will be achieved by adding housing to each settlement. One could argue that the settlements that you identify as unsustainable could grow and thrive by adding housing and local services to them but you do not include this at all. For example, the only mention of Halland in the WLP 2024 is to categorise it as unsustainable. The residents of Halland are left to wonder just what relevance this plan has to do with them ?

Paragraph 6.43 states that all of the settlements (thereby including East Hoathly) have a convenience store that is open 7 days a week at least 9 am to 5pm. This is not true, the Village Stores does not open on Sunday and closes at lunchtime on Saturdays. You also suggest that this is acceptable in sustainability terms if access to another settlement via public transport is available. This is nonsense and we cannot believe that you really think it credible that in 2024 a resident will use a bus to travel to a neighbouring settlement to buy bread and milk from their convenience store. As an example, for East Hoathly, you would have to use the hourly bus service to perhaps travel North to Ridgewood for 15/20 minutes, or South to a garage on The Dicker, buy your bread and milk and then wait for the next hourly service to return you to East Hoathly.

Appendix D indicates that East Hoathly has 2 recreational play spaces. Village Concerns contests this. There is only one public recreational play space. There is also a private recreational play space that is owned and managed by a residents company. This should reduce the East Hoathly score. Calculating Approach C is difficult as Table 11 is unclear as to its scoring system. The categories of Pharmacy, Dentist, Place of Worship or Community Hall/Village Hall/Community Hub have the Annotation “N/A” and “Cap at 3 additional points”. This does not explain how the score should be calculated.

Appendix E shows the score for East Hoathly Method 1c to be 79 but it is not clear how this has been calculated. Based on Table 11, it should be the 1a baseline of 72 + 1 for an extra recreational play area (now contested - see above) and a maximum of a cap of 3 for the extra Community Hall. This should give a maximum score of 76.

Paragraph 6.43 also states that East Hoathly has a GP Surgery but this does not take account of the current availability of GPs in East Hoathly. The East Hoathly Surgery is part of the Buxted Medical Practice and it is now more likely that an appointment will be at Manor Oak, Horam or at Buxted rather

than at East Hoathly. Neither Buxted nor Manor Oak are accessible by public transport without significant time and walking. You should provide an assessment of how people travel to their GP Surgery. Village Concerns believes that the majority of people now travel by car to get to their GPs.

Village Concerns believes that your argument in Paragraph 6.44 is deeply flawed. Urban area bus services are a great idea and when frequent enough and cheap enough they are a brilliant solution for urban transport and sustainability. However, the existence of a rural bus service does not equate to usage. A bus service that is not being used is not helping sustainability. A few people are dependent on rural bus services and this is unlikely to change. However, the general level of bus usage in rural areas is very low and has been steadily declining despite constant efforts to improve them. Unless you can provide evidence to show that Travel Plans and Bus Service Improvement Plans actually result in increased bus usage, you cannot claim that the existence of a bus service provides sustainability.

Paragraph 6.51 asserts that East Hoathly is a Type 4 Settlement despite it not conforming with the criteria you specify in Paragraph 6.43 for a Type 4 Settlement and includes as part of its justification a statement that: “[there is a frequent hourly bus service Monday to Saturday with journey times of around 19 minutes to Uckfield. The village therefore offers good and sustainable access to a higher order settlement](#)”. We have commented already on the paucity of this argument. Local surveys show 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 54 Bus that passed through the Parish was 4 per bus (the majority of the buses were double decker with an average bus capacity of 66). You may choose to contest our survey figures but we do not believe that you have your own data for bus usage. Again, we state that the existence of a bus service does not equate to sustainability if it does not reduce the use of cars. You have no evidence to show that putting housing estates in rural villages achieves modal shift to sustainable transport.

Paragraph 6.51 also states that the journey time is around 19 minutes. Village Concerns contests this, it is more likely to be 22 minutes as stated in Appendix G, Page 387 and we ask that you correct this. We also note that Appendix G describes the East Hoathly bus service as “regular” and not “frequent”. This is a better choice of language and we refer you to our comments above on Paragraph 5.7 of the Sustainable Settlement Study.

Appendix G, Page 387 states that the “[Conservation Area \(covers area along the High Street, Waldron Road and part of Graywood Road\)](#)”. You should amend this to include a “significant part of South Street”. Also you should

amend the sentence that follows - there are 22 Heritage Assets within the Conservation Area (20 Grade II and two Grade II\* - The Parish Church and Belmont House.

Village Concerns has identified inconsistencies in the descriptions of settlements within Appendix G. This variance in the way you describe and catalogue settlements is either irrelevant padding or an important part of the decision making process. We believe you should be consistent throughout. For example:

In the description of Eridge, you mention the proximity of missing services/shops but this is not done for East Hoathly.

You identify that Eridge is not on a designated national cycling or walking train. We assume that this should be "walking trail". The same information is not included for East Hoathly.

You identify the closest secondary schools for Eridge but not for East Hoathly.

Development is described for Fairwarp as including infilling and cul-de-sacs but for not for East Hoathly.

For Halland and many other villages you identify employment opportunities but do not do so for East Hoathly.

You mention the journey time to Eastbourne for Halland but not for East Hoathly.

For Halland in Appendix G, Page 414/5 you should note that the Car Dealership is now a fabric shop. In the description you should amend the following: "East Hoathly is the closest **larger** village (approx. 1.9 miles **south-East**) and has the nearest primary school, doctors surgery, convenience store (open **5 ½** days a week at least 9am-5pm), pharmacy and post office". Your description of Stavertons Nursery is also exaggerated. We suggest: "Stavertons Nursery has a farm shop with a very small selection of groceries and a limited range of fresh fruit and vegetables".

Village Concerns strongly believe that East Hoathly should be reclassified as a Type 5 settlement. Your description of a Type 5 settlement is a perfect description of East Hoathly - A settlement with some community services with limited access to public transport. It is likely that residents will rely on the private car to travel to meet their day to day needs for education, employment, services and facilities. Any honest and objective assessment

of this village would confirm this. We strongly believe that you are being skewed in your judgement because the planning department have been offered development land in the parish.

Table 13 purports to be a statement of the Settlement Categories and Table 14, a statement of the Proposed Settlement Hierarchy but you somewhat give the game away by including a list of settlements in both tables, suggesting that you had already made your decisions before defining the Settlement Categories.

Village Concerns notes that you appear to depart from the usual practice of specifying which settlements are sustainable and which are unsustainable as part of this Sustainable Settlement Study. In Paragraph 5.4 you specify that the five main towns are sustainable and then go on to assess 78 settlements without actually specifying whether they are sustainable or not. Paragraph 4.36 of the WLP 2024 does specify that Type 1 to Type 4 settlements will be sustainable. We feel that you should specify this within the Sustainable Settlement Study. This is important because, in the recent past, planning applications in Halland have been refused or appeals dismissed because Halland is designated as an Unsustainable Settlement. Conversely, the planning department regard the designation as sustainable as a binary issue such that the designation as sustainable is not nuanced by its relative position in the Settlement Hierarchy. When the chief planning officer was asked (at the WLP 24 East Hoathly Exhibition), he could provide no examples of applications not being recommended for approval because they were not sustainable.

Village Concerns notes your comments on Development Boundaries and we refer you to our comments in response to Question 2.

Appendix H is rather incomplete and particularly so for East Hoathly on Pages 550/552 and Halland on Pages 570/572. It does not include the description of East Hoathly or Halland within the Withdrawn WLP 2019 or the Core Areas Withdrawn WLP 2019. You can examine this missing information in the East Hoathly with Halland Submission Neighbourhood Plan (Annex A). Despite the 1998 assessment concluding that East Hoathly was a location where limited new development was considered to be acceptable 85 homes were added (29% increase) 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 and lost a pub. This is our summary of the History of East Hoathly since 1998:

# The Reducing Sustainability of East Hoathly

WLP 1998	“a location where limited new development was considered to be acceptable”
1998 to 2009	85 homes added, loss of one shop, several businesses and significant commercial site.
2013 Core Strategy	“the absence of a sustainable transport system and recent housing developments meant that the village was not selected to grow further”
2013 to 2021	267 homes approved, loss of a pub
WLP 2019	no allocation of housing sites and a very tightly drawn development boundary around the existing built area.

Appendix H raises the question of how WDC could describe East Hoathly in 2013: “the absence of a sustainable transport system and recent housing developments meant that the village was not selected to grow further” and yet now say the same bus service is Frequent and provides sustainable access. Successive Local Plan documents in 1998, 2013 and 2019 have all identified that East Hoathly is unsuitable for growth and yet between the publication of each document there have been large scale housing developments in the village. There is no consistency in the analysis or the application of the policies.

## Question 90

Do you have any comments on the Interim Equalities Impact Assessment?

Village Concerns believes that people who are in need of Affordable and Social Housing will be disadvantaged by Policy SS2 and Policy HO1. We say this in particular reference to East Hoathly which is allocated 686 homes



as part of the WLP 2024 (267 in approved planning applications and an additional allocation of 419 homes. The first 205 homes began construction in February 2023. As yet, none are occupied and  $\frac{3}{4}$  of the site has been mothballed with no further construction work being carried out. The house-builder has had no interest from housing associations for the Affordable and Social Housing. They tell us that the reason is that East Hoathly is too far from the local towns and the services necessary for residents. They are about to submit a revised planning application and it is likely that the agreed 35% of Affordable Housing will not be achieved. A significant part of the justification for major planning applications in Wealden is to satisfy the urgent need for Affordable and Social Housing. Allocating more housing to East Hoathly will jeopardise the delivery of yet more much needed Affordable and Social Housing.

## Question 91

Do you have any further comments on any other supporting documents?

### **Chapter 14**

Some of the targets are not overly demanding and merely aim to increase or decrease from existing levels. eg. Policy SS8 your target is to Increase over the plan period. This could amount to one additional charging device. Village Concerns believes that you should set challenging targets.

The target to Minimise loss for Policies NE3 and NE4 is not supported. Given that all loss of existing assets should be replaced in accordance with the policy. If the policy text is not strong enough to ensure that there is no loss, then it should be strengthened.

The target to Minimise loss for Policy NE9 is not supported. If the policy text is not strong enough to ensure that there is no loss, then it should be strengthened.

How will you monitor Policy NE10 ? Wealden's position in a ranking table is not a measure of how well you are doing. If your are all doing badly you could still rank highly in the table.

The target to Maximise (eg Policy EC1) is too wooly. Your targets need to be specific and measurable so that they can be assessed.

For Policy INF6 you should monitor separately for rural areas so that you are aware of the digital divide that exists.