Wealden District Council Local Plan Examination

Hearing Statement - Village Concerns

Respondents Reference Number 1183219

1. Village Concerns is a Local Action Group from the Parish of East Hoathly with Halland. Village Concerns reflects the views of most of the Parish and has an email list of 128 supporters.

Matter 1: Legal Compliance, including Duty to Co-operate

Issue 1 - Sustainability Appraisal (SA) - Question 8

2. The Wealden Local Plan was published for Consultation on 13 August 2018 and Village Concerns added comments on Wealden’s Consultation Portal on a range of matters. In general, Village Concerns supported the Wealden Local Plan as submitted for Consultation although it was concerned with the fragile nature of the infrastructure and sustainability of this Parish. When the Wealden Local Plan was submitted to the Planning Inspectorate in January 2019 it included a Sustainability Appraisal - Addendum January 2019. This was not published for public Consultation and it is this matter on which we now wish to comment.

3. The Sustainability Appraisal - Addendum January 2019 put forward 2 additional Scenarios (O and P) both of which propose higher housing numbers over the Plan Period 2013 to 2028. Wealden’s Sustainability Appraisal rejected both of these scenarios.

4. Paragraph 2.5 of the Sustainability Appraisal - Addendum January 2019 states that “These settlements [East Hoathly and Horam] are considered the most sustainable within the North of the District as per the Settlement Hierarchy”. Village Concerns contests this statement as it is not supported by any evidence. The Settlement Hierarchy Background Paper, Appendix B summarises the Facilities Assessment of Wealden Settlements. Within the North of the District, East Hoathly ranks in equivalent terms with Buxted, Forest Row, Frant, Groombridge, Hartfield, Maresfield, Mayfield, Nutley, Rotherfield and Wadhurst. East Hoathly is not the most sustainable of these villages. This claim also excludes the examination of other elements in the Settlement Hierarchy such as the Edge of Tunbridge Wells in Wealden District, Uckfield, Crowborough and Heathfield. Some of these are included for increased development in Scenarios O and P but their capacity/sustainability has not been assessed against the capacity/sustainability of East Hoathly.
The selection of East Hoathly appears to be completely arbitrary and not supported by any evidence. Building 761 additional homes on greenfield land in the middle of the countryside far from jobs, schools and transport links is not sustainable. If they must be built, then they should be built close the jobs, schools, facilities and transport links that will sustain them. If they are to be built in settlements such as East Hoathly, where sustainability is very low, then they should be more widely distributed between all similar settlements.

**Settlement Hierarchy**

5. The existing infrastructure and services of this community are already working at or above their capacity. There are frequent power cuts and a poor broadband service. Many elements of sustainability have diminished in recent years and many have diminished since Wealden gathered the evidence (IOR 2015) to carry out its Sustainability Appraisal. Village Concerns contests the position of East Hoathly in the Settlement Hierarchy as a Large Village - Type 2. East Hoathly is the smallest settlement in this category and has suffered several cuts to its sustainability since Wealden carried out the assessment of its Settlement Hierarchy. The Foresters pub closed in 2017, the mobile library service ceased, access to the GP Surgery has reduced with frequent diversions to the Buxted Surgery, the frequency of the Bus service has halved, East Hoathly School has had a waiting list for the last 10 years and the public toilets closed. Many businesses have closed and in many cases in the past 50 years the sites of these businesses have been developed into housing that has exacerbated the imbalance between housing and local employment. Village Concerns has requested that East Hoathly should be reassessed by Wealden at the earliest opportunity and designated as an Unsustainable Settlement.

**Scenario O**

6. In addition to Wealden’s Sustainability Appraisal we would add the following comments to support the rejection of Scenario O:

SA Objective 1 - To protect and enhance biodiversity.

Wealden correctly point out the damage that the proposed development would have on the Ashdown Forest SAC, Lewes Downs SAC and potentially the Pevensy Levels SAC. They rightly identify that East Hoathly MSOA has a particularly significant adverse effect on the traffic on the A22 and hence the Ashdown Forest SAC and Lewes Downs SAC. However,
Wealden does not address the issue of the biodiversity in this Parish. This Parish contains a network of ancient woodland and species rich hedgerows as well as a large number of ponds and waterways that contribute to a rich yet fragile range of biodiversity. Building such a significant number of homes on greenfield sites in this Village would remove habitats and feeding grounds for much of our fauna. It would substantially alter the surface water drainage of the low land surrounding the Village which in turn affects the surrounding waterways and ancient woodland. Had we been able to comment on this proposal we would have urged Wealden to record this as a very negative impact on the SA Objective 1.

SA Objective 2 - to conserve and enhance the countryside, landscape, historic environments and cultural assets.

Wealden correctly note that the impact of this development would be out of keeping in terms of scale and massing. We would strengthen this statement to be a very negative impact in terms of scale and massing. East Hoathly is a small rural village which increased in size by 29% in 2009. To add the 48 homes already proposed in the Wealden Local Plan with the additional 761 homes of Scenario O would represent an increase of 303% from 2009. This scale of development would neither conserve nor enhance the countryside, landscape, historic environments or cultural assets of East Hoathly.

Homes in East Hoathly Village

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Homes in East Hoathly</th>
<th>Juzier/Nightingales</th>
<th>Windfall Allowance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1841</td>
<td>1841</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1899</td>
<td>204</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1929</td>
<td>253</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1976</td>
<td>375</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1990</td>
<td>398</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2009</td>
<td>978</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2019</td>
<td>1181</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
A particularly attractive aspect of East Hoathly is its setting in a rural environment with the approaches to the Village via roads with wide verges flanked by hedgerows backing onto agricultural land. The urbanisation of this setting would destroy the character of the Village. Wealden’s Landscape and Settlement Character Assessment notes that the fields around the Village are a “patchwork of small scale ancient and historic fieldscapes” and “cohesive assarts”. Most of the urban edges are deemed as “sensitive due to woodland and mature vegetation”. Significant views are noted and an interlocking network of footpaths, including the Weald Way which passes through the Village. An expansion of the scale of Scenario O would irreversibly change the landscape of this community, losing Wealden an excellent example of village community with characteristics not commonly found elsewhere. The loss of this landscape to housing would have a very negative impact on SA Objective 2.

SA Objective 3 - to enhance and provide access to the countryside, landscape, historic environments and cultural assets for residents and visitors.

Wealden correctly note that the access in Wealden would not be enhanced by Scenario O. For East Hoathly we would contest that it would be to the significant detriment of providing access for visitors to our historic Village. East Hoathly has no school places, no employment for new residents, very limited infrastructure and very limited provision for shopping and leisure. Therefore, all new residents would be forced into cars to travel for school, employment, shopping and leisure. This would further congest Wealden’s roads and the A22 in particular. This would exacerbate the problem for all people using the roads in Wealden including potential tourists and visitors to East Hoathly. Once in East Hoathly many of the now attractive local walks and open spaces would have been urbanised by Scenario O and demonstrably less attractive to visitors/tourists.

SA Objective 5 - to maintain and improve the water quality of rivers and groundwater.

Wealden suggest that the impact of Scenario O on rivers and groundwater could be dealt with under the policies contained within its Plan. However, we suggest that the situation faced by an isolated rural village such as East Hoathly requires separate examination. To urbanise the proposed area to accommodate
761 homes would remove a significant area of agricultural land that currently acts to absorb groundwater and release it gradually into the many local watercourses. The local biodiversity has evolved over many hundreds of years in harmony with this system. The run off from such a large urbanised area would significantly affect the local watercourses. The run off carries with it the contamination from roadways and domestic life that would be carried into the watercourses and flow into the catchments of the Rivers Uck and Cuckmere. In an isolated rural village none of this run off is captured for treatment and would therefore diminish further the “moderate to poor” ecological status of Wealden’s rivers.

SA Objective 7 - to reduce the risk of flooding.

East Hoathly is situated at the foot of higher ground to the West and East draining into the area of the London Road. This subsequently then drains North to the River Uck and South to the River Cuckmere. The land around the London Road is often waterlogged and contains a number of ponds and watercourses. Parts of the ancient woodland surrounding this area are already vulnerable to flooding during heavy rainfall. The Scheduled...
Ancient Monument of Moat Wood to the South, as its name suggests, contains many watercourses. The fields in this area absorb a significant amount of water. The hedgerows in this area absorb a significant amount of water and slow the passage of surface water (as clearly acknowledged in the Sussex Flow Initiative). To urbanise this large area would alter the flood patterns of the area and pose a significant risk to these sensitive woodlands, hedgerows and the biodiversity they contain.

SA Objective 8 - to reduce air pollution and ensure local air quality continues to improve.

Wealden note that some sites proposed within Scenario O are situated close to named wastewater treatment works. However, it fails to mention the East Hoathly Sewage Works which already creates odour problems for the nearby residents. A housing application (WD/2018/1508/MAO) has already been submitted for land adjacent to this Sewage Works. Southern Water and Wealden’s Senior Environmental Officer have already stated that no development should take place within 500 metres of this Sewage Works. It should also be noted that this Sewage Works is operating very close to its capacity and could not cope with the addition of 761 new homes. If the Plant is enlarged to cope with the proposed expansion then the odour issue would be exacerbated.

Building 761 homes in a location with such a lack of facilities creates a significant increase in vehicle traffic. This would significantly increase air pollution throughout the District.

SA Objective 9 - to ensure the best use of previously developed land and existing buildings.

There is no scope to use such land in East Hoathly so any new development would have to be on greenfield sites. Wealden clearly identified this in it Sustainable Settlement Analysis 2019 Appendix B1.

SA Objective 10 - to minimise journey lengths and encourage sustainable transport.

The proposal to build 761 homes in an isolated rural village would create the need for significant numbers of long journeys by car to schools, jobs and for shopping and leisure. East Hoathly School is full and there has been a waiting list for places
for the past 10 years and there are currently no job vacancies in
the village businesses. The access to GP Surgery has
diminished in recent years and many patients are now diverted
to the Buxted Surgery some 14 Km away. The Foresters Pub
closed in 2017. All the new residents would have to use cars. It
is not realistic to use cycling as a means of transport to travel to
local towns and particularly on the A22 where the traffic is too
fast and the roadway too narrow for safe cycling. There is only
one bus route in the village and it runs hourly. There are no
services on Sundays or after 8 pm so its use for evening leisure
or shift work is not possible. It only connects North/South via
Uckfield and Hailsham so travel East/West to Lewes and
Heathfield cannot be done directly and makes journey times
extremely long and unrealistic for daily travel.

SA Objective 12 - to improve access to services; facilities; the
countryside and open spaces.

Wealden correctly identifies that such access would not be
improved for villages such as East Hoathly. We would go further
and suggest that for East Hoathly this access would be
worsened. The 761 new homes would have access to the
countryside and open spaces of the Parish but would all have to
travel for access to services and facilities in the local towns and
use cars to access the wider countryside and open spaces.

SA Objective 14 - to improve levels of skills.

Wealden suggest that there would be the potential during the
construction phase for local people to learn construction skills.
Village Concerns believe this to be disingenuous and would like
to see evidence where this has occurred for a rural village in
previous developments.

SA Objective 15 - to facilitate improved health and wellbeing.

Wealden acknowledge in Sustainable Settlement Analysis 2019
Appendix B1, that East Hoathly has limited leisure facilities and
that travel to Hailsham or Uckfield is required. The addition of
761 homes would require a significant extra burden on the roads
to allow people to satisfy SA Objective 15.
SA Objective 16 - to create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion.

East Hoathly believes it is already a vibrant, active, inclusive and open minded community. The cohesion of that community is dependant on its size and rate of growth. We have already grown significantly and are still adapting to that increase. Many of the new members of our community are having to commute for school and employment so their opportunities to integrate are therefore more difficult and take longer to achieve. The addition of a further 761 homes would completely disintegrate the cohesiveness of this community and have devastating results. It should be noted that when Wealden approved the development of 75 homes in 2009 it stated that no further notable development would be undertaken. To break that promise would destroy any trust that exists between this community and Wealden.

SA Objective 17 - to create new employment opportunities.

Wealden’s Appraisal makes no mention of employment opportunities for East Hoathly. Thus, all 761 new homes would be seeking employment in local towns or commuting further afield. This is palpably unsustainable.

SA Objective 18 - to diversify and strengthen the local economy.

Sustainable Settlement Analysis 2019 Appendix B1 states that “voids in shops are low, indicating buoyancy in the local market”. This does not reflect the reality. Voids do not exist because whenever a business closes it is changed to housing. For example the Smock Shop is now a house, the Foresters Pub has planning permission for housing, the Methodist Chapel became an antiques business and is now a house. This follows the pattern of developments in the Village where business sites have changed to housing:

1964 - Susans Close built on the site of a Workshop and Garden.

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

1988 - Carpenters Croft built on the site of Bookers Pill Factory.
2001/2 - An extension to the Mews built on the site of Chapman and Smith Safir Works.

2009 - Juziers Drive and Trug Close built on the site of E&A Carriers and PB Fencing.

7. Having examined Scenario O against the SA Objectives, Village Concerns believes that Wealden have underestimated the significant negative impact that Scenario O would have on Sustainability of this community. We support Wealden’s rejection of Scenario O but believe that the justification for the rejection should be reinforced appropriately. This case would have been made if Scenario O had been published for consultation with the Submission Wealden Local Plan.

**Scenario P**

8. In addition to Wealden’s Sustainability Appraisal we would add the following comments to support the rejection of Scenario P: The arguments are the same as those for Scenario O but worsened by the addition of the Windfall Allowance of 48 making a total increase of 809 homes for this small rural village with very limited facilities and already overstretched infrastructure.

**Summary**

9. The proposal to build 761 homes in East Hoathly as part of Scenario O or Scenario P would have a very negative impact on the Sustainability of this Parish. It would build on greenfield land adjacent to ancient woodland and amidst a delicate network of ponds and waterways that contain a wide array of biodiversity. The contaminated run off into these areas would cause significant harm. The increase in the size of the village by 303% is unsustainable and would destroy the nature of the historic small rural village. A large part of our community already need to commute to other places for schools, employment, shopping and leisure. The proposed new homes would dramatically add to this traffic and turn East Hoathly into a commuter dormitory. The village has an inadequate bus service and the utter dependancy of the new residents on cars would add to Wealden’s traffic congestion, air pollution generally and specifically for the A22 corridor and the damage being done to the Ashdown Forest SAC and Lewes Downs SAC. We believe any consideration to Include Scenario O, Scenario P or any increase to the current Windfall Allowance of 48 would be unsound.