

Errors for East Hoathly in the new Draft Local Plan

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Dear Councillors,

The NPPG is very clear that every Local Plan has to be underpinned by evidence studies completed prior to publication of the Plan. Studies should not be produced after publication. The new Draft Local Plan claims to be supported by evidence contained in the following reports:

1. National Planning Policy Framework (NPPF)
2. National Planning Practice Guidance (NPPG)
3. The Strategic Housing Market Assessment (SHMA)
4. The review of the Objectively Assessed Housing Need (OAHN)
5. The Strategic Housing and Employment Land Availability Assessment (SHELAA)
6. Stage 1-Wealden Local Plan Transport Study
7. The Viability Assessment;
8. The Retail, Town Centre and Economic Study
9. The Gypsy and Traveller Accommodation Needs Assessment
10. The Strategic Food Risk Assessment (SFRA)
11. Open Space, Sports and Recreation Assessment
12. The Green Infrastructure Study
13. The Landscape Study and Site Specific Landscape and Ecology Assessments
14. Burial Ground Assessment
15. Review of Conservation Areas and Local Wildlife sites.
16. Sustainability Appraisal
17. Infrastructure Delivery Plan
18. The Ashdown Forest Transport Model,
19. The Nitrogen Deposition Monitoring undertaken on Ashdown Forest,
20. The ecological assessments of Ashdown Forest
21. The Year 3 Report: Ecological and Air Quality Monitoring and Modelling at Ashdown Forest
22. The Ashdown Forest Visitor Survey 2016 and Ashdown Forest Visitor Survey 2009
23. The air quality assessment on the Pevensey Levels 2016.

Yet the majority of these reports are not available for public view, despite the statement made by Nigel Hannam “that the evidence base studies would be shared as they become available and not all coming together immediately before publication”. Given that notably the Sustainability Appraisal and the Ashdown Forest reports are not complete and the key infrastructure provider ESCC has yet to comment, it does seem rather premature for Councillors to make a recommendation on the new Local Plan on 13th March.

We, the Village Concerns Steering Committee of East Hoathly, want to make you aware of errors that we strongly believe should be corrected before the draft plan is recommended. You have the opportunity and responsibility to ensure this happens.

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In the draft Local Plan the case for targeting East Hoathly for large development is transparently contrived. The most glaring examples are highlighted below but first, here is an example of the numerous disingenuous descriptions peppered through the section on East Hoathly: contrast section **26.143** where poetic licence is used to manipulate the reader's favourable impression of Hartfield, leaning heavily on the A.A Milne connection, with section **21.1** in which the less enriched introduction to East Hoathly conspicuously omits mention of its link to Thomas Turner, the internationally famous shopkeeper diarist of the 18th Century.

- Section 21.1** states "East Hoathly is a small village...." while in 'Table 1 Current Settlement Hierarchy' it becomes a large village:

Large Village – type 2	Sustainable Settlement	Buxted; East Hoathly; Frant; Groombridge; Hartfield; Herstmonceux; Horam; Mayfield; Ninfield; Rotherfield and Westham	Settlement which is accessible with very good local facilities but relatively smaller than type 1 village
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Such inconsistency prejudices East Hoathly's assessment for sustainable growth. In fact East Hoathly with a population of 1300 has very modest facilities, all of which are located on a 90° bend in a narrow high street, and currently suffers severe infrastructure limitations.

To correct the error: Return to the 2013 Core Strategy assessment, since nothing has changed: Table 1 must show East Hoathly as a 'Local Settlement' with limited basic facilities.

- Section 21.3** states "There is a regular daily bus service providing access to Uckfield, Tunbridge Wells, Brighton, Polegate...". To be clear, bus access to Brighton is possible but will take over 2 hours assuming the link via Uckfield is not missed because of congestion on the A22.

The same section is wrong to claim "Uckfield train station provides regular and direct trains to Haywards Heath, London and Tunbridge Wells". There is no direct train service to Haywards Heath or Tunbridge Wells; make the train journey via London to either destination and it will take over 2 hours, hardly commutable.

To correct the error: delete Brighton, Haywards Heath and Tunbridge Wells. Note that there are no plans to improve bus services. In fact The BBC announced on 12th Nov 2016: Councils have reduced bus services by more than 12% in the past year.

- Section 21.9** claims "East Hoathly is a sustainable settlement..." The report 'Village-Concerns-Objections-to-WD20162796MAO', issued in Feb 2017 to WDC Planning Committee members, comprehensively rebuts the WDC Sustainability Assessment for East Hoathly. The real and present limitations of transport, traffic, parking, infrastructure and employment are clearly set out in the report. The new proposed development boundary, conveniently embracing Greenfield land targeted by developers, will have a severe impact on environment, notably biodiversity and ancient woodlands.

Independent Consultee reports conclude:

- There will be an inordinate and rapid increase in traffic and associated pollution not only on the dangerous congested corner in the conservation area of the village but also on northbound roads passing through the Ashdown Forest.

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- Biodiversity will be severely impacted: Ancient Woodland will be irrevocably damaged; well established species rich hedgerows will be destroyed; and protected species, particularly Great Crested Newts, will be destroyed.
- That there are major issues with both foul water and surface water disposal.
 - The existing foul water drainage system to the village has evolved over time and is currently running at or beyond capacity. Even if a new sewer was laid the entire length of the village and across the fields to the waste water treatment plant, the plant would need to be upgraded or replaced.
 - Any surface water proposal is likely to cause flooding to adjacent land and would be dependent upon legal consent for access to third party land.

To correct the error: state that East Hoathly is not a sustainable settlement. The East Hoathly vision for help in meeting the housing need must be realistically constrained by the severe environment, social and economic limitations in the village. With regard to the severe limitation of the sewerage plant and infrastructure in the village major work would have to be undertaken. Package Treatment Plants are not normally acceptable to the Environment Agency and will not be appropriate in the village because of land drainage problems.

4. **Section 21.11** allocates 205 homes to East Hoathly over the plan period; Table 2 however allocates 230 homes. Incompetent data handling is worrying; what is terrifying is WDC's belief that East Hoathly can sustain a 50% growth when its Sustainability Assessment has been shown to be seriously flawed.

To correct the error: To meet the spatial objectives of this plan, growth and change in East Hoathly can only make a modest contribution. Therefore revise the target (?205 or 230) to a much lower figure and then be consistent when using this new figure. East Hoathly has had a successful model of small scale development over several decades. This has been sustainable and resulted in a cohesive community.

5. **Section 21.12** justifies the positioning of the new proposed development boundary in the south of the village. The same arguments are justified for the north of the village but if applied, the boundary would be drawn to protect the land targeted by developers. This is a prime example of inconsistency.

To correct the error: Re-draw the proposed development boundary to exclude the land targeted by developers in the north of the village. In this way the arguments for boundary positioning will remain consistent. Note the recent Government White Paper states "We need to build the right homes in the right places. Reduce speculative development and support our villages, towns and cities in a way that preserves the unique character of their communities and protects precious countryside.

6. **Section 21.13** "Elsewhere, the recreation ground clearly defines the edge of the built up part of the village and provides a visual link with the countryside beyond." Yet land is earmarked for development on the western boundary of the recreation ground, the other side of the built up part of the village! Now inconsistency is traded for contradiction.

To correct the error: Exclude the land on the western boundary of the recreation ground from development by re-positioning the proposed development boundary. In this way the comments concerning a visual link with the countryside will be accurate.

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7. **Section 21.16** states “This makes some further expansion appropriate and land has been allocated to accommodate some modest residential growth in a location that is close to the existing village”. Residents of East Hoathly do not think 50% growth can be described as ‘modest’ and this was made clear in the petition presented to WDC and is on the Local Plan Sub-Committee meeting agenda for Monday 13th March.

To correct the error: The comment ‘modest residential growth’ will only be accurate once the outrageous figure of 205 (or 230) is substantially reduced to reflect an honest settlement classification of East Hoathly.

8. **Section 21.20** states “East Hoathly has a good provision of services and facilities including a primary school, a medical centre ... also has open space and recreation facilities including allotments and a recreation ground with tennis courts, a cricket pitch, football pitch...” It is important to see the reality: the primary school is full and there is no room or budget for expansion; the medical centre is under-resourced and refers patients to Buxted (no transport link); the football pitch has not been used for many years because it is permanently water-logged over winter months. The one modest village shop, the hairdressers, the secondhand bookshop, the cafe and the pub are all located on the 90° bend. As a result traffic congestion and parking are a nightmare now.

To correct the error: East Hoathly does not have a good provision of services and facilities and it certainly cannot sustain a proposed housing increase of 50%. The section must be extensively modified. Policy INF3 states “Studies will need to be undertaken and measures implemented to deal with the cumulative impact of development on the road network within the villages of: Ninfield, Horam, and Wadhurst”. This statement should be updated to include East Hoathly.

9. **Section 21.28** states “Development in this part of East Hoathly along with land at Broomy Lodge Field would encircle the recreation ground” while section 21.14 states “the recreation ground clearly defines the edge of the built up part of the village and provides a visual link with the countryside beyond”. Arguing black is white is a waste of time.

To correct the error: Honour section **21.14** and remove the contrived deceit and contradiction in section **21.28** which tries to support development to the west of the recreation ground.

10. **Section 21.29** states “The provision of an active visual frontage will contribute to maintaining continuity from the existing village centre and will assist in keeping vehicle speeds lower for highway's safety”. The hedgerows and trees along the London Road are an important habitat and factor forming the rural vista towards the conservation centre of the village. This view defines its historic setting. Change to a more urban characteristic is definitely rejected by the community.

To correct the error: The intention expressed in this section is a monumental mistake. East Hoathly wants to retain its rural character and its very attractive gateway vista. Delete the concept of an ‘active visual frontage’ or ‘street scene’ if this means destroying hedgerows and trees and erecting lots of signage ironmongery.

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