

Comments by Laughton Parish Council on Direction of Travel Consultation.

Chap 4. Climate change and zero carbon emissions.

Question 1. 5:

Foreword stresses climate emergency so let's see that in everything in the plan addresses that today, not tomorrow.

Cannot use per capita carbon emissions because population is growing.

Need to mandate zero carbon in new housing somehow. No reason not to. Via an updated Wealden Design Guide?

Can't have solar farms everywhere. Agriculture and forestry absorb carbon.

Water-need to plan for de-salination plant?

Flood risk-need to ensure that Environment Agency Flood Risk map is up to date and that developments in one area do not exacerbate flooding elsewhere.

Electric vehicles won't solve congestion, nor will they solve all sources of pollution from vehicles.

More houses = more vehicles and more congestion unless you get serious about public transport and real provision for walking and cycling not just within new developments.

Need adjoining districts with employment centres to provide more housing to reduce out commuting from Wealden.

Be bold: plan a development without the provision of private car parking spaces as done in London.

Chap 5. Infrastructure

Question 2. 10:

Acknowledgement of the historic under provision of infrastructure-but is the money going to come forward to address that and the expansion required for the growth? It is a hope. There is no guarantee and so infrastructure will get further behind.

Impact of new housing and businesses whilst everyone dependent on private car transport and A22 and A27 congested results in substantially increased traffic flows on existing rural minor roads which get trashed and then discourage locals from cycling or walking on those lanes. ESCC always says it has no money. Your Local Plan has to do more than just pay lip service to the problems. The problem needs addressing first i.e. viable alternatives to the private car, electric or otherwise.

Existing Dept for Transport data on traffic concentrated on main roads where there has not been much traffic growth. This is because traffic is using the smaller rural routes with less congestion. But these lanes are where the traffic is not well controlled i.e., no speed limits, nor are the lanes generally suitable eg narrow and no footpaths, traffic in conflict with vulnerable road users. There is much less data on small rural lanes which have experienced far greater traffic growth than the main roads and the impact is ignored by ESCC Highways. The Local Plan needs to take this into account.

A traffic jam of electric vehicles is still a traffic jam and still has environmental implications. Electric vehicles using rural lanes as rat runs are even worse as the vulnerable road user won't hear them coming.

Even if new development in supposedly sustainable locations given quantity of out commuting, traffic will increase everywhere even in villages which don't have sustainable transport links nor the benefit of national road funding.

Despite 10% addition to housing stock in Laughton, mainly through agricultural conversions, the amount of CIL received by the parish council has not been sufficient to do anything meaningful eg not enough for a 30mph or lower speed limit throughout the village. Absolutely no support from ESCC even though everyone has a right to feel safe where they live.

Developers and planners need to assess better the impact of developments on roads and spillover of traffic through nearby villages eg Ridgewood at Uckfield and Hesmonds Stud East Hoathly. Where and

how are new residents going to get to work and school? They are not all going to fit on the current bus service. Proper modelling of congestion impacts and CO2 emissions. Real mitigation required eg speed limits on rural lanes, traffic calming to discourage rat runs in rural lanes surrounding the developments. Please do not dump significant developments in unsustainable villages just because developers put large fields forward. This is not planned development, it is opportunistic.

Chap 6. Housing need and delivery.

Question 3. 15:

Difficult to follow the trail of documents and references to numerous other documents to comprehend the housing target number which may now change anyway.

Housing demand due to inward migration-over 15,000 since 2011 (population increase plus net deaths). Mainly families? Brighton and Hove, East Grinstead, Tunbridge Wells and Lewes not mentioned as areas where migration of families occurs from due to lack of suitable housing. But those towns are centres of employment and have public transport. Housing demand in Wealden is due to under provision outside of the district but the where better jobs and public transport infrastructure are.

6.47: housing affordability: surely distorted by low wages of Wealden based employers and acknowledgement that many workers out commute to higher paid jobs. Personal incomes data for Wealden residents higher than wages data. Formula too dumb to pick this up and so is not correct. There needs to be a coherent approach led by where the infrastructure is, not led by whoever pushes a big bit of land in front of the planners first.

Agricultural conversions: it feels like most become 4+ bedroom executive dwellings often remote from the village centres and disconnected from the community. Opportunities lost to compel smaller cheaper dwellings for local families with modest incomes. Laughton has had at least 25 agricultural conversions on housing stock of 300. All in unsustainable locations. No honesty about prior agricultural intensity of use. Eg hay storage barns-would not have 8 vehicle movements a day every day of the year.

Don't allow developers to build dormitory developments in unsustainable locations eg East Hoathly, Blackboys.

Environment Agency needs to update flood data for Wealden urgently and to ensure that housing is not built in inappropriate locations which create flood problems elsewhere.

Question 4. 20:

Need to avoid developers wriggling out of affordable housing provision. Anyone can show anything in their profit and loss figures. Adjust CIL charging so that an extra slice always goes to an affordable housing fund unless developer fulfils full obligation at a site i.e. the developer should be indifferent or even better off building the affordable housing. CIL needs to be used more aggressively to ensure affordable units are built.

And that this extra slice of CIL should apply even if only single dwelling is built.

Small parishes do not have resource for community land trusts.

More work on why duty to cooperate is required-surely failure of neighbouring authorities to deliver housing to support their own employment etc.

Rural exception sites with market housing will create a bun fight and will result in communities being blackmailed by developers. Rural exception sites should not have market housing. And no point unless public transport improves. Need a return to home tied to job eg for local policeman, school teacher, for rural workers, district nurse etc, not general market housing.

Don't have a step change in size of development which requires affordable housing provision eg 10 new homes means 35% provision as developers apply for 9. Use CIL to smooth this out so even one new home contributes and make sure WDC's Sussex Weald Homes always has enough projects on its book to use the money.

Chap 7 Business, jobs, economy

Question 5. 25:

Understand need for flexibility in use classes. But need to make sure uses are appropriate in locations on narrow rural lanes eg logistics business requiring frequent deliveries by class 1 HGVs on single track lanes with no passing spaces, frequent deliveries and collections by large lorries in rural areas, or eg car repair workshop where repaired cars are frequently put through their paces on narrow rural lanes by employees, who all have to get to work by car, have no awareness of rural environment.

Limp “conditions” eg Composting facility at Whitesmith- the lorries are meant to use the A22/A26/A27 rather than the B roads. They ignore it. Why? Congestion and speed limits on the A roads.

Laughton experiences a large number of pallet distribution lorries going to and from a depot at Palehouse Common using its narrow rural lanes which trash the verges because the lane is not wide enough for vehicles to pass and discourage locals from walking. Why are these lorries diverting?

Congestion and speed limits on the A roads.

Some sort of “do no harm” test needs to be included or S106 agreements need to be used to pay for weight limits on rural lanes and speed limits because ESCC will always say not enough people have been killed or seriously injured. But it is not about that. Rural villages should and are entitled to be protected in the same way that towns are. But ESCC won't.

Ensure public transport infrastructure and **safe** cycling everywhere is in place to ensure employees have a genuine choice of travel to work modes. Places of work should include cycle parking / improved bus services / company buses and should be accompanied by reduced speed limits on the surrounding rural lanes in order to protect other road users. Any new business area should have a proper and viable alternative to the car, electric or otherwise, as a means to get to work. This needs to be policy.

Chap 8 Town centre vibrancy and success

Question 6. 30:

In absence of good public transport need to allow easy access by car to towns for convenient shopping.

Or ensure useable public transport which would be preferable. Someone needs to rethink the rural bus routes to make them more useable-cost, frequency and safe bus stops so the bus won't sail by leaving the passenger stranded until the next one which may not come for hours, days or until the following week.

Chap 9 Tourism

Question 7. 35:

Need to get ESCC to support “Quiet Lanes” to make walking and cycling a more attractive option. They say they don't do them. No substantive reason ever given. They would allow villages to be connected up with attractive safe cycling and walking routes.

Need useable, frequent, reliable, affordable public transport to ensure residents and tourists don't create traffic jams of electric vehicles or otherwise.

Chap 10. Protecting the natural environment

Question 8. 40:

Where does net biodiversity gain sit with overriding need to reduce total carbon emissions?

Seems ridiculous building on greenfield sites in unsustainable locations and then putting up a bat box and planting a couple of trees and thinking that is OK.

Parish councils need help to identify and register LWS.

Question 9. 45:

Green infrastructure: Yes. Get the consultants to engage with parish councils. Laughton often inundated with walkers and discarded full dog poo bags and their cars parked on the verges and other informal

parking areas or clogging up space for residents. The visitors leave the muddy mess for locals which never regenerates because of compaction and erosion. The village is not equipped to cope with all these car based visitors and they are destroying the very thing they have come to visit. We need help as it will get worse with Uckfield and East Hoathly expanding.

ESCC must review its Byways Open to All Traffic (BOATs) with a view to making them into Restricted Byways. Usage by motorcycles and 4x4 vehicles is no longer compatible with need for wildlife, safe and tranquil green spaces. They are a tiny minority but cause a disproportionate amount of aggravation and conflict for the majority who are non motorised users. They cannot ever be adequately policed which results in further conflict, often ugly, with people and nature.

Chap 11. Protecting landscape and heritage

Question 10. 50:

Ensure good design everywhere, not just in AONB or Conservation areas. Just because inappropriate design allowed under previous planning regimes outside of designated areas does not mean that it is acceptable now.

There should be a dark skies policy for all areas which are without street lights.

Question 11.

No comment.

Chap12. High quality design

Question 12. 60:

Good quality should be mandated design everywhere, even if not in a designated area. It does not cost a developer extra.

Chap 13. Communities safe and thriving

Question 13. 65:

Don't allow developers to build dormitory settlements in unsustainable locations.

ESCC needs to take walking and cycling outside of towns more seriously.

Consultations required on walkability in villages which have seen significant increase in traffic due to development elsewhere and congested main routes. Many villagers do not feel safe on their rural lanes and won't let their children cycle which leads to more car usage. ESCC cannot be allowed to wait until people killed or seriously injured.

It is ironic that whilst this consultation goes on it is becoming more and more dangerous for walkers and cyclists to use the country lanes. As traffic increases, with no accompanying reduction in speed limits, the verges are eroded, the traffic goes faster still and there is nowhere for cyclists, walkers, riders to take refuge.

The "school run" needs to be investigated. In Laughton it generates a huge amount of traffic and congestion. Good local schools for everywhere would allow children be able to attend their local school rather than being chauffeured backwards and forwards to far off schools.

Noise management: stricter enforcement of noise regulations required for the increasing number of outdoor festivals in the district-no doubt because of slack licence enforcement. The noise from festivals wafting over the countryside is making life a misery for residents in the countryside in the summer. No noise leakage should be permitted off the site at all. Noise leakage is not permitted in an urban environment. Costless to Wealden if it is made a condition of the licence. Useless complaining to Environmental Health afterwards-the disturbance has occurred and the organizers always say they complied and measured the noise and that it was not a problem even though locals were disturbed often in to the early hours of the morning. The noise disturbance should not be allowed to have happened in the first place.

Chap 14 Growth options

Question 14. 67:

Option 1 preferred because density should allow public transport and provision of local services within a tight area. Wealden shows a lack of confidence in sustainable modes of transport saying that A22 and A27 will need improving.

Question 14. 68-69:

COVID may change commuting frequencies eg impact on traffic volumes if only have to go to office 2 days a week? Even working from home 1 day a week will remove 20% of commuting journeys.

Important to acknowledge that rural areas will be further adversely impacted by overall increase in road traffic with more housing everywhere. Rural communities already plagued "by rat runs". Wealden and ESCC needs to mitigate these otherwise villagers will be further forced to use their cars more as they feel unsafe walking or cycling.

Traffic volumes on rural lanes are not well measured so currently get ignored.

Please be honest about sustainable villages. 200 plus houses at East Hoathly and now 50 at Blackboys which any normal person would say these are not sustainable villages. The developments will have an adverse impact on surrounding settlements as well due to car dependency to get to work, school and a dependence on vans delivering supermarket shopping etc.

Question 14. 70:

Berwick a possibility for a new settlement but again need for honesty given infrequent trains, disabled access at the station and a lack of shops and likelihood that an improved and more accessible railway station would start to draw passengers from other settlements.