

## **WESTHAM PARISH COUNCIL**

### **Wealden Local Plan**

#### **A formal response to the Issues, Options and Recommendations Document December 2015.**

Westham Parish Council is made up of three distinct settlements, Westham Village, Stone Cross and Hankham. All three were small rural communities until the 1990s when the growth of house building began to transform Stone Cross in to what is now for the most part urbanised. It is an example of how house building can spoil that special rural quality that differentiates Wealden from other districts.

Given that all three settlements are dealt with individually in the Local Plan the Council decided that Councillors residing in the three settlements should, after consultation with residents prepare a response to the Issue, Options and Recommendations Consultation on behalf of the Parish Council.

The comments are interlinked to a degree as it is difficult to wholly isolate the settlements so there is some repetition.

#### **Hankham**

Residents in Hankham have identified a range of problems which would be exasperated by the proposal to build 10 new houses in the village

1. The whole infrastructure of the village needs to be addressed starting with the problems associated with traffic and the state of the roads. The present volume of traffic, which is bound to increase with new housing, is excessive and at present it is clear that the roads are not wide enough in many parts of the village for two cars to pass. The village already serves as a Stone Cross bypass with substantial numbers of large vehicles passing through the village. Traffic has increased with the development of virtual trading estates, the presence of which some residents are unaware. These developments are served by commercial vehicles of all sizes.

The primary school parents and the increasing number of staff have rendered journeys in or out of the village at certain times hazardous and the parking of these vehicles has destroyed paths and verges in the village. Up to 100 cars have been parked on Hankham Road, Hankham Street and Hankham Hall Road on some afternoons. Residents feel it is unwise/unsafe to leave home or return at the time around the start and the end of the school day.

Local farmers find it increasingly difficult to move around the village to carry out their work whilst access for emergency vehicles is impeded. In the same way local horse riders (of whom there are many) find the village an increasingly hazardous area.

These problems need to be addressed before any additional traffic is inflicted on the village. 10 new houses will mean at least another 20 cars permanently part of the problem. Action needs to be taken to make roads safe with these solutions:-

- a) The grass verges need protecting with appropriate kerbing.
  - b) The possible introduction of a speed limit throughout the village and possible traffic calming measures.
  - c) Provision of "off the road parking" for the primary school - this was discussed 20 years ago and the addition of 2 parking spaces in the school at present does not impact on the problem
  - d) A weight/size limit on access to the village for heavy traffic using the village as a short cut
2. The question of sewage and drainage needs addressing. The question of whether the new houses will have mains drainage is of paramount importance and will that facility be made available to all residents? The present use of cess pits creates a health hazard on numerous occasions with seepage and flooding. New houses without mains drainage should not be considered. There are several places in the village where the road floods with heavy rain which needs resolving as drainage of the present roads is insufficient.

Given that the infrastructure is improved, residents wish to make the following observations/suggestions/objections

- a) 10 new house will lead to an expected 20 new cars. Parking off the road should be required for 2 cars with every house built.
- b) Hankham has no facilities other than the a primary school which will have to accept Hankham residents but secondary school children will have to travel to Eastbourne for schooling - free school travel is under threat in the County and to reside in Hankham will have a financial implication for parents of children of school age
- c) The absence of facilities extends to shops and health provision. These are only available at Stone Cross where health demands already exceed provision and shopping opportunities are limited.
- d) Any new building should take into consideration the network of footpaths in the village which are well used by local walkers and tourists walking the countryside.
- e) Residents are opposed to the creation of a new "mini -estate" of 10 houses and believe that new houses should be built to complement the existing style and provision in the village.
- f) Whilst low cost housing may be considered the limitations identified in b) & c) above need to be considered with planning.
- g) Present congestion and useage indicates that building should not take place in the central area around Hankham Hall Road/ Foords Lane /Hankham Street/Hankham Road
- h) The needs of farming and farm land must be included in any planning consideration.
- i) Mains drainage available for all is wanted which addresses some of the flood problems.

### Conclusion

Residents do not consider an additional 10 houses should be built in the village especially as Hankham is described as a neighbourhood settlement and paragraph 8.36 states that these are not suitable for planning purposes. Hankham has a

number of Listed Buildings and any new houses, if they are approved, should reflect the present mixture of residential and green space. Each new house should have direct access onto existing roads.

### **Stone Cross**

At the outset it is important to state that the residents of Stone Cross do not consider themselves to be NIMBYs. Many residents would support the additional housing numbers if they were confident that the necessary infrastructure would be put in place to support the proposed growth. They do not have that confidence as residents do not consider there has been sufficient improvement to the existing infrastructure to support the housing numbers we have now. This has been highlighted in the Council's comments on planning applications for the past few years. The main problems residents wish to be drawn to your attention are:

- a. Doctor's practices have reached full capacity and seem unable to recruit new GPs in sufficient numbers.
- b. Dental practices are full and no longer taking NHS patients.
- c. School children are having to travel further afield as local schools reach capacity.
- d. Hospitals . We are all aware of the current problems. The proposed additional housing will only worsen those problems.
- e. We have a growth of residents aged 65+. The numbers in the 85+ group is heading towards double the national average. There seems to be a presumption that younger people will buy the new housing. Is this correct?
- f. Roads are in a poor state. Residents ask if anyone from the District Council has driven around Stone Cross between 7.30 and 9.00 in the mornings!
- g. The plan refers to the shopping centre being limited in facilities. Does a mini Tesco, a Chinese takeaway, a Veterinarian, an Estate Agent and Hairdressers really constitute a shopping centre? Again residents ask who from Wealden District Council has actually looked to see what we have.

As previously mentioned the plan separates the three communities for housing numbers but the concern is that for infill purposes the three are being treated as one. Map 44 does not take account of the outline planning permissions already granted and therefore portrays a biased view of the infill available. We do not therefore agree with the preferred option testing 29 for Stone Cross.

Many residents are worried that Stone Cross is being perceived as part of Eastbourne and the concern is that the new Local Plan will spread urbanisation to cover Eastbourne, Stone Cross, Polegate, Willingdon and finally Hailsham.

8.43 states "The first recommended approach distributes development away from Ashdown Forest and concentrates development in the most suitable areas." Whilst the reasoning behind this comment is understood it should not be to the detriment of another unique area such as the Pevensey Levels. Additional housing in the whole of Westham Parish and the increased traffic that it will bring must effect the local air quality and the nitrogen sensitivity of the Pevensey Levels and the surrounding area. In the plan Tourism is identified as one of the "Priority Actions". At the present time Tourism is probably the only real growth industry (discounting house building) in Wealden and we must take care to protect and preserve our historic features. Additional traffic from housing built over the past 20 years is creating problems in

locations such as Pevensey Castle and the fear is that more traffic will only serve to discourage tourists.

#### Additional Comments on Stone Cross

##### North East Stone Cross

SA1,12.6.4 describes a net biodiversity loss with green field development in Stone Cross. To minimise this loss a buffer zone of green space and native vegetation would be needed around the important ancient woodland at Pickens Wood and along the north side of the hedgerow in Peelings Lane.

##### Option 2 East Stone Cross

There are long views here from Westham towards the Downs. The fields here which drain down to the Rattle stream are always flooded in winter. This is an important green gap with separating the village of Westham.

##### Option 3 South East Stone Cross.

Increasing land loss to development would threaten the viability of Friday Street Farm in managing the wetlands. Views from along the public footpath between Stone Cross and Westham would be lost.

##### Option 4 West Stone Cross.

Much of the land is subject to flooding and long views towards the downs from the foot path would be lost.

##### Option 5 North West Stone Cross.

SA17 Employment. SA14 skills and training Stone Cross Garden Centre is an important employer and also supports local horticultural jobs in Hankham. The cafe is a social community resource. It is important that this business is not destroyed.

### **Westham**

Westham village has been allocated 350 houses. Elsewhere in the parish, Stone Cross has been allocated 500 houses on top of the 650 in the Core Strategy Local Plan (CSLP). The combined total for the parish is 1,510 (including the 10 for Hankham), which is the second largest allocation in Wealden.

This allocation is far too large and must be reconsidered.

Westham is one of the most historic villages in Wealden. It was certainly extant in the third century, being the west hamlet to the fort at Anderida. It continued in Saxon times and had a Saxon church. During the early Norman period, the wooden Saxon church was rebuilt in stone, allegedly, the first church the Normans constructed in England. Until the 19<sup>th</sup> century, Westham continued as a small farming community, with some yeoman's hall houses surviving to this day. The village grew a little during the mid-19<sup>th</sup> century with the onset of the railway. The first small estates were built after WWII by the local authority but it was not until the

1960's that larger market housing estates were first constructed. From the mid 1970's an area previously occupied by a mushroom farm and a pig farm became an industrial estate, which has been extended several times. The estate is largely populated with "town" type industries rather than rural businesses. It is constrained from any further expansion by the Mountney Levels (an extension of the Pevensey Levels) which are in a flood zone.

Until 1990, the neighbouring settlement of Stone Cross was a small village of around 300 houses forming a ribbon development along the four roads meeting at the central cross-roads. Then Wealden decided that the village should be expanded by the addition of around 1,000 new houses which were constructed in the 1990's. At the same time, Eastbourne Borough Council permitted development along its northern side right up to the borough boundary. Thus, in a relatively short space of time, Stone Cross changed from a small, discrete village to become an urban extension of Eastbourne. Over the last fifteen years, further building has increased Stone Cross to around 1,650 dwellings.

The 2013 CSLP allocated a further 650 houses to Stone Cross. The majority of these will be situated to the east of the village, eroding the countryside gap with Westham. The proposal within the new Local Plan is to examine all areas for construction of the additional 500 houses and does not preclude building to the east which will result in practical coalescence with Westham. The preferred areas for testing for Westham, are the north, west and north-west. These latter two areas are adjacent to Stone Cross and greatly increase the risk of coalescence.

Most residents in Westham are totally against the scale of building being proposed. In September 2014, every house in Westham was visited and their opinion sought with regard to a small estate of 18 houses being proposed immediately north of Peelings Lane. Responses were received from 685 households (out of a total of 1,008 in the village) and 654 were against extending the village into the countryside. Only eight households were in favour, the remainder declined to give their opinion. A public meeting was held in November 2014 to introduce the newly formed Conservation Group to the residents. The opportunity was taken to ask those attending for their views with regard to further building in the village. 100% of the 76 attendees were against.

The latest proposal to permit a further 350 houses must be resisted. There comes a point where continued development will cause irreparable harm to the historic landscape and the community. That point has now been reached. The OAN that Wealden is currently using is wrong and has overstated the level of need for new housing. This is an area with minimal brownfield land and is predominantly rural and the Council's wish to provide more development than is needed and thus degrade the rural surroundings, which they profess to value, is completely bizarre.

The residents of Westham value their rural surroundings and would like to retain their historical setting as a rural community on the edge of the Pevensey Levels. The proposed area for development to the north of the village is subject to long views from the Levels. A planning inspector refused an appeal in January 2015 for a development that would extend the edge of the urban area into the countryside to the north. An inspector also refused an appeal in 2000 in the same area for the same reason i.e. development would harm the character and appearance of the area.

Stone Cross has, in a matter of less than 20 years, been transformed from a small rural village to an urban, dormitory extension to Eastbourne. The CSLP allocation, is moving Stone Cross very close to Westham. The current proposal will mean practical coalescence of Westham and Stone Cross which will totally destroy the character of one of Wealden's most historic villages. The Local Plan proposal must be reconsidered, for both Westham and Stone Cross.

The preferred option for testing indicates that initially, the focus will be on the delivery of infill. It is disappointing that officers have made this decision as they have clearly not investigated the availability of land for infill. There is no infill land in Westham and this could be ascertained by officers by a very brief examination of Map 45. Thus any new development will be in the countryside adjacent to the Pevensey Levels and outside the current development boundary.

#### Question 46 Sustainability Appraisal

The concept is good, however the execution is very poor and renders the Appraisal worthless. Included below are some examples from the Sustainability Appraisal for Westham (the full text from pages 272-275 is included for ease of reference) where it is considered that many of the positives scores, when examined rationally, should be negative.

A comparison between Wealden's preferred option sustainability matrix and one prepared taking into consideration an accurate assessment against each objective is included below. This contains no positive effects, four neutral effects, five questionable effects and nine negative effects. Thus, from this result it is quite apparent that the preferred option for Westham has an overall negative effect on the sustainability objectives.

**Therefore, the preferred option for Westham is unsustainable and should not be taken forward.**

	Sustainability Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
<b>Preferred Option 30 for Testing (P.272)</b>	+	+	o	o	o	o	+	?	+	?	?	+	+	?	?	+	?	?
<b>Corrected Preferred Option</b>	-	-	o	o	o	o	-	-	?	?	?	-	-	-	-	-	?	?

#### **Commentary on Wealden's Sustainability Objectives for Westham**

The text from pages 272-275 from the Sustainability Appraisal Part B is replicated below in italics followed by a commentary.

***SA1 To protect and enhance biodiversity and geodiversity within the District***

*12.7.4 All of the Options would deliver development on Greenfield land and so there would be some loss in biodiversity, however there are no significant biodiversity constraints and therefore overall the effects on SA1 would be positive*

This comment lacks all credibility. To take the position that green field development would have a positive effect on the protection and enhancement of biodiversity is, in our opinion, utterly dishonest. The positive mark in the matrix for each of the considered options in the sustainability appraisal matrix should be replaced by a negative mark.

***SA2 Conserve and enhance the District's countryside, landscape, historic environments and cultural assets***

*12.7.5 In terms of SA2, the effects are also considered to be positive in that none of the sectors are particularly prominent in the landscape or views. Option 2 however contains the eastern sector within which lie the ruins of Pevensey Castle and the Roman fort and so development here may adversely affect the setting of the asset. Conversely, development in this sector may enhance access to the historic and cultural asset (SA3).*

It is very difficult to understand how any loss of countryside to development can be considered to be positive when the objective is to conserve and enhance the countryside. Countryside is not conserved and/or enhanced by building houses on it. Thus, the Council's assessment against this objective is completely wrong and the positive scores in the sustainability matrix should be amended to negative.

The suggestion that building houses adjacent to Pevensey Castle may enhance access to the asset is so ludicrous as to be considered a bad joke. In proposing this position, the author has destroyed any credibility.

***SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.***

*No text is included in the SA document for this objective*

This is correctly scored as negative in the matrix on page 272 as any development will be unable to reduce the risk of flooding. However, when the matrix is reproduced for testing the preferred options on page 275, it is marked as positive. This is obviously a mistake.

***SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy***

*12.7.7 The effects of the Options on SA8 and SA11 are linked. All of the Options raise concerns over air pollution issues (SA8) due to the proximity to the road network. The presence of the train station offers good public transport links to Eastbourne and Brighton and would help to mitigate this aspect but all new development in the area should focus on reducing future air pollution through enhancing public transport links, walking and cycle routes to services and facilities. Emissions from new development will need to be addressed through sustainable building design.*

The matrix shows a question mark for this objective. This cannot be correct and it should be negative. An increase in traffic through further development is inevitable and this will degrade air quality. Thus, any development does not have a questionable effect, it has a deleterious effect which is negative. Even with enhanced public transport, only a proportion of the new population will forsake their car and air quality will still be harmed.

***SA12 Improve access to services; facilities; the countryside and open spaces***

*12.7.9 The north; north-west and eastern sectors have good connectivity with the existing settlement which offers some facilities and services and the northwest sector also has a good proximity and access to Stone Cross (SA12). The south east and south west sectors are removed from the settlement and severed by the railway line creating a feeling of them being disjointed from the existing built form.*

This point (12.7.9) does not address the objective which is to **improve access** to services, the countryside and open spaces. That new development will have access, does not meet the criterion for improvement. No account has been taken on the effects of new development on the existing population which impedes their access. Thus the positive score against options 1, 5 & 6 should be replaced by a negative score.

***SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home***

*12.7.10 In terms of SA13, all of the sectors have constraints, primarily in the form of flood risk areas. The northern sector (Option 1) and north-west sector (Option 6), present the best opportunities for the delivery of market and affordable housing due to the fact it has the least amount of flood risk. There is likely to be small opportunities within the other sectors but these will be limited.*

Whereas people moving in to new homes should be provided with a good quality and sustainably constructed new home, there is no guarantee that everyone has the opportunity to live in an affordable home. In addition, this objective includes **everyone** and there is nothing in Wealden's proposals to ensure that any existing resident has the realistic opportunity to live in a good quality, sustainably constructed and affordable home. Thus, this objective should be scored negative.

***SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness***

There is no text for this objective although it is scored as neutral. Given that there is no provision in the proposals to improve skills, education and training and to develop a skilled workforce amongst the large increase in population that 350 new homes will bring, this lack of any training/upskilling provision should be regarded as negative.

***SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health***

*12.7.11 In terms of health and wellbeing (SA15) Westham shares access to the Surgery at Stone Cross and in this respect the north-west sector offers the best access. The west and north-western sectors (Options 5 and 6) do raise issues over road noise which can affect the health and wellbeing of people and so have negative effects on SA15.*

There is nothing in the proposals to facilitate **improved** health and wellbeing for either the existing population or the residents of any new development. That the existing and new residents have access to a surgery does not facilitate any improvements. The score for all options on this point should be changed to negative.

***SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community***

*12.7.12 Options 1; 2 and 5 have good connectivity with the settlement centre and offer good potential to create a more cohesive community. Development within the south east and south west sectors (Options 3 and 4) are disconnected from the main settlement and any development here would need to focus on community vibrancy to ensure it overcame that fact. The north-west sector (Option 6) is a little far out from the settlement however development here could lead to the creation of a more cohesive community in combination with development at Stone Cross.*

It is difficult to understand how building houses in green fields in areas that have access to the village centre is going to create a more cohesive community. By destroying the existing rural surroundings and urbanising the village is more likely to create a less cohesive community. How one concentrates on increasing community vibrancy is very much a mystery. To consider new housing to be thrilling, takes too much imagination when there is no precedent to understand. It is considered that new housing will not contribute to this objective and the scoring for all options should be negative.

Westham is very proud of its rural setting and does not want to combine with the urban extension to Eastbourne that used to be the small village of Stone Cross. Therefore, development in the north-west sector will not create a more cohesive community (whatever that is).

***SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses***

*12.7.13 In economic terms the south east and south west sectors offer the greatest potential for employment floorspace provision (SA17). There are existing employment sites within these sectors and so this makes them more suitable to employment rather than housing development. For the other sectors there are opportunities for employment provision as part of mixed use developments and this would improve access to jobs.*

Whether or not some sectors offer the greatest potential for employment floor space is immaterial. There are no proposals for new employment space in Westham in the Issues, Options and Recommendations document and therefore there is unlikely to be more employment opportunities. To suggest that more employment space may be forthcoming when there are no visible proposals, is in our opinion a dishonest position to adopt. The score for all options should be negative.

***SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism***

*12.7.14 For SA18, Options 1; 2 and 5 offer the potential for regenerating the settlement centre. The remaining Options are not particularly well connected to the settlement centre.*

It is difficult to understand why Option 5 is considered positive with regard to this objective given that the area available for development is small with the majority of the area being in the flood zone. Considering the position of Westham it is difficult to comprehend how further development will satisfy any of the criteria for this objective and the score for each option should be negative.

There is no requirement to regenerate the settlement centre. Westham is a village and villages have limited facilities. If anybody would like more facilities, they are at liberty to relocate to a town. The majority of village residents live in a village setting by choice, they do not wish to live in a town.

### **12.7.16 The Preferred Option is:**

*"To initially focus the delivery on infill, subject to a capacity study, with potential allocations to meet requirements in North, West and North West Westham, whilst avoiding areas of flood risk".*

### **Environmental SA Objectives (SA1-SA11)**

*12.7.17 Overall the Preferred Option for Testing is likely to have positive effects on these SA Objectives. There are no biodiversity or particular landscape constraints and the fact that development will initially be focused on infill means that the best use of brownfield land will be achieved first. However, it is clear that there will need to be some element of Greenfield land development as well. The Preferred Option for Testing also avoids any flood risk areas and so will help achieve SA7. For SA8 and SA11 emissions are likely to increase due to the fact that Westham has such good access to the road network, however the presence of the train station should help mitigate any negative impacts and development could help enhance access to the train station, particularly walking and cycling routes, from the sectors included. There is no infill potential for Westham, any development will be outside the current development boundary and all development will be on green field land (unless development is permitted on existing employment units or the campsite). Thus, green field development will have a negative impact on SA1 & SA2.*

SA7 requires that flooding be reduced, the preferred option does not reduce the incidence of flooding and is therefore not positive.

For SA8, it is required to improve air quality. Any increase in traffic will degrade air quality. That some of the new residents may use the station, rather than their car, will reduce the amount of additional emissions, but these emissions will still be greater than before the development occurred. Thus, this objective should be scored as negative.

SA9 requires the best use of previously developed land and buildings. There is a commitment to investigate the use of brownfield land but no commitment to introduce a policy that brownfield land must be developed before greenfield. Without this policy, this objective can only be scored neutral at best.

SA11, requires a reduction in greenhouse gasses. It is accepted that a new development can reduce the amount of greenhouse gasses emitted when compared to older developments, but there will be some increase in emissions overall. This means the preferred option fails the test of reduction and should therefore have a negative score.

### **Social SA Objectives (SA12-SA16)**

*12.7.18 Socially, the effects of the Preferred Option for Testing are likely to be positive. Westham is an accessible settlement with good links to Eastbourne providing access to services and facilities for people. With the train station this access is further enhanced (SA12). Housing provision will be within the most accessible sectors and will be able to meet local need provided issues of flood risk can be overcome (SA13). The presence of the flood risk areas does reduce the land potentially available for development however the Preferred Option for Testing is seeking to locate development in the least constrained sectors in terms of flood risk.*

Access cannot be enhanced by the existing train station, least of all further enhanced. Access to the countryside is not improved by the preferred option, it is degraded for all the existing residents. SA12 should therefore be negative. Whereas 350 new houses will meet the local housing need many times over, the addition of many more houses than is required by the current need will have a negative effect on the existing population. SA13 is also negative as the only improvements will be felt by the new residents, not the existing, thus the requirement for everyone to benefit is not delivered.

*12.7.19 In regards to SA14 the Preferred Option has no direct effect as it does not deal with employment land provision, however the level of housing proposed would help support a local workforce and attract new businesses. Westham itself does not have a surgery but there is access to health care facilities at Stone Cross and Langney. The scale of development and sector location may provide opportunities for new health care facilities to address this issue (SA15).*

There is no provision for training or upskilling so SA14 is not met. For SA15, access to an existing surgery does not enhance wellbeing and this objective is not met.

*12.7.20 The Preferred Option for Testing should help foster vibrant and inclusive communities through opportunities to enhance connectivity with the centre and the wider area including Stone Cross and Eastbourne. This would need to be particularly considered if housing development occurs in the north-west sector.*

Similarly, nor is SA16 achieved – building 350 new houses on green fields on the edge of the existing settlement will not achieve a vibrant, active, inclusive and open minded community or reduce poverty and social exclusion for all sectors of the community.

Thus, none of the social objectives are met and the score for all four should be negative.

### ***Economic SA Objectives (SA17 and SA18)***

*12.7.21 In economic terms the Preferred Option for Testing offers opportunities for employment provision as part of mixed use developments and this would improve access to jobs.*

There are no provisions in the proposals for mixed use developments, the proposals make provision for housing only. To suggest otherwise in order to meet this objective is in our opinion dishonest. There is benefit in economic terms arising from the preferred option.

### Additional comments on Westham

**Westham, Preferred option for testing, 30, P.193, Question 29. Disagree - another 350 dwellings would be unsustainable. Causing huge loss of local distinctiveness. There is not enough room for this number of houses.**

### **Reasons:-**

Flood Risk - Large areas of the village are in flood risk zones 2 and 3.

The Pevensey Levels international Ramstar site is part of the North Sector. To minimise the loss of biodiversity there needs to be a buffer zone around the levels. The Wealden Local Plan (WLP), Design and Heritage Background Paper, Point 1.25,

states that "Expansion of urban development on the fringes of the levels has impinged on the open character of the landscape in some places with associated pollution often damaging the fragile ecology of the area."

Tourist Economy - There are 120 caravan pitches, bed and breakfast establishments, pubs, restaurants and shops which rely on tourist money.

Tourists staying overnight and visitors spend much more than villagers. Tourists support many local jobs.

Biodiversity - Development would reduce biodiversity. Rare birds and mammals under threat will not be hunting on fields with noise, lights, cars, dogs, cats and people. Pollution from cars and more residents would drain across the Pevensey levels. This is evidenced in the WLP where it is stated that past development on the fringes of the levels has damaged the wildlife. Local civil engineers say that mitigation with SUDS often leads to pollution seeping deeper in to the ground. Tourists are attracted by the heritage, wildlife, agricultural heritage, quiet rural country lanes and foot paths, landscape views and fresh air. Residents also depend on these resources for their mental and physical wellbeing. Because these features are our collective cultural heritage and there is no public park in the rural village of Westham.

Peelings Lane - This is an ancient single track pre- Roman "sunken driveway". It is the original route linking Westham and Stone Cross. It is part of the geodiversity and deserves to be registered as a "Local Asset". The lane is adjacent to the Pevensey and Westham's designated "Heritage Area". Much of the hedgerow is ancient, with diverse native flora and fauna which have evolved over thousands of years.

Spectacular wild flowers such as Ladies Smock are found in spots that are managed appropriately. Biodiversity would increase even more with an enhanced management plan. The widening and increase in traffic on any sections of this quiet lane to enable development access would destroy the integrity of this sustainable resource. It is widely used by walkers, joggers, children learning to cycle, disabled people with walking frames and tourists. At present it is a safe sustainable route between Westham and Stone Cross. A tourist leaflet explaining some of the heritage and wild life features of the lane is being developed. The lane is part of the E9 European walking route from Spain and France via the South Downs way then via the 1066 walk to Battle. The widening and increase in traffic on any sections of this quiet lane to enable development access would destroy the integrity of this sustainable resource. These facts have been reflected by planning inspectors in recent years and developments in the North Sector have been rejected by the planning inspector.

Westham Village - The Wealden Local Plan Sustainability Assessment document (SA).

SA1, 12.7.4 states that all the greenfield sites in Westham would have, " some loss of biodiversity " with development.

SA2, " Conserve and enhance the district's countryside, landscape, historic environment and cultural assets" states that none of the sectors are particularly prominent in landscape or views but gives no evidence for this. We will outline the important landscape and views in comments on each sector. It is also stated that development near the Castle may enhance access (SA3) but residents consider that

there is no evidence or logic in this assertion as development would spoil the views and restrict access.

SA, 12. 12.7.9 concerns improving access to the countryside and open spaces but access for current tourists and residents will be reduced if more fields are developed.

SA181.7.14 promoting sustainable tourism. The tourists who visit to enjoy the countryside will be discouraged by building on green fields and the loss of biodiversity.

#### Option 1 North Westham

An appeal by developers to gain housing permission in this area in 2014 was dismissed by the government planning inspector who cited the reasons in a 5 page document. These reasons include many of the facts mentioned above.

The detrimental landscape impact on the, "landscape views ", from both directions along the Mill Farm footpath and the "vegetated banks", of Peelings Lane are cited. 18 dwellings were proposed then and the inspector said that this number would be "intrusive in the landscape". The stream in the lower field at Mill Farm always floods in winter.

He also mentioned the high risk of pollution of the Pevensey levels, (which are 240 metres away), even though SUDS were planned.

Further east along Peelings Lane the 1066 foot path crosses Castle Farm there are extensive castle views. Many tourists stroll across here to the Chilley farm shop and cafe. There is also another footpath with views to the east.

#### Option 2 East Westham

This area is all flood zone and more development would destroy the setting of the Castle. The proposed conservation area extensions are in this area.

#### Option 3 South East Westham

This area is largely flood zone. The nationally rare Fen Raft spider which is habitat sensitive is found in the ditches here.

The tourist caravan site provides employment for Westham and supports many local businesses.

#### Option 4 South West Westham

This is a flood risk zone. There is only a narrow buffer between industry and housing.

#### Option 5 West Westham

This is all flood risk zone. 50% of the field area is flooded for several months every winter. Some of the fields are part of the "climate change buffer zone" mentioned in

the previous local plan. There are extensive long views across to the Downs from the foot path by the road.

#### Option 6 North West Westham

The fields either side of the Rattle Stream in the south here are part of the "climate change buffer zone", they are often flooded in the winter.

Fields to the North of Peelings Lane have no access to any traffic increase as the lane is a narrow single track ancient "sunken" lane. As discussed previously heritage, biodiversity and amenity damage would take place if the lane is widened. Widening would not be possible due to the presence of buildings at the east end and the A27 at the west end.

Development on green fields in areas 1-6 is not sustainable, would not meet the aims of SA1 , SA2 .and SA12 and should not take place. No clear evidence is given for meeting these aims. The present economic benefits of tourism would be severely threatened with a threat to jobs from the deterioration of landscape, environmental quality and quality of life.

### **Wealden Local Plan – Conservation Areas**

Question 1: Do you agree or disagree with the recommendation and preferred option for testing for existing Conservation areas, (contained in Chapter 5)?

Agree

Q2: Do you agree or disagree with the alternatives for existing Conservation Areas, (contained in chapter 5)?

Agree - 5.18.2.6 Inclusion of options PYW 1 to 6. This land will protect the setting of Pevensey Castle and the ancient buildings of Pevensey and Westham

Q3: Do you agree or disagree with the recommendation and the preferred option for testing for new conservation areas (contained in chapter 6)?

Issue 5, Option 5

Agree - new conservation areas are important to protect the setting of ancient settlements such as Pevensey and Westham. Where there is a need to ensure that historic local distinctiveness is conserved for residents and for tourists who stay in the villages. This brings economic gain.

Q4: Do you agree or disagree with the alternatives for new conservation areas, (contained in chapter 6)?

Issue 6, Option 6

Agree - Non Designated or Locally Designated Heritage Assets are an irreplaceable cultural and well-being resource. For example Peelings lane which is the original route linking Westham and Stone Cross. This is an ancient pre Roman, single track, "Sunken Lane", with associated ancient hedges and distinctive flora.

Q5: Do you agree or disagree with the settlements not proposed to be taken forward?

Agree - Some of these have features which would benefit from being designated as "Local Heritage Assets". For example Hankham village.