

Objection to the allocation of funding to a Community Land Trust for the development of HELAA site GUE0010 'Land at Fairview'

I refer to the site identified as GUE0010 'Land at Fairview' on the Councils Housing and Economic Land Availability Assessment (HELAA) published in April 2024

I fail to understand why Rother District Council appears to be offering land in Guestling to a CLT when it fails to satisfy numerous paragraphs of the Development Plan and it has already been assessed as unsuitable by the Council! I refer to the site identified as GUE0010 Land at Fairview, Pett.

The Council in the HELAA has already stated the following in relation to this plan:

"the sustainability of the location and accessibility is an issue. there are very few services, and no continuous footway to village amenities including bus stops. To access the limited services in Pett requires walking mainly in the carriageway. While a footway outside the site could potentially be provided this would still not provide a continuous link. Future residents would be car dependent for most services."

Members of the CLT appear to consider that a designation as a 'rural exception site' gives it some kind of amnesty from the need to follow the requirements of the Development Plan. However, this is not the case.

In addition, the lengthy Rother Local Development Plan emphasises the need for active travel in multiple paragraphs throughout the document. This is clearly an indication of the importance attached by Rother District Council to ensuring future housing developments encourage healthy lifestyles and environmental sustainability.

However, the proposed development at Fairview does not align with the Local Plan. Despite it's designation as a 'Rural Exception Site', this does not exempt it from the requirement to have safe access nor from numerous other requirements. Quotes from Rother Council Documents in speech marks and annotated in below show the 'Fairview site is unsuitable for housing. Due to the repetitions in the local plan, the annotations are in consequence somewhat repetitive.

Policy DHG2: Rural Exception Sites states that "in exceptional circumstances, planning permission may be granted for small scale residential development outside the development boundary in order to meet a rural need for local affordable housing." However It further states: "Such development will be permitted where the following requirements are met :"

"(i) it helps to meet a proven local housing need for affordable housing in the village/parish, as demonstrated in an up-to-date assessment of local housing need" The CLT are basing this perceived need on a survey conducted in 2021. There is no 'up to date' assessment of local housing need. Only two of the respondents to the housing needs survey conducted in 2021 felt their need was sufficiently strong to register with a housing association or local authority. Several other local low cost schemes have been constructed since the 2021 survey was conducted.

(ii) "it is of a size, tenure, mix and cost appropriate to the assessed local housing need"; 43 percent of respondents to the 2021 survey indicated a desire to live in a flat/studio flat. These types of home are not being offered by the CLT on the proposed site.

“(iii) it is well related to an existing settlement and its services, including access to public transport” It is not well related to an existing settlement (it is isolated from it). It does not have safe access to local services. Public transport is unsatisfactory. Active transport to and from this site would be impossible for some groups and extremely dangerous for others.

“(iv) the development is supported or initiated by the Parish Council”; The CLT claim the proposed development is for two parishes. Neither Pett Parish Council nor Guestling Parish Council have made a decision whether to support the current plans and it was not supported previously by Pett Parish Council (v) The local planning authority is satisfied that the identified local housing need cannot be met within the settlement development boundary; and

“(vi) The development does not significantly harm the character of the rural area, settlement or the landscape, and meets other normal local planning and highway authority criteria, in line with other Council policies”.

It contravenes numerous statements and commitments made in the Rother Plan District Local Plan (April 2024). Please see further evidence below

“Planning permission will only be granted where it can be demonstrated, through the submission of appropriate evidence, that there is, or will be, sufficient infrastructure capacity to meet all the necessary requirements arising from the development. “(Page 223) This site does not have appropriate infrastructure. It is isolated through lack paths or cycle ways from facilities such as schools, Village Hall, play group, doctor’s surgery, food shops, places of worship, open spaces, sports and recreation facilities, places of entertainment and meeting places. The timetabled local bus service is very poor (and unreliable) and the ‘Flexibus’ service does not operate to facilities in Hastings.

“Where new infrastructure capacity is required, it must be demonstrated that it can be delivered upfront or early in the development phasing.” This has not been demonstrated.

“If infrastructure cannot be delivered upfront or early in the development timescale, an agreed timetable, secured through planning condition or legal agreement will need to be in place so that the infrastructure can be delivered as soon as practically possible” This has not been actioned.

“Applications must set out all the infrastructure implications of a proposal and how they have engaged and worked with infrastructure providers. This includes infrastructure that is required to be delivered both on or off-site.” This has not been actioned. Members of the CLT appear to believe they have no responsibility in ensuring safe, appropriate access to off-site infrastructure.

“Where a proposal would be made unviable in light on infrastructure requirements, open book calculations verified by an independent consultant approved by the Council must be provided. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developers cost to ensure the value of planning obligations This has not been actioned encouraging active travel will minimise emission output parallel to population growth and associated increase in trips.” Safe active travel is not possible from this site due to the lack of paved paths for safe walking/wheeling.

The bends at the point of egress from this site do not allow good sight lines for able bodied adults to cross the road on foot, by bike or for carers pushing a child buggy wheelchair. It is even

more hazardous for unaccompanied children, those with disabilities and the elderly. There is no footpath on either side of Pett Road adjacent to the proposed development and dangers are compounded by nuisance parking which forces pedestrians and others into the middle of the road. The stretch of and the nearby lanes are narrow and dangerous for cyclists and pedestrians. They are unsuitable for pushchairs and wheelchairs. There are no traffic calming measures on Pett Road the speed limit is never enforced. The road is used by some motorists as an alternative to the A259 as a through-route between Hastings and Rye between White Hart Hill and the junction east of Winchelsea and Winchelsea Beach. Furthermore, it is used by drivers of large vehicles who are unfamiliar with the road including large numbers of towed caravans, campervans and other traffic accessing tourist sites in Watermill Lane as well as delivery vehicles, private cars and agricultural vehicles.

The result is likely to be an over-reliance on private motorised transport for those who can afford it and social isolation for those who cannot. The lack of safe active travel routes to and from this site will lead to clear predictable physical dangers and damaging psychological impact for those who cannot afford private transport since they would become isolated on site.

In addition the environmental damage caused by increased private transport movements and the physical health implications resulting from an inability to use active travel are obvious. Many of these problems would be felt most acutely by people with protected characteristics including those with disabilities, parents with children in buggies and the elderly as well as those on the lowest incomes.

“This overall priority envisions a network of mixed-use and adaptable places which promote happiness, health and wellbeing, foster social interaction, reduce health inequalities, encourage active living, and enhance overall quality of life. The lack of safe active travel options would discourage active living and severely limit opportunities for social interaction with the local offsite community. This site would not therefore promote happiness, health and wellbeing, nor would it reduce health inequalities or enhance the overall quality of life“..... where people can meet most of their daily needs within a reasonable distance of their home, preferably by walking, wheeling, cycling (active travel), or using public transport options.” The proposed development will not provide safe opportunities for walking, wheeling and cycling since there is no provision for site users to leave the site safely and there are no safe active travel routes to any local infrastructure such as shops, meeting places, health services, schools, adult education, entertainment, recreation or sporting facilities “..... To minimise carbon emissions, new development will be guided to locations that help to reduce the overall need to travel, offer the best opportunity for active travel, and for the use of public transport. This will help to maximise opportunities for sustainable travel and reduce the reliance on and for minimal use of private motor vehicles.” The proposed development will not provide the above for active travel for the reasons already stated. Public transport is sporadic and unreliable. It does not operate in the evenings or on Sundays. The ‘Flexibus’ service does not cover Hastings. The result will be an over-reliance on private motor vehicles which will increase pollution, increase vehicle movements on local roads and further exacerbate the climate emergency. (PAGE 62 – Live Well Locally “to plan housing developments along corridors with frequent public transport, or in places where they will facilitate such provision;” As stated above, there is very INFREQUENT (and unreliable) public transport on Pett Road. There are no plans to facilitate better provision and the ‘Flexibus’ does not enable residents to reach locations in Hastings.

“Vision, Overall Priorities and Objectives “

- Quality of Life will be enhanced:

Residents will be able to live well locally within safe, balanced and age-friendly communities, where residents and visitors can reach the facilities and services they need, often by walking, cycling and public transport.

NONE OF THE UNDERLINED STATEMENT ABOVE APPLIES TO THIS SITE FOR THE REASONS ALREADY STATED.

What does Green to the Core mean?

- "RDC has declared a climate emergency and this is the defining issue of our times. Local planning authorities have a legal duty to ensure that planning policy contributes to the mitigation of, and adaption to, climate change"
Whilst the proposals for the buildings on this site aim to be sustainable, this will be negated by the need for large numbers of polluting vehicle movements on and off site for years to come.
- "contributing to the radical reduction in carbon emissions required by national planning policy through planning for sustainable transport, net zero housing and renewable energy;"
- Green to the Core emphasises the need to consider the impact of our planning decisions on the climate emergency, and contributes to the radical reductions in emissions required locally. The proposed development would encourage the use of private cars (for those who can afford them). This will lead to an increase in private vehicle movements and increased emissions contrary to claims relating to the sustainable nature of this site.
- "Live Well Locally recognises that in all planning decisions, the goal is to create healthy, sustainable and inclusive communities."
- "planning for physical and mental health and wellbeing by supporting strong, safe and sustainable communities, with a community-led focus, promoting healthier lifestyles, reducing inequality and deprivation"
- The lack of opportunities for safe active, sustainable travel on the 'Wildflowers' site will be counter-productive to healthy life styles. For some people with protected characteristics and those who cannot afford private motor vehicles/taxi fares, homes on this site are likely to cause social isolation and exclusion from the local community This will be socially divisive and will lead to poor mental health.
- Paragraph 157 of the NPPF states that the planning system 'should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings" The inaccessibility of this site via affordable, active sustainable methods of transport means that it is unsuitable for achieving the aims stated above. This site is therefore not suitable to 'contribute to radical reductions in greenhouse emissions'
- "Direct development to sustainable locations, with services and transport options. "
"Develop planning policy that contributes to the radical reductions in emissions required nationally, whilst still making development viable. Whilst there are aims to plan sustainable

buildings on this site, the inability to access the proposed homes and local infrastructure safely on foot or by safe sustainable and affordable methods of transport will not enable the proposed development to contribute to a 'radical reduction in emissions'"

1. "Key recommendations

Achieving significant carbon reductions in Rother will require coordination between not just how buildings are developed (as directed by planning policy) but where they are located

The lack of active travel provision does not allow this site to fully support a 'low carbon future'."

As stated above, the location of this site will not lead to increased carbon emissions due to the necessity to access local infrastructure via numerous vehicle movements in private transport.

This scheme has no plan to re-use existing resources. The possibility of converting existing buildings elsewhere does not appear to have been properly explored.

2.9 "Live Well Locally promotes the idea that residents of all ages, abilities and backgrounds should be able to access their daily needs (housing, work, food, health, education and culture and leisure) as locally as possible and have the option to do this by walking, wheeling, cycling or by public transport.

Where a mix of local amenities are not accessible by walking and cycling, development must be located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service(s), which connects to destination(s) "

The proposed site does not provide a safe option to access daily needs by walking, wheeling or cycling and the options of doing so by public transport are extremely limited. The local bus stops are not even safely accessible from the site!

"The difference in annual emissions among the scenarios can be largely explained by transport emissions based on the assumptions for each scenario relating to commuting trips, travel modes and electrification rates of private vehicles and public transport. These findings indicate that measures focused only on buildings' performance will not be alone sufficient to reduce the emissions associated with growth to net zero "

- "Measures and policy should focus on 1) reduction of trip rates and miles, 2) zero emissions public transport, 4) electrification of private vehicles, and 5) incentives for visitors to use public transport instead of driving in the district. "

IT IS CLEAR THAT THE PROPOSED SITE DOES NOT FOCUS ON 1-5 above

"In assessing the suitability of a particular location for development, when both allocating land for development and determining planning applications, sites and/or proposals must accord with the relevant policies of this Local Plan and meet the following strategic placemaking policies:

- Facilities and Services (Policy LWL2)
- Walking, Wheeling, Cycling & Public Transport (outside the site) (Policy LWL3)"

For the reasons already stated, this site does not meet requirements above

"All new development must ensure access for all and help make walking and cycling feel like the natural choice for everyone undertaking short journeys (such as the school run or older generations accessing local facilities and services) or as part of longer journeys. "

The proposed development does not ensure access for all. Walking and Cycling are dangerous even for short journeys. Local facilities would NOT be safely available to the elderly and the local school is inaccessible except on one journey in each direction per day on an unreliable school bus service. The timetable for this bus excludes children from attending breakfast club or after school activities. (Please contact Guestling Bradshaw CE Primary School for details of the number of times this bus has been cancelled in the last twelve months).

(A)" All development proposals for one or more new dwellings must meet the following criteria: (PAGE 69)

..... within a safe, usable walking distance of a mix of local amenities (either within the site or outside but accessed via an accessible walking network) appropriate to the development proposed. "

from page 199 Health and Well being:

iv) "Be supported by necessary infrastructure provision, including prioritising the use of accessible sustainable and active transport measures which improve access and link developments to key services and facilities

5. v) reducing social isolation, enabling active lifestyles and improving social cohesion and connectivity; "

"Planning permission will only be granted where it can be demonstrated, through the submission of appropriate evidence, that there is, or will be, sufficient infrastructure capacity to meet all the necessary requirements arising from the development. Where new infrastructure capacity is required, it must be demonstrated that it can be delivered upfront or early in the development phasing.

Planning Permission should therefore NOT be granted

A small level of sensitive development will be delivered in the Hastings Fringes where it is well connected to the urban fabric of Hastings, to public and active transport routes, and to key services and facilities."

The proposed site is NOT well connected in the manner described

CONCLUSION

It is clear that Rother District Plan has been written to ensure housing development takes place in areas with good public transport and active travel links with overriding aims to promote public mental and physical health and counteract harmful pollution and environmental damage.

Unfortunately, the location of the 'Fairview' site does not permit safe access to infrastructure by sustainable means and therefore it clearly does NOT satisfy numerous aspects the requirements of the Local Plan in relating to environmental considerations and the safety, mental and physical health of residents.

In addition to the inaccessibility to the proposed site, there are additional significant factors of concern in relation to construction on the 'Fairview' site.

These include major unresolved issues in relation to further pressure being exerted on the already overstretched local drainage system by additional foul and surface water. Frequent pollution of inland coastal waterways is already well documented. This development would result in further urban sprawl into this Area of Outstanding Natural Beauty with detrimental visual impact, and harmful pollution in terms of greenhouse gases associated with additional transport movements, light pollution of dark night-time skies and noise. Whilst the CLT are likely to claim that this site does not have 'special significance' in relation to local flora and fauna and soil, the proposal will nevertheless destroy yet another greenfield site at a time when there is National and local concern about destruction of natural habitats, and an urgent need for conservation and re-wilding. Claims relating to this project being are a gross simplification since they do not take account of irreversible.

Due to its inaccessibility by sustainable and active travel, pollution resulting from the necessity for numerous vehicle movements to access local infrastructure into the indefinite future make any claim that this is 'carbon neutral' or 'sustainable' a gross distortion of reality. Not only will it exacerbate the climate emergency, but it will lead to the destruction of soils, insect populations, birds and other creatures which live and feed on this site.

Having read the Rother Development Plan in its entirety, I am impressed with the professionalism of its authors. Whilst there is clearly a need for input from local people in relation to proposals for housing schemes it is essential that the numerous safeguards in National guidelines and those identified by authors of the Local Plan are followed. Long term issues relating to the global climate emergency and needs of wildlife, the local community and the Global Climate Emergency are far too important to be sacrificed for a short term ill-conceived perceived 'advantage' relating to offering this land to the CLT at a "bargain price". I am extremely concerned that the CLT are blinkered to the long term harmful effects of attempting to develop this site.

This site is clearly unsuitable and funds derived from public money would be better spent on investigating sites for sustainable low cost housing which DO fulfil the requirements of the Rother Plan rather than wasting them on a CLT group who appear to be incapable of interpreting those recommendations. If homes are constructed on the 'Wildflowers' site the CLT are in danger of blighting the lives of those they are trying to assist.

Whilst the 'Fairview' site is clearly not suitable for the numerous reasons given, land adjacent to the Village Hall in Pett may be more suitable for limited small scale development of low cost housing if a demonstrable need is identified by an up to date professional survey approved by Rother Council. The Village Hall site is currently a neglected, uncultivated field which is not used for livestock. It was previously offered for housing by the land owner but planning permission was not pursued. It has immediate access to the Village Hall, and existing road access from Pett Road. It also has pavement access to church, hairdresser and pedestrian access to the Two Sawyers public house. In addition public rights of way provide access to green space including Woodland and various public footpaths also enable access to the recreation ground, cricket pitch, tennis court and lawn bowls in Pett and the local primary school and church in Guestling. Currently there are also adjacent allotments.

