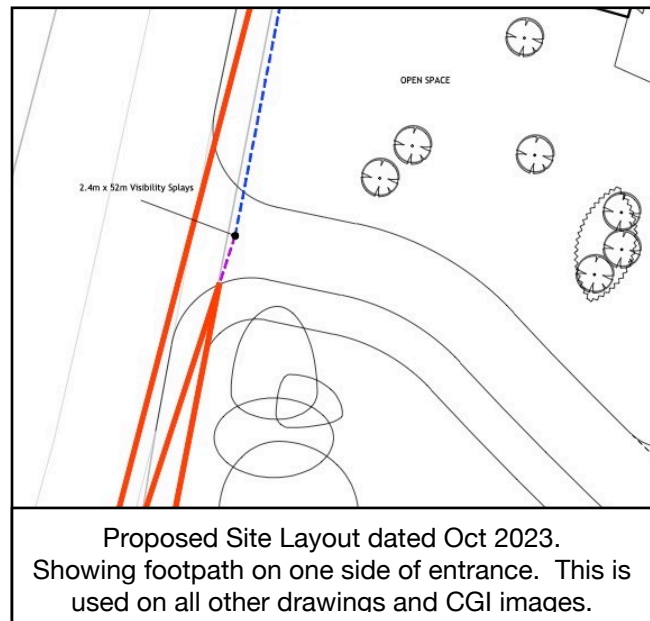
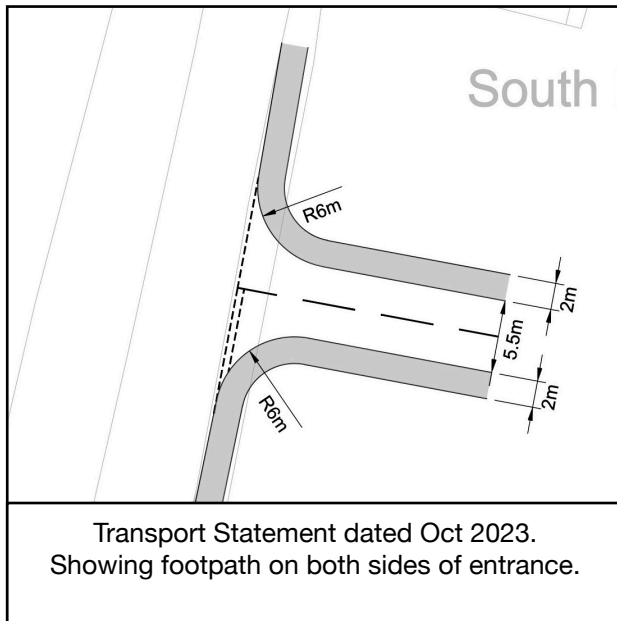


## Heritage Issues

1. The WDC Conservation Officer stated that: “It would also be critical to retain the non-designated heritage asset that sits within the site and utilise the existing access onto the site rather than creating new access points”. There is no need for a new entrance to this site. One currently exists that is sufficient for 20 homes and this should be utilised. It would simplify the South Street access and improve safety. The proposed new entrance is shown in 2 conflicting forms:



2. The WDC Conservation Officer stated that: “any development of the site should incorporate the retention of a rural edge to the village and the East Hoathly Conservation Area as a critical element to retain existing character and provide an important break between the village and more modern development to the south”. The applicant’s planning statement claims that the application retains the rural edge to the village but this is not true, they are proposing an unnecessary additional road access, blocking the view of the circle of Oaks with a garage block and a two storey house.

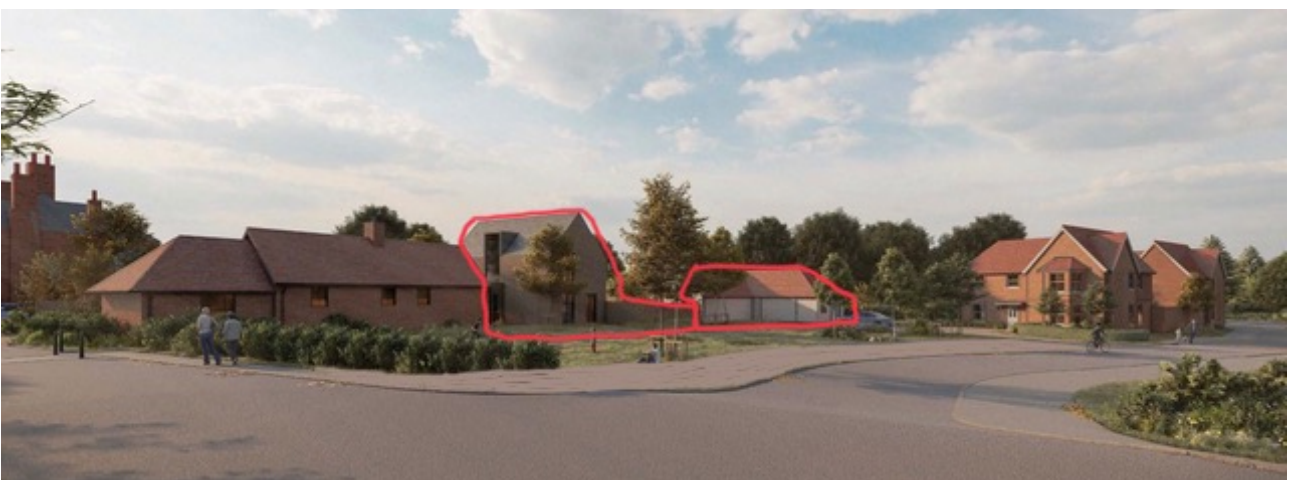


The picture above shows the applicant's CGI of what they want to present to the planning committee as the site entrance.



This is a more realistic version of the same site entrance with the additional pavement added and some vehicle parking which would no doubt occur as a result of an inadequate parking space allocation for the 20 homes.

3. In both the images above, this does not represent a preservation of the rural edge of the village and the Conservation Area. The only way to comply with this would be to reduce the two storey extension to the stable block and the garage block so that the Circle of Oaks can be seen. Also, the creation of an unnecessary road access and pavements ruins the rural aspect of this image. The inclusion of this unnecessary access will cause harm to the Setting of the Conservation Area and Non-Designated Heritage Assets.

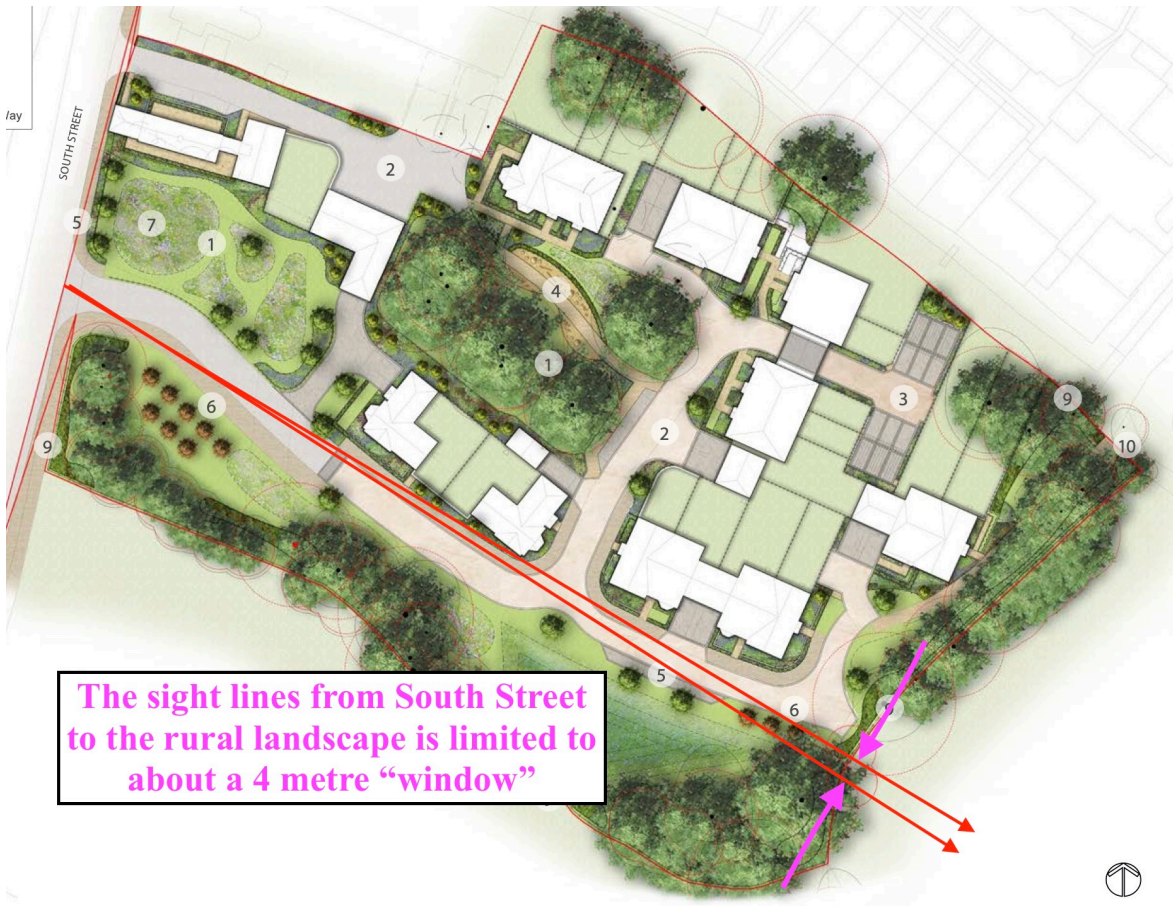


4. Plot 3 is not a good solution to the conservation issue and will not address the harm to the Setting of the Conservation Area and Non-Designated Heritage Assets. The Conservation Officer suggested: “the stables building should also be provided with a use to ensure its long term repair and maintenance and it was suggested that this could be converted to a single storey dwelling, perhaps with a small extension”. The applicants proposal is not for a small extension. It is a 3 bed home of two storeys which increases the floor area of the original single storey dwelling by 161%. A small extension might be to accommodate a one bedroom house with a one storey extension. Using the stables as a commercial space would also be a possibility and bring some employment opportunities to the community or possibly a community building.

5. The Landscape and Visibility Study makes a lot of claims about being able to see into the site, “open views of the new homes are anticipated”. They completely miss the point that the view the village wants to see is the Circle of Oaks in its rural setting. This is also what is required to retain the rural setting of the Conservation Area and limit the harm to the Setting of the Conservation Area and Non-Designated Heritage Assets. The views to the rural landscape beyond the site which they claim will be retained but in reality this will be a very narrow view of only about 4 metres.







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## **Changes since 2018**

6. Since 2018 things have changed so there is the opportunity to address other issues but these may be disregarded by the planning department and potentially by the Planning Committee. They are:

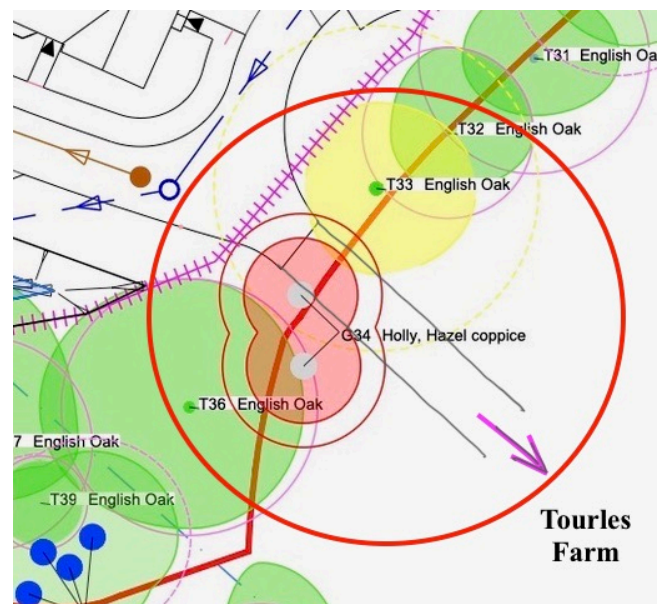
### **Applicant's Future Plans**

a. The applicant plans to develop other land in the Parish and specifically Tourles Farm to the East of this site:

(1) They purchased this plot in order to provide the necessary access.

(2) They have prematurely installed a gate onto South Street to suggest that this access to the site has always existed. In doing so, they replaced a traditional post and rail fence (still referred to in the Applicant's Design and Access Statement, page 20) with post and wire fencing contrary to the WDC guidance contained in the Applicant's Landscape and Visual Impact Assessment, page 13.

(3) They have felled a significant Oak Tree [T33 'A' category (high value)] and propose the removal of G34 (a group of Holly/Hazel) on the eastern boundary of the site and propose to build a small section of road leading to their proposed access way into the fields beyond. It is not clear if permission was sought to fell this significant Oak Tree.



(4) They have informed the Parish Council of this plan to build 255 homes using this access.

b. This clear plan for development of 255 homes with the bulk of the vehicles from those houses passing through this site is not mentioned in the application. This application is being assessed for a new access onto South Street based on 16 homes (the other 4 homes will use the existing access onto South Street). This access should be assessed based on the full plans that this developer has for this access point. It should also take into account the new developments on London Road



(205 homes) and South Street (55 homes) which will have already added a significant amount of traffic to the village.

c. The Applicant insists that this application should be determined without reference to any future development at Tourles Farm. If that is the case, then this application does not make the most effective use of this site, thus failing to comply with NPPF 2023 Section 11.

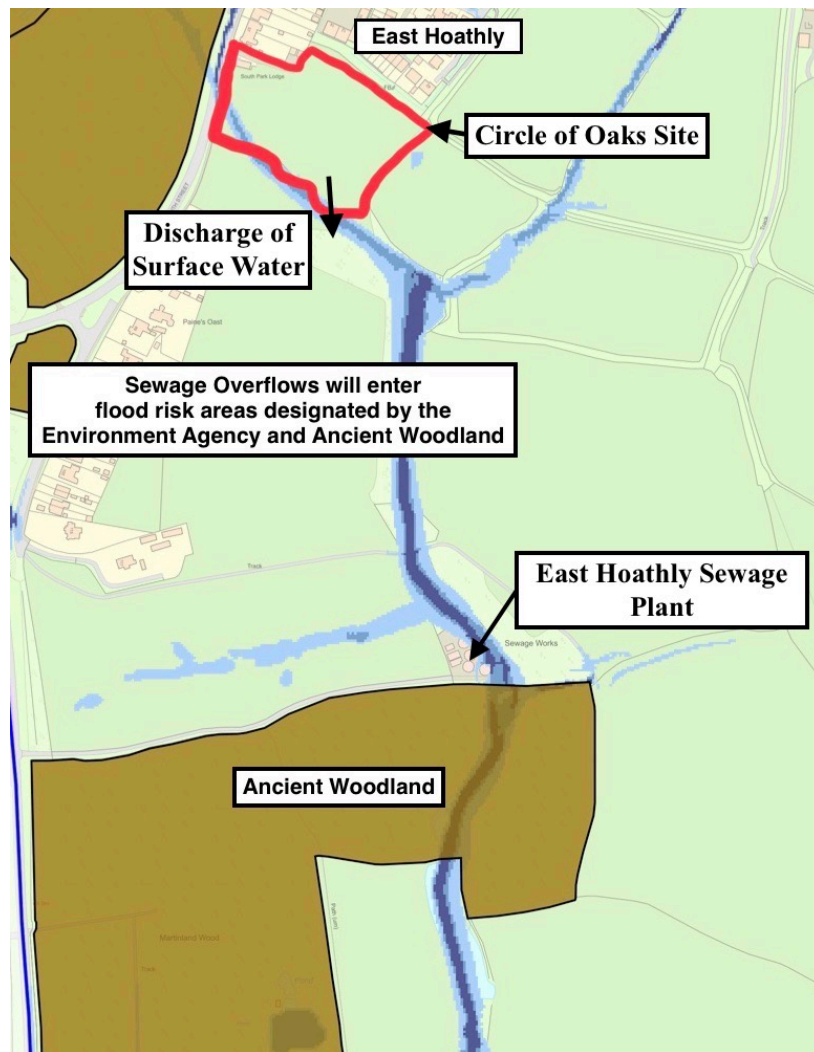
### **Impact of Bradford's and Hesmond's Development**

d. The planning application for South Street (Bradfords) has been approved and this impacts on the Circle of Oaks application which it did not in 2018. This creates new issues not addressed in 2018:

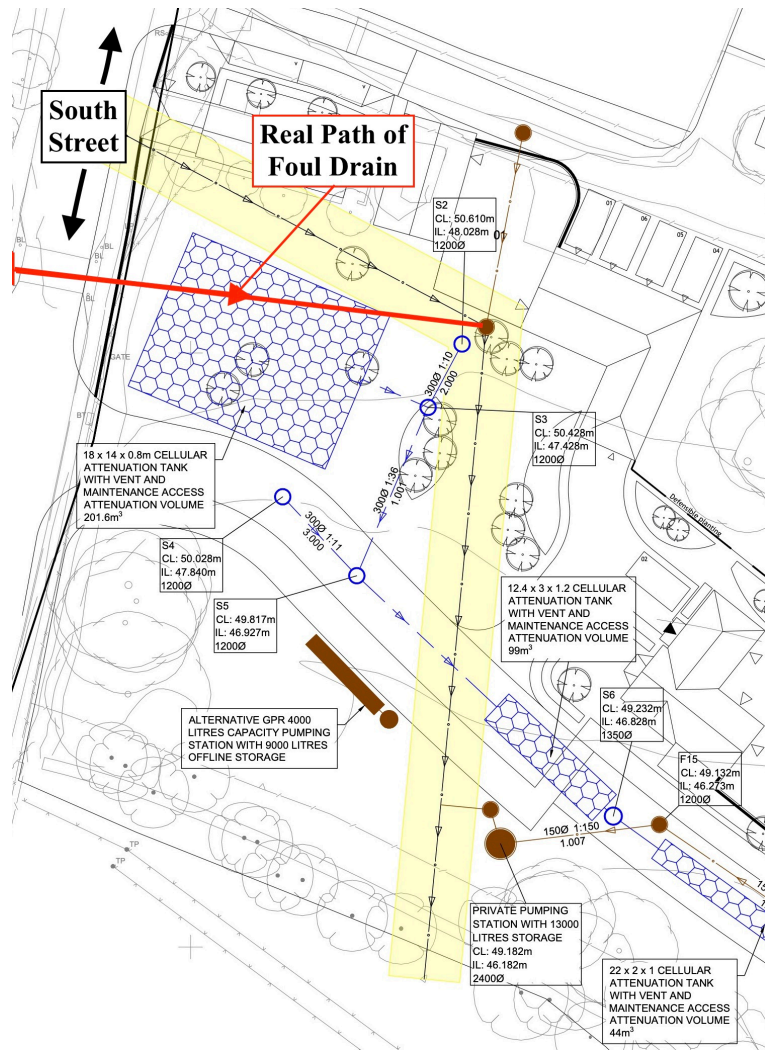
(1) The proximity of 2 housing developments with 3 vehicle access points onto South Street within 90 metres of each other is going to be hazardous and ESCC should give this a full analysis.

(2) The Transport Statement states: "The levels of traffic generated from a development of 20 dwellings would be indiscernible over and above the usual daily fluctuations in traffic flow on the highway network and are considered immaterial. The future development flows certainly cannot be considered as being 'severe' which is the test applied in the NPPF". This completely ignores the in combination effect of the already approved 262 additional homes in the village or the intention of the applicant to build an additional 255 homes most of which would use the proposed access onto South Street.

(3) The proposed development will collect all storm water from roofs and gutters and all surface water drainage into underground tanks which feed into an attenuation pond in the South East corner of the site. This will then discharge through a pipe onto the land that has been approved for development of 55 houses. This focussing of all the rain water into one discharge point will have an effect on the flood risk in the area of discharge and beyond. This has not been considered in the Flood Impact Assessment and there is no indication that the Applicant has liaised with the adjoining landowner. This has also not been considered in the Ecological Appraisal. This area is already known to be an area at risk of flooding:



(4) The foul drainage plan is confused and not sufficient for a full planning application. Southern Water (Southern Water Reference DSA000022709 dated 19 May 2023) has apparently indicated that there is no capacity issue but there is no indication that this letter has taken into account the development on South Street or Hesmonds. The foul drain position on the site plans are incorrect when compared to the Southern Water plans. This would have an impact on the proposed underground storage tank shown on the drainage plan. On another document (WD-2023-2516-MAJ\_Statements-Reports\_TF1237-FAB-00-XX-RP-G-830, Appendix 3) the foul drain is shown in another position entirely and marked as “existing sewer diverted”. The proposed route takes the sewer underneath the attenuation pond. These plans are a mess and inadequate for a full planning application. There is no indication if the Applicant has liaised with the adjoining landowner regarding this proposed re-positioning of the sewer nor any liaison with Southern Water, nor the PC.





## **Parking**

7. The Parking Allocation is inadequate for the following reasons:
  - a. The application proposes parking one vehicle in a garage/carport and another in front of it. This is known as “Tandem” parking and it is not supported. ESCC Guidance for Parking at New Residential Developments states: “Tandem parking is unlikely to be utilised to its potential, especially if both cars are in regular use”.
  - b. ESCC Guidance for Parking at New Residential Developments states: “Where garages are proposed they will need to meet the minimum dimensions .... and even then will only count as  $\frac{1}{3}$  space each due to their limited use. This means for every 3 garages to be provided, they will only count as 1 parking space towards the overall parking requirement”.
  - c. ESCC Guidance for Parking at New Residential Developments states: “Car parking also needs to be designed with security in mind. Therefore, parking for each dwelling is often best located on plot, preferably at the front or side of the dwelling where it can be overlooked by the owner”.
8. The parking allocation proposed is the minimum required by the ESCC standards but does not take account of the  $\frac{1}{3}$  reduction for garage spaces, nor the reduction required for tandem parking. Irrespective of this, it ignores the NP which seeks that developers exceed the minimum requirement in order to reflect the reality of vehicle ownership in this car dependent community. Current vehicle ownership in this village is 2.24 cars per household. This would require a car parking allocation for this application of at least 49 spaces of which the 12 garages could only count as  $12 \div 3 = 4$  spaces. Therefore this application provides only 32 spaces for a need of at least 49. This will result in on-street parking. This is even accepted in the Transport Statement which states: “ample visitor parking opportunities are available on-street along the 5.5m wide site access road”. This shows a blatant disregard for the need to plan proper parking and openly encourages on-street parking which is a hazard for emergency vehicles, refuse/delivery vehicles, pedestrians and wheelers trying to use footpaths or cross roads.
9. Cycle parking is shown in rear gardens. Access to the rear gardens is only possible by going through the house for plots 4, 5 and 8.

## **Green Gap**

10. When the approved 55 homes are built on South Street, the Green Gap at the Circle of Oaks will be the only remaining corridor linking the wildlife of

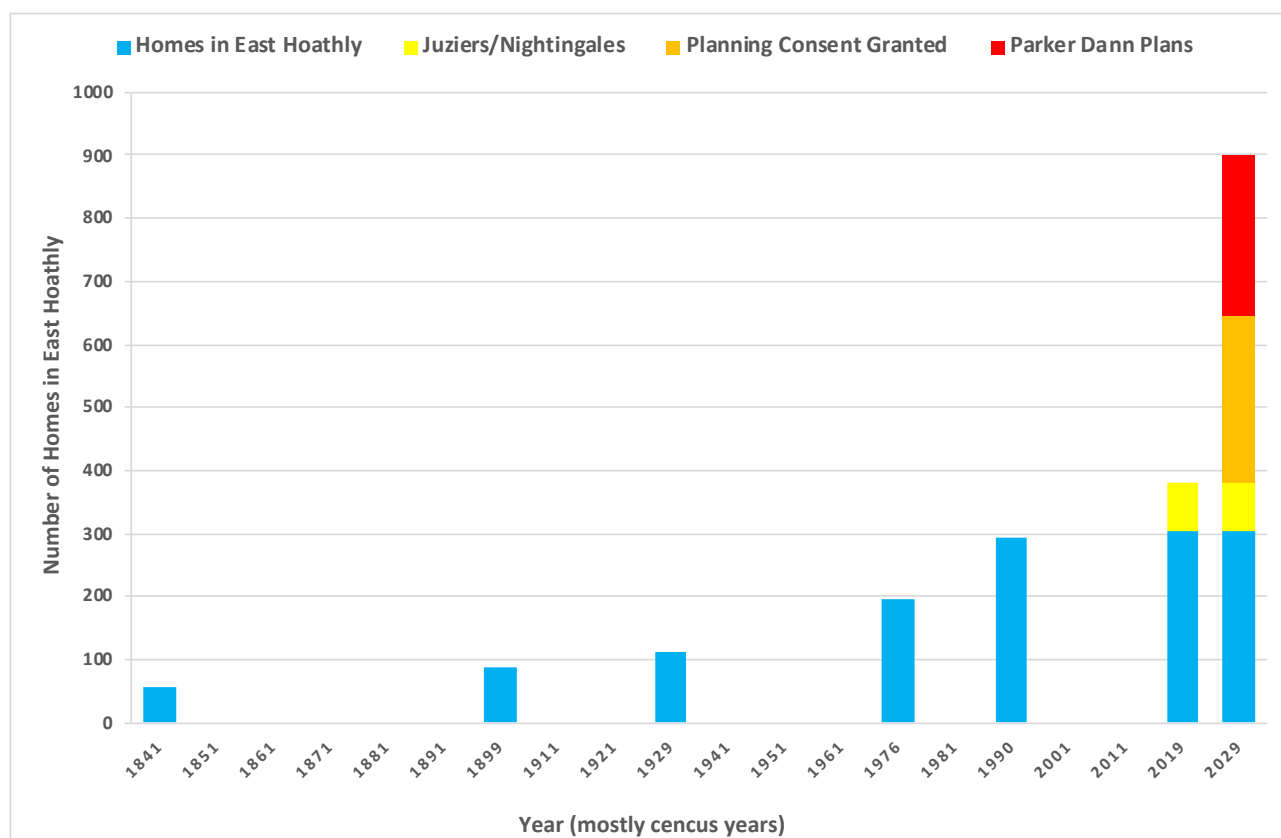
the Ancient Woodland to the West (in Moat Wood) to the open countryside to the East and South of the Village. If the land is developed it would close this corridor and isolate this wildlife.

11. This is important because the wildlife in Moat Wood and its surrounding areas is already enclosed to the East by the significant barrier of the A22. This will affect animals that need to move through the gap to forage in the fields and hedgerows beyond and those, such as bats, which fly from Moat Wood, along the hedge lines to transit to feeding grounds in such places as the Sewage Plant. Rather than providing a minimum of 10% Net Biodiversity Gain, the approval of this application would have a devastating effect on biodiversity.

12. WDC described this space in the following terms “the intervening open land is considered to be an important and integral part of the countryside surrounding East Hoathly where any extension or consolidation of development would be harmful to the character and landscape setting of the village”. WDC should stick by their words and refuse this application.

### **Scale/Infrastructure**

13. The scale of the growth of East Hoathly is extraordinary and it has all occurred outside of any strategic infrastructure planning. This is a disgrace. To add another 20 homes will worsen this situation. The veiled intention of this developer to provide access to Tourles Farm is a cynical financially



driven intent to destroy this community. The infrastructure has been buckling for decades, with a sewage system that cannot cope, frequent power cuts, poor broadband and mobile phone provision and roads and pavements that are in a shoddy state.

### **Other matters**

14. The Mix of homes does not comply with the preferences of the NP. It includes only 5 x two bed homes and no one bed homes. This preference is also supported by WDC Housing Development Officer Jenny Hudson, who (in relation to the Hesmonds development which is trying to wriggle out of its commitment to provide one bed flats by building them with an “office” which everyone knows will then be marketed as a second bedroom and thereby be less affordable) recently stated: [“The main demand from the Housing Register is for 1 bed flats and it is imperative that these 15 flats remain as 1 bed units”](#).

15. The drainage plan is complex for such a small development and is likely to have a considerable maintenance cost for the residents. There is no estimate of this cost and this should be provided to show that the housing will be viable. These costings should include the maintenance cost for the permeable road surfaces and paving which are all considerable and will fall on the occupants.

16. The proposed communal garage block is unacceptable:

a. It blocks the view of the Circle of Oaks.

b. The garages are separated from their houses and this is considered a retrograde planning practice. ESCC Guidance for Parking at New Residential Developments states: [“Most car owners like to be able to see their vehicles and to know that they are parked securely”](#).

c. The garages have EV charging points. It is not clear if this would be on the same electrical supply as the house to which it belongs or if a second electrical supply would be required by each owner with the commensurate extra standing charges.

d. The garage is also the site for the refuse bin storage (currently 2 large wheelie bins and an optional green waste bin) per house. The size of the garages means that the bins would need to be stored behind the car where access would be difficult and require both the houses vehicles to be moved to get the bins out.



e. Loading and unloading shopping, children and babies is all complicated if the vehicle parking is not close to its house.

17. The plan proposes extensive use of close boarded fence boundaries which is desperately unimaginative and is in conflict with the NP.

18. Plots 7 to 14 show refuse bins stored outside front doors and this not acceptable for a new development. Some properties might be able to take them to the rear of the property but no access is shown for this and it would appear to be impossible for plots 5 and 8. No bin storage or collection route is shown for plots 4, 5 or 6.

19. There is no detailed plan for the car-ports for plots 10 - 13.

20. There is insufficient space around the Circle of Oaks. The tree canopies are shown over roads and abutting buildings. These protected trees will grow for hopefully another 500 years and need space. As shown, they will require constant pruning and have their roots damaged by roadways and buildings. This will result in uneven growth which will ultimately imbalance them and damage their future.