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Friday, 2 February 2024

Dear Mr Robins,

### **Application WD/2023/2516/MAJ**

1. We, the Steering Group of the Village Concerns Action Group, represent the views of over 250 supporters from our community and we object to Planning Application WD/2023/2516/MAJ. This letter is not just an objection. We also ask for clarification on some of the documents that you have posted on your website and we request an answer to those questions.
2. The recent publication of draft Wealden Local Plan documents has finally laid bare the intention of WDC to build on as much of Hesmond's Stud as they can with a further 419 houses for East Hoathly in addition to the 267 already in the pipeline. They propose to absolutely destroy the character of this historic rural village.
3. The 53 documents added to the Circle of Oaks Application in the last couple of weeks reduce the number of new homes from 20 to 17 but it remains a ploy to build an access road for the land to the East.
4. The Village Concerns Objection dated 29 November 2023 remains valid and this Objection deals specifically with the 53 amended documents.

### **Amended Documents**

5. The developer's Design and Access Statement is a wonderful example of the callous disregard they have for this village. It is a "cut and paste" piece of fiction put forward to justify a wholly inappropriate development proposal. The proof is in Paragraph 1.2 where it claims to provide a: "[design that respects its context but also references the character and distinctiveness of Petersfield](#)". This appeared in the original submission and

the developer cares so little about the character and distinctiveness of this community that they cannot be bothered to proof read their make-believe fabrications.

6. The whole layout is poorly designed and this all leads from the constraint of having the new access roadway to provide access into the fields beyond. It remains an appallingly poor use of the space and is not effective use of land in NPPF terms. Two access roads were not required for the original submission and the reduction to 17 homes makes this even less sensible. It remains a very ineffective use of land in NPPF terms.

### **Plot 1**

7. The two storey extension to the existing outbuilding (within the Conservation Area) is described by the Conservation Officer as: “does not sit comfortably with the outbuilding and poorly presents onto the Conservation Area”, and, “It both tends to overwhelm the outbuilding in its scale/ proportions and feels too detached”. In other words, adding a two storey modern extension to make an outbuilding into a 3 bedroom house is an unworkable idea and would harm the Conservation Area and its setting.

### **Housing Mix**

8. This application was criticised in its original form for having too many large homes and not the small starter homes and downsizing homes that are needed in this community. The revised housing mix has ignored this, and increases the ratio of large homes to small homes. It still does not provide any one bedroom homes, completely ignoring the WDC Housing Department and Parish NP.

	4 Bed	3 Bed	2 Bed	Ratio of 2:4 Bed Homes
Old Proposal	3	10	7	0.3
New Proposal	2	10	5	0.28

### **Parking**

9. There are still not enough parking spaces. They are all one garage/car-port space with a second space in front of the garage/car-port. This “Jack and Jill” style parking is not acceptable and a very retrograde approach to design. 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”.

10. Visitor parking is closer to Plots 1 and 2 than their allocated parking. This is nonsense and would invite misuse of visitor parking spaces and is poor design. The ESCC guide for Parking Provision in New Developments states: “Most car owners like to be able to see their vehicles and to know that they are parked securely. It is therefore imperative that parking courtyards are overlooked”. This planning application provides the opposite. It hides the allocated parking places from the occupants and puts visitor parking in view of the homes.

11. The reduction in the size of the original communal garage block is an improvement but it still blocks the view of the circle of oak trees. A second shared garage block separated from the homes it serves has been created for Plots 2 and 12. The issues of shared garaging separated from the homes they serve remain:

a. 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”. Loading and unloading shopping, children and babies is all complicated if the vehicle parking is not close to its house. The communal garage block is separated from the houses it serves and will provide significant inconvenience, poor security and be a constant concern to the occupant’s peace of mind.

b. The ESCC Good Practice Guide seeks to “encourage residents to responsibly handle their rubbish and recycling, an external bin store should be conveniently located within 30 metres of an entrance to the property”. The communal garage block is separated from the houses it serves. In some cases the bin storage is further than 30 metres from the entrance and the need to enter a garage will increase the inconvenience.

c. There is insufficient detail of the EV charging facilities. For example, will users of the combined garage blocks have the electrical supply connected to their home, or will they have a second electrical supply and account and thereby have two sets of standing charges.

12. Plot 3 is a 4 bed house and is allocated 2 parking spaces compared with the Plot 2 (the other 4 Bed House) which is allocated 4 parking spaces.

This is makes no sense and is inadequate parking provision especially as it is also tandem parking.

### **Plot Size and Boundaries**

13. The plot boundaries only show the rear gardens. There are large areas between Plots 5-6 and 7-8 which are not part of the plot and therefore presumably common land and not owned by the householders. The frontages of the homes are not shown within a plot boundary and therefore must be presumed to be common land. We do not believe that this is sensible or is likely to be the intention of the developer. The correct boundaries should be shown. This is particularly important for this site as it would appear that the boundaries of the frontages and the common land will be very close to the houses, for example Plot 5 and Plot 17. It is not clear what boundary treatment, if any, is intended for these frontages. The design of these public communal spaces and their proximity to the private space of the plot needs clear delineation and careful design. None of this has been detailed or explained.

14. The plot sizes in relation to the size of the houses varies with no logic. Plots 3 and 4 are similar sized semi-detached houses but the garden width for Plot 3 is 12 m compared to 5 m for Plot 4. A similar inconsistency occurs for Plots 5-6 and 7-8. In addition, the smallest garden is allocated to Plot 5 which is a 3 bed home yet a 2 bed home has a larger garden. There is no fundamental link between the number of bedrooms and garden size but it makes sense for a larger family home to have access to more garden space. This is a result of the constrained site and trying to squeeze in an unnecessary access road and too many large houses.

### **Refuse Plan**

15. The plans still shows storage locations for bins inside garages or outside front doors. Some of the bin locations are separated an unacceptable distance from their houses ( 35m for Plot 2 and 60m for Plot 3). Most of the bin collection points are shown on roadways or paths which is unacceptable and will block access for prams, wheelchairs and vehicles. Some bin collection points are shown at the entrances to garages/parking spaces and this will cause access problems and is likely to lead to bins being placed in unacceptable positions. It will also cause visibility issues for vehicles exiting the driveways and will pose a safety issue for pedestrians/ cyclists. You should note that bin collection times in this village vary considerably and bins are often left at their collection point for a whole day. It is also not uncommon for them not be collected on the allotted day so bin

collection points should not be somewhere that will inhibit access to pavements, roadways or garages.

16. The shared garages for Plots 1,3 and 4 are 7 m deep which allows (just) for the storage of the refuse bins behind the cars as shown in the Refuse Plan. The shared garages for Plots 2 and 12 are 6 m deep and for Plots 11 and 13 are 5.8 m deep which does not allow space for the refuse bins to be stored behind the cars. Storing the refuse bins inside the rear of garages is a bad idea in the first place but not to allow space to do so as planned is very poor design.

### **EV Charging**

17. The garages are all to be provided with EV charging points. The position of these should be shown so that it is clear how the safe positioning of cables can be achieved for those electric vehicles that are on the forecourt in front of the garage.

18. There is still no provision of EV charging for visitors. It is clear that this is not a requirement of building regulations or something that WDC consider important. However, when the majority of vehicles have switched to EV, it will be very much a necessity and you should not be building housing estates with a lifespan of many decades that are not ready for the EV future.

### **Cycle Storage**

19. Cycle storage is still shown in rear gardens with the only access though the house. If gates into the gardens are expected and allowed, they must be shown. If gates are to be provided, will paths to these gates be constructed. If the only access is to be through the house this should be made clear. Adding cycle storage to meet to the requirements of Active Travel policies is good, but it should be done in a way that is practical and well designed.

### **Main Sewer**

20. The Drainage plans still show the main sewer in the wrong place. The drawings provided to us by Southern Water clearly show the location of the main sewer and it is substantially different to that shown in this application.

21. The Maintenance Plan shows what appears to be a sewage holding tank. It is unlabelled but suggests that sewage will be stored on site and then pumped into the main sewer when required. On what basis will this storage and pumping station operate ? The maintenance and costs all of

this equipment should be detailed so that the ongoing service charges for the proposed development are known.

### **SuDS Maintenance Plan and Drainage Strategy**

22. A SuDS Maintenance Plan has now been provided. It is interesting, but it is useless without costings. The Parish Council should be examining if such maintenance schedules are being followed on other new developments in the Parish. If they are not, and such SuDS maintenance plans prove to not be enforceable, then the effectiveness of the SuDS concept fails and surface water flooding will become a significant issue. Handing this responsibility to the occupants of resident associations is untested and unlikely to be effective.

23. The revised drawings fail to show how the surface water will be discharged from the site. The previous drawings showed a discharge point onto the neighbouring property. If this is still the intention for this full planning application then it should be shown on the drawings. Village Concerns believes that the application should also indicate that some liaison has taken place with the neighbouring landowner.

24. The amended drawings now include a pumping station for surface water. The purpose of this is not made clear. Where is it pumping water to and from ? The maintenance and costs for all of this equipment should be detailed so that the ongoing service charges for the proposed development are known.

### **Document Issues**

25. Many of the 53 documents added to the website have errors or appear to be duplicates. These should be corrected to make public scrutiny possible.

#### **WD-2023-2516-MAJ Plans D3266-FAB-00-XX-DR-L-1001 PL01**

26. Revision Date incorrect - shows 10 Jan 2022.

#### **WD-2023-2516-MAJ Plans D3266-FAB-00-XX-DR-L-1002 PL02**

27. Revision Date incorrect - shows 10 Jan 2022.

#### **WD-2023-2516-MAJ Plans FL23-2035-080 Proposed Street Scenes**

28. These views are highly misleading and should be deleted. They give the impression of views onto an open housing development but the reality is that there is no vantage point from which these views could be seen. If an observer was positioned at the viewpoint for these views the Street Scenes shown would not be visible and they are therefore not real and highly misleading.

### **WD-2023-2516-MAJ Plans FL23-2035-085 Proposed Site Section**

29. The same comments as above apply. In addition it appears that the viewpoint chosen for these views is also from an elevated position above ground level, so again is not a real viewpoint from which a viewer could see these scenes.

### **Plot 1 Plans and Section and Plot 1 Elevations**

30. These documents appear as amended documents and they appear twice. In all the amended documents, no differences can be seen with the originals. The Planning Department are asked to make clear what changes have been made and to remove the duplication of documents on the website?

31. Plots 2 to 17 Amended Plans Elevations and Sections all appear to be duplicated and should be removed from the website.

### **WD-2023-2516-MAJ Statements-Reports D3266 FAB 00 XX-RP-L-0001 Landscape Design and Access Statement PL02 low res.pdf**

32. This document is a mystery. It purports to be Revision PL02 of D3266. This is not the case and the Planning Department are asked to clarify which document this document is revising. It seems to bear no direct similarity to any previous document. If it is a revision, which document does it supersede ?

33. The language used in the document makes it difficult to understand the meaning of the words presented. The section on Planning Policy is just a collection of statements that do not relate to the proposed development site . Paragraph 2 uses the phrase tree scales - what does this mean ? Another example is “an extent of Moat Wood” - what does this mean ?

34. Paragraph 3 states the “intention of nestling the proposed development with the existing and retained landscape”. We would describe the intention as to build road access to land to the East and surrounding the

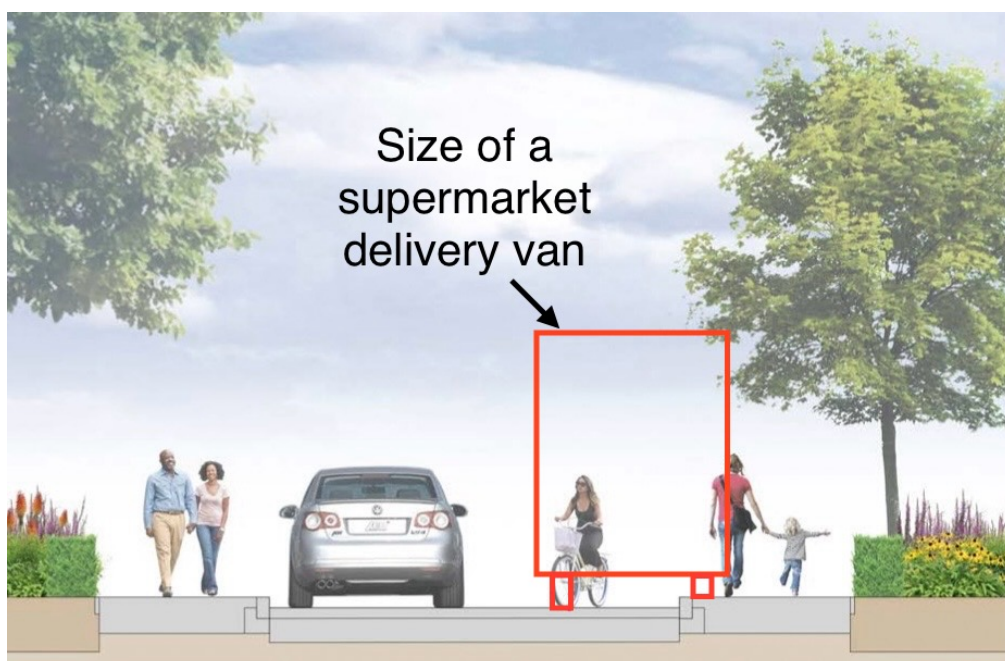
iconic Circle of Oaks with large houses that will obliterate the views and setting of the Conservation Area.

35. Paragraph 4 is a plan with badly overlapping areas supposedly delineating Residential Streets, Public Open Space and Landscape Edge. The overlaps imply that a street can also be a landscape edge, part of residential buildings or the front gardens of the houses. This exemplifies the problem that the site layouts showing each plot do not show the plot boundary at the front and sides of each property. It also fails to identify the considerable areas, such as those around the car ports which are not shown as part of a house plot and must therefore be communal areas which will require maintenance and regulation.

36. Paragraph 4.1 states for the Public Open Space, that “existing tree planting retained”. This is not true, the trees that are inconvenient to the developer (Trees T4 and T5) are proposed for removal. This breaks the “Circle of Oaks”. A developer with more soul and environmental empathy would retain the full circle and plant additional oak trees to eventually replace some of the existing short lived parts of the circle.

37. Paragraph 4.3 states that “existing tree planting retained”. **This is a falsehood.** The developer has already taken down a healthy mature oak tree T33 in order to provide the impression that there has always been a gateway into the land to the East.

38. Paragraph 4.4 shows street scenes that bear little resemblance or relevance to the proposed designs. They attempt to paint an idyllic scene but the reality will be far different. An example of a more realistic view is shown below:





39. Paragraphs 7 and 8 show attractive furniture and play equipment . The maintenance costs should be detailed so that the ongoing service charges for the proposed development are known. The developer proposes extensive use of close boarded fencing **contrary** to the WDC and NP preference.

40. Paragraph 9 proposes the removal of dead, diseased, decaying and damaged wood. This portrays an embarrassing lack of understanding of biodiversity. This material is essential for many insects, invertebrates and birds in that it provides their food and habitats. It is part of the natural flora in the landscape on which many other forms of life depend.

41. The section on Maintenance and Management does not mention the cost of the proposed schemes. It is essential that the costs are estimated so that the ongoing service charges for the proposed development are known.

42. There is some concern that the play area and seating areas within the publicly accessible open green space would be within 6m of the front door of Plot 4. Such proximity may cause issues.

### **Design and Access Statement**

43. The developer's Design and Access Statement has been cut and pasted from a document written for the town of Petersfield in Hampshire.

44. This developer copies wording from the Parish NP that: "[East Hoathly has significant and attractive green approaches](#)", but fails to add that this same developer has ripped out most of the hedgerows and trees of one of these green approaches to build 205 homes and has plans to destroy the remainder of the green approaches.

45. Section 2.6 copies out sections of Planning Policy (mostly related to car parking) including parts of the Parish NP. The developer then ignores all the intent of these extracts, which is to provide more parking than required by using the existing ESCC Parking Demand Tool. The developer puts forward the minimum required by ESCC. This is a pathetic attempt to make it appear that they have taken the Parish NP into account and then done the absolute bare minimum that they are required to do.

46. In Paragraph 5.1 the developer's arithmetic is flawed in that it lists 18 homes in this application to build 17 homes. The final part of the paragraph describing the layout was not really true for the first submission but it is wholly wrong for this amended submission and should be deleted or rewritten.

### **Statutory Consultees**

47. Statutory Consultees have raised their own issues with this submission and it remains far from ready for consideration. Village Concerns requested that 53 amended documents should have triggered a formal re-consultation but the Planning Department have failed to respond to our request and failed to start another formal consultation.

Victoria Aldridge and Katherine Gutkind  
Joint Chairs  
Village Concerns