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Wednesday, 29 November 2023

Dear Mr Robins,

Application WD/2023/2516/MAJ

1. We, the Steering Group of the Village Concerns Action Group, represent the views of over 200 supporters from our community and we object to Planning Application WD/2023/2516/MAJ.
2. The thinly veiled intention of this application is to provide access to Tourles Farm in a cynical financially driven intent to destroy this community. The developer does not care that the infrastructure in this village 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.
3. The application is full of flaws. They have copied parts of the draft neighbourhood plan where they think it supports their application but changed some of the words to bolster their views whilst leaving the reader to think that it is the wording of the neighbourhood plan. In their planning Statement they have cut and pasted sections of text but not bothered to proof read the wording to ensure that it makes sense. They have referred to a host of local place names in an attempt to show the depth of their research but misspelt many of them showing how little they know of this community. It is a shoddy piece of work and should be refused on these grounds alone.
4. Village Concerns urges Wealden District Council to not consider this application until its missing and erroneous reports are complete, until the financial inducement that Parker Dann has offered the Parish Council has been investigated and until the Wealden Local Plan is published. Irrespective of this, you should refuse this application based on the information that follows.

Heritage Assets

5. This application claims to have addressed the harm that will be caused to the Heritage Assets within and adjacent to the proposed development site. It does not satisfactorily address that harm and this application should be refused.

6. 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 at Figures 1 and 2:

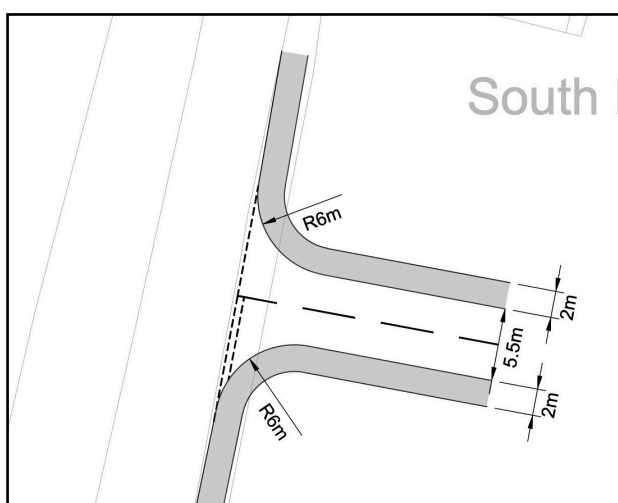


Figure 1 - Transport Statement dated Oct 2023. Showing footpath on both sides of entrance.

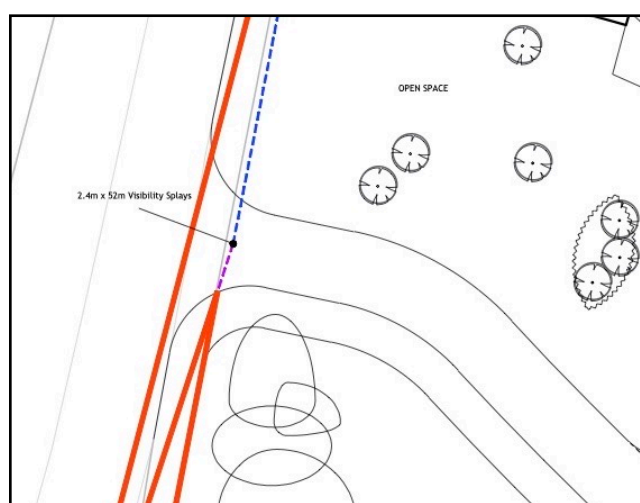


Figure 2 - Proposed Site Layout dated Oct 2023. Showing footpath on one side of entrance. This is used on all other drawings and CGI images.

7. 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.



Figure 3 - The picture above shows the applicant's CGI of what they want to present to the planning committee as the site entrance.



Figure 4 - 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.

8. 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. The red marking on Figure 4 below shows how the view of the Circle of Oak trees is obscured. 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, Park Lodge, Cherry Tree Cottages and the non-designated Heritage Asset on the site.

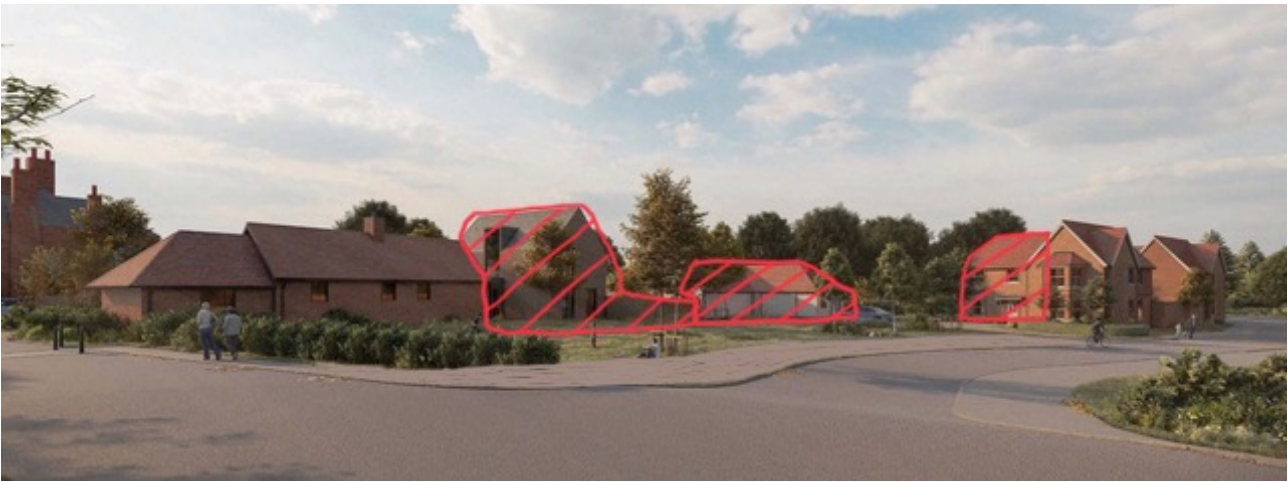


Figure 5 - showing how the proposed buildings obscure the view of the Circle of Oak trees.

9. Plot 3 is not a solution to the conservation issue and will not address the harm to the Setting of the Conservation Area, Park Lodge, Cherry Tree Cottages and the non-designated Heritage Asset on the site. 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 building by 161%. A small extension might have been a one bedroom house with a one storey extension. Using the stables as a commercial space would be an alternative to bring some employment opportunities to the community or possibly a community building.

10. The Applicant’s Heritage Impact Assessment describes the building as of: “low architectural and historic interest”. This is a biased and incorrect description. It is part of the Conservation Area which is a Heritage Asset and as a rural building, it forms a critical part of the rural edge of the village and the rural setting of the Conservation Area. The Heritage Impact Assessment completely ignores the effect of urbanising the site and the harmful effect that this would have on the rural setting of the Conservation Area.

11. The Applicant’s 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. The loss of these highly valued and sensitive views will harm the character of the settlement. The applicant claims that the views to the rural landscape beyond the site will be retained but in reality this would be a very narrow view of only about 4 metres. This can be seen by comparing the applicant’s image of the view in

Figure 6 to the only remaining sight lines shown in Figure 7 and an impression of what that would look like in reality at Figure 8. The urbanisation of this site will harm the character of the settlement and harm the enjoyment and health and wellbeing benefits (including mental health benefits) that access to natural environment provides.



IK: 20231



Figure 8 - Approximate position of the 4 metre “window that would still be retained from South Street.

Applicant’s Planning Statement

12. The Applicant’s Planning Statement is dated October 2023 yet states that this is an outline planning application despite it being a full planning application. The same error occurs in many other documents and is indicative of the shoddy nature of this work.

13. The Applicant’s Planning Statement says that no commentary within the Draft Neighbourhood Plan on why the site has been designated as a Local Green Space and no acknowledgement that the site is not publicly accessible. The commentary was provided in Annex L, Pages 166 to 168 with further information in Table 15 on Page 183. It is a pity that the Applicant missed this, as it would have informed them what a bad idea it is to build on this land. The might also wish to read the Government Guidance for Local Green Spaces which quite clearly states: “[land could be considered for designation even if there is no public access \(eg green areas which are valued because of their wildlife, historic significance and/or beauty](#)” (Paragraph: 017 Reference ID: 37-017-20140306).

13. The Applicant states that: “[East Hoathly and the assessment Site are not located within a designated landscape, nor the setting to one](#)” but ignore the fact that part of the site is in the designated Conservation Area and the whole of the site is part of the setting of the Conservation Area. The Applicant goes on to state that: “[sites north of London Road and at Paine’s Farm have been granted planning permission for residential development. As such, these factors influence the future baseline of the contextual setting and should be considered in the planning balance](#)”. We have tried really hard to make any sense of this gobbledygook but it is nonsense. The fact that 262 homes have been approved in this village means that it should be even more important to retain the remaining rural edges to the Conservation Area.



Figure 9 - Showing proposed route through site to access Tourles Farm including tree T33 (significant high value Oak) that has been cut down by the Applicant.

14. The final insult in the Applicant’s Planning Statement is the claim that “The adverse effects will diminish over time as the landscape proposals mature”. This is wholly wrong. The view of the Circle of Oaks will be lost forever as will the views to open countryside beyond the site. The rural setting of the Conservation Area would be lost forever.

Changes since 2018

15. Since 2018 things have changed so we urge the planning department and Planning Committee South not just to assess this application on the basis of the reasons that the 2018 application was refused. The things that have changed 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 (see Figure 9 on following page).

(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 the land on 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 (Bradford's) 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. This location already has a traffic calming measure and pedestrian crossing point (Figure 10) that would sit between the two of the proposed access points. The safety of this has not been mentioned or analysed.



Figure 10 - Traffic Calming Measure and Crossing Point on South Street.

(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:

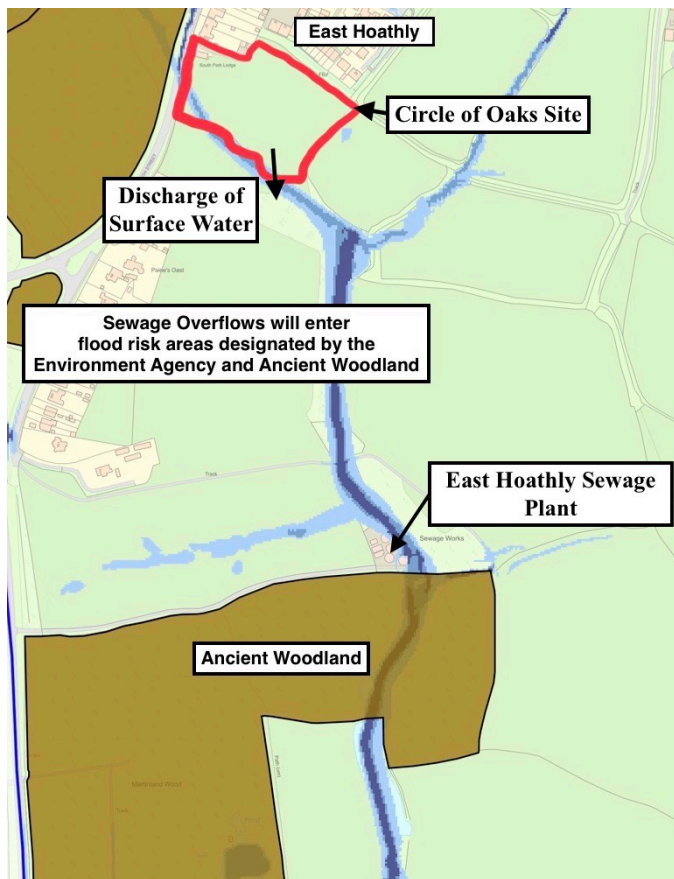


Figure 11 - Showing discharge of Surface Water from Circle of Oaks site onto South Street

(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.

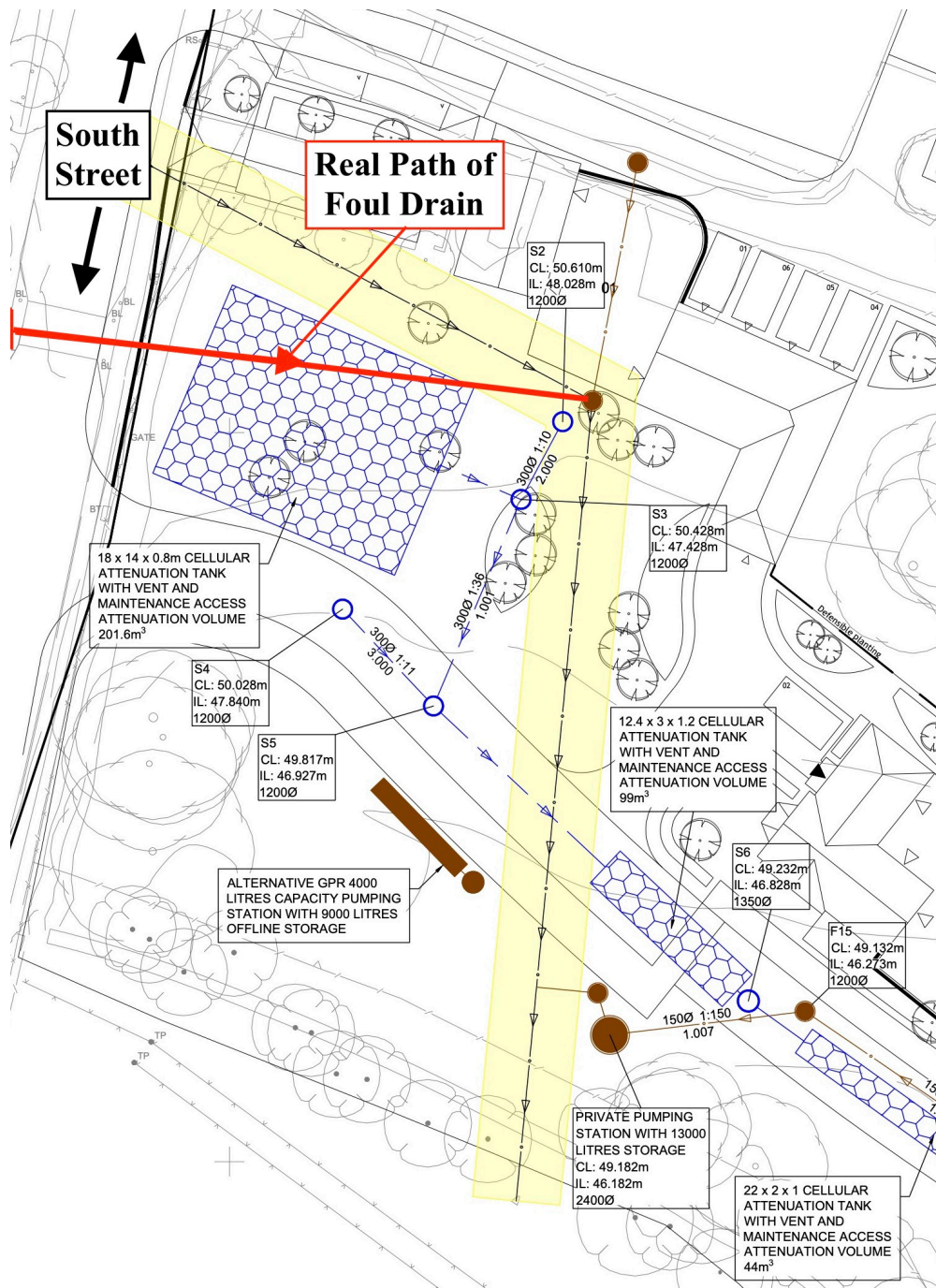


Figure 12 - Applicant's plan showing route of sewer marked in yellow compared with Southern Water plan shown in red.

(5) The Southern Water Consultation Response to this application raises important issues that this full planning application does not address:

- (a) No odour survey has been carried out.

(b) Notwithstanding the incorrect and differing routes shown for the Southern Water sewer, the real route of the sewer fails to comply with the requirement for no construction within 3 metres of the sewer.

(c) The submitted drainage strategy shows a cellular attenuation tank within 5 metres of the sewer and this is not permitted (a second cellular attenuation tank is also within 5 metres of the sewer but Southern Water have not mentioned this).

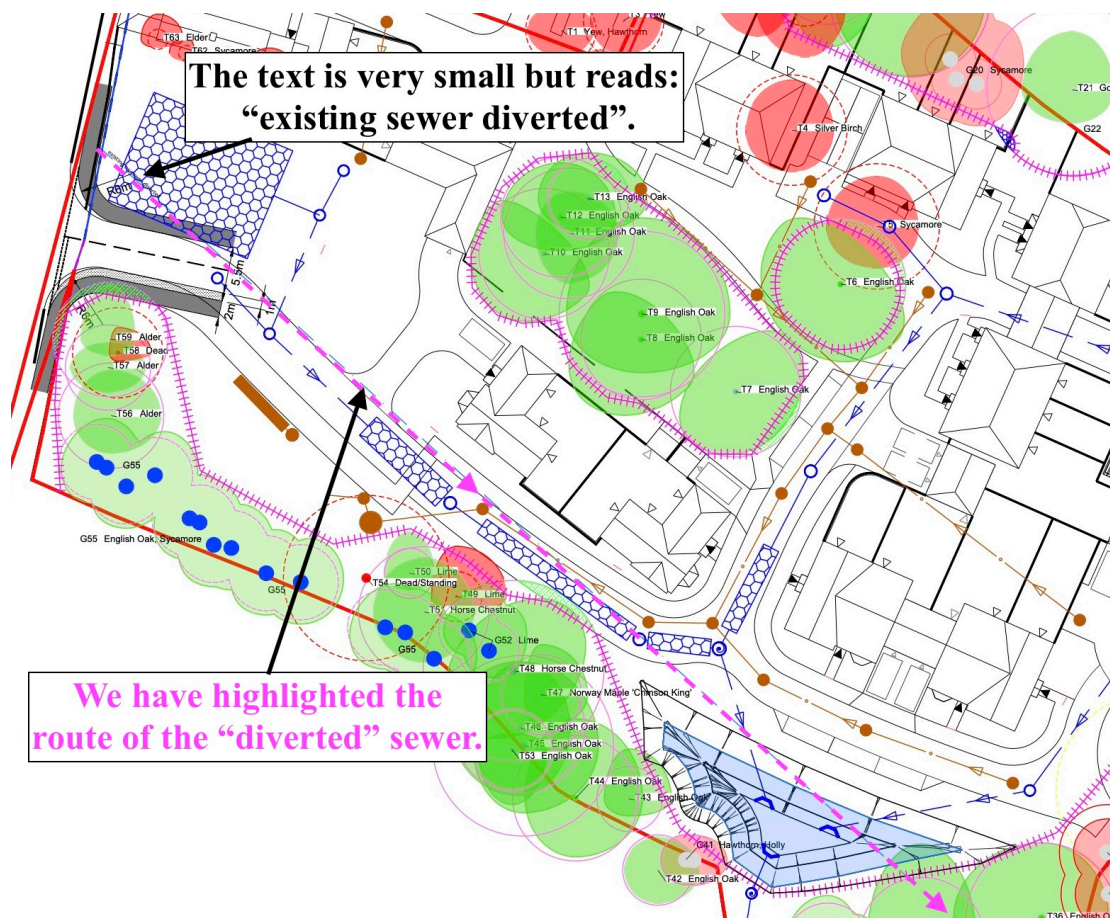


Figure 13 - Another route shown by Applicant for diversion of main East Hoathly sewer.

(6) It is noted that Southern Water Clean Rivers and Seas Plan (now available online) shows that no work is planned on the East Hoathly Sewage Plant until at least 2030. It is ludicrous that they can be happy with a sewage system that is already failing before 262 new homes are added to the system and with a further 255 being planned by a developer - all before they plan any upgrade

work. Just to make their position even more ludicrous, the work they are proposing some time after 2030 is installing SUDs on one hectare of unspecified land, planting trees on unspecified land, installing a rain garden on unspecified land and the provision of “at least” 76 household water butts. It beggars belief that they think that this plan will work. It clearly shows utter contempt for the current level of sewage overflows shown in Figure 14. These sewage spills have resulted in the watercourse being graded at only “Moderate Ecological Status” (Environment Agency) rather than the Good or High status that it should be.

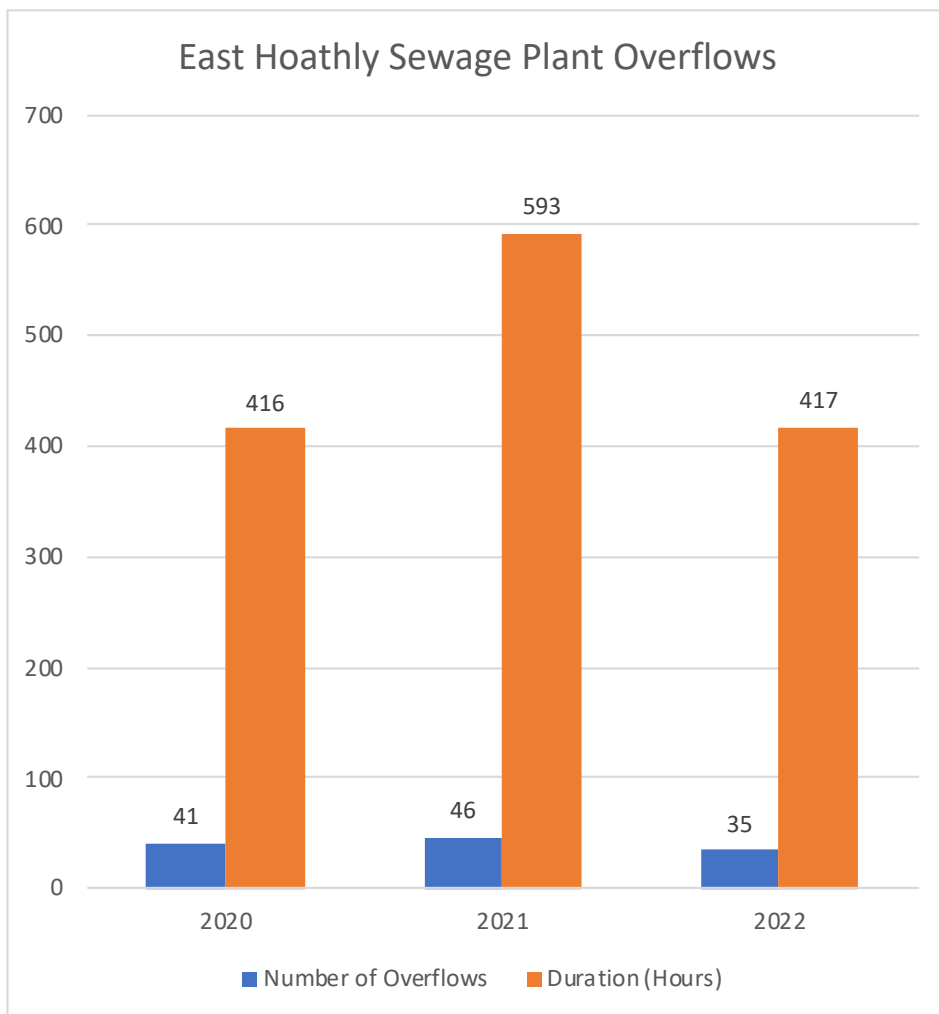


Figure 14 - East Hoathly Sewage Plant Overflows

Scale

16. The scale of the growth of East Hoathly is extraordinary and it has all occurred without any strategic infrastructure planning. Since the publication of the WDC 1998 LP the Parish has not been allocated any housing as part

of an adopted LP. However, since 1998 the Parish has seen significant housing development with more now approved by WDC. With the already approved housing and the Parker Dann plans this will represent a 206% increase since 1998 as can be seen in Figure 15. To add another 20 homes will worsen this situation. To propose such an increase is unsustainable overdevelopment.

17. It was the clear intention of Wealden Core Strategy 2013 to concentrate housing where it would be sustainable. This Application clearly fails to comply with Policy SP03: [“To help address the need for homes, to ensure the economic prosperity of the District and to support its residents](#)

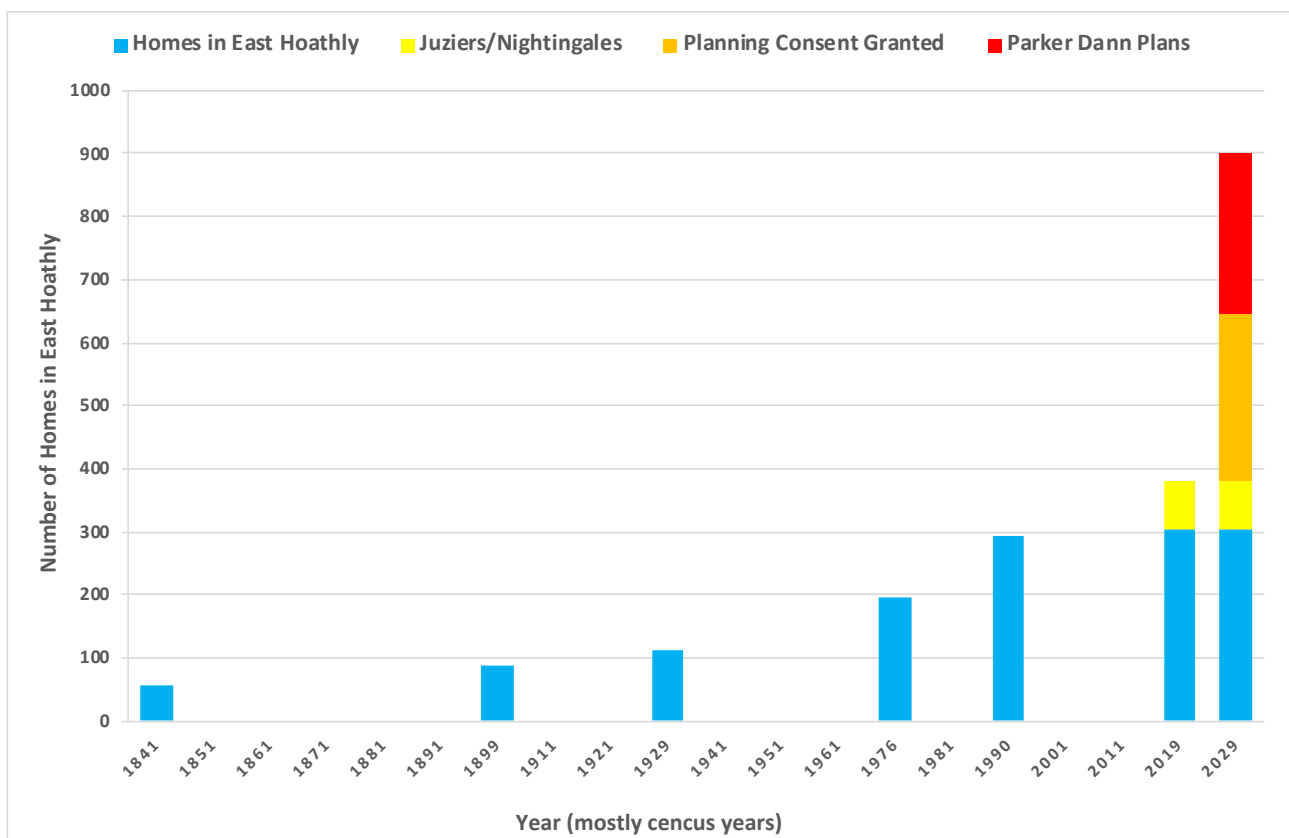


Figure 15 - Scale of growth in number of homes in East Hoathly

and the changing requirements of residents in terms of size, type, tenure and location of homes, whilst protecting our valued environment we will provide for at least 9440 homes within Wealden from 2006 to 2027. The delivery of on average 450 dwellings per annum provides a realistic timeframe for the market to deliver the housing and also better provides for the timely delivery of necessary infrastructure. The majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion. Development will be focused in and

around the settlements of Hailsham/ Hellingly, Polegate/ Willingdon/ Stone Cross and Uckfield to help stimulate investment in those centres, and, to varying but lesser degrees, in and around Crowborough and Heathfield to meet housing need.”

18. The NPPF 2023 Paragraph 78 states that “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs”. There is no local need for 20 houses following the approval of 262 new homes in the Parish since 2021.

19. The NPPF 2023 Paragraph 84 requires that decisions should enable “the sustainable growth and expansion of all types of business in rural areas”. This application makes no contribution to existing businesses and provides no new employment or business opportunities.

Conformity with Extant Planning Policies

20. This Application does not comply with saved policies GD 2 and DC 17 of Wealden Local Plan 1998 in that the site is outside the Development Boundary.

21. This Application does not comply with saved policy WCS 6 of Wealden Core Strategy in that the Development Boundary for East Hoathly was removed and thereby deemed not suitable for any development as indicated by Paragraph 6.47: “Development boundaries enable a clear distinction to be made between settlements (towns and villages) where certain forms of development may be appropriate or encouraged, and the smaller settlements and rural areas where protection of the countryside would usually take precedence. In order to sustain our larger, and more sustainable, villages the retention of development boundaries will allow a flexible approach in the provision of employment and other services and facilities. The role of development boundaries is to enable the market to deliver investment, regeneration, employment and growth subject to the detailed control of design and other matters through the development management process. However, within the development boundaries the principle of development is acceptable. Therefore, in addition to the towns the strategy seeks to retain development boundaries in those centres classified as a District Centre, Service Centre and Local Service Centre in order to ensure sustainable settlements in the future and provide for vital villages supporting the rural area. Each rural settlement will be considered on its own merit in following Development Plan Documents and, if appropriate, the development boundary reviewed and adjusted to meet the needs and characteristics of the area.”

22. The Mix of homes does not comply with the preferences of this Parish as specified in the East Hoathly with Halland Neighbourhood Plan. It includes only 5 x two bed homes and no one bed homes. This preference is also supported by WDC Housing Department. The Hesmond's development now being built by Redrow Homes, is proposing to build 15 one bedroom flats with an additional "office". They know that these will be marketed as a second bedroom with a commensurately higher price thus making them less affordable for people trying to get onto the housing ladder. WDC Housing Development Officer Jenny Hudson wrote to the Planning Department in November 2022 stating: ["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"](#). This application does nothing to satisfy the preference of this Parish nor the Housing Register for one bed flats.

23. The Officer's Report for the previous application stated: ["it is the view of the Council that the modest boost to the housing land supply that would result from the development \(the public benefit of the provision of housing\) fails to outweigh the permanent harm that would occur"](#). This was an application for 28 homes so the current application for 20 homes must represent an even less weight against the other harms that will be caused by this application.

The Broken Sustainability of East Hoathly

Infrastructure

24. The existing infrastructure of the village is stretched significantly:
- a. There are frequent power cuts in our Parish (Twenty Power Cuts recorded by UK Power Networks during 2023 already) and as can be seen in Figure 16, the situation is getting worse. The move away from fossil fuels for heating and home charging of EVs will lead to the existing and any new homes to be increasingly dependent on electricity. This will exacerbate the existing problems with our electrical supply network. UK Power Networks can barely cope now and this will get worse with more housing in rural locations such as ours when everyone has plugged in their electric cars and replaced oil heating with electric heaters. The Wealden Climate Emergency Plan quotes a National Grid report that states "that there could be between 2.7 and 10.6 million Electric Vehicles (EV)s on the roads by 2030 which would present a broad-ranging challenge across all areas of electricity infrastructure". In other words, if we get even close to the levels of EVs necessary, the National Grid will not cope.

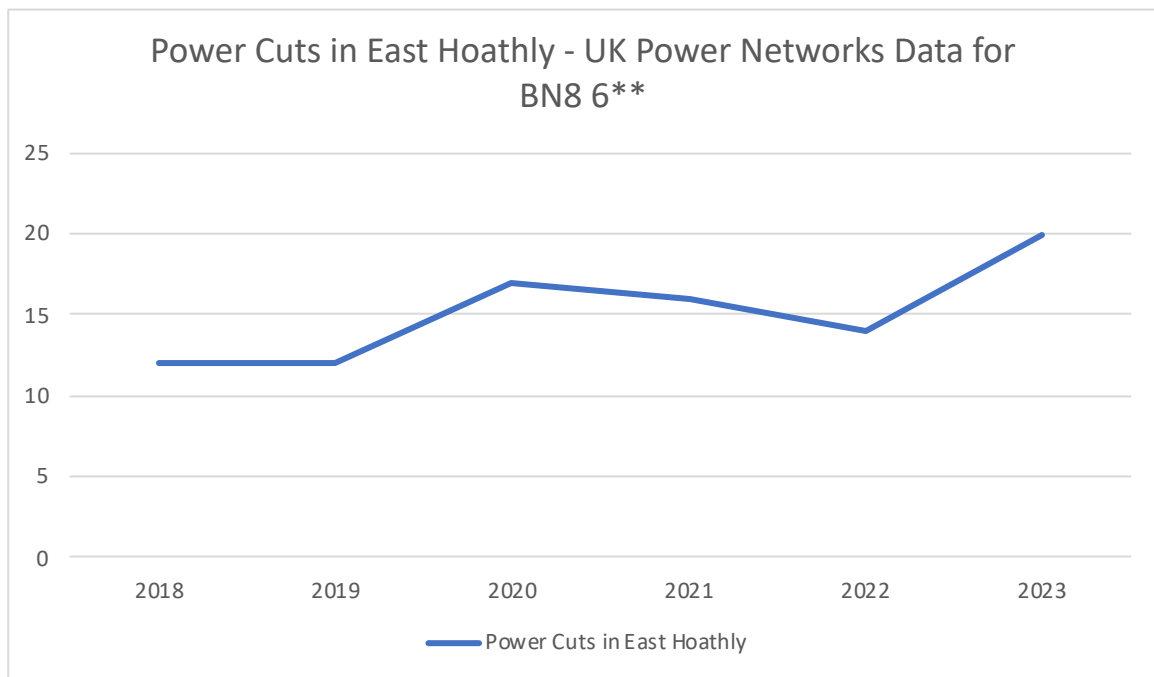


Figure 16 - Power Cuts in East Hoathly - UK Power Networks Data for BN8 6**

- b. Broadband speeds are slow and the service is intermittent. Frequent drop outs are experienced. Current Broadband speeds and reliability prevent many home businesses being viable in this Parish.
- c. Foul drainage pipes are already struggling to cope and problems occur regularly. The pipe diameters and gradients are too low to allow the addition of additional users.
- d. There is no gas supply.

25. The Applicant does not propose any contribution for infrastructure improvements as required by NPPF 2023 Paragraph 34. The infrastructure of East Hoathly is already seriously compromised and this Application to add 20 homes, in addition to those already approved, whilst not proposing any infrastructure improvements, is unsustainable.

Bus Service

26. The Bus service is inadequate. The application mentions the bus service but fails to say that there are no evening services in East Hoathly. The bus only runs every hour (every two hours on Sundays) making it a problem for commuting to work as the times will often not connect with employment hours or connecting transport links. Evening shift work or socialising is impossible as the last bus is 7.30 pm. Local surveys showed

that in a whole day (averaged for School Terms/Holidays), only 19 people from the Parish used the 54 Bus and no one used the 28 Bus. The average number of people on the buses that passed through the Parish was 3 per bus (the majority of the buses were double decker with an average bus capacity of 66).

27. The Bus service is effectively of no use to the residents of East Hoathly and no amount of new residents will make it so. This Application clearly fails to satisfy Local Plan 1998 Saved Policy: [“Policy EN2. The Council will seek to maintain the existing settlement pattern and ensure that major new developments generating significant travel movements are located efficiently in relation to existing development and to public transport.”](#)

Traffic Congestion

28. Traffic in the village is increasing and congestion around the Post Office corner is often problematic. There is an increasing trend of people using the village and back lanes to avoid the congestion on the A22. Online shopping deliveries are also adding to vehicles in the village. The addition of further housing will add to the congestion in the village but also onto the A22 as every new resident will be totally car dependent for schools, employment, shopping and leisure. This Application clearly fails to comply with NPPF 2023 Paragraph 110 in that the new residents (with a predicted 52 new vehicles) would be almost totally car dependent: [“Within this context, applications for development should:](#)



Figure 17 - Example of congestion at the East Hoathly Post Office Corner.

- a. give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b. address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c. create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d. allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e. be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

29. Sub-Paragraph 15.d has already stated the need to properly assess the safety concerns of having 3 road junctions for major housing developments within 90 metres of each other. The Transport Statement states that: “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”. This is a deception. It is vital that the in combination effect is assessed for the 517 additional homes and 1344 additional vehicles that this village faces and that a full traffic survey and assessment is carried out for South Street before any planning decision is considered.

30. The Applicant’s Traffic Safety Assessment shows collision data for 2017 to 2021 but not 2022. It also shows a map that is not centred on the site therefore fails to include incidents on part of the A22 and therefore mention of a fatal accident in 2017. These errors should be rectified before any planning decision is considered.

Education

31. The village primary school is full and new residents generally have to find school places in other villages or towns. New residents would be forced into their cars to deliver and collect their children.

32. The usual choice of Secondary School for East Hoathly is Ringmer and Uckfield and we understand that both schools are full. There is clearly no capacity for new students to be homed in East Hoathly.

33. Tertiary Education is largely based in Lewes and Brighton. With no bus service from East Hoathly to these destinations, cars are the only alternative.

Doctors

34. The Doctors Surgery amalgamated with the Buxted Practice in 2001 and opened in a new premises in 2012. In the last decade, the possibility of seeing a Doctor in East Hoathly has diminished. This is partly due to a general shortage of GPs but also a result of resources being centralised to Buxted. It is frequently difficult to get a Doctors appointment in East Hoathly and patients are often asked to travel to Buxted or Horam. This is inconvenient for all patients but impossible for those who do not have a car. Doctors are not available on a daily basis at the surgery. This is a highly valued resource and the work they do is amazing but it can only be described as a part-time service.

Reductions in Services

35. Many of the facilities providing services to East Hoathly have closed in recent years and this reduces the sustainability of the village:

- a. The Foresters Pub closed in 2017.
- b. The Butchers Shop closed in 2001.
- c. The Smock Shop closed in 1995.
- d. The Public Toilets closed in 1998.
- e. The remaining local business are an important part of our local economy. They attract customers and visitors to the community and provide employment opportunities for local people. However, as the nature of these businesses change, then it can have a detrimental effect on sustainability. If a food business changes to a gift shop, the level of employment may stay the same but the ability of the new shop to sustain the local inhabitants may be reduced. People need food on a regular basis but only occasionally need to buy a gift. Therefore, the need for the local inhabitants to travel is increased thereby reducing sustainability. In employment terms the change of

nature of these business premises is often neutral but the effect on the community is important. Some examples of this have been:

(1) The Butchers Shop was replaced by a Craft Shop which then became a Book Shop.

(2) The Petrol Station/Garage was replaced with a range of small business units currently: Homeopathic Vet, Osteopathic Practitioner, Sign-writer, Glass Bead Maker, Photographers, Health House and Dressmakers.

Reductions in Local Employment

36. Most of the house building in East Hoathly has been on the sites of businesses and this has significantly changed the balance of the living and working community. Most residents now have to travel out of the Parish (mostly by car) to work, for shopping and leisure. Most of the local sources of employment have been turned into housing.

- a. 1964 - Susans Close built on the site of a Workshop and Garden.
- b. 1988 - Thomas Turner Drive built on the site of Trills Builders.
- c. 1988 - Carpenters Croft built on the site of Bookers Pill Factory.
- d. 2001/2 - An extension to the Mews built on the site of Chapman and Smith Safir Works.
- e. 2009 - Juziers Drive and Trug Close built on the site of E&A Carriers and PB Fencing.
- f. The current planning approvals for 262 homes will remove one of the Hesmond's Stud business units and associated workers leading to further loss of local employment. The removal of agricultural land from a working farm to develop the land at South Street will reduce the level of work being done by that farm, and hence reduce the employment capacity of that farm.

37. This application offers no employment opportunities to the village and will do nothing to arrest the trend shown in Figure 18 that this village is becoming a commuter dormitory.

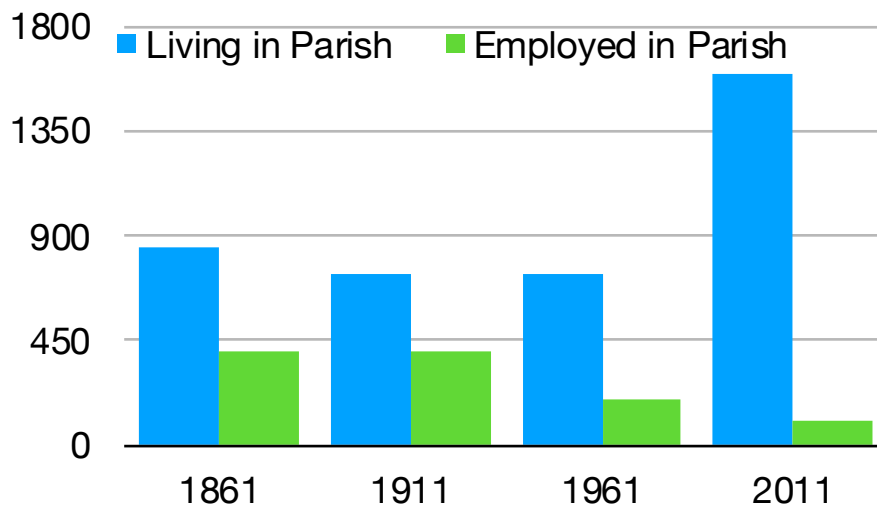


Figure 18 - Changing nature of population and employment in Parish.

Flooding

38. Flooding has already been mentioned at Sub-Paragraph 15.d in the context of how it will affect the approved South Street development site. However, flooding in this area will also be affected by the surface water discharge from other developments and this must be considered as a whole.

39. The developments of The Mews and subsequently Juziers Drive/Trug Close have urbanised a significant area of agricultural land on the East of the village. The surface water run-off from these developments is discharged into the watercourse running along the East of the development area. The catchment Swales that were constructed in the Juziers development are already silted up and no longer working effectively. They regularly overflow and flood the public footpath and field margins on the application site as can be seen in Figure 19.



Figure 19 - Overflowing SUDs scheme in Juziers Drive flooding the Public Right of Way.

40. The Applicant's site is part of this area that is now regularly under water. If this proposed development is permitted it will add to the surface water run-off and discharge an ever increasing amount of water onto the approved South Street development site and into the water course that then runs South into the East Hoathly Sewage Plant. This has flooded in the past and no assessment has been done to look at the potential impact of the increased flood risk to this whole area, the Sewage Plant and the Ancient Woodland beyond.

41. A secondary issue with urban run-off is that it is contaminated by fuel, road spillages, cleaning materials, household detritus and domestic garden products. All of this contaminates the water courses and damages the environment. The effect of one development may be small but the cumulative effect is significant and does not support the NPPF requirements to protect the environment.

Green Gap

42. The Green Gap on South Street is known locally as the Circle of Oaks owing to the characteristic circle of oak trees growing in the centre of the site. 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, isolate the wildlife and destroy the Green Gap.

43. The Green Gap on South Street is identified in the Submission Wealden Local Plan 2019 at Paragraph 25.216 (This document was withdrawn but the opinion expressed remains valid) as:

“The development boundary at East Hoathly seeks to prevent significant outward encroachment of development into the surrounding open countryside. To the south, the development boundary follows the clear physical edge to development backed by Moat Wood and open fields. The isolated ribbon of development fronting the A22 to the south of Park Lodge has been excluded since 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.”

44. WDC should stick by their words and refuse this application. This recognition of the Green Gap has been the case in all Wealden characterisations of this village since at least the Wealden Local Plan 1998. The importance of green gaps providing separation between housing in settlements is identified in the WDC Landscape Character Assessment 2022. One of its guidelines for the Ouse Catchment (Zone 6D), in which the Circle of Oaks sits, is to: “Limit the amount and scale of development in rural areas, protecting the existing low-density settlement pattern of dispersed rural villages, hamlets, and scattered farms, and the separation between these different settlement types”.

45. The importance of this open greenspace is also recognized in the WDC Draft Conservation Area Character Appraisal 2021:

a. “Open spaces within and on the edge of the conservation area are important as they help to define the built environment and create a sense of place”.

b. “The most important views looking into, out of and through the conservation area are shown on the character appraisal map in Appendix 1. These contribute to the character and setting of the conservation area and care needs to be taken to ensure that they are not lost or compromised by future development or poorly sited services”.

46. The protection of Green Gaps in relation to Development Boundaries is clearly supported in Wealden’s Submission Local Plan 2019 (This document was withdrawn but the opinion expressed remains valid) and it provides other examples such as:

a. Paragraph 20.19 - Wadhurst. *“It is important to continue to maintain the existing separation of Durgates and Sparrows Green from Wadhurst, as the characters of these two settlements are distinctly different. Separate development boundaries are drawn to prevent any intensification of the existing development north of the High Street or an encroachment of new development into the more rural area to the south around Wadhurst Castle, which would lead to coalescence of the settlements. Any proposals for development in this gap will be strongly resisted.”*

b. Paragraph 20.12 - Wadhurst. *“The primary school’s playground and playing fields have not been included in view of their more open aspect, which makes an important contribution to the gap between Durgates and the High Street.”*

c. Paragraph 27.66 - Laughton. *“This gives the settlement two distinct character areas, with significant gaps in development affording attractive views across the farmland and woods of the Low Weald. The village owes much of its charm to this unspoilt countryside setting, which is enhanced by extensive tree groups and mature hedgerows.”*

47. The Green Gap on the Circle of Oaks site fulfils all the criteria discussed above and should be given the same level of protection to prevent it being included in any future development.

48. The site has been subject to repeated attempts to obtain planning consent for housing. These began in 1961 and there have been 15 applications since then, all of which were refused permission, withdrawn, including two which then had appeals rejected. A further planning application was made in 2018 which was refused in 2021, the decision appealed and that appeal was withdrawn. WDC has assessed the site as

suitable for housing in their SHELAA report (SHELAA ref:154/1950) but 14 refusals of permission, two rejected appeals and four applications/appeals withdrawn indicates strongly that this site is unsuitable for development. WDC should show consistency in their decision making and this is an important material consideration. The recent approval of the scheme for 55 dwellings to the South makes it even more important to protect the last rural backdrop to the Setting of the Conservation Area, Park Lodge, Cherry Tree Cottages and the non-designated Heritage Asset on the site.

49. The Applicant's own Heritage Impact Assessment states: "Due to the density of tree cover, raised banks and mature hedges however, the impact of modern development on the historic environment on key approach roads to the area has been minimal with the approaches largely remaining 'green' and verdant ones". This ignores the recent planning approvals to build on the main approaches to the village. The response of the Applicant is to destroy this remaining "green" and verdant approach to the historic environment.

50. The Heritage Impact Assessment then goes on to say: "The site on the whole is considered to provide a positive contribution to the conservation area as part of its open, green boundary along an area traditionally characterised by linear ribbon development. This overall contribution is low however, due to the limited visual and experiential relationship there is between the site and the conservation area". This is wrong and totally fails to recognise the visual and experiential relationship between the site and the Conservation Area and the enjoyment and health and wellbeing benefits (including mental health benefits) that access to natural environment provides. The Applicant is attempting to use the argument that because there are modern developments that have already harmed the Conservation Area and Heritage Assets, that it is okay to do it again. This argument must be opposed and this application refused.

Wildlife Corridor

51. The Circle of Oaks Green Gap provides a corridor of access 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. This is important because the wildlife in Moat Wood and its surrounding areas is enclosed to the West 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.

52. This is recognised as one of the community and environmental benefits identified in the Locality Guide to Making Local Green Space Designations by **“Providing habitats for wildlife and natural corridors and spaces through urban areas”**. If the land is developed it would close this corridor and isolate this wildlife:

Bats

- a. The importance of this wildlife corridor is shown in the evidence provided by the applicant’s Bat Survey. Large numbers of bats, of varying species, were detected flying in the area of the site. However, the surveyors did not make the obvious connection as to what the bats were doing. The bats emerging from Moat Wood cross South Street at the Green Gap and head East to the tree-line at the Eastern edge of the site. They then follow the tree line South to the Sewage Plant where they feed on the abundant insects flying above the Plant.
- b. The Bat Survey correctly identifies that any development on this site would have an adverse effect on these bats. However, the proposed lighting controls are wholly unacceptable. Such lighting controls are uncontrollable and ineffective. The bat’s transit routes would be badly affected and it is likely to isolate them from their feeding sites.
- c. The proposed lighting controls have already been ignored by the applicant’s designer who shows houses with outside lights that would breach the lighting controls. The lighting controls also ignores the potential car headlight traffic along the Southern boundary of the site for 255 homes and 663 vehicles. All of the proposed lighting controls do not provide any mitigation to the harm being proposed unless they are enforceable, and they are not enforceable.
- d. To mitigate the loss of roosts in the buildings on site, the application proposes the installation of bat boxes. However, it does not indicate how these will be maintained and replaced over the lifetime of the housing. If this is to be borne by the homeowners it needs to be costed and published now.

Mammals

- e. It is also known that deer use the cover of Moat Wood and emerge from it to cross South Street through the Green Gap to

connect to the countryside beyond for grazing. Badgers also use the corridor to transit from Moat Wood to the open countryside beyond.

f. The application records the presence of protected Hazel Doormice on the site but does not explain how they will be protected from the introduction of playing children and domestic pets that will be released into their habitat.

Great Crested Newts

g. The Naturespace Report quite correctly identifies that this application does not provide adequate information about the potential harm to Great Crested Newts. The applicant's ecological assessment fails to satisfy the Natural England requirement that they provide survey data for ponds within 500 metres of the site.

Reptiles

h. Slow worms, grass snakes and common lizards have been found in this area. They use the habitats in the margins of the area and the open spaces for foraging. The rare Black Adder that has been located in Moat Wood may also be present in the area.

i. The Ecological Report proposes that the grass is allowed to grow long and to put some log piles on the perimeter of part of the site. It is then assumed that the reptiles will naturally relocate to this confined area and be happy. This is the wrong attitude. Reptiles use this site and others as a place to live and breed but also as a place for foraging. If you build on the site then you remove their ability to forage and they will not survive. Urbanising the site also makes it virtually impossible for them to transit from Moat Wood to the countryside to the East. This would hinder their survival and detrimentally isolate genetic groupings. To protect and enhance biodiversity (as required by NPPF 2023 Paragraphs 174 - 177) you need to allow the wildlife to continue living and thriving. They need the whole site to do this. In accordance with the wording of the NPPF this application should be refused because [“there would be an adverse effect from the project on the integrity of the habitats site”](#).

Pets

The introduction of domestic cats and dogs into the area would be a significant hazard for wildlife, principally the doormice, reptiles and birds. The applicant's reports suggest that the “wildlife refuges” on

the perimeter of the site would not be fenced. Without fencing, the areas at the fringes of the site would be used by pets and children and provide no refuge for the wildlife.

53. The Ecological Reports indicate that additional surveys are required in relation to reptiles, great crested newts, hazel dormice and tree assessment in regard to bats. This work needs to be done before any decision is made about this application.

Trees

54. The circle of oak trees in the centre of the area is a well-known local feature and attractive reminder of the rural nature of this village. These mature trees are protected with a Tree Preservation Order in acknowledgement of their importance.

55. The application proposes removing several trees. This should be opposed as they are all important habitats for wildlife. Any new development should go around the trees that exist. The applicant proposes to remove T4 (silver birch) and T5 (Sycamore) because they are in the way of proposed houses. These trees form part of the circle of trees in the centre of this field and form part of the circle of trees known as the "Circle of Oaks". They should be retained and accompanied by new plantings of oak trees to ensure the ongoing retention of the Circle of Oaks. Only in exceptional circumstances should a mature tree be removed. An oak tree such as T33 (category "A" - high value) should not have been removed and certainly not in advance of submitting a planning application and without permission.

56. The root protection area and canopy for trees T10, T11 and T12 are all shown to extend up to or beyond the proposed garage block. This is unacceptable. This provides no space for the continued growth of the roots and healthy development of these protected trees. These trees should have a lifespan that exceeds the lifetime of the buildings. To restrict their space to expand invites conflict between the tree and the buildings. The roots would be constrained and they would require constant pruning to prevent them interfering with the buildings.

57. The most important part of the root protection zone is within the top 60 cm of soil depth (Woodland Trust Guidance). This would be affected by the foundations of the proposed garage block and its construction.

58. The Applicant's plan proposes the construction of roadways, parking bays, paths and pavements within or immediately adjacent to the root protection zones of trees T6, T7, T8, T9 and T10. Again, this will cause harm

during the construction phase and ongoing harm the future growth and health of these protected trees.

59. Village Concerns believes that trees T4 and T5 should be retained with additional oak trees planted and a dig free zone of twice the diameter of the existing canopy in all directions should be provided to allow the trees to remain healthy.

60. The Arboricultural Development Report repeatedly mentions removing trees on the site that are dead. The developer clearly wants a pretty looking site in order to maximise its profits but these dead trees are important habitats for insects and wildlife. They are part of the sites biodiversity and should be left as they are.

Refuse Plan

61. The Refuse Plan only shows a swept path analysis for the central part of the proposed development and not the three other areas they would need to access. The refuse vehicle shown in the swept path analysis is 11.22 metres in length, whereas the ESCC requirement is for a 12 metre length vehicle (Good Practice Guide for Property Developers - Refuse & Recycling Storage at New Residential Developments within the Eastbourne, Hastings, Wealden and Rother Council Areas). Without the evidence to show that the correct size of refuse vehicle can safely access all areas of the site, the application should be rejected. The swept path analysis also fails to show the presence of parked cars or even larger parked vehicles that the Applicant's Transport Statement says is acceptable (Paragraph 3.4.2).

62. The ESCC Good Practice Guide states that: [“Bin stores should be located within 25 metres of the Collection Point where the collection vehicle will stop”](#). It is impossible to be certain that the Refuse Plan complies with these guidelines because it does not show the Collection Points. This information should be provided before the plan can be assessed.

63. Twelve of the plots show the bin storage (currently 2 large wheelie bins and an optional green waste bin) inside the garage. This is unworkable for several reasons:

- a. The garages are barely wide enough to just fit a car so the bin would need to be behind the car or in front and thereby need the removal of the car to get to the bin or removal of the bin to get the car in and out.

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. The ESCC Good Practice Guide requires the ceiling height to be sufficient for the lid on the bins to be fully opened. An 1100 litre bin requires a ceiling height no lower than 2.3 metres. The only drawings provided for the garages does not show ceiling heights but they appear to be below 2.3 metres.

d. The ESCC Good Practice Guide requires that the doors to an internal bin store should be louvered to allow ventilation into the bin store. The drawings provided show no louvre doors.

64. 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. These issues should be resolved before this application is considered.

Car Parking

Parking Allocation

65. 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”. This application proposes tandem parking for 19 of the 20 homes.

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 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”.

66. 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 Neighbourhood Plan 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 can only count as $12 \div 3 = 4$ spaces. Therefore this application provides only 32 spaces for a requirement of at least 49. This will result in on-street parking. 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.

Parking Proximity

67. 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.

Visitor Parking

68. The Transport Statement states that the application is in outline - this is wrong, it is a full application. It states that: “ample visitor parking opportunities are available on-street along the 5.5m wide site access road”.

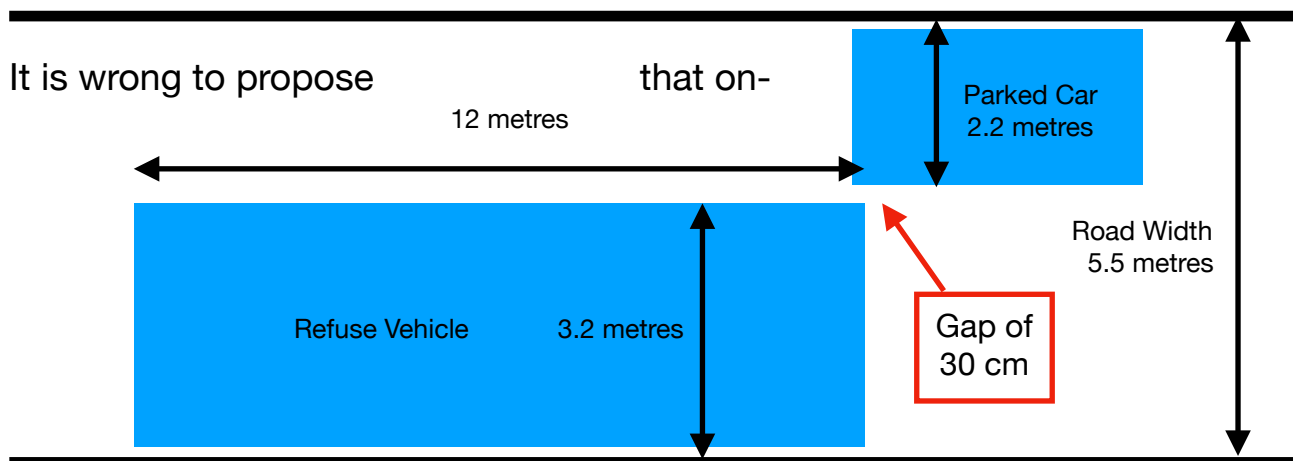


Figure 20 - Space for Refuse Vehicle to Pass

street parking is used for visitors. The ESCC Guidance for Parking at new Residential Development opposes this and states: "[The Government concluded that previous policies have directly resulted in an increased level of on-street parking consequently causing congestion and potential hazards for pedestrians](#)".

69. The average UK car width is 1.82 metres with the widest at 2 metres. Given that people will park at least 20 centimetres away from the kerb and a Refuse Vehicle should pass a parked vehicle with at least 20 centimetres clearance to the opposite kerb, this leaves a gap of only 30 centimetres in the centre of the road. This does not take account of curves in the roadway and the probability of multiple parked cars, larger vans or vehicles parked more than 20 centimetres from the kerb. Figure 20 shows how the Applicant's proposal for on-street parking is unworkable and will encourage vehicles to park on pavements or for refuse vehicles to mount pavements.

Parking Structure Design

70. There is insufficient detail to show the design of the garages. This is in respect of their size and accessibility when a car is inside along with the refuse bins.

71. There is insufficient detail of the EV charging facilities. For example, will users of the combined garage block 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.

72. There are no plans for the design of the car-ports for plots 10 - 13.

Cycle Parking

73. 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. This is unacceptable.

Site Contamination

74. One of the reasons that a previous planning application was refused for this site was that its use for general industrial purposes could not be proven for a period of 10 years. WDC could only show that it had been used for a period of 5 years. If this site or any part of it was used for general industrial purposes the whole site should be subject to survey for potential hazardous materials and contamination before any planning decision is made.

Boundary Treatments

75. The Applicant's Planning Statement states that: "Throughout East Hoathly, there is a varied mix of boundary treatments. Properties on South Street and The High Street, all commonly have dwarf walls, small picket fences and hedgerows. Gardens are typically seen with standard sized fencing and full height walls to road side verges". The Neighbourhood Plan states: "Boundary treatments should be varied, incorporating a mix of such things as walls, hedgerows, post and rail fencing, picket fencing and railings. Close boarded fencing should be avoided". It is therefore sad that the developer has proposed extensive use of close boarded fence boundaries which is desperately unimaginative and is in conflict with the Neighbourhood Plan and the Wealden Design Guide (Section 3, Page 19).

76. The WDC Landscape Character Assessment 2022 provides the following Landscape Guideline for the proposed development site as part of Landscape 6E (Page 185): "Protect and manage the existing hedgerow network, and plan for the restoration of, and linkages between, hedgerows, including establishing hedgerow oaks, to maintain habitat corridors and to retain the medieval field pattern typical of the High Weald. Remove post and wire fencing where appropriate". Page 20 of the Applicant's Design and Access Statement records the view from South Street as: "a post and rail fence borders the site allowing far reaching views across the site from the road". In fact this also incorporated an old laid hedgerow. However, the Applicant chose to ignore the WDC Landscape Guidance and to rip out the hedgerow and traditional fencing and to replace it with post and wire fencing. They have also removed oak tree T33 which also ignores this guidance in addition to being done without permission.

77. This disregard for the existing boundary treatments clearly goes against one of the recognised forces for change detailed in the WDC Landscape Character Assessment : "Loss and decline of hedgerows and hedgerow trees, and reinforcement with post and wire fencing, which reduces the rural character and sense of enclosure provided by the hedgerow network". It should be noted that this has been done to the rural setting of the Conservation Area.

Public Rights of Way

78. The Applicant's Hazel Dormouse Survey Report states at Paragraph 1.4, that: "Boundary features will be largely retained although a 2.5m² (approximate) area of scrub will require removal along the northern boundary of the site to facilitate construction of a public footpath to link to an existing

public footpath adjacent to the north”. Connecting this site to the existing public footpath that emerges from the Juziers development is an excellent idea and should be a Planning Condition of this application. However, this is the only document that mentions it. This is unacceptable. It should form part of the Planning Statement, The Design and Access Statement, liaison should have been carried out with ESCC and other relevant bodies. Given the flooding that already occurs in that North Eastern corner of the site, the developer might also want to design a Monet style bridge to facilitate a suitable crossing point.

Climate Emergency

79. The Climate Emergency is happening now yet the developer proposes a minimal effort to address it. The application proposes no on site energy generation and ignores the Neighbourhood Plan policies.

80. The Applicant’s Sustainability and Energy Statement states (Page 18): “Consideration has been given to the use of grey water recycling. However, customer’s resistance to the appearance of the recycled water and the cost of the systems does not currently make them a viable option. They have therefore not been included in the proposals”. Customer resistance is irrelevant, this is a Climate Emergency and natural resources must not continue to be wasted in this way. The South East has inadequate water storage capacity and regular water restrictions during dry periods.

81. The Applicant’s Sustainability and Energy Statement states (Page 16): “Whilst the installation of photovoltaic panels is not expressly proposed at this stage, panels could be installed to selected house to further reduce emissions”. This is a full planning application so this statement essentially means that it will never be considered at any stage.

82. The Applicant’s Sustainability and Energy Statement proudly states (Page 13): “The site carbon dioxide emissions are reduced by 11,966 kg CO₂ per year as a result of the energy efficiency measures and the installation of air source heat pumps, which equates to a reduction of 58.37% of the TER emissions”. The Applicant may be very proud of this but leaving this land as a field would reduce the predicted emissions by 100%. It should also be noted that the developer is not proposing to do anything more than the minimum demanded by building regulations.

Ongoing Costs

83. The ongoing costs of living on this site will be considerable and this should be estimated now in order for the viability of the proposal to be established.

84. The drainage plan is complex for such a small development and is likely to have a considerable maintenance cost for the residents. The scheme includes a large number of underground surface water holding tanks and chambers, foul water pumping station, foul water storage tank, all of which will require expensive inspections and maintenance.

a. A Maintenance Schedule is specified in the Flood Risk Assessment at Table 3 but this does not include costings and only covers surface water drainage. There appears to be an assessment of the need to install pollution controls to the system that concludes that additional mitigation is required (penultimate page of the Flood Risk Assessment). However, there appear to be no pollution controls or traps on the surface water drainage system nor any mention of what additional mitigation is required. The maintenance requirements of pollution controls should be added to the Maintenance Schedule and ongoing maintenance costs established. These deficiencies should be corrected prior to this application being considered further.

b. No Maintenance Schedule is provided for the foul waste pumping station or the foul water storage tank.

c. No Maintenance Schedule is provided for the road surfaces and paving which are all considerable and will fall on the residents. The images provided by the applicant indicate that the roadway and paving will be permeable block paving. This is not made clear on the design drawings and will have an impact if it is to be incorporated into the SUDs scheme.

85. The maintenance of the planting schemes and retained boundaries and trees needs costing so that it is clear what the long term costs will be.

86. The attenuation pond is shown on a computer generated image as a small (8 metre wide) pleasant duck pond. The reality will be that it will have to be fenced for safety reasons and, based on the Drainage Plan, will be 43 metres wide. It will also be encroached on 3 sides by existing trees and shrubs which will deposit significant debris and leaves reducing its capacity and effectiveness. This requires regular and costly maintenance.

87. It is disappointing that the application proposes no seating for the site which could provide places for residents to linger, promoting social cohesion

and community wellbeing. If the Applicant chooses to rectify this deficiency they should also establish the ongoing maintenance costs for such seating.

88. The ecological mitigation proposed for the site includes provision of Bat Boxes and the maintenance of habitats for plants and wildlife. The ongoing maintenance costs of these is substantial and must be estimated.

Summary

89. This application would cause significant harm to the setting of the East Hoathly Conservation Area Park Lodge, Cherry Tree Cottages and the non-designated Heritage Asset on the site. The addition of a new vehicle entrance to the site is unnecessary and would destroy the open and rural setting of the Conservation Area. The addition of a 2 storey extension to the existing building to make a 3 bedroom house is a wholly inappropriate use of this rural building and would destroy its character and the open and rural setting of the Conservation Area.

90. The much loved and sensitive views into the Circle of Oaks field with the views into open countryside beyond are of significant importance to villagers. The proposed development would urbanise the whole site, masking the view of the Circle of Oaks with buildings, obliterating the view to the open countryside and presenting a view of tarmac and parked cars in place of nature and openness. This would cause harm to the the enjoyment, health and wellbeing benefits (including mental health benefits) that access to the natural environment provides.

91. The applicant proposes to focus the discharge of all surface water at one point onto a site that has been granted planning permission for housing with no assessment of the impact on that site or on the ecology of the area. The applicant has felled a significant oak tree without permission to prepare access for a road to Tourles Farm. If this application is linked to future applications it must be considered as a whole, if it is not linked, then this represents a very ineffective use of this land.

92. The proposal for 3 road access points with 90 metres, a pedestrian crossing and the additional 1,344 vehicles that this village faces, has not been assessed.

93. The plan to divert the main village sewer is ambiguous and conflicts with the proposed SUDs plan. The sewage plant does not have capacity even before the approved 262 homes are built. The village infrastructure does not have the capacity to absorb what will be a 206% increase in homes since 1998. It is overdevelopment and unsustainable. It breaches extant

planning policies GD2, DC17 and WCS6, it does not satisfy the preferred housing mix of the WDC Housing Department nor our Neighbourhood Plan. WDC stated that the previous proposal for 28 homes carried modest weight in the planning balance so 20 homes must carry even less weight.

94. The proposal will destroy the Green Gap which is the only remaining remnant of open rural setting for the Conservation Area. Its value to villagers health and well-being is important but it is vital to the wildlife that uses it as a wildlife corridor linking Moat Wood with the open countryside to the East. This would be particularly so for Hazel dormice, reptiles and bats. The protected trees will be constrained by the construction, their roots damaged and prevented from further growth and thus their health and longevity diminished.

95. The Refuse plan, Garage Plan and Parking Plan are all unworkable and fall well short of the minimum requirements let alone a well designed modern living space.

96. The application makes grand claims about the quality of this proposal but it is missing vital reports and information, it is not high quality design, its presentation is shoddy and error strewn. The thinly veiled intention of this application is to provide access to Tourles Farm in a cynical financially driven intent to destroy this community.

97. Village Concerns urges Wealden District Council to not consider this application until its missing and erroneous reports are complete, until the financial inducement that Parker Dann has offered the Parish Council has been investigated and until the Wealden Local Plan is published. Irrespective of this, you should refuse this application on significant material harms that outweigh the very modest benefits of this proposal. WDC should show consistency in their decision making and refuse this application as they have done on for the previous 15 applications.

Victoria Aldridge and Katherine Gutkind
Joint Chairs
Village Concerns