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Monday, 25 April 2022

Dear Mr Robins,

**Redrow Homes - Hesmond's Stud Detailed Planning  
Application WD/2022/0341/MAJ**

**Village Concerns Objection 3 - Heritage Assets**

1. We are writing to you as the Co-Chairs of Village Concerns, a local Action Group from East Hoathly with Halland Parish. We represent the views of over 200 supporters against the overdevelopment of our Parish.
2. We object to Planning Application WD/2022/0341/MAJ. We wish to restate our objection of 3 March 2022 that there are fundamental problems with this application:

The application is incomplete and does not contain sufficient detail for a full planning application.

The application is premature in that it assumes that the principle of development has been established and that the Judicial Review process (relating to the grant of outline consent for this site) has concluded. The Judicial Review process continues and your statements and the developers assertions are factually incorrect and you have not corrected them.

The applicant's claim on their website (<https://redrowconsults.co.uk/east-hoathly/>) to have begun the process of purchasing the site in early 2020. Elsewhere on the website they contradict this by saying they began the process of acquiring the site in Spring 2021. They also state on the website that they have exchanged contracts. At the public consultation event in November 2021 they went further and told many residents that they had purchased the site. We believe that this claim to be the owner of the site

appears to be a breach of the Planning Condition that Planning Application WD/2020/2660/PO seeks to discharge.

3. We raised these matters with you on 3 March 2022 and you have not responded despite our request that you do so.

4. This Objection covers Heritage matters, further objections on other matters will follow.

### **National Policy**

5. National Policy Planning Framework (NPPF) 2021 at Paragraph 194 requires: “an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”. The detail provided should be sufficient to understand the potential impact of the proposal on their significance. The Local Authority is required under Paragraph 195 to assess the significance of development affecting the setting of a heritage asset. This is reinforced in Policy Planning Guidance (PPG) - Historic Environment (updated 23 July 2019) where it states that “Significance derives not only from a heritage asset’s physical presence, but also from its setting”. The Applicant has failed to adequately describe or understand the importance of the setting of the heritage assets surrounding the proposed development.

## **Listed Buildings**

6. There are many Listed Buildings that surround the proposed development but four are of particular importance:

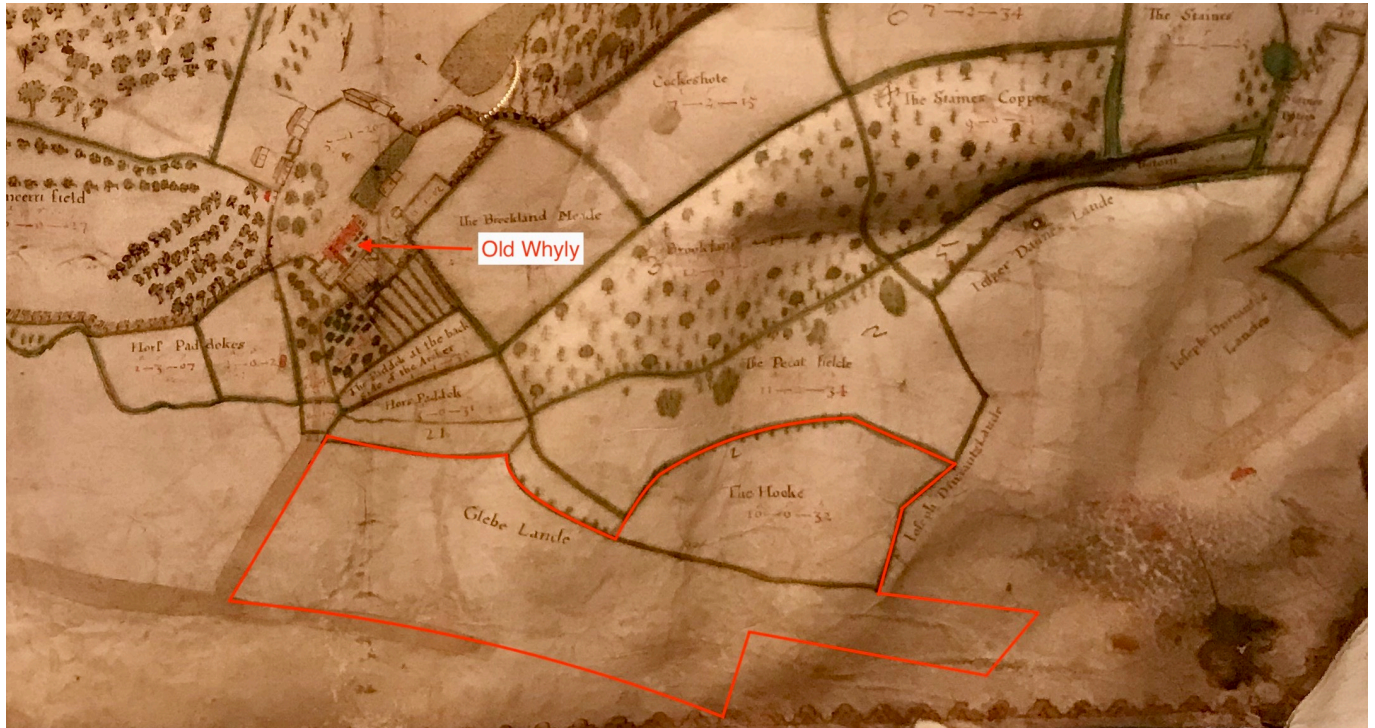
**Old Whyly** Old Whyly is a Grade 2 Listed Building and one of the oldest buildings in the Parish. Historic England describe it as 18th Century.



**Old Whyly**

However, the College of Arms records a dwelling here in 1100 and elements of a screen dated to 1400 are still visible in the kitchen area. Thomas Lunsford, perhaps its most notorious occupant, was living there in 1633 when he attempted to shoot Thomas Pelham at the doorway to East Hoathly Church. It has played a significant part in the history of this community and is frequently mentioned in the Thomas Turner Diaries of the mid 1700s. It is a popular destination for walkers and local historians and its setting is largely unspoilt by the intervening 900 years. The approach to Old Whyly from the London Road is an important part of its setting. Flanked on one side by Ancient Woodland alongside Croom

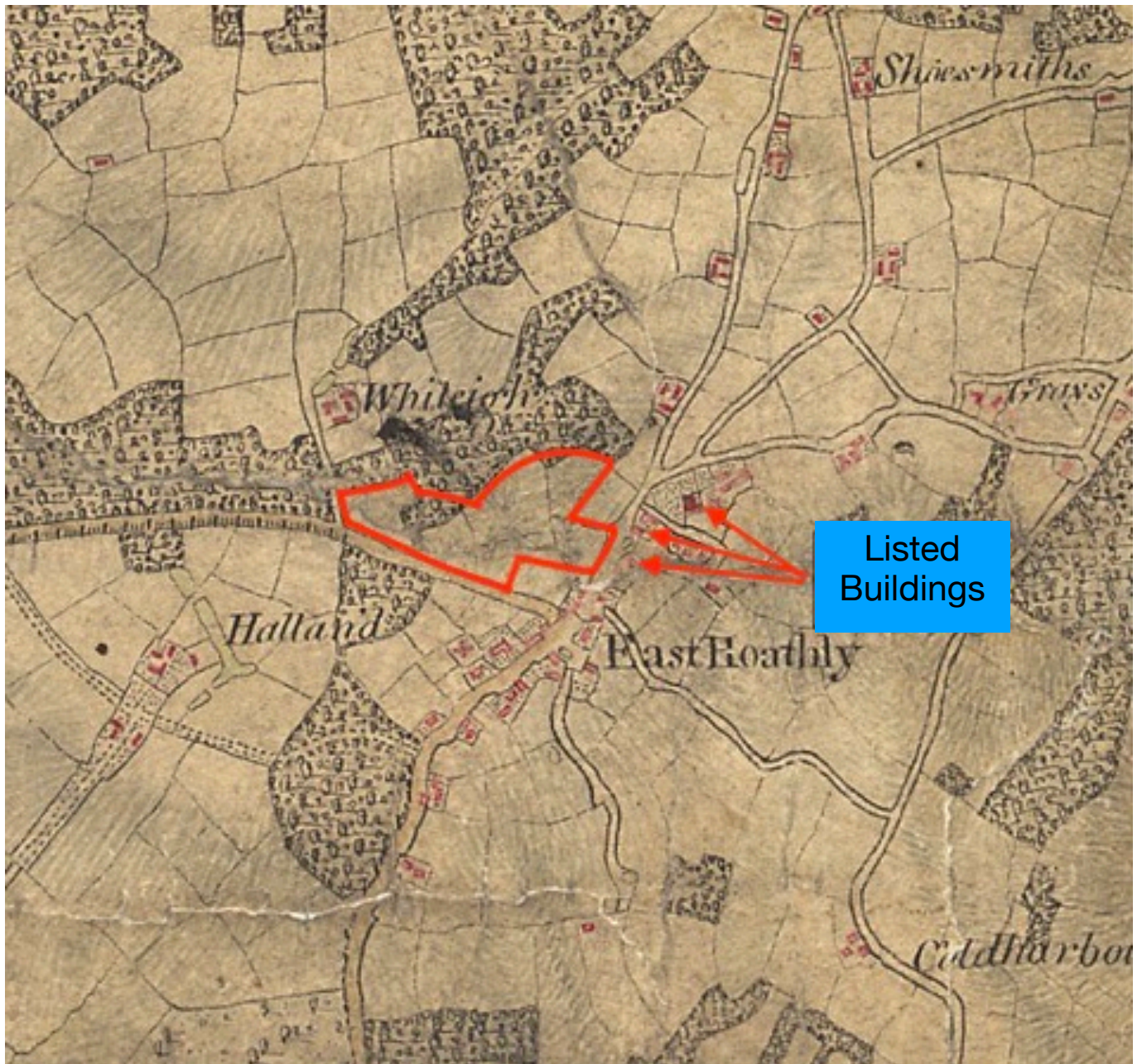
Cottage Meadow a Local Wildlife Site (LWS) and on the other side by open pasture leading into the surrounding Ancient Woodland. The view from this approach towards the village of East Hoathly has remained unchanged for over 400 years and forms part of the setting for this important Listed Building.



***Old Whyly Estate Map 1625 showing overlay of proposed development***

### **Waldron Road**

Three large houses sit in elevated positions on Waldron Road leading North from East Hoathly. They form a significant and striking combination. They are all Listed Buildings and their collective stature emphasises the importance of the setting onto which they face. The Pevsner Guide notes them as “[The three best houses](#)” and remarks that East Hoathly “[is distinguished for the excellence and neatness of its houses](#)”. This concept is supported by PPG - Historic Environment Paragraph 13, which states that “[buildings that are in close proximity ..... may have a historic or aesthetic connection that amplifies the experience of the significance of each](#)”.



***Ordnance Survey Drawing 1789 showing overlay of proposed development***

**Belmont** Belmont is a Grade 2 Star Listed Building. It is described by Historic England as an 18th Century square house that was originally the Rectory for East Hoathly. It is probable that it was built in 1764 for the Rector Thomas Porter and the event is recorded in the Thomas Turner Diaries. As the Rectory it played an important part in village life and was also home to Captain Henry Topham Clements who led the scheme to build the Village School in 1863.

It should be noted that only 6% of Listed Buildings are categorised as Grade 2 Star. These are particularly significant Heritage Assets and require an added level of consideration and protection.



**Belmont**

**The Gate House** The Gate House is a Grade 2 Listed Building. Historic England describe it as early 19th Century but it is shown on the Ordnance Survey Drawing of 1789 and was probably built around 1750. It was the home of Doctor Thomas Holman who owned the first steam powered motor vehicle in the village. When he was using this vehicle to visit patients the house had already been the home of a dynasty of village Doctors for over one hundred years. What is now the Dining Room was the Surgery.



**The Gate House**

**Hesmonds** Hesmonds is a Grade 2 Listed Building. It is described by Historic England as an “L” shaped house dating from 1830. However, it was already a significant property when in the ownership of Matthew Martin in 1807. There are references to property on this site during the 18th Century and it is probable that the core of the current house was built in the early part of the 1700s. Until recently the house was the home of the owner of Hesmonds Stud and much of the farming land of the Parish and as such was at the centre of much of the village’s business. The well supplying Hesmonds water also supplied its estate cottages and many of the village houses well into the 20th Century.



## **Hesmonds**

This trio of houses have been deeply woven into the development of this community since the 1700s and they have looked out onto the pasture land to the West of Waldron Road with views to the Ancient Woodlands beyond. The connection of the unspoilt frontages of these houses brings a timeless quality to this approach to the village. The glimpses of these much admired houses and their gardens provides an aesthetic quality to this part of the Conservation Area that is enjoyed by those passing along the Waldron Road. The pastoral scene onto which they face is very much



part of this aesthetic and is a tangible reminder of the former links of these houses to the development and functioning of the village.



The approach to the village along the Waldron Road is similar to that of the approach along the London Road. These approaches are essentially open pasture backed by Ancient Woodland and this forms the character setting for the village. The approaches to the village provide an atmosphere of calm pastoral tranquility. They contribute to the sense of arrival. The proposal to urbanise this open pasture along the London Road and Waldron Road would have a substantial negative impact on the setting of these Listed Buildings.

It should be noted that the proposed development land and the land in front of The Gate House and Belmont has all been owned by the three houses for at least 200 years. The Gate House still owns the paddocks opposite itself and Belmont. Until the recent separation of Hesmonds House from the Hesmonds Stud Farm (2011), the whole of the proposed development site was part of the Hesmonds Estate. This reinforces the importance of the views to the settings of these listed buildings.

## Hesmond's Stable Block

The Hesmond's Stable Block is believed to date from the mid 20 th Century and was recently refurbished to a high standard. Along with The Gate House Stables it creates a rural setting for the Heritage Assets. Paragraph 200 of NPPF 2021 should prohibit development in front of this important combination of Listed Buildings: “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” No such justification is provided.



**Hesmond's Stable Block**

Paragraph 199 of NPPF 2021 states that “great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)”. The cumulative importance of these Listed Buildings and the Conservation Area should give even greater weight to the need to preserve this setting and views.

## **Public Benefit**

7. Sustaining the setting of these listed buildings would provide a public benefit in accordance with NPPF 2021, Paragraphs 8 and 202. The historic rural approaches to the village and the calm tranquil setting all add to the attraction of living in this community and the health and wellbeing of both residents and visitors. To urbanise this setting would do significant harm to this public benefit.

## **East Hoathly Conservation Area Character Appraisal**

8. Wealden District Council (WDC) designated the East Hoathly Conservation Area in 1995 and it was re-designated with an enlarged boundary in March 2017. WDC published a draft Conservation Area Character Appraisal for East Hoathly in January 2021.

9. The detailed Character Appraisal clearly identifies the importance of the landscape setting for the Conservation Area and particularly for the Waldron Road area. It describes the landscape setting for the character area in the following terms “contributes to the significance of the character area and the way in which it is appreciated. The rural location of the village within the gently sloping agricultural landscape of the Low Weald and in close proximity to the South Downs means that there is open fields and woodland surrounding the character area”. It comments that the Waldron Road area “feels quite rural”.

10. Clearly, the proposal to urbanise this setting would cause harm to the Heritage Assets.

## **Landscape and Visual Impact Assessment**

11. The previous planning application for this site included a Landscape and Visual Impact Assessment. No equivalent has been submitted for this new application. The original submission made reference to the WDC Landscape and Character Assessment 2017. This described the area of the proposed development as (See Annex A):

“5.12.14 Landscape Setting Area 4 is considered to make a Major contribution to the Landscape Setting of the Settlement. This area is considered to have a strong strength of place as a result of the pockets of Ancient Woodland. There is also inter-visibility between this area and historic buildings within the historic core. The large areas of Ancient Woodland provide a strong sense of visual containment and enclosure to views north and eastwards from the settlement. They provide a wooded backdrop and interrupt long distance views across the landscape.”

12. The Applicant does not give sufficient importance to the strong wording of Wealden's Assessment, particularly in respect to the "inter-visibility between this area and historic buildings within the historic core".

13. The Applicant does not acknowledge that to build on this site would remove completely "the strong sense of visual containment and enclosure" because the whole of the open area would be urbanised removing forever the "long distance views across the landscape".

### **The Real Visual Impact**

14. The reality of the negative visual impact would be dramatic and significant. This can be seen in the following images with the proposed site boundary shown in red. This represents the site at ground level but the height of the buildings will make the visual impact even more dramatic than is represented in these pictures. The visual impact should be assessed imagining a housing estate of 2 storey house with gabled roof, dormer windows and chimneys, not merely the view from ground level. The impact would be different for the 2 sides of the proposed development:

#### **Waldron Road**

The view from Belmont, The Gate House and Hesmonds overlooks the whole of the proposed development site. Also, the view in these pictures represents one perspective from the Listed Building but will be replicated from the whole of its grounds, associated cottages and outbuildings all of which are protected by the same Listed Building status. These different vantage points would create an even greater panorama of negative visual impact. It must be remembered that the red boundary shows the proposed development site but the negative impact on the setting of the Listed Buildings includes the area between the curtilage of the Listed Building and the proposed site boundary.

Proposed Site Boundary from Belmont



Proposed Site Boundary from The Gate House



# Proposed Site Boundary from Hesmonds



## Old Whyly

The approach to Old Whyly from London Road is an integral part of its setting and this would be urbanised along the whole of the Eastern side of the road. The height of the buildings adjacent to this approach would have a significant negative impact on the setting of this historic building and obscure the view to the trees and ancient woodland to the North from London Road.



## **Applicant's Built Heritage Statement (RPS Group)**

15. The Applicant's Built Heritage Statement contains many errors and comes to a false conclusion. It is essentially a desk based exercise that presents a lack of understanding of the local area and its heritage value.

16. The executive summary describes the access to the site as coming from Hollow Lane. It is presumed that they have taken this incorrect information from Google Maps and not even referred to the applicant's documents which clearly refer to the access from Waldron Road. This is a minor error in many respects but is indicative of the poor quality of the work.

17. The executive summary also makes claims that harm has been minimised through considered design. It is clearly what the developer wants everyone to believe but it is not credible. This report was drafted and finalised in January 2022 and could not have seen the final details of the proposed development which were not finished until 21 February 2022 (documents revised on 21 February were loaded onto the website on 22 February 2022). So how can RPS Group claim to have determined that considered designs had minimised the harm when they didn't know the full details of the proposed designs ?

18. The RPS Group report says that it has considered the related consultation responses but it fails to consider the contributions from many other sources. There were representations from the Parish Council, CPRE, The Georgian Group (who are consultees on this new application), Asset Heritage Consulting and a range of local contributors including a paper presented by the owners of the 4 neighbouring Listed Buildings. To have ignored these submissions is unprofessional and does not allow an informed judgement to have been reached.

19. In Paragraph 3.1, the RPS Group report only assesses the significance of the proposed development on 5 Listed Buildings. Historic England and the WDC Conservation Officer are quite clear that other heritage assets such as Lavender Cottage and Fern Cottage are affected by the proposals yet the RPS Group are content not to have considered them. As such, their report is flawed, incomplete and cannot be regarded as providing an informed judgement.

20. Paragraph 3.5 of the RPS Group report is a wonderful example of how little this desk based assessment is worth. It states that intensive development of new dwellings in denser more formal layouts have been built on Juziers Drive, Buttsfield Lane and Turner Drive (this should have been Thomas Turner Drive). It also states that these are excluded from the Conservation Area. This is not true as part of Buttsfield Lane including probably the oldest Listed Building in the Parish (The Old Post Office Cottage) is part of the Conservation Area. The three roads are vastly different in terms of character and housing density, Thomas



Turner Drive is 25 dwellings per hectare (dph), Juziers Drive is 22 dph and Buttsfield Lane is 18 dph. Paragraph 3.5 is therefore factually incorrect and irrespective of this, it is meaningless.

21. Paragraph 3.6 of the RPS Group report cites some of the Key Characteristics of the Conservation Area Character Appraisal but excludes one of the most important ones in relation to the proposed application. That is: “[Historic core of the village predominantly developed along the High Street and medieval church, the road junctions with London Road and Mill Lane, and the former village green and pond, with more dispersed settlement along Waldron Road and South Street](#)”. The key point here is that the settlement along Waldron Road is dispersed, there is open space, views and the rural setting of the village and its Conservation Area.

22. Paragraph 3.9 of the RPS Group report is an example of the reductive nature of this report as a whole. It mentions a few elements of Character Area A but omits most of the detail. The Conservation Area Character Appraisal describes Character Area A in 3,703 words whereas the RPS Group report condenses this to 205 words. As such it is of little use in providing an informed and reasonable judgement of the impact of harm to this part of the Conservation Area.

23. Paragraph 3.14 of the RPS Group report states that because of the position of Turner Drive (again, this should have been Thomas Turner Drive) and Carpenters Croft, that the proposed development site is separated visually and physically from the village core and much of Character Area A. They claim that this means that it is not possible for proposed development site to experience the significance of Character Area A. This is wrong. Visual and physical connection is not necessary for the site to have an adverse impact on the Character Area. The RPS Group report ignores the government’s Planning Policy Guidance - Historic Environment which clearly states:

“[The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.](#)”

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation".

24. Paragraph 3.15 of the RPS Group report states that "the site is appreciable on the approach into the core of the conservation area from the north and as an appreciable part of its rural setting, contributes to the historic interest of the conservation area". We presume that this is yet another error and they should have referred to the approach from the West.

25. It is a little petty to point out that in Paragraph 3.16 of the RPS Group report they misspell Norman as Normal in relation to the origins of our Church. This would have been ignored had they not also misspelt it in Paragraph 3.4 as a Norma church ! This poor proof reading is sloppy and does not impart any confidence in the quality or conclusions of this desk based report.

26. Paragraph 3.19 of the RPS Group report is a travesty. It concludes (albeit that the language used is convoluted and imprecise) that the setting of the Church is not impacted by the proposed development site. This is wrong. The setting of the Church has already been eroded by development on 3 sides, the only unspoilt view remaining in its setting is that over the sports ground and onto the proposed development site. The report states that views of the Church from the site are only glimpsed between vegetation. This may be true but it underlines the importance of these glimpsed views of a country church, particularly from the public right of way which crosses the site. The view of a distant rural church tower is a quintessentially English pleasure and something that should be protected, not dismissed.

27. Paragraph 3.22 of the RPS Group report is disturbing in that it concludes that the views of Belmont looking from the proposed development site are extremely limited and therefore only a limited contribution. This is wholly wrong and is also irrelevant. The important matter is the views from the Belmont onto the proposed development site and these would be harmed. The same is true for The Gate House and Hesmonds. Another example of an RPS Group error is that the author has noted the fact that the 1839 Tithing Map Apportionment shows that 4 fields were Glebe Land owned by the then Rector, the Reverend Edward

Langdale. The author then incorrectly asserts that this shows a historic link to Belmont. However, Belmont was never Glebe Land, nor did the Reverend Edward Langdale ever live at Belmont so there is no historic link. Strangely, the author fails to note in Paragraphs 3.26 and 3.27, the historic connection between Hesmonds and Hesmond's Stud. This only ended in 2011 when the new owner severed the centuries old connection of this farmland to Hesmond's House.

28. Paragraph 3.25 of the RPS Group report notes that The Gate House is closer to the proposed development site than Belmont or Hesmonds and is less enclosed with views into the site and visibility from the site. It mistakenly concludes that the harm caused by the proposed development will be limited.

29. Paragraph 3.27 of the RPS Group report concludes that the contribution of the proposed development site to the significance of Hesmonds is limited. This is an appalling misjudgement. The proposed development would be around 6 metres from the curtilage of this Heritage Asset and with views from its gardens directly onto the site particularly when the proposed 2 storey homes are built above the existing hedge. It should also be remembered that the existing screen of trees that limit the view from the house are not permanent. Disease and weather could remove that screen overnight. The importance of the settings of Belmont, The Gate House and Hesmonds is that they sit in front of open paddocks with rural views, not views onto a housing estate.

30. Paragraph 3.29 of the RPS Group report is utterly dismissive of the impact of the proposed development on Old Whyly (the report repeatedly mis-names the property as Whyly). This is wrong. The approach to Old Whyly is a rural lane leading to this peaceful isolated rural house of great distinction. The author also misses the historic connection of Old Whyly to the part of the site previously known as the Hooke (see map on Page 2). The urbanisation of this rural lane would harm the setting of Old Whyly.

31. Section 4 of the RPS Group report purports to assess the impact of the proposed development. It is particularly disappointing that this section is so inadequate and misguided:

It claims that the layout and architectural styles have been selected to respond to the character of the conservation area. As already stated at Paragraph 17 this could not be true as this report was completed prior to the completion of the final designs and layout of the scheme.

It claims that the design and materials palette have been chosen to respond to the local vernacular. This is not true:

The designs proposed for the homes are stock Redrow designs taken from a catalogue. They have nothing to do with this village or Sussex architecture. They show 16 different house design options named: Windsor, Warwick, Tweed, Tavy, Snowden, Shaftsbury, Richmond, Oxford, Letchworth, Leamington, Highgrove, Henley, Hampstead, Dart, Chester and Cambridge. None of these names relate to Sussex and it is hardly surprising that the designs bear no relevance to Sussex architecture. More specifically, none of the designs bear any resemblance to the vernacular of East Hoathly.

The colours of the proposed bricks and tiles are not Sussex colours. The traditional Sussex colour is much more orange. Blue Headers are also a Sussex tradition. The proposed tiles appear to be machine cut and lack any character.

All roofs have the same roofing material - plain tiles. This is unbelievably unimaginative. Why no variation. Why not some decorative tiling or some decorative ridge tiles/finials, why not some slate.

32. The design statement claims that Arts and Crafts design has been used. We see no evidence of this. Arts and Crafts architecture is regarded as a style that urged for a return to craftsmanship and which rebelled against industrialisation and mass production. The generally agreed principles of Arts and Crafts design are:

Clarity of form and structure

Variety of materials

Asymmetry

Traditional construction

Craftsmanship

33. These principles seem to be fundamentally at odds with the Redrow's claim of being a national volume house builder and the stock designs from other parts of the country that they have proposed.

34. Paragraph 4.4 of the RPS Group report chillingly states that the proposal contains no specific mitigation measures. This disregards the whole tenor of the comments of Historic England and the WDC Conservation Officer in 2020 and

again in 2022 that the scheme should be reduced from 205 homes. It also disregards the debate of Planning Committee South when it chose to grant outline consent for the original application. It ignores the pre application meetings with Redrow Homes at which the planning department has on more than one occasion recommended a reduction in the number of homes on the site. Given that this was a significant issue when the outline consent was approved we are disappointed that Redrow Homes have ignored this advice.

35. The RPS Group report assesses the harm to heritage assets as follows:

Conservation Area	less than substantial - low/middle
Parish Church	no impact
Belmont	less than substantial - low
The Gate House	less than substantial - low
Hesmonds	less than substantial - low
Old Whyly	no impact

36. This is totally at odds with the assessments of Historic England, the WDC Conservation Officer, The Georgian Group and Asset Heritage Consulting. The Historic England consultation response of 10 March 2022 is damning. It reminds WDC that its advice on the first application was that the proposed development would result in a high level of unjustified harm to East Hoathly conservation area and some harm to several listed buildings. Historic England suggested an entirely new application with a smaller more sensitive scheme utilising only part of the site. Historic England object to the new application after determining that the proposal would cause a high level of less than substantial harm to the conservation area and a medium degree of less than substantial harm to a number of listed buildings. The WDC Conservation Officer concurs with this view.

37. The RPS Group report claims to have mitigated against the harm to the heritage assets by extensive embedded mitigation or mitigation by design. This is wholly disingenuous and just lip-service to justify the building of a housing estate directly plucked from the catalogue of a national volume house builder. We can see no evidence that the designs have been subject to “considered design”, offer any mitigation to the ideas put forward in the original application or comply with the guidance offered by Historic England or the WDC Conservation Officer.

38. The report concludes by claiming that a Redrow balancing exercise demonstrates that harm to the heritage assets will be outweighed by public benefits. We contest this and trust that the Local Planning Authority and Planning Committee South will come to a more rational and balanced view.

### **Conclusion**

39. The Applicant has provided a desk based report that has failed to adequately describe or understand the importance of the setting of the heritage assets affected by the proposed development. It is lacking in detail and contains many errors from minor spelling mistakes to significant misjudgements on the importance of the harm that the proposed development would cause to the heritage assets. As such, it fails to meet the requirements of the NPPF and PPG - Historic Environment. It fails to give any consideration to the cumulative importance of the Listed Buildings (and in particular, Old Whyly, Belmont, The Gate House and Hesmonds) and Conservation Area in respect to the proposed development site and therefore does not attribute them greater weight in accordance with NPPF 2021 Paragraph 199.

40. The Applicant has presented and endorsed a report which totally ignores the assessments of Historic England, the WDC Conservation Officer, The Georgian Group and Asset Heritage Consulting. The clear guidance of professional authorities on Heritage matters is that this planning application is unacceptable and that formal advice has been ignored. We do not believe that as the Local Planning Authority you will be able to demonstrate that the harm that would be caused to the heritage assets will outweigh the public benefit of the proposed development.

41. We urge you to reject this application.

Katherine Gutkind and Kathryn Richardson  
Co-Chairs  
Village Concerns

Annex:

A WDC Landscape and Character Assessment 2017 Figure 5.5

cc

Councillor Draper  
Parish Council  
WDC Conservation and Design Officer  
Historic England  
Georgian Group  
Victorian Society

# Annex A

## WDC Landscape and Character Assessment 2017

### Figure 5.5

