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Thursday, 19 May 2022

Dear Mr Robins,

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

Village Concerns Objection 5 - Design and Layout

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 would amount to 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 Design and Layout matters, further objections on other matters will follow. The sections highlighted in blue are quotes from Wealden District Council (WDC) documents or policy documents such as the National Policy Planning Framework (NPPF).

5. The Wealden Local Plan Core Strategy 2013 identified East Hoathly as “a Neighbourhood Centre which it defined as a settlement with limited, basic or no facilities but with access to another centre, or a settlement with facilities but poor accessibility or access only to a device or local centre”. The Core Strategy 2013 also removed the Development Boundary from East Hoathly and proposed no growth for the Parish. In 2009, 75 homes were built in the Parish and since 2013 a further 16 have been built and 6 more are under construction. This equates to an average increase of 7 homes per year which is a 1.3% growth per year. In Wealden over this period the average growth has been 0.97%. It can therefore be seen that this Parish has already had more than its share of growth compared with Wealden. Fifty five new homes have been approved for South Street and if this application is approved it would amount to an additional 260 homes in the Parish.

6. For a Parish that WDC has identified for no growth, with no improvements in infrastructure and already a higher rate of housing growth than Wealden as a whole, it would be negligent to approve this application. This view is supported by a recent statement from the Secretary of State for Levelling Up, Housing and Communities: “instead of creating and enhancing neighbourhoods we have seen dormitories planted in the wrong place in the wrong way”.

Design

Climate Emergency

7. The Applicant’s Planning Statement and the Design and Access Statement make no mention of heating systems, use of grey water, chimneys, use of renewable energy, fibre cables, electric vehicle charging points and do not mention the CLIMATE EMERGENCY other than to quote the planning legislation to which they must adhere.

8. The Applicant’s Energy Report essentially says that Redrow are aiming to be much better for the planet in the future but for this development it will be the minimum requirements of current Building Regulations. They will not go beyond what they have to do by law.

9. The Applicant's Energy Report is a perfect example of a desk top report by someone with no knowledge of the site or the situation in this community. It describes East Hoathly as urban, East Hoathly is not urban - towns and cities are urban. It discusses the use of Air Source Heat Pumps being used to replace gas boilers when they need replacing - this village has no mains gas.

10. The Applicant's Energy Report calculates that the new development will be 4.3% better in CO2 emissions than previous housing. This is not enough to even scratch the surface of the Climate Emergency. There should be a step change towards carbon neutral homes if new developments are to have any impact. Redrow seem to be content to leave the Climate Emergency to someone else to solve. This is an appalling position for a self proclaimed national house builder.

11. This proposal seeks to demolish recently refurbished equine facilities and an existing home. The original application for this site was a hybrid application that proposed the rebuilding of these facilities at Ailies Lane. This idea was later withdrawn but the business viability following the loss of the facilities still proposed for demolition was never addressed:

If these facilities are no longer required, then a business case to support this should be put forward and this would have a bearing on Planning Application WD/2020/2660/PO.

If these facilities are no longer required, then they should be repurposed for some other agricultural or commercial purposes. To demolish them has a significant carbon cost that cannot be justified during a Climate Emergency. To demolish them is contrary to WDC policy (for example Core Strategy 2013 Policy SPO9) and NPPF 2021 Paragraph 152. Why demolish the perfectly good buildings on the site (including one home), why not repurpose them as commercial premises and bring some employment opportunities to the site ? The stable block on Waldron Road has character and fits in with the rural setting. Why not repurpose it as a commercial building ?

The loss of employment in the Parish by the landowner choosing to relocate his business abroad has not been addressed:

The first option that should be explored is to sell the land as an agricultural holding and retain the employment potential of the business.

The second option is to redevelop/convert the site into a different rural business. Saved Policy BS9 and Paragraphs 7.46 to 7.49 of the Wealden Local Plan 1998 are quite clear that opportunities to

retain this business as place of employment should be pursued. Paragraph 50 clearly states that this takes precedence over housing: “Certain new business activity may be satisfactorily introduced into the countryside through the conversion of suitable rural buildings. Appropriate criteria are set out in Policy DC7. The value of such opportunities as a means of diversifying the rural economy is recognised by the priority given to business conversions over those to other uses, including residential”.

The Landowner has shown no evidence of trying to sell the land as a business, no proposals to repurpose the land and facilities with potential for rural employment. The Landowner has simply chosen to relocate abroad to obtain tax advantages and apply to WDC to profit hugely by sacking local workers to build houses on the site of a viable business. WDC should not allow this damage to the rural economy. It should protect the employment opportunities of this site retaining the existing buildings within the layout of any development.

12. Village Concerns strongly believes that this car dependent proposal represents unsustainable development when assessed against the NPPF objectives. It could only be presented for approval in the conditions where WDC have failed to meet the five year land supply target. The Climate Emergency is blind to the land supply target and this application will worsen the Climate Emergency. WDC should reject this application on these grounds alone.

13. The Applicant’s submissions contain a Design and Access Statement prepared by Sten Architecture from Wakefield and a Planning Statement from Urbanissta, a firm located in London and Birmingham. Both documents seem to have been produced independently and contain many inconsistencies. Both are liberally scattered with claims that the designs have been carefully and fully considered and uses language that claims the designs are bespoke and will reflect the rural character of the village. Nothing could be further from the truth.

14. Redrow boast that they are a “national volume house builder” and that is exactly what this proposal resembles.

15. It is particularly disappointing that neither of the design documents mentions the draft Character Area Assessment for the East Hoathly Conservation Area. The draft Character Area Assessment document contains a great deal of information that should have been incorporated into their plans. They also appear to have paid no attention to the draft East Hoathly with Halland Neighbourhood Plan. They have made no contact with the Neighbourhood Plan Steering Group and made no request to see the draft Parish Character Area Assessment that will accompany the Neighbourhood Plan. This is especially

surprising given that both their documents claim to have consulted widely in the preparation of their designs.

16. The Design and Access Statement even contains, under the heading of Design Solution - Heritage, a plan showing the wrong Conservation Area. A perfect example of how this application has been rushed and badly researched. The consequence of this lack of consultation and lack of reference to important documents is that the designs are ill informed and bear little relevance to this village.

Design Quality

17. 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 provide 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.

18. The designs are too similar to each other. There are no bungalows or specifically designated retirement homes. The height of all the buildings is too similar. Without variety it will not look like natural development and will appear like an estate bolted onto the side of a historic village. They have proposed a uniform, urban extension lacking in character. To quote the Secretary of State for Levelling Up, Housing and Communities: [“Britain needs beautiful homes and communities. That’s why I’ll clamp down on developers of soulless dormitories ... Too many new homes have been ugly, shoddily constructed and of poor quality. Identikit creations plonked down without regard to the shape and character of existing communities”](#).

19. 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

20. 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.

Design Detail

21. The community would have liked to have the opportunity to comment on the designs of the proposed homes but these were not available when Redrow carried out their public consultation. This would have allowed them to adjust their designs and make them relevant to the local vernacular. Some of the feedback they might have been given would include”

Too many of the designs have rendered finishes. This is not a common wall finish in this village.

The sizes of the windows are too small. They look mismatched if compared to traditional designs.

Cladding is used in some designs but not reflecting the local style which is generally for the whole of an upper storey to be clad. The cladding design is wavy edged boards in a natural colour (although it is not made clear if this is natural wood or UPVC). East Hoathly cladding is usually white plain boards (usually shiplap).

Many of the window designs use leaded lights. Whilst this has been used in the village it is not generally a Sussex characteristic and should be reduced to reflect the existing character of the village.

The Apartment block looks like an old workhouse. The balconies appear very utilitarian. If the idea of the balcony is to compensate for the lack of a garden would it not be preferable (and healthier) to have a private garden for the whole apartment block ? It does not give the appearance of being a beautiful place to live as required by the Government's Building Better, Building Beautiful Commission Report 2021.

Many of the designs have integral garages which dominate the design and spoil the aesthetic quality of the home. At the Consultation Event a designer admitted that very few garages would ever be used for cars so why allow them to ruin the designs ?

Brick chimneys are shown on one of the 16 house designs. Steel chimneys then appear on some of the site plans. The Statement of Community Involvement states that all homes will feature electric heating

systems. This is a full planning application and yet the form of heating for the properties appears to be a mystery to the designers. The application should not contain such contradictory information. What form of heating is proposed and why do the designs not show the homes as they will be built ?

All roofs have the same roofing material - plain tiles. Most of the roof heights and styles are similar and generally the pitch is too shallow. This is unbelievably unimaginative and some variation should be introduced. Variation with decorative tiling, decorative ridge tiles/finials should be included as well as alternative materials such as slate. Even a cursory visit to the village would show the wide variation in roofing materials and styles.

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. This is a really critical issue. If poor quality bricks and tiles are sourced and the wrong colour palette used, then the designs will never fit in with the existing vernacular.

Brick cill and lintel designs are copied through many of the house designs. Brick cills are not a feature of Sussex design and should be replaced. Brick lintels are a feature of Sussex design but they should be brick slip flat gauge arch lintels not straight ones.

All the designs are a pastiche of historical vernacular. When this is done well it works but these designs are generic UK designs that have no connection to East Hoathly.

Why are there no contemporary designs. East Hoathly does not have much contemporary design but it does exist and when done well it sits comfortably alongside traditional design.

The Snowden and Warwick designs use the same layout for one and two bed homes. The one bed versions show the second bedroom as a study. This is lazy design and wrong. The occupant will be able to use the study as a second bedroom and the design intention is circumvented. Specific one bed designs should be produced.

The proposed boundaries between the plots are mostly wooden fencing. This is cheap and repetitive and would create the look of a housing estate with no sense of place. This should be changed to introduce some variety and reflect the existing character of the village using brick, flint, and hedges. Hedges would also help to improve the retention of biodiversity.

Layout

General Layout

22. The application shows examples of the street scenes. These are depressing, each one being spoilt by being too crowded. In general, taking one house out of every line of housing would give the buildings a space to breath and create a sense of place rather than a congested and cluttered urban environment.

23. The set-back of most of the properties is the same and this lack of variation does not reflect that existing in the village. It creates a feeling that the layout has not developed naturally over time and the regularity is more appropriate to an urban setting rather than a historic rural village.

Public Right of Way (PROW)

24. The Design and Access Statement states: “There is an existing PROW from London Road through the site. This access is maintained and the route slightly diverted to follow green corridors and allow better connections for new residents”. This is not true. The public footpath is shown being diverted onto the London Road which is not a green corridor. No justification or explanation has been provided to support this change. They propose the removal of the pavement on the North side of London Road so that people would have to cross to the South side to enter the village. Village Concerns feels very strongly that the footpath should remain inside the landscaped part of the development and emerge in its existing place alongside Long Pond. The existing path alongside Long Pond should also be retained.

25. The re-routing of a PROW and its urbanisation is something that has been proposed with no justification or examination of alternatives. It has been done purely to simplify the layout of the proposed development. This is a rural village that is proud of its rural PROWs and the benefits they bring to the character of the area. Any development proposal should be made to adapt around such important features of our landscape (supported by an objection from the Ramblers’ Association).

Garages/Car Parking

26. Village Concerns Objection 4 - dated 5 May 2022, contained objections in relation the impact of Garages and Car Parking on Sustainability. These objections still stand and some are repeated here where they are relevant to the issue of the Design and Layout of the site.

27. The garages are too small to accommodate large cars. Internal space for a single garage is 3 x 6 m with a 2.4 m wide door. A modern SUV is 2.22 x 5 m. Getting such a vehicle through the door with only 9 cm space on either side is not easy and once inside, you would not be able to open the doors or boot. Logically a double garage should be twice as big but they are 5.6 x 5.5 m inside which is smaller and inadequate. The same issue applies to parking spaces which are too small for most modern vehicles.

28. The plans submitted with the application do not show the visitor parking spaces. The plans submitted also do not show the allocation of parking spaces to homes. It is therefore impossible to assess the adequacy of the parking allocations or the appropriateness of their location.

29. The proposal claims to provide 456 car parking spaces (including 41 visitor parking spaces and 20 unallocated spaces) but none of the plans clearly shows where these are. Irrespective of this, the numbers do not add up. The application states that its parking allocation is based on 2 spaces per house and 1.33 spaces per flat. The exact number of flats is unclear as the Planning Statement states at Paragraph 2.10 that the full application contains no flats but Paragraph 3.5 states that there will be 15 flats. Based on this, their calculation should have produced 461 parking spaces as shown in the table below.

	Proposed	Parking Allocation
Houses	190	380
Flats	15	20
Visitors		41
Unallocated		20
Total		461

30. The difference of 5 missing car parking spaces is small but indicative of the imprecise nature of this application and reiterates that the plans do not delineate the allocation of parking spaces.

31. However, this avoids a more important matter. The allocation of parking spaces, be it 456 or 461, will be inadequate because it is based on parking allocations that do not reflect modern rural life in this village:

Even a one bed flat is likely to have 2 occupants who may each have a vehicle. They are only allocated 1.33 spaces, so where are they expected to park in a car dependent rural village ?

The real vehicle ownership in East Hoathly, established by local survey, is 2.24 vehicles per household and until developers and ESCC start to pay attention to this then they will continue to produce developments that are immediately cluttered with cars, on-street parking and access issues for delivery vehicles, refuse vehicles and emergency vehicles.

There is no parking allocated for self employed work vehicles.

32. A general point is that the roads are too narrow - one parked vehicle could completely block the road preventing access for residents, delivery vehicles, refuse and emergency vehicles. The inadequate parking provision is highly likely to result in on-street parking. All of the above points lead to the conclusion that more vehicle parking will be required, garages need to be larger and the roads need to be wider. All of this will impact the layout of the proposed site.

Electric Vehicle Charging Points

33. The applicant's Planning Statement mentions Electric Vehicle Charging Points but only to say that they will be covered in the Transport Assessment. Unfortunately this message has not been passed to GTA Civils as their report does not mention Electric Vehicle Charging Points other than to quote the NPPF requirement that they should provide them. This is a full application for a major housing development in a Climate Emergency for a location that is known to be car dependent. It is unacceptable that the applicant pays such little regard to such an important matter.

34. The Air Quality Report suggests that only 190 residential units will receive their own charging points the flats will have to share. This is unacceptable. Not only will the flats not have sufficient parking space they will not have their own charging points.

35. No mention is made anywhere in regard to the provision of charging points for visitor parking spaces.

36. No detail is provided as to how each parking space will be able to access a charging point. Detailed designs need to be provided in order to assess the suitability of this scheme. It is highly likely that the proposed development would be another planning and design failure, with crowded forecourts full of vehicles and electric charging cables trailing everywhere.

Traffic Access

37. In the Village Concerns Objection 1 - dated 3 March 2022, we raised the issue of Traffic Access and are repeating those comments below with some additional remarks.

38. The applicant's claim that there are striking similarities between the Detailed Application WD/2022/0341/MAJ and the Outline Application WD/2016/2796/MAO are incorrect:

The applicant claims that Application WD/2022/0341/MAJ has identical vehicular and pedestrian access points. This is incorrect.

It remains unclear to us what access arrangements the members of Planning Committee South thought they were approving on 16 July 2020. The Officer's Report proposed that planning permission be granted, subject to conditions. Condition 18 states "No development shall be occupied until the vehicular access serving the development has been constructed in accordance with the approved drawing no 39667/5508/005 Rev C as amended as part of the s278 agreement and detailed design. HW08(M)". The only plans in the Officer's Report that show the access arrangements, show a roundabout access onto London road. This plan is shown twice in the Officer's Report. However, the decision notice included Revision G, not Revision C. The brief planning meeting did not include any debate on the access arrangements despite it being a matter of significant public objection. No detailed plans were presented for the Waldron Road access, no Road Safety Analysis, no ESCC Highways approval (despite the repeated requests for details made by ESCC Highways), and, despite significant public objection, full permission for access was granted.

The Access Drawing (Revision G) included in the Decision Notice dated 11 June 2021 still shows a roundabout on London Road. It has been overwritten but it is still confusing and ambiguous.

The new application proposes the speed limit is reduced to 40 mph on the London Road. This was not the case for the original application. The highways authority had stipulated that the speed be controlled by "visible frontage development". Village Concerns did not agree with this concept but nevertheless it was the agreed position of ESCC Highways approval of the access arrangements for the Outline Consent.

The pedestrian access point now being proposed is different to the one approved in 2020. The only plan showing the proposed route of the PROW in the Officer's Report shows the route is inside the hedge line of proposed development. This is different to the new application which also proposes removal of the pavement on the

North side of London Road so that users of the PROW would have to cross the London Road to access the village.

39. One of the proposed entrances to the site is very close to the Sports Ground entrance and a pedestrian crossing necessitated because of the proposed removal of the footpath on the North. This will create a complex situation of 2 junctions and a pedestrian crossing in close proximity. This will be hazardous and should be changed. Village Concerns believes that the Road Safety Assessment of this is inadequate and that this matter should be more fully examined.

40. The access arrangement for the Waldron Road takes no account of vehicles parked opposite the entrance. This is now commonplace and would prevent the proposed vehicle tracking being achieved. No mention of this is made in the applicant's submission of vehicle parking on Waldron Road or any proposed limitations to be imposed.

41. As a result of the significant issues raised by the changes in the proposed access arrangements and the lack of detail submitted, particularly for the Waldron Road access, this matter should be re-submitted with full details, a transport analysis and safety analysis.



Transport Assessment

42. Village Concerns Objection 4 - dated 5 May 2022, contained objections in relation to the impact of Transport on Sustainability. These objections still stand and some of the comments are repeated here where they relate to Design and Layout.

43. The Transport Assessment produces data that does not match the reality of a rural car dependent development. The vehicle movements from the proposed development will exceed those calculated by GTA Civils. This is partly because the comparator sites that the Transport Assessment uses are not comparable with East Hoathly. The comparator sites are urban, edge of town sites that do not compare with a small rural village with inadequate public transport and where it is too far to walk or safely cycle to alternative places.

44. This Transport Assessment also claims that in the am peak period of one hour, 43 people will walk out of the proposed development, 7 people will use the bus and 4 will cycle. A recent survey of the Juziers development showed that the level of pedestrians is about half the Redrow calculation, no one used a cycle and only 2 people from the whole village used the bus. Village Concerns believes that the “missing” pedestrians and cyclists will in fact be in more cars. This situation could be exacerbated further because the East Hoathly School is already oversubscribed so none of the new residents of South St or the proposed Redrow development will be able to walk their children to East Hoathly School. They will all get into cars and drive elsewhere in the District.

45. The Transport Assessment states that there are 2 trains per hour from Uckfield in the peak hours. This is incorrect, it is one. It describes this level of service as moderate frequency and that it goes to key destinations. These key destinations are Crowborough – Cowden – Oxted – East Croydon – London Bridge. The service of one per hour is not moderate frequency it is low frequency and only London Bridge is a key destination. Key destinations would be Brighton, Tunbridge Wells, Eastbourne, Lewes, Haywards Heath and Heathfield, none of which are accessible by train.

46. The Transport Assessment takes no account of the South Street development of 55 homes which will have a cumulative effect on traffic flows and has been ignored.

47. This flawed analysis of the impact of the proposed development on Transport has the following effects:

It makes the proposed scheme appear acceptable and one without harmful effects on climate change, pollution, parking, and congestion.

It supports a design layout that will be inadequate for the level of car dependency that will ensue.

It makes claims about the use of public transport that are false and misleading. This makes the proposed scheme appear to offer modal shift and compliance with sustainable development objectives. The reality, as evidenced by the Juzier Development, is one where the Travel Plan has failed and car dependency exceeds the predictions.

Woodland Buffer

48. A 20m buffer has to be provided for Ancient Woodland but on the section of boundary that is not Ancient Woodland, Redrow propose to build out to the boundary. This “bulge” spoils the transition to the woodland edge and it is mean-spirited to take advantage of this gap in the regulations. This section of woodland is home to some majestic Western Red Cedars which grow to an enormous size. This section of woodland (albeit not Ancient) and these magnificent trees deserve the same level of protection. The developer should provide a 20 m buffer for all the woodland to the North of the site to help protect these magnificent trees.

49. There is no indication what form of fencing there would be to the woodland in the North of the site. This is unacceptable for a full planning application. The boundary arrangements should be fully detailed and liaison should have been conducted with all the adjacent landowners. No such liaison or consultation has taken place. If the boundary arrangements are not adequately planned and designed then it will lead to problems of residents, children and pets moving into conflict with neighbouring properties.

Surface Water Drainage

50. Village Concerns Objection 4 - dated 5 May 2022, contained objections in relation to Surface Water Drainage. These objections still stand and Village Concerns is not convinced that SUDs systems work as effectively as the developers claim and believe that greater scrutiny should be given to this matter. It is likely that an effective SUDs system would have to be better engineered and much larger, such that this would have an impact on the size of the development that can be accommodated on the site and the layout.

Sewage

51. Village Concerns Objection 4 - dated 5 May 2022, contained objections in relation to Sewage. These objections still stand and Village Concerns is not convinced that the sewage disposal plans are complete or have been adequately

thought through. It was made very clear to the applicant, at the Consultation Event, that Sewage was one of the most significant concerns of the villagers who are only too aware of the failings of the current sewage system. The applicant has presented an incomplete plan, lacking in detail and devoid of any plan as to how the existing system will cope or be upgraded.

52. Village Concerns is alarmed by the increasing evidence that sewage is being removed by tanker vehicles from East Hoathly Sewage Plant and many other locations in Wealden that cannot treat their own waste. If Southern Water and Redrow have any intention of using tanker vehicles to remove sewage as a result of the increased pressure on the East Hoathly Sewage Plant, then this should be specified in the planning application. This would have an impact on the sustainability of the proposal and also the layout of the site which would require space and access for tanker vehicles. It would also presumably require screening and separation from the homes which would also affect the site layout. If tanker vehicles are to be used to remove sewage generated from this site then it is a further addition to the vehicle dependent nature of this development and another example that it is the wrong development on the wrong site.

Community Land Trust

53. East Hoathly with Halland have a Community Land Trust who's vision is:

“We are an independent community-led organisation seeking to develop innovative, affordable housing to be held in perpetuity for the people of the parish of East Hoathly with Halland.

Our aim is to create an exemplar zero-carbon housing development in keeping with the historical heritage, local landscape and vibrant community fabric of the parish.

With shared values of community, companionship and ecological responsibility at its heart, the Community Land Trust will create high-quality sustainable homes within a financially empowering model. This ensures a future-proof legacy of affordable homes for those who can demonstrate an ongoing link to the local area, but who may not be able to otherwise afford a property in the local area, young families, downsizers, co-housers, alongside the provision of work-space appropriate to the heritage of the parish.

Flexibility is key: the scheme is site specific, offering a range of owner/occupier, leasing, social housing and co-housing options. Our mission is to initially develop a pilot scheme of 4-6 properties while in tandem consulting with the wider community to draw out the outline of a more comprehensive scheme

We are working in conjunction with the Sussex Community Housing Hub.”

54. The Community Land Trust have produced a Housing Needs Survey for the Parish. The Applicant was unaware that this organisation existed when questioned at their Consultation Event. Their planning application repeatedly talks about meeting local housing needs but fails to mention the Community Land Trust. It has had no dialogue with the Community Land Trust, allocated no land for such a project and ignored the valuable information they have about the real housing need in this Parish. This applicant clearly puts its greed ahead of the needs and desires of this community.

Social Segregation

55. Pages 24 and 26 of the Applicant’s Planning Statement repeat the statement: “**Inclusive access ensures for ease of movement by all social groupings**” This is elitist and condescending. We are an open community and do not support the segregation of social grouping that is implicit in this statement. The Planning Statement also makes claims on Page 52 that it provides “**a mix of housing tenures and homes to provide accommodation to a mix of people at all stages of life**”. This is untrue, for example it does not provide any one bedroom market housing but does propose 67 four and five bedroom houses that this Parish and WDC do not need. This is because the applicant favours profit over meeting the real housing needs of this Parish and the District.

56. The applicant has positioned all the affordable housing in one part of the site and the same is true of the self-builds. If this is to be a socially integrated community it should be more mixed. Segregation is a failure of planning and vision.

Omissions from the Plans

Street Furniture

57. The plans show no seats, no litter bins, no dog waste bins, no fire hydrants. This is a full planning application and these details need to be considered by the designers, consulted on with the public and included in the plans.

Utility Infrastructure

58. It is probable that this site would need some form of electrical sub station and telecommunications cabinets. Where are these to be sited ? It they are added as an afterthought it is more likely that they will be visibly obtrusive and diminish any “beauty” to which this plan ought to aspire.

Ongoing Maintenance Costs

59. What would the ongoing maintenance cost be for the estate? The application makes reference to many matters that will require residents to pay for ongoing maintenance and some of these may end up being something the Parish has to pay for. These should be costed now and included as part of the application:

A maintenance plan is proposed for landscaping and planting. This includes meadow and wildflower planting which, although a wonderful idea and highly beneficial for biodiversity, requires skilled and expensive maintenance. The cost will be high and should be clear before the application is considered.

A maintenance plan is proposed for the swales and drainage system. This should be costed and clear before the application is considered.

A maintenance plan is proposed for the sewage system including sewage storage tank and sewage pump - which requires regular maintenance and CCTV inspection as mentioned in the application. The applicant suggests that this system will be adopted in time by Southern Water but residents will pay in the interim. This should be costed and clear before the application is considered and some assurance established with Southern Water that they will adopt the system.

A maintenance plan will be required for the Trees on site and their root protection. This should be costed and clear before the application is considered.

No details of the proposed play equipment are provided in the application documents. Some pictures and drawings indicate that it will be a natural play area with "woodland" play equipment. Others show conventional equipment. The detailed plans for the play area should form part of the application. It would also have been considerate if the applicant had taken the time to speak to the Parish Council and local children's groups to establish what type of equipment would be most appropriate. Despite the lack of any detailed design of the Play Area, a maintenance plan is proposed for the Play Area in the application. This should be costed and clear before the application is considered.

A maintenance plan is proposed for Ecology Management.

60. The cumulative cost of all of these maintenance plans could be considerable and should be known prior to consideration of this application. It

has important relevance to the economic viability of the scheme.

Economic Viability

61. The applicant's Economic Benefits Statement claims that employment of construction personnel will amount to a £50 million worth of salaries. The applicant makes this significant claim to justify the proposed scheme as satisfying the NPPF economic objective for sustainable development. The addition of CIL charges, material costs, profit for the landowner, profit for the developer, profit for Redrow, consultant costs suggests that the total sum may exceed the value of 205 homes. It should also be noted that much of the scheme is not yet designed (such as the sewage system) so cannot have been costed. Village Concerns has doubts that this scheme is economically viable. This may result in the applicant claiming at a later stage that it cannot afford to complete the affordable housing. We believe that WDC should demand greater transparency of the economic viability of this scheme before it is approved.

Consultation

62. WDC should, under NPPF 2021 Paragraph 133, “ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life⁵¹. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing”. We are not aware that there has been any engagement by WDC with the Parish Council or the local community to provide such workshops or carry out any public consultation prior to the submission of this application.

Conclusion

63. This planning application fails to adequately address the Climate Emergency. It offers nothing in excess of the minimum requirements of current building regulations. It proposes no on-site renewable energy production and does not detail how the homes will be heated. It proposes the demolition of perfectly functional buildings and a home with no regard to the carbon cost of such waste. This is devoid of vision for the current emergency and lacks the detail required by a full planning application.

64. The designs put forward are not specifically designed for this village, they have been copied from a Redrow catalogue from other parts of the country and bear little similarity to the local vernacular in design, materials or colours. The designs pay no regard to the draft Character Area Assessments that are available

for the Parish and Conservation Area. Redrow have made no contact with the Neighbourhood Plan team, the Community Land Trust or neighbouring landowners.

65. The proposed layout of the scheme is lacking in significant detail. Its layout is too urban with regular setbacks from the streets, wooden fencing separating plots and a uniformity of height as some examples of things that detract from the type of organic growth and layout that might reflect an historic rural village. The scheme makes unacceptable comments about social segregation that we oppose strongly.

66. The level of car parking space and electric vehicle charging is inadequate for such a car dependent community and yet it will dominate the scheme and make it a cluttered unappealing sight lacking in beauty. The level of car dependency is unquestionable in such a rural village with an inadequate bus service and the applicant's Transport Assessment is a disgraceful attempt to justify this proposal as sustainable.

67. Traffic Access on the London Road proposes a complex proximity of 2 road junctions and a pedestrian crossing to accommodate the proposal to re-route and urbanise the Public Footpath. Traffic Access on the Waldron Road does not take account of parked vehicles. These safety issues have not been adequately addressed by the applicant or ESCC Highways.

68. Sewage disposal is a significant concern for this community and this proposal is incomplete and lacking in important detail such that none of our concerns have been satisfied.

69. This application should be withdrawn in embarrassment until the missing drawings, reports and detail are completed. The applicant should take the time to consult the local community and neighbouring landowners and produce a bespoke design that reflects East Hoathly and its character. It should aim to produce a beautiful proposal not something photocopied from their nationwide catalogue. However, more than anything they should show some courage and vision by addressing the Climate Emergency.

Katherine Gutkind and Kathryn Richardson
Co-Chairs
Village Concerns

cc

Councillor Draper
Parish Council