

7 Thomas Turner Drive
East Hoathly
East Sussex
BN8 6QF

Telephone:01825 840082

E-mail: villageconcerns2016@gmail.com

Saturday, 9 July 2022

Dear Mr Robins,

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

Village Concerns Objection 6 - Housing Mix

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 Housing Mix 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 former 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”.

WDC Housing Mix Policy

7. WDC has a duty to deliver a sufficient supply of homes under NPPF 2021 Paragraphs 60 to 63 and to produce policies that achieve this. This includes the requirement to inform those policies with a local housing need assessment. Paragraph 62 of NPPF 2021 specifies that “the size, type and tenure of housing needed for different groups in the community should be assessed”. Wealden has failed to maintain an up to date Local Plan or satisfy a 5 year Land Supply.

8. The only extant policies that deal with Housing Mix are Core Strategy Local Plan 2013 - WCS8 Affordable Housing and Affordable Housing Delivery Local Plan 2016 - AFH1. Both of these policies promise to provide supplementary documents that will provide detailed advice on the operation of the policy but these have not been produced.

9. The relevant part of WCS8 is: “New housing developments will be expected to provide for a mix of dwelling size, type and tenure that meet the identified housing needs of the community”.

10. The relevant part of AFH1 is: “New housing developments, including affordable housing, will be expected to provide for a mix of dwelling size, type and tenure that meet the identified housing needs of the local area”.

11. There is some ambiguity in the wording of these policies and in particular as to how these policies apply to market housing as opposed to affordable housing. Village Concerns are of the view that:

WDC has a duty under NPPF 2021 to control the Housing Mix for both affordable and market housing.

Policy AFH1, by including the phrase, “including affordable housing”, must also therefore apply to market housing.

No other WDC policy appears to enable a control of the Housing Mix.

WDC Local Housing Needs Assessment

12. The most recent WDC Local Housing Needs Assessment was conducted in 2021 and identified a housing mix for market and affordable housing. This was expressed in percentage terms for any proposed development. This is shown in the table below converting the percentages into the respective housing numbers. The Applicant has failed to satisfy this Housing Need Assessment and does not refer to it anywhere in the application.

Applicant’s Housing Mix Proposal

13. The applicant makes no reference to the WDC Housing Mix policies, nor the extant Housing Needs Assessment.

14. Planning Application WD/2016/2796/MAO included a Planning Statement in which it created its own Housing Mix to satisfy its own wishes and this is shown in the table below. Redrow, in Planning Application WD/2022/0341/MAJ has chosen to change this proposed Housing Mix and this is also shown in the table below (this is yet another example of how this current application is not similar to the 2016 Application). The applicant claims in Paragraph 3.3 of the Planning Statement that: “This Full planning application offers the opportunity to develop in more detail key aspects of the site and the offer to ensure that it is deliverable and meets local demand/need as well as responding to matters raised by WDC

officers, through two pre-application meetings and iterative discussions and as well as through engagement with wider stakeholders”. This is a self serving and false statement. It does not respond positively to matters raised by WDC Housing Service or to local demand/need. It does not included any positive response to engagement with the Parish Council or local community. It has failed to respond to the suggestions by WDC in the two pre-application meetings that a smaller scheme be considered.

15. WDC Housing Service is a statutory consultee for planning applications and submitted comments on both applications:

Planning Application WD/2016/2796/MAO

The Housing Service proposed for a Housing Mix for Affordable Housing which is also shown in the table below. In essence, this stated that the applicant had failed to meet the tenure or bedroom mix that was required. This Housing Service comment was included in the Planning Officer’s report but it was not discussed during the Planning Committee South deliberations nor was it included as a condition in the Decision Notice. WDC were content to allow the applicant to control these matters.

Planning Application WD/2022/0341/MAJ

The Redrow proposal repeats the errors of the first application. It does not provide the required mix of tenure (social rented/affordable rented/intermediate housing) for the affordable housing and has simply stipulated that it would all be rented. This is unacceptable in a Full Planning application and disregards the Housing Service recommendations. The Housing Service comments on the Redrow housing mix are rather less direct than for the original application but they do identify that their previous advice has not been followed and that the housing mix is still wrong. They express this as a percentage of applicants on the Housing Register. This has been converted into housing numbers and shown in the table below.

The applicant has proposed 82 one/two bed homes when the Housing Needs Survey has identified a need for 98. The applicant has proposed 63 four/five bed homes when the Housing needs Survey has identified a need for 36. This disregard of the Local Housing Need is a typical example of developer greed proposing the wrong homes in the wrong place.

16. It is clear that the applicant has failed to satisfy the requirement of NPPF 2021 to meet the local housing need assessment or follow the advice of the WDC Housing Service.

Parish Housing Needs

17. The Parish has expressed its Local Housing Needs in several ways:

Parish Council Survey 2016.

Village Concerns objections to Planning Application WD/2016/2796/MAO.

East Hoathly with Halland Community Land Trust Housing Needs Survey Report.

Views expressed in public consultation events with Redrow and in written submissions.

18. These expressions can be summarised as an acknowledgement that if this Parish needs any housing, it is for market housing of 1 and 2 bed homes that cater for retirement and downsizing. Also, that affordable housing should be provided through a community land trust offering predominately 1 and 2 bed homes for local people. The applicant has not referred to the Parish Housing Needs nor the Community Land Trust.

19. The WDC Housing Service states that there are 57 applicants on the Housing Register with a connection to this Parish or a connection to an adjoining parish. However, only 5 of this 57 are from this Parish. It should also be pointed out that although these people are on the Housing Register and have a connection of proximity to this Parish, they may not have any preference to live in East Hoathly. The point is that if 260 new homes are built in this Parish it will result in 92 affordable homes where there are only 57 people on the Housing Register with a local connection and it is probable that a many of them do not wish to live in East Hoathly. The question has to be asked what is the point of filling these homes with people with no local connection, no desire to live here and miles from the facilities they need to sustain them ?

	1 Bed	2 Bed	1/2 Bed	3 Bed	4 Bed	5 Bed	4/5 Bed	Total
Hesmond's 1 - 2016								
Planning Statement			41	122			42	205
WDC Housing Service - Affordable	26	29	55	15	2		2	72
Hesmond's 2 - 2022								
Planning Statement - Market		28	28	36	55	4	59	123
Planning Statement - Self Build		5	5	5				10
Planning Statement - Affordable	15	34	49	19	4		4	72
WDC Housing Service - Affordable	37	20	57	11			4	72
WDC Housing Needs Assessment 2021								
Market	7	40	47	53			33	133
Affordable	29	22	51	18			3	72
CLT Housing Needs Survey Report								
Affordable	13	3	16	4		1	1	21
Market	8	4	12			1	1	13

Conclusion

20. WDC do not have clear unambiguous policies for controlling market housing mix and seem content to allow developers to control this despite NPPF 2021 being very clear that it is their duty to do so.

21. The developer has failed to comply with the suggestions in pre application meetings that a smaller scheme would be preferred. The developer also disregards the advice of the WDC Housing Service and gives no regard to the WDC Local Housing Needs Assessment. They ignore the housing needs of this Parish and have failed to engage with the Parish Council, Neighbourhood Plan

Steering Group, Community Land Trust or taken into account the views of the public expressed at the consultation event.

22. The applicant has proposed too few one and two bed homes and far too many three, four and five bedroom homes. They have put their greed to build these large homes ahead of Wealden's need and the needs of this Parish.

23. We urge you to reject this application.

Katherine Gutkind and Kathryn Richardson
Co-Chairs
Village Concerns

cc

Councillor Draper
Parish Council