

White Cottage
East Hoathly
East Sussex
BN8 6RA

Telephone:01825 841004

E-mail: villageconcerns2016@gmail.com

Tuesday 29 April 2025

Hesmond's Stud Application WD/2025/0376/MAJ

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 250 supporters against the overdevelopment of our Parish. We object to Planning Application WD/2025/0376/MAJ.

Executive Summary

2. This application should not be considered until the Wealden Local Plan process has concluded so that the strategic implications of the plan have been scrutinised and approved. In particular, the positioning and funding for a new school needs to be determined as part of the local plan process, not a speculative planning application.

3. This application will have significant detrimental impacts on the character and amenity of this historic community and we strongly believe that this should take precedence over the housing land supply issues which the Council faces. It is not a strategically sustainable settlement compared with the towns and large villages that have multiple bus services, rail connections and significant employment opportunities.

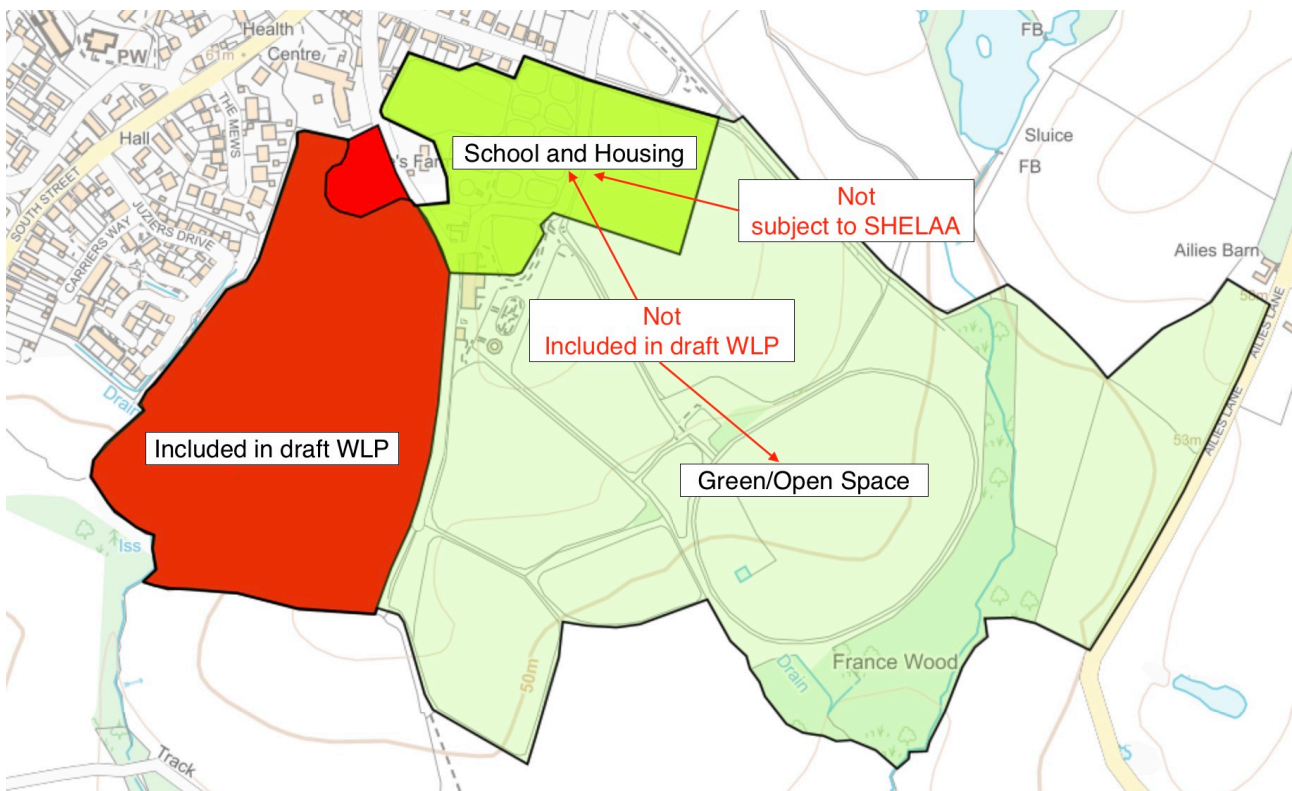
4. This application fails to assess the wider infrastructure implications for this village in relation to Transport, Highway Safety, Sewage, Education and Employment. These amount to significant harmful impacts on this community that outweigh any benefits of new housing. It proposes to add 275 more houses whilst the already approved housing is still being built. It gives no time for the community to adapt and embrace such a rapid population growth.

5. This hybrid application includes Site B (Harrisons Field) which is totally separated from the existing village (around one kilometre) and makes it a wholly unsustainable location. The other element of the hybrid application is to build on Site A, a school for 426 children at the bottom of a cul-de-sac of 193 homes in a totally car dependent village. This would be particularly chaotic on refuse collection days and when delivery vehicles are in the housing area.
6. The application offers the site for a school but there is no funding for the construction or operation of a new school and ESCC figures suggest that there may be no need for one.
7. The Parish has seen significant housing development with 277 homes approved by WDC and a further 419 allocated in the draft WLP. This will represent an increase in housing for East Hoathly of 308% since 2000.
8. The application fails to comply with extant policies GD2, DC 17, EN1, SPO8, WCS5 and WCS7. The application fails to comply with the East Hoathly and Halland Neighbourhood Plan Policy 1: to deliver a higher proportion of homes of one, two or three bedrooms.
9. Since the 2011 Census the level of public transport use in this Parish has fallen from 6.8% to 3.5% and the use of vehicles increased from 81.2% to 87.5%. This is a totally car dependent community and therefore development here is unsustainable by definition. The applicant's Transport Assessment contains many significant inaccuracies and does not calculate traffic flows for a full school of 426 children and staff.
10. Southern Water have accepted that the Wastewater Treatment Works cannot cope with this development and Village Concerns urges you not to consider this application until the full scope of works is established, timetabled and undergone further public consultation.
11. Village Concerns requests that you refuse this application.

Strategic Implications

12. We have many objections to the detail of this application but our overriding objection relates to the strategic implications of adding a further 275 homes to this historic village prior to full consideration of a new Wealden Local Plan (WLP):

a. The WLP process has not fully assessed these sites in relation to the already approved planning applications for East Hoathly and the additional sites already put forward in the draft WLP. A significant part of Site A (Tourles Farm) has not been assessed as part of the SHELAA process and is outside the area of land allocated for development in the draft WLP:

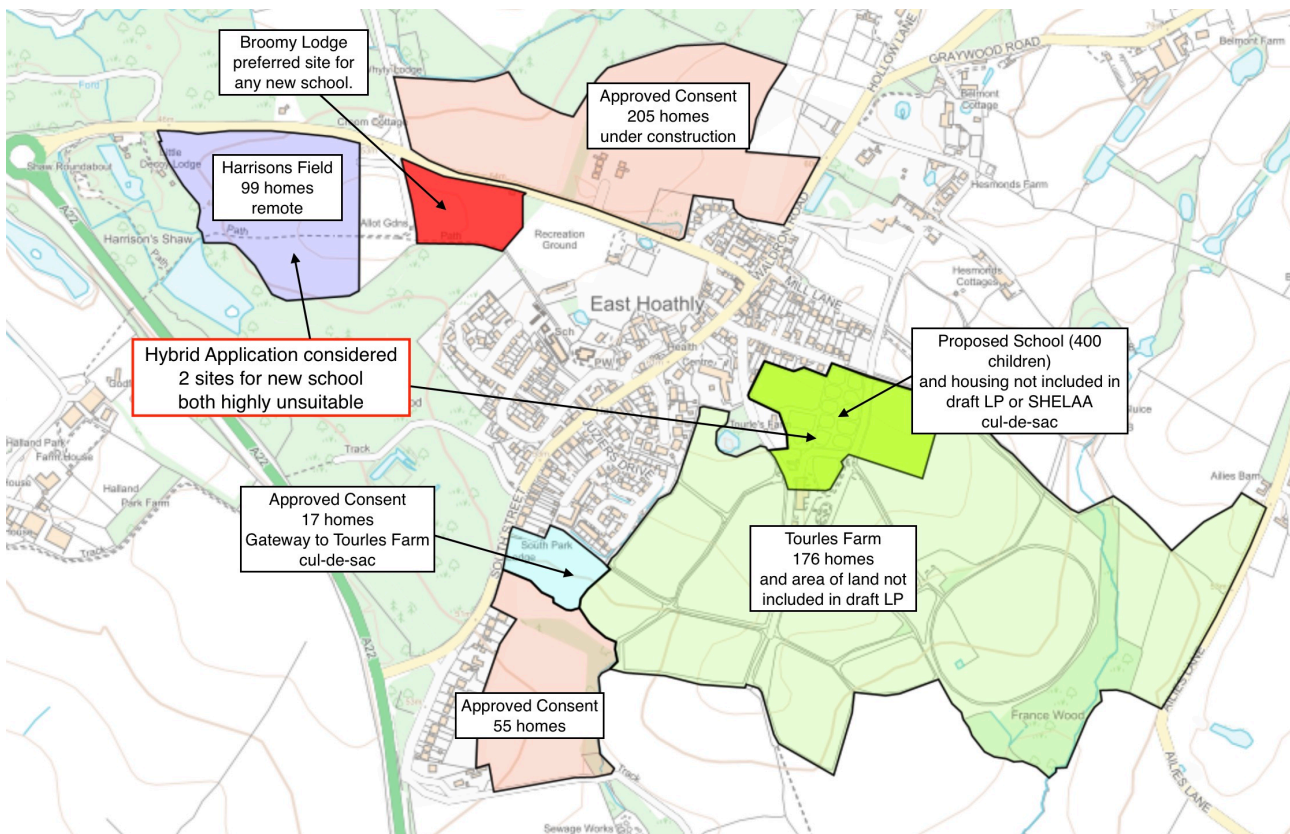


b. The WLP process should be allowed to complete its scrutiny including the examination in public prior to any applications of such strategic importance being made. This hybrid application would have significant detrimental impacts on the character and amenity of this historic community and we strongly believe that this should take precedence over the housing land supply issues which the Council faces. The Local Plan Sub Committee indicated on 5 March 2025 that a revised Regulation 18 Consultation would be undertaken in the

Autumn of 2025 making the consideration of this application even more premature.

c. East Hoathly is an historic rural village that should be conserved and enhanced. It is not a strategically sustainable settlement compared with the towns and large villages that have multiple bus services, rail connections and significant employment opportunities. To further suburbanise this unsustainable village would be a monumental planning failure. This application would cause substantial further harm to the rural character and amenities of East Hoathly.

d. This hybrid application includes Site B (Harrisons Field) which is totally separated from the existing village (around one kilometre) and makes it a wholly unsustainable location. The unsuitability of the Site B should mean that the whole hybrid application should be rejected.



e. The other element of the hybrid application is to build on Site A, a school for 426 children at the bottom of a cul-de-sac of 193 homes in a totally car dependent settlement. This proposal is wholly unworkable and a recipe for disaster. The unsuitability of Site A should mean that the whole hybrid application should be rejected.

f. If the land allocations proposed in the draft WLP are approved by the Planning Inspector, then the preferred site for an enlarged school would be the Broomy Lodge site which is not at the end of a cul-de-sac and is more central to the existing housing. Thus, this application's proposal to provide land for a school in a wholly unsuitable location is disingenuous and would almost certainly lead to the school not being built as proposed. It has only been included to make it look as if this hybrid application is doing something to improve sustainability but the construction of the school is unfunded and is a callous attempt by the developer to influence the decision makers.

Sustainability

Failures to Satisfy Sustainability Policy

13. Paragraph 8 of NPPF 2024 requires that the planning system achieve 3 overarching objectives to achieve Sustainable Development. This Application fails to satisfy any of these criteria:

Economic Objective

a. The building of the homes might have some minor short term economic benefit to the local economy and would benefit the building sector in the short term but it would cause significant harm to the economy in the longer term. Building new homes in a village with “limited, basic or no facilities”¹ and no employment opportunities will require those facilities to be provided at a cost for which there is no budget. The reality is that new residents would have to commute, by car, to get to jobs, schools, shops and services. The cost of dealing with this poorly located community and the traffic it would generate would be significant and last forever. The cost to the road network, greater need for car parks and the cost impacts relating to climate change are all economic factors that WDC has already identified as having significant funding shortfalls. We have retained the need to commute to school in this assessment because although the applicant is providing land for a new school, there is no funding to construct or operate a new school. Also, the need for commuting for higher levels of education remains.

b. We would like to draw your attention to a claim made by the applicant in relation to Economic Viability for their application to build

¹ Wealden Core Strategy 2013 Settlement Hierarchy Table 1 - Neighbourhood Centre - East Hoathly.

205 homes on London Road, East Hoathly.² The applicant's Economic Benefits Statement³ claimed that employment of construction personnel would amount to £50 million worth of salaries. The applicant made this significant claim to justify the proposed scheme as satisfying the NPPF economic objective for sustainable development. Village Concerns challenged this unsubstantiated claim but received no response. Village Concerns had significant doubts that this scheme would be economically viable and in its objection stated: "This may result in the applicant claiming at a later stage that it cannot afford to complete the affordable housing". We asked that WDC demand greater transparency of the economic viability of this scheme before it was approved.

c. To date, no housing association has shown any interest in the affordable housing on the London Road 205 homes because it is too remote and in a settlement lacking the necessary services and facilities needed by their clients. The applicant's Planning Statement for this new application tries to justify the proposal to build 275 new homes primarily on the basis that it will provide 99 affordable homes. This ignores completely that this is the wrong location for the affordable housing and the same issues will be faced in getting housing associations interested. The arithmetic is also questionable. The Application Form shows 93 Affordable Homes, the Planning Statement states 99 Affordable Homes but the requirement should be a minimum of $275 \times 0.35 = 96.25$. Presumably the planning department will help them to do the sums correctly.

Social Objective

d. The NPPF social objective requires that sustainable development will support "strong, vibrant and healthy communities"⁴. The scale of development already approved for East Hoathly and those proposed in the draft WLP will destroy this community:

(1) East Hoathly village has seen significant growth in the last 25 years and is destined to grow further. In the first decade of this period, housing in the village of East Hoathly increased from 294 to 380 which represented a 29% increase in the number of homes. During the period since 1998 the Parish was not allocated any housing as part of an adopted

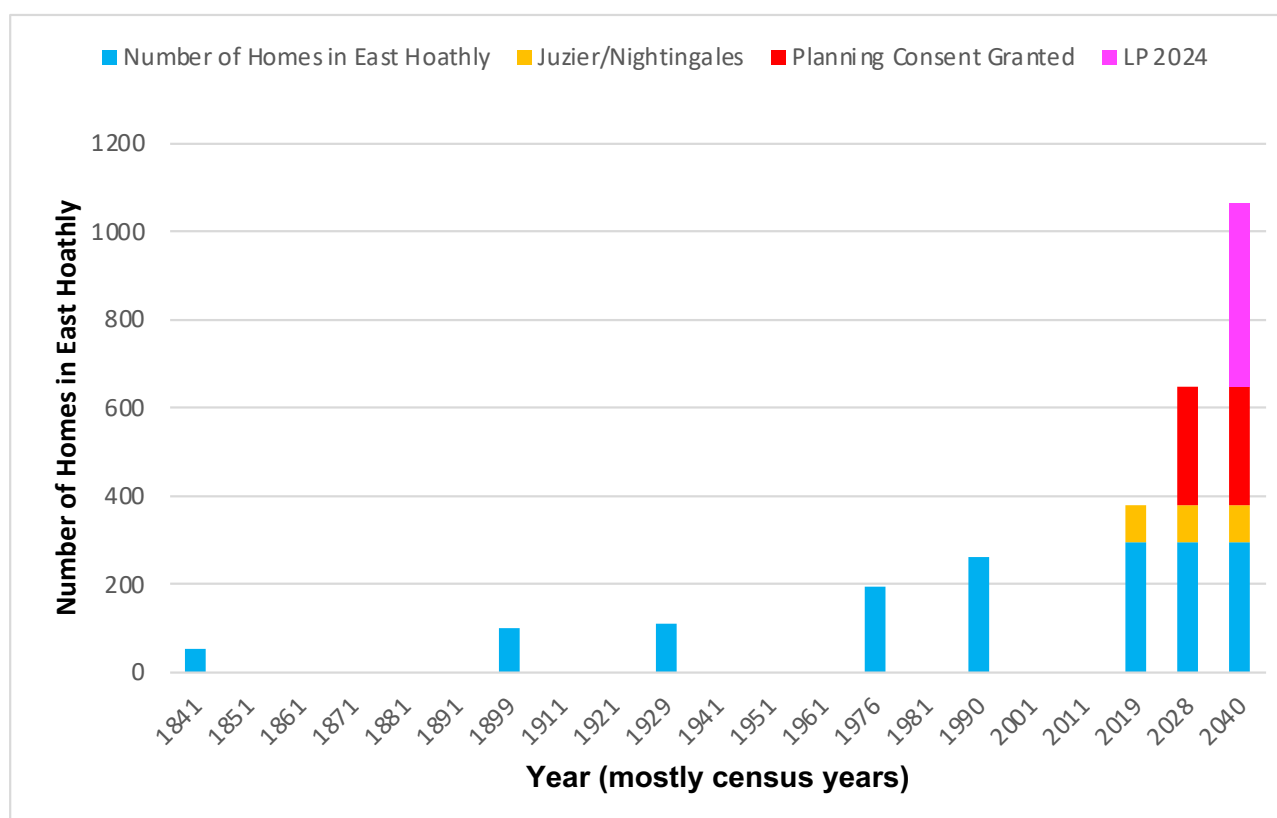
² Village Concerns Objection to Planning Application WD/2022/0341/MAJ dated 19 May 2022

³ Economic Benefits Statement on behalf of Redrow Homes dated 21 January 2022.

⁴ NPPF 2024 Paragraph 8b.

LP. Despite this, the Parish has seen significant speculative housing development with 277 approved by WDC and a further 419 allocated in the draft WLP. This will represent an increase in housing of 308% since 2000⁵. The applicant’s Planning Statement includes the particularly galling and insensitive comment at Paragraph 9.2.1: “Increased patronage of local services should be particularly welcome given historically low levels of housing delivery in the village and the closure of some facilities”.

(2) The population of the Parish would see a commensurate increase as a result of the proposed levels of development. The scale of the population growth proposed is extraordinary and far exceeds that proposed for other much larger settlements in Wealden⁶:



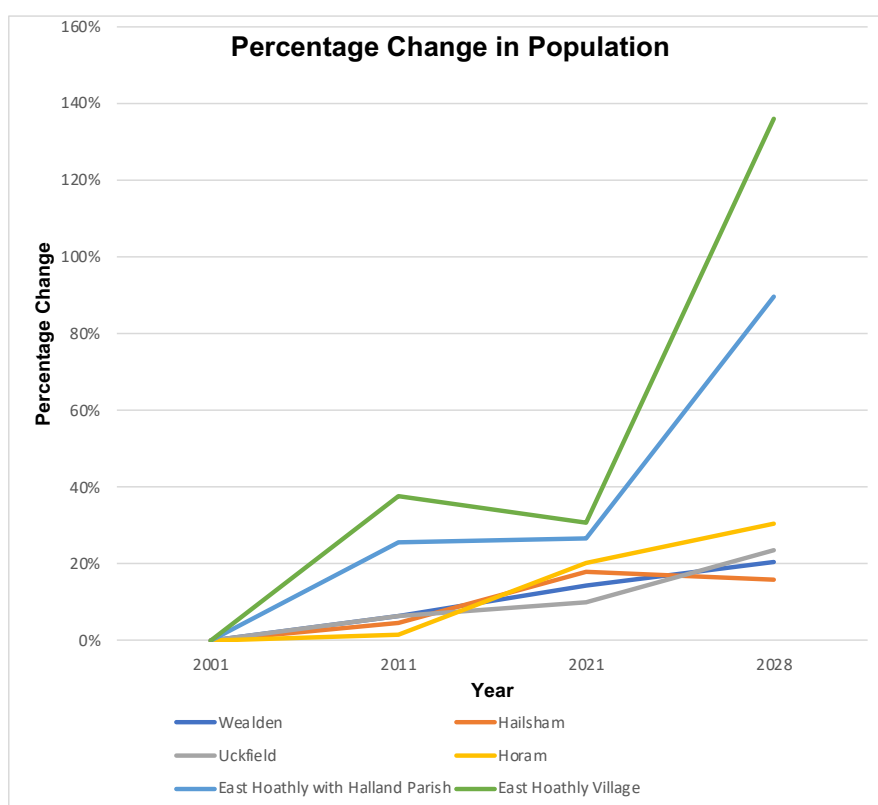
(3) The scale of development proposed will overwhelm the existing “strong, vibrant and healthy community” and leave it broken. The Adopted East Hoathly with Halland Neighbourhood Plan (EHHNP) states that: “the scale of such

⁵ EHHNP Website - Parish Statistics.

⁶ EHHNP Website - Parish Statistics.

increases is unsustainable without a strategic plan to improve services and infrastructure”.

(4) The Adopted EHHNP goes on to say that: “This Parish believes that the scale of such increases is unsustainable without a strategic plan to improve services and infrastructure yet no plan has been put forward. The growth of this Parish, and in particular, East Hoathly village, will see this community grow proportionally bigger than any other community in Wealden”. Increasing the size of this community with no strategic plan in place to improve the already failing local infrastructure would be planning vandalism.



Environmental Objective

e. This proposal would cause serious harm to the natural environment of East Hoathly. It would clearly not “improve biodiversity”, nor would it “use natural resources prudently” and it would not “minimise waste and pollution or mitigate and adapt to climate change, including moving to a low carbon economy” as required by the NPPF:

(1) It would build on some of the very best agricultural land in the Parish at a time when consideration should be given to increasing local food production. The land has not even been surveyed to establish its Agricultural Land Classification (ALC) within the Department for Environment, Food and Rural Affairs categorisations. The draft WLP Policy NE9 proposes that the Local Planning Authority will assume a site is classed as “best and most versatile” and seek to protect such land unless the applicant carry out a survey to establish the ALC grading. This policy should be applied now.

(2) It would devastate the biodiversity of the fauna that live along the hedgerows, and ancient woodland around the sites that use the area for grazing and foraging. It would cause further fragmentation of wildlife habitats and continue the devastating practice of building around ancient woodlands. This isolates these fragile habitats and puts hoards of voracious pets on the doorstep of these supposedly protected places.

(3) The creation of totally car dependent estates will be the epitome of a high carbon economy that will do nothing to alleviate climate change. It would add a significant additional Carbon Dioxide burden caused by the addition of at least 700 cars all commuting to get to jobs, schools, shops and services.

(4) This proposal seeks to demolish equine facilities and an existing home. **If** they are no longer required, these facilities could be repurposed for some other agricultural or commercial purposes. To demolish them is contrary to WDC policy and NPPF 2024 Paragraph 161.

Failure to comply with Extant Policies

14. The failure of WDC to create an up to date local plan or to satisfy a 5 year land supply has led to speculative planning applications totally under the control of developers. There has been no strategic planning for East Hoathly and no strategic infrastructure plan. This is an utter failure of the planning system. The proposals included in the draft LP would see this village triple in size since 2009. If you approve this application you will have allowed that to take place with no strategic plan in place and no funded plan for any infrastructure to support it.

15. Historically you have afforded little weight to the extant WDC planning policies. However, for the record, this application fails to accord with the following saved policies:

- a. Policy EN1 of the Wealden Local Plan 1998. “The Council will pursue sustainable development, having regard to the principles contained in Government guidance and its own Strategy for the Environment, in considering the location, layout and design of development, renewable energy and waste management proposals and in assessing the effects of proposals on the environment, including on water and air quality”.
- b. Policy SPO8 of the Wealden Core Strategy 2013. “We will maintain and where appropriate enhance through the encouragement of growth, the effective network of villages that will continue to support the day to day needs of our rural communities, and which will accommodate some additional growth where this would be sustainable”.
- c. Policy WCS5 of the Wealden Core Strategy 2013. “The release of land for housing will be managed so that it will deliver the level and broad distribution of development set out in Policy WCS2. The release of land will be dependant on the timely provision of infrastructure necessary to deliver housing, including affordable housing. The adequacy of housing land supply will be assessed regularly through reviews of the Strategic Housing Land Availability Assessment, the Infrastructure Delivery Plan and through regular housing land availability monitoring. Monitoring will allow effective cohesion between housing delivery and the provision of infrastructure”.
- d. Policy WCS7 of the Wealden Core Strategy 2013. “The release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development. Where development would create the need to provide additional or improved community facilities, services and infrastructure to mitigate its impact, a programme of delivery must be agreed with the relevant infrastructure providers which will ensure that these improvements are provided at the time they are needed. These may involve coordinating contributions from the development with other investment streams. This approach will ensure that the necessary improvements can be completed in a timely manner to support growth.....”.

- e. Policy GD2 of the Wealden Local Plan 1998. “Outside the development boundaries, as defined on the Proposals Map, development will be resisted unless it is in accordance with specific policies in this Plan”.
- f. Policy DC17 of the Wealden Local Plan 1998. “Housing development will not be allowed outside development boundaries, as defined on the Proposals Map, unless it conforms with other policies in the Plan”.

16. The above Policies have all failed in relation to East Hoathly:

- a. Policies GD2 and DC17 should both prevent development in East Hoathly.
- b. Policies WCS2, WCS5, WCS7 and EN1 should all prevent speculative planning applications tripling the size of a car dependent rural community without a strategic plan to improve the infrastructure and services of that community.
- c. To date, no WDC controlled CIL money has been allocated to this Parish despite all the approved developments. This shows a failure to comply with WCS7.
- d. The intention of Policy SPO8 to maintain the day to day needs of a rural community is far outstripped by the scale of development already approved regardless of this application to add a further 275 homes.

17. The applicant’s Planning Statement does précis the main EHHNP policies but omits important elements and fails to show that they have satisfied the NP policies in their submission. The application also fails to address the EHHNP Aspirations and whilst this is not mandatory, it would have been more respectful to this community:

EHHNP Policy 1

- a. The applicant has chosen to ignore part of EHHNP Policy 1: “This would be through the delivery of a higher proportion of homes of one, two or three bedrooms and a greater balance of smaller homes for retirement and downsizing”.
- b. The table below shows the bedroom mix for the combined application of Site A and B compared against the 2021 Census for East

Hoathly and the development currently under construction on the London Road Site (205) (using the same developer - Parker Dann). This clearly shows that this application fails to deliver, based on the current housing stock and the most recent development, a higher proportion of homes of one, two or three bedrooms and a greater balance of smaller homes for retirement and downsizing and therefore fails to comply with EHHNP Policy 1.

	1 Bed	2 Bed	3 Bed	4+ Bed	Total	1 to 3 Bed %	4+ Bed %
Site A	9	53	58	56	176	68%	32%
Site B		22	33	44	99	56%	44%
Site A and B	9	75	91	100	275	64%	36%
London Road Site (205)	12	66	64	63	205	69%	31%
2021 Census	27	112	179	165	483	66%	34%

EHHNP Policy 5.6

c. The applicant omits to include mention of part of the EHHNP Policy 5.6: “Provide opportunities for gardening, wildlife and food production within existing and new residential areas, including the utilization of underused roadside verges for wildlife habitat, where it is safe to do so”. The applicant proposes additional allotments on Site B alongside existing allotments in East Hoathly. The existing allotments are already somewhat detached from the village so to expand here makes no sense. New allotments should be sited on Site A.

d. The applicant has provided the minimum space for new allotments specified in the draft WLP and Village Concerns believes that this should be substantially increased in order to mitigate the loss of food producing agricultural land.

EHHNP Policy 8

e. EHHNP Policy 8.1 seeks to prevent the loss of land or buildings currently in business use. This includes the Hesmonds Stud Yard in this application. No evidence has been put forward to “demonstrate that the business is not viable and has been marketed for a period of

18 months at a realistic valuation for existing and other commercial uses”.

f. EHHNP Policy 8.5 seeks to encourage local employment to be provided in mixed residential and commercial developments. The application does not provide any employment opportunities (the proposed school is excluded as there is no funding for its construction or operation) and no explanation as to why this is not possible.

EHHNP Aspiration 6

g. EHHNP Aspiration 6 seeks to encourage the provision of fibre-optic broadband to homes adjacent to the new developments. Developers are encouraged to provide fibre-optic broadband to the houses surrounding any proposed development as mitigation for the disturbance the residents face during the construction phase and the loss of views and space. The applicant does not comment on this.

h. EHHNP Aspiration 7 seeks the creation of a safe footpath and cycleway connecting East Hoathly and Halland. This would better connect Site B to both villages but has not been commented on by the applicant.

18. WDC recommended approval of application WD/2022/0341/MAJ in 2022 having made the judgement that the benefits of meeting their housing targets would not significantly and demonstrably outweigh the adverse impacts of the proposal. We believe that they were wrong in 2022 and this is being born out by the glacially slow sales and the lack of any housing association interest in the affordable housing. Clearly showing that this is the wrong place to build large amounts of affordable housing and that building in this area does not lead to lower house prices. WDC, and many others, have challenged the government housing targets as they believe they are wrong. WDC should not approve development when they fundamentally believe it is wrong. They should refuse this application, defend their decision if it is appealed and challenge the government position. The only people who would benefit from this development are the developer and the billionaire landowner.

The Broken Sustainability of East Hoathly

Education

19. East Hoathly Primary School has in the recent past been oversubscribed and new residents often had to find school places in other

villages or towns. A fall in the number of children of Primary school age in the District has led to a reduction in the pressure on school places. However, the already approved consents for 267 additional homes could significantly overwhelm the capacity of the existing school. The school is expected to reach its capacity again by 2028 and the village will return to a situation where parents will be forced into their cars to deliver and collect their children outside the Parish. With the 267 additional homes already approved and the 419 included in the draft WLP a new school may become essential but its location and size should be a strategic decision, not the choice of a single developer. It is staggering that no one at the existing school had heard of this proposal when the matter was raised with them last week.

20. The usual choice of Secondary School for East Hoathly is Ringmer and Uckfield which both require bus or private car to access them. There is no potential for walking or safe cycling.

Proposed School

21. We do not believe that the the applicant's proposal to provide land for a new school would actually result in a school being built on the site allocated. The proposed land is not included in the draft WLP nor has it been assessed as part of the SHELAA process.

22. The proposed land sits at the end of what would be a large cul-de-sac of 193 homes accessed by a winding narrow road. It should be noted that given the inadequate parking space allocations for the proposed development, there will be cars parked on this access road. An examination of other recent developments in East Hoathly provides ample evidence of this. A school for 426 children (400 primary age children and 26 nursery age children) would have a significant number of children being delivered by car and this would be chaotic, especially on refuse collection days and when delivery vehicles are in the housing area.



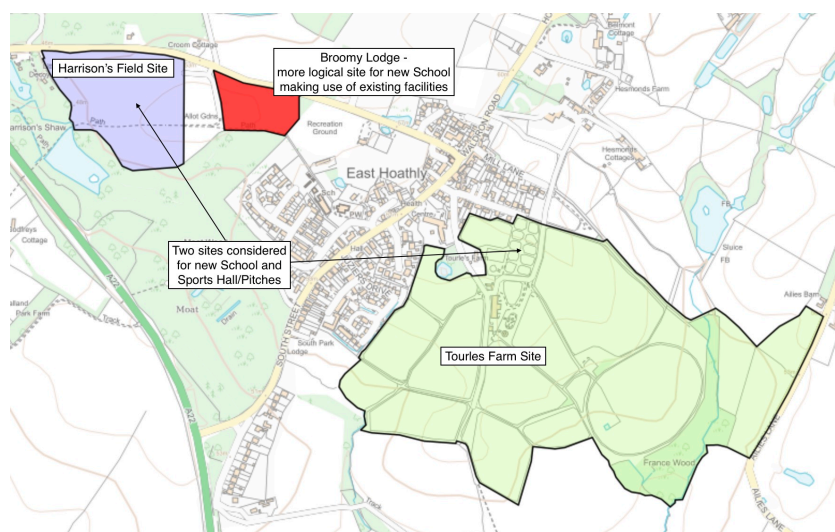
**Juziers Drive,
East Hoathly**

23. Part of the proposed access for the proposed school is to use Buttsfield Lane. It has been wrongly assumed that this lane can be used for cyclists and wheeled vehicles. This is a private road and unlikely to receive the approval of the residents.

24. The applicant is offering the site for a school to be built despite their misleading statements that they are offering a school. The construction of the school and the operating costs are unfunded and are not part of any published ESCC long term plans. The ESCC School Organisation Plan⁷ acknowledges that this Parish is destined to have 700 additional homes in the period up to 2040. However, the predicted number of children of Primary School age is expected to continue to fall in the Wealden area, such that the existing capacity within Wealden is never exceeded⁸. Specifically for East Hoathly it acknowledges that "[new homes planned for East Hoathly could put pressure on places at East Hoathly CE Primary School in future years](#)". None of this amounts to any funding being allocated for a new school in East Hoathly. The surplus capacity within the District is expected to grow beyond 2028 so there is no pressure to build any new Primary schools. Village Concerns sees no prospect that ESCC will fund a new school whilst they predict significant surplus capacity in the District and it is equally unlikely that WDC will allocate CIL funds to build a school that ESCC would not want to operate.

25. The applicant proposes that the new school would have sports pitches and changing facilities that would be available for public hire. This is an ill considered suggestion that would place the school facility in direct competition with the East Hoathly Sports Ground and Pavilion. It is likely to lead to both becoming economically unviable.

26. Irrespective of the expectation that the school will or will not be built, the choice of its location should be a strategic decision. The applicant has examined 2 potential sites but ignored the preferable site of Broomy Lodge. Broomy Lodge is less remote than Site B, and



⁷ ESCC School Organisation Plan 2024 - 2028.

⁸ ESCC School Organisation Plan 2024 - 2028 - ESCC Pupil Forecasts - Page 113.

unlike Site A, it is not in a cul-de-sac with significant access issues. Broomy Lodge is also adjacent to the existing Sports Ground and could use the facilities with ease without the need to build their own.

27. We are particularly concerned about the comment made in the applicant's Design and Access Statement⁹: "Although deliberations over the school's location are still ongoing, we have shown the proposed building and associated facilities with landscaping on Site A. This was highlighted by the Parish Council as their preferred location and to demonstrate the developments aims and ambitions this site will host the school". The public are certainly not aware that the Parish Council have expressed such a preference, nor that they would have the authority to do so.

28. The applicant's Transport Assessment includes details relating to discussions with ESCC about the proposed school indicating that it initially would be a half form entry school (similar to the existing East Hoathly School) but capable of expanded to a two form school¹⁰. None of this detail is included anywhere else in the application and it would be helpful if the full details could be published before councillors are asked to make a decision on the matter and the public reconsulted. Page 75 of the Transport Assessment includes a letter from ESCC Communities Economy and Transport which suggests that it is not even clear if both the existing school and a new 2 year school might coexist. Such alarming inconsistencies need to be clarified.

29. The applicant's Transport Assessment makes a huge error in calculating the impact of the proposed school on the traffic generated from the new development:

a. Table 5.3 of the Transport Assessment is an assessment of the Trip Generation for staff and pupils at peak hours. This amounts to 20 trips for pupils and 10 trips for staff. The trip generation at the existing school is higher than this so it is astonishing that they can assert that a 426 child school could possibly only result in 30 trips at peak times. These figures are clearly wrong and question the validity of the whole Transport Assessment.

b. Page 77 of the Transport Assessment states that their calculations are based on the the new development of 265 homes generating 74 additional places at the school. Firstly, this should be for 275 homes and the school proposed is for 400 primary aged children

⁹ Design and Access Statement Part 8, Paragraph 8.1.

¹⁰ Transport Assessment

and 26 nursery aged children so it is these figures that must be used for the Transport Assessment. The clearly invalidates the whole of the submitted Transport Assessment.

30. The car parking allocated for the proposed school is risible. It appears to be 35 spaces which would barely be large enough for the staff. It would be totally unable to provide enough space for pick-up/drop-off times and not enough space for times when parents are expecting to visit the school.

31. Page 76 of the Transport Assessment stipulates that the proposed school would not adopt the school car park. This suggests that this would therefore be a WDC car park and open to the public. This is a bad idea and would suffer the same fate as currently exists where public parking in the car park adjacent to the East Hoathly School often prevents staff and parents being able to park nearby.

32. The plans appear to show no pavement alongside the route from the road access route from South Street to the school. This is a major oversight and if this application is approved it must include a pavement suitable for prams, cycles and wheelers for the whole route alongside the school access road.

Doctors

33. 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 is not able to satisfy the demand and needs of the residents of this Parish, in this Parish. The Surgery does not have the capacity to take on extra patients and cannot currently meet the needs of existing patients.

Bus Service

34. The Bus service is inadequate. There are insufficient evening services with one bus every 2 hours and none on Sunday evening. The daytime bus only runs every hour 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 is almost impossible. The service from Halland to Lewes

and Brighton effectively ceased in 2019 when the timetable was reduced to an extremely limited and fractured service.

35. The Bus services are really important for those residents who have no other choice, but the level of use is extremely low. On average only 19 people use the East Hoathly bus each day and the average number of people on any bus passing through the Parish is 3¹¹ (mostly on double decker buses). It should be noted that this is following housing developments in this community that have produced travel plans to improve bus usage. The applicant's Transport Assessment does not provide anything that suggests new residents will use the bus in preference to their cars.

36. Rural bus services are expensive, infrequent and clearly not providing an attractive enough alternative to car travel. It is inconceivable that any new Travel Plan will achieve any modal shift to sustainable transport. The Travel Plans that are put in place include a requirement to audit their effect. We can find no evidence that these audits are ever carried out or that anyone takes any action based on them. They are a waste of money and a fig leaf to justify unsustainable development.

37. The applicant's Transport Assessment includes (Page 81) vague indications that additional bus services would be temporarily funded through a Section 106 agreement but these do not appear in any other part of the application. Village Concerns would welcome additional services but questions their temporary funding. We see no evidence to show that temporarily funded services are economically viable and they will therefore eventually disappear. They are a "sticking plaster" to enable a claim of sustainability to cloak unsustainable housing development.

Facilities Lost

38. The following facilities have closed in East Hoathly, thereby reducing sustainability:

- a. The Petrol Station/Garage in East Hoathly closed in 1988.
- b. The Smock Shop in East Hoathly closed in 1996.
- c. The Public Toilets in East Hoathly closed in 1998.
- d. The Butchers Shop in East Hoathly closed in 2001.
- e. The Foresters Pub in East Hoathly closed in 2017.

¹¹ Survey of Bus Usage - EHHNP Website - Parish Statistics.

Reductions in Local Employment

39. Since 1964 East Hoathly has seen a continuing reduction in local employment opportunities as planning consents have been granted to build housing on the sites of local businesses:

- 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.
1988 - Carpenters Croft built on the site of Bookers Pill Factory.
- c. 2001/2 - An extension to the Mews built on the site of Chapman and Smith Safir Works.
- d. 2009 - Juziers Drive and Trug Close built on the site of E&A Carriers and PB Fencing.
- e. 2022 - One of Hesmonds Stud Yards closed.

40. The proposal offers no new employment opportunities other than those at a new school but as the construction and operation of this is unfunded, no new jobs are guaranteed. Employment would be lost from the Tourles Farm Yard.

Infrastructure

41. The applicant states in their Design and Access Statement, Section 1.3 Our Visions and Aspirations: That they will “[Provide new infrastructure to allow sustainable transport for all of East Hoathly](#)”. Sadly, this does not translate into any actual new infrastructure for East Hoathly. Another hollow promise from this developer.

Renewable Energy

42. The Climate Emergency should be pushing us into a future of renewable energy for all new developments. New developments should be dependant on electric vehicles, electric heating and electric cooking. This proposal contains nothing suggesting that renewable energy is being considered for the site and does not specify what heating systems will be provided. The application does not provide any public electric vehicle charging for visitor car parking. The applicant does not state that all homes

will be provided with electric vehicle charging points. This is unacceptable for a totally car dependent housing estate in a Climate Emergency.

Transport

43. This Application seeks to provide housing on a site that is separated and remote from the village and a second site that is an enormous cul-de-sac with a 426 children school trapped at its extremity. This would be hugely “inefficient” and 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”.

44. This Application seeks to add around 700 additional cars to the village plus the significant number of vehicles that would be visiting the proposed school. With the cars from already approved development, this will impose a significant number of additional vehicles on the village roads and village centre. No strategic overview has been carried out to improve parking or safety. This clearly fails to satisfy Local Plan 1998 Saved Policy: **Policy TR3** “the proposed development does not create or perpetuate unacceptable traffic conditions”.

45. This Application also fails to satisfy Section 9 of NPPF 2024 by failing to promote sustainable transport. It specifically fails to meet the requirements of NPPF 2024 Paragraph 110: “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”. The Transport Plan submitted is a cut and paste copy of a standard plan which provides no real expectation of any modal shift in transport usage.

46. The 2021 Census¹² figures show that this Parish has a higher proportion of vehicles at 1.8 per home compared with Wealden at 1.4 per home. Our own survey¹³ shows that the current situation is even worse with 2.2 vehicles per home in East Hoathly. This clearly shows the car dependent nature of this Parish. The table below shows ONS data¹⁴ for Method of Travel to Work, showing how this Parish compares to Wealden and how the situation has deteriorated since the 2011 census. Since the 2011 Census the level of public transport use in this Parish has fallen from 6.8% to 3.5% and the use of vehicles increased from 81.2% to 87.5%:

¹² ONS 2021 Census Table TS045 and Parish Summary for East Hoathly with Halland.

¹³ EHHNP Website - Parish Statistics.

¹⁴ ONS 2021 Census Table TS061 and 2011 Census Table QS416EW.

Method of Travel to Work as a percentage	Public Transport	Car/Van/Taxi/Motor Cycle	Cycle	Foot
Wealden 2021	4.2	86.3	1.1	8.4
East Hoathly with Halland - 2021	3.5	87.5	1.0	8.0
East Hoathly with Halland - 2011	6.8	81.2	1.0	11.0

47. There are arguments that the changing nature of modern life should reduce this car dependency with more people working from home and the use of home delivery reducing the need to travel to larger urban centres. However, these changes in modern life bring with them additional pressure on rural villages from vehicles:

- a. Every home delivery brings a vehicle into the village (often with a much larger vehicle than the private car that would have previously done the job).
- b. Home deliveries are now made for individual small items which might previously have been collected as part of a bigger shopping trip.
- c. Individual meals are now home delivered as a matter of routine and always with some form of vehicle.
- d. Supermarket home deliveries have increased, particularly during the Covid 19 pandemic, but this is not believed to have reduced the number of shopping trips made by most households.
- e. People who have chosen to work from home rather than in an urban centre now have to travel to shopping and leisure facilities whereas previously they may have incorporated this into their working travel.

48. 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. 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.

49. Village Concerns made objections to the application WD/2023/2516/MAJ on 29 November 2023. One objection was the proposed 3 vehicle access points onto South Street within 90 metres of one another. ESCC Highways also raised concerns about this in their consultation submission date 24 November 2023 and wanted a building that is a non-designated heritage asset and part of the Conservation Area to be removed to improve the sightline for the entrance.

50. 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 WDC Conservation Officer also 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.

51. The requirements of NPPF 2024 Paragraph 216, EHHNP Policy 4.2 and the comments of the WDC Conservation Officer mean that this non-designated heritage asset cannot be removed. As such, ESCC Highways objection must still stand and WDC should indicate how the required sightline will be provided. This is of critical importance given that one of the 3 access points onto South Street is now proposed for 193 homes and a 426 child school.

52. The applicant’s Travel Plan expends a great deal of effort showing how long it would take to walk and cycle from various places to and from Sites A and B. They include routes that are not used by residents because it is too dangerous to cycle or walk on the A22 and many would also apply this to London Road. In Paragraph 2.4.2 of the Travel Plan, they state that the bypass created favourable conditions for cycling. This is wrong and betrays an ignorance of the local conditions typical of such desktop consultancy.

53. The applicant’s Travel Plan lists its Aims at Section 6.4 and the key one of these is: “to reduce the level of car trips by an indicative figure of 10% (which will be established following baseline surveys)”. It will be a pyrrhic victory to have an additional 700 vehicles in the village and for the Travel Plan to regard it as success to reduce the trips of these 700 vehicles by 10%.

Applicant's Transport Assessment

54. The applicant's 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. This is partly because the comparator sites that the Transport Assessment uses are not comparable with East Hoathly. They chose 6 sites (Herne Bay, Great Yarmouth, Swaffham, Holt, Horley and Stafford) to provide their data, all of which are in towns not villages. All of the 6 sites have significant services and infrastructure within walking and cycling distance. They have better access to bus services and most have train stations. They are utterly incomparable to East Hoathly and will provide lower car use data as a result.

55. The applicant's 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.

56. The applicant's Transport Assessment takes no account of the cumulative effect on traffic flows from all the proposed housing approved in East Hoathly.

57. Site B is remote from the village and the proposal to urbanise an existing PROW and provide lighting for it is not supported, nor would it satisfy the issue of remoteness. The urbanisation and lighting of the PROW would not comply with the WDC Landscape Character Assessment guideline to ["Maintain the rural character of the landscape away from the large urban areas, retaining tranquillity and dark skies where present"](#), nor EHHNP Policy 6.

58. Village Concerns believes that the planning department should identify the flaws in applicant's Transport Assessment and challenge them (See additional comments in Paragraphs 28 to 31). We see no evidence to show that WDC challenge poorly chosen comparator sites or false claims about public transport services.

Car Parking

59. Car Parking is a problem in most of the village housing developments including those built in 2009. The applicant's planning statement indicates

that they will only meet the minimum requirement of ESCC for car parking spaces and hence will repeat the failings of previous developments and provide inadequate parking space for the higher levels of vehicle ownership in this car dependent rural village. The number of spaces will be inadequate because:

- a. It is based on 2 spaces per house and 1.33 spaces per flat whereas the existing car ownership in the village is 2.25 vehicles/home. Even a one bed flat is likely to have 2 occupants who may each have a vehicle. This application proposes an already inadequate level of parking spaces.
- b. Self-employed residents often have an additional vehicle for their trade and this has to be parked in the village. NPPF 2024 Paragraph 114 recognises the need for overnight parking of lorries but this does not extend to self-employed business vans and vehicles. The parking allocation in modern housing developments does not allow for these additional vehicles and they usually end up being parked on the streets. These are often large vans and this creates access problems as the narrow streets are not designed to have such vehicles parked on them. The result is that they are commonly parked on the approaches to the village. These large working vehicles are inappropriate in scale and appearance to park in residential areas. This application offers no parking arrangements for self employed business vehicles.
- c. Many parishioners also have the addition of caravans or other recreational equipment that takes up their allotted space and thereby forces them to park their cars on the streets. This application provides no space for such things.

60. The applicant's planning statement indicates that they will only meet the minimum requirement of ESCC for the size of each parking space. Parking Space size for new developments is generally too small for many modern vehicles and too few for existing vehicle ownership. The result is more on-street parking. From an aesthetic perspective it also creates a very unappealing view of the places in which people live. Cluttered forecourts crammed with vehicles that spill out onto the roads and encumber the pavements.

61. The space allocated for a parking bay is generally 5m x 2.5m and this is too small for many modern vehicles to park and then open their doors (particularly the 4x4 SUVs that are very common in rural areas).

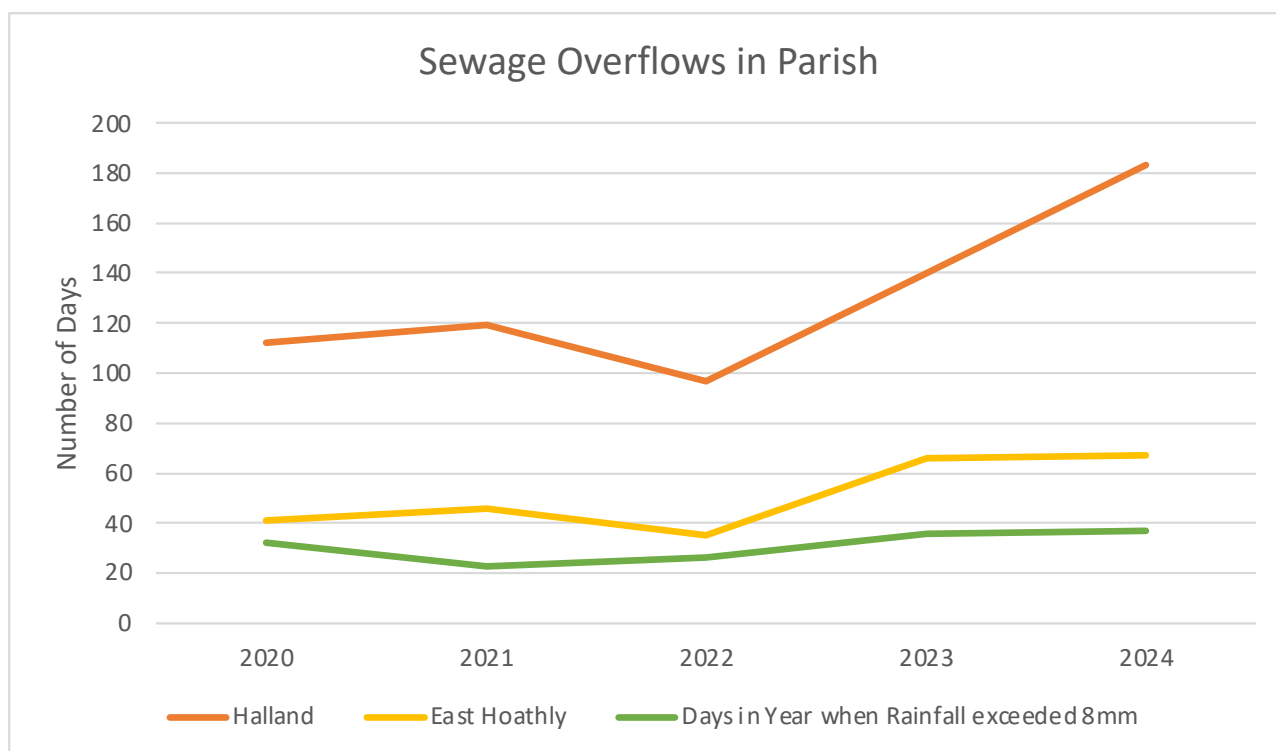
62. The garages are too small to accommodate large cars. This proposal shows the internal space for a single garage is 3 x 6 m with a 2.4 m wide door. A Landrover Discovery could not open its doors or boot whilst inside. Logically a double garage should be twice as big but they are 5.6 x 5.5 m inside and therefore inadequate. The result would be more on-street parking. This application proposes the minimum ESCC space standards and will therefore repeat the failings of previous developments and provide parking spaces and garages that are too small for modern vehicles.

63. No plan is shown for the visitor parking space. The proposal does not show the allocation of parking spaces to homes so that it cannot be determined where the visitor parking is sited. Visitor parking spaces are normally used by residents and it is important that it is clearly marked to show visitors where they can park. This application provides no information to enable us to comment on the level and siting of visitor parking.

Sewage

64. The Sewage disposal plans are not acceptable. Site B proposes to store sewage on site and then pump the sewage up London Road to a connection at the same point outside Thomas Turner Drive where the Redrow development now connects into the main sewer. One of the options put forward for Site A also involves storing sewage on site and then pumping it into the main sewer.

65. The problem with privately owned sewage pumping schemes is that they are being added to the sewage network with no coordination. They separately choose their method of operation and could all decide to discharge their daily store of sewage into the main sewer at the same time. There is a significant risk that this could overload the system. The East Hoathly Wastewater Treatment Works (WTW) already produces a significant number of sewage overflows and the trend in the past 5 years is an increasing one as can be seen in the chart below:



66. The overflows occur when rainfall adds to the volume of sewage in the system and it is a certainty. An overflow occurs when the storage capacity of the Plant is full. In 2024 this happened on 67 days (almost once every 5 days for the whole year) and during those 67 overflow days, the overflow continued for 939 hours which is an average of over 14 hours per day. If the proposed developments are approved, when the next 67 days of 14 hour overflows happen, if this coincides with the sewage from the new pumping systems (Paddock Green, Harrisons Field and Tourles Farm) all joining the system, then all of that sewage will go directly into the water courses.

67. The size of the sewage pipes in the East Hoathly system is already inadequate to cope with the Paddock Green site but our concerns about this have been ignored. To add a further 275 homes and a 426 children school to the system would require a significant upgrade to the whole system of pipework and the WTW Plant. This application provides no information for this to be considered and should be rejected as incomplete.

68. We also wish to draw your attention to the Appeal Decision - Land at Old Orchard House, Horam - APP/C1435/W/24/3343709. This centred on a planning condition imposed to ensure that a suitable foul drainage scheme be implemented before any of the dwellings were occupied. The Inspector concluded [“that it is not demonstrated the submitted scheme would ensure suitable foul water drainage, due to the potential for increased pollution in the water environment. This would conflict with the reason for the imposition of the condition and with Policy WCS7 of the CSLP and the Framework”](#).

The number of overflows at the East Hoathly WTW Plant are broadly equivalent to that of the pumping station and WTW at Horam and the same planning condition should apply.

69. The applicants Flood Risk Assessment and Drainage Strategy¹⁵ states: “Southern Water have been contacted regarding foul capacity and have confirmed that there isn’t currently capacity. Letters confirming this has been included in Appendix 2. Southern Water have confirmed that offsite upgrade works will be required to provide capacity for the new connections. They aim to provide this within 24 months following the date that planning has been granted”. The letter from Southern Water dated 13 Jan 2025 provides no indication of the work required but this is the first occasion on which they have acknowledged that there is inadequate capacity at the East Hoathly WTW.

70. This is a matter that causes significant concern to this community and they deserve to know the full implications of any work that is planned. Any plan should only be determined when the full scale of current and proposed development in the catchment area for the East Hoathly WTW have been established. This should not be until the completion of the WLP process. Village Concerns urges you not to consider this application until the full scope of works is established, timetabled and undergone further public consultation.

71. Having written this letter in January 2025, Southern Water then submitted a consultation submission on 25 April 2025 stating that there is currently adequate capacity in the local sewerage network. However they also state that this is for manhole reference TQ51159801 which is in the area of the junction of the M25/M11 to the North East of London. Southern Water need to correct these errors and state their position with accuracy and consistency.

SUDS

72. The SUDS drainage schemes for Site A and Site B appear to be complex and this implies that the maintenance costs for the scheme would be high. Village Concerns has raised the cost of such maintenance in the past and never seen any cost estimates provided. These costs will be passed on the new residents and we believe that the estimates should be made now and form part of the planning process. The cumulative service charge costs for new estates is becoming considerable and it questions the economic viability of some sites. Sussex Police have in response to this application submitted a very clear position as to the cost to Sussex Police of

¹⁵ Flood Risk Assessment and Drainage Strategy dated February 2025, Paragraph 10.2.

the proposed development, and stated that they will object if these costs are not met. We believe that the same logic should apply to SUDS maintenance costs and other maintenance issues that will form part of an estate service charge.

73. We also note that the SUDS outlet for the 17 home scheme on South Street has been diverted from its approved outlet. The implications of this need to be examined within the overall effects on the watercourse that leads to the East Hoathly WTW. Village Concerns has raised the issue previously that the in combination effect of all the SUDS schemes on the East of East Hoathly with the proposed additional 176 homes plus a 426 child school added to the watercourse, has not been assessed. This matter requires review before you add another development onto this complex situation.

Consultation

74. WDC should, under NPPF 2024 Paragraph 35, “set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure”. This application does not propose any contribution for infrastructure improvements in East Hoathly with the exception of a 426 children school for which the construction and operation is unfunded. The infrastructure of East Hoathly is already seriously compromised and this Application to add 275 homes whilst not proposing any funded infrastructure improvements is nonsensical.

75. WDC should, under NPPF 2024 Paragraph 138, “ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. The National Model Design Code is the primary basis for the preparation and use of local design codes. For assessing proposals there is a range of tools including workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. 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 and mixed use developments”. 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.

Recent Appeal and Planning Decisions

Appeal Decision - Bramblebank, Halland - APP/C1435/W/21/3275234

76. The Bramblebank Appeal was refused in part because “it would generate significant travel movements and not promote sustainable transport”. The Planning Inspector identified “considerable environmental harm” and “a considerable degree of social harm in respect of providing new homes in a location which does not provide suitably for the day-to-day needs of its residents, nor give ready access to them by sustainable means and so would encourage unsustainable patterns of travel”. This was for a development of 30 homes so clearly the proposal for 275 homes would have a far more harmful effect.

Appeal Decision - Catsfield Road, Ninfield - APP/C1435/W/21/3272342

77. The Catsfield Road Appeal was refused in part because it “would transform the rural character of the eastern approach to the village from Catsfield Road on account of the substantial loss of trees and hedgerow”. The Planning Inspector further noted that “it would be unsympathetic and harmful to its rural setting and the character and appearance of the countryside from where it would be experienced along Catsfield Road. The proposed development would therefore cause significant harm to the rural character and appearance of the area”. In summing up the planning balance, the Planning Inspector concludes that “the proposal would not constitute sustainable development for which the presumption in favour applies”. This was for a development of 38 homes so clearly the proposal for 275 homes would have a far more harmful affect in respect of East Hoathly.

Biodiversity

78. The applicant’s attitude to biodiversity can be summed up in their comment in the Design and Access Statement, Section 2.8: “The large expanse of farmland offer little opportunity for a truly diverse natural landscape impacting on biodiversity”. The applicant’s solution to this is to build all over the farmlands green fields, hedgerows and trees. The residents of this community value the farmland from which our food is produced and value the biodiversity that lives in the field margins, hedgerows and woodlands. We also note that it is embarrassing that a firm of consultants are still using 2011 census data in their Statement.

79. The proposed development will destroy the habitats of many plants and creatures that live in the field margins and hedgerows of the proposed

greenfield sites. It will destroy the foraging areas and transit routes for many animals, causing isolation of animal populations. It will build in the fields surrounding ancient woodland causing significant stress to these protected habitats. The pets of the new residents will predate and disturb the wildlife. The environment will be harmed by the developments and much of the wildlife will not survive. The applicant has paid for a biodiversity report that claims the development will enhance biodiversity. Village Concerns is not deceived by this report.

80. The applicant's Planning Statement proposes 15m buffers to the Ancient Woodland. Village Concerns believes that the Ancient Woodland buffer - should be 25 metres (to conform with draft WLP Policy NE4). It is noted that the applicant provided 20m buffers for the London Road (205) application currently under construction.

81. The application proposes a large expanse of green/open space to the East of Site B. However, it provides no ownership details for this land and no maintenance estimate. We are concerned that there would be no protection from further development on this land dependant on who owns it. The Design and Access Statement Section 9 suggests that some of the fields would be managed as private pasture. The meaning of this is not clear and a more detailed management plan is required before this application can be properly considered.

82. Village Concerns notes that this hybrid application appears to be seeking changes to the already approved planning application WD/2023/2516/MAJ for 17 homes off South Street, East Hoathly. The decision notice for this approval was only published in October 2024 but appears not to include in the list of approved documents the Tenure Plan that formed part of the application. We understand that this should have been: WD-2023-2516-MAJ_Plans_FL23-2035-064-C - Tenure Plan. This is relevant because the applicant appears to show a different arrangement in the Design and Access Statement Section 3.8.5 Tenure Plan. We ask that the planning department confirm if this is a formal request to amend the approved Tenure Plan and inform us why this was omitted from the Decision Notice.

Conclusion

83. Village Concerns object most strongly to the submission of this application prior to the completion of the WLP process. It proposes the wrong location for a school that has no funding and new homes whilst this community is still absorbing a doubling in its size amidst the constant sounds of construction. It proposes more housing with no employment opportunities or infrastructure to improve our sustainability. It proposes more affordable housing in a place that does not attract housing association interest and does nothing but add 700 more cars to a car dependent community during a Climate Emergency.

Victoria Aldridge and Katherine Gutkind
Joint Chairs
Village Concerns