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Monday, 9 March 2020

Dear Stacy Robins,

HESMONDS STUD PLANNING APPLICATION - WD/2016/2796/MAO

1. We note that further reports have been submitted in February 2020 for the above application. The underlying theme of all these reports is that this development will cause considerable harm in many respects. The reports are totally inadequate efforts to mitigate the harm, but it cannot be mitigated. The reports are flawed, not adequately brought up to date and appear rushed both lacking in scrutiny and depth.

Our objections still stand.

2. Regarding each report in turn

Transport Assessment (TA) - GTA Civils dated 24 January 2020

a. The assessment forecast has been changed from 2021 to 2025. This TA has completely disregarded the increase of traffic on the A22 in the years since the original TA was submitted in Nov 2016. The A22 is now gridlocked in the morning rush hour travelling north and evening rush hour travelling south in the vicinity of the Village bypass. This situation will worsen with the increase in housing in the South Wealden Growth Area with approved Planning Applications being built out in the next few years to 2025.

b. A development of 205 houses in East Hoathly means new residents will be car dependent and the increase in trips will have a significant effect at the junctions onto the A22.

c. This TA and the previous one in 2016 have made no assessment of the impact on the country lanes around the Village. Increasingly these lanes are being used as "rat runs" by vehicles coming off the A22 to avoid the grid lock. These lanes are narrow, frequently with

deep ditches either side. The roads are poorly maintained with many potholes and erosion at the edges making the lanes narrower. Dangerous conditions are developing.

d. The TA also makes no assessment of increased traffic in the village particularly on the High St which is a Conservation Area and the right angled corner in the centre of the Village.

Ecology Report - CT Ecology dated 12 February 2020

e. This report does not acknowledge the net loss in Biodiversity that this development would create. **We note that WDC has not submitted a Biodiversity Report for this site of almost 15 hectares.** WDC should produce a Biodiversity Report for this application and there is no reason why it should not come to the same conclusions as for Application WD/2018/2741/MAO.

f. It is acknowledged that Great Crested Newts on the site will have to be disturbed. This is not acceptable. The totally inadequate original Great Crested Newt Survey was heavily criticised by both the Sussex Amphibian Group and the Sussex Wildlife Trust. No attempt has been made to do a further survey. The breeding population has been massively underestimated.

g. What is not considered is that this site is part of a network of ponds in and around the site which provide foraging ground and transit routes for Great Crested Newts. The level of disturbance of habitat spreads beyond the boundaries of the site and no mitigation measures will rectify this. The effect on the Great Crested Newt population will be devastating.

Landscape and Visual Impact Assessment (LVA) Report - FLA dated 10 February 2020

h. The photographs of the viewpoints show exactly the importance of the Landscape to the setting, ambiance and Conservation Area of the Village. The feeble attempts at mitigation with some screening planting even allowing a period of several years will not mitigate the harm.

i. The following quotes in red from the LVA Assessment indicate how important the proposed site is to the setting of this community. All of this would be destroyed by the proposed development:

1.5 Significant Landscape features and views from within and around the overall site have been recorded.

2.65 Open views across gently rolling fields. There is a strong sense of remoteness and tranquillity.

2.67 Urban Edges. Most areas are sensitive due to woodland and mature vegetation.

2.68 The site lies specifically within Area 4. Landscape setting Area 4 is considered to make a Major contribution to the Setting of the Settlement. This area is considered to have a strong sense of place as a result of pockets of Ancient Woodland. There is also intervisibility between this area and historic buildings within the Historic Core.

2.69 Area 4 is identified as having moderate landscape sensitivity and high landscape value and plays a major contribution to the landscape setting of the village.

2.70 The site adjoins a sensitive urban edge and one small section of a prominent urban edge.

3.8 The Scale of the proposed development, changing permanent pasture to provide new housing and associated green space would result in High Magnitude being recorded. (Notable change in landscape character over extensive area or intensive change over more limited area.)

3.13 Therefore due to the magnitude of change being recorded as High this would result in substantial negative impact being recorded for the unmitigated condition.

j. The Mitigation proposals contained in the LVA Assessment are ineffectual and some examples of this are:

(1) Using building materials of a certain colour and composition. It is naïve to think this would compensate for loss of Landscape. It must be noted that this is an outline application, so materials and design do not carry any weight at this stage.

(2) Screening on London Road is necessary to preserve the Landscape. There is a conflict with Road Safety. It is possible large swathes of Species rich hedgerows would have

to be removed to provide visibility splays. The approach to the Village would become a street scene. The mitigating effect of screening would not be possible adding to the harm from the loss of an important hedgerow necessary to preserving the landscape.

(3) The report specifically states it is important to limit urbanising features on London Rd. It is not possible to preserve the Landscape and green approach to the Village whilst reducing traffic speeds and increasing visibility on London Rd. The two are in conflict.

(4) Mitigation from increased planting will take up to 15 years and then only a 2 point reduction.

k. Overall this report is hastily produced with errors and has not been brought up to date. Examples are:

(1) Table 6 is referencing Horam not East Hoathly.

(2) The report has not used the latest NPPF references and has taken no account of the extended Conservation Area.

Heritage Statement - ASE dated February 2020

l. The revised report submitted by Archaeology South-East (ASE) is as deeply flawed as its predecessor.

(1) The ASE report now recognises the existence of the 2017 Conservation Area for East Hoathly. Sadly, it makes no proper assessment of the impact of the proposed development on this enlarged Conservation Area. Irrespective of the nearby Designated Heritage Assets the impact on the enlarged Conservation Area should be fully assessed. This is not done.

(2) Both the ASE Reports refer to Section 12 of the NPPF which refers back to a section of NPPF 2012 covering "Conserving and Enhancing the Historic Environment". The correct reference for NPPF 2019 should be Section 16. This is worrying as it could indicate that ASE are seeking to avoid the updated policies which provide an enhanced level of protection for Heritage Assets and Conservation Areas. Despite the change to the Conservation Area and the intervening 4 years, ASE have still not managed to do more than a "rapid" desk based assessment. This is totally

inadequate given the proximity of 4 Listed Buildings, one of which is Grade 2*.

(3) The ASE Report fails to address any of the matters contained in our previous objection or the expert opinion of Dr Nicholas Doggett of Asset Heritage Consulting in his letter of objection both dated 22nd January 2020 both of which are or should have been known to both the Applicant and ASE before completion of their report (as it is dated February 2020). ASE have not sought to visit any of our properties either before or after completion of their report to correctly establish the impact on setting.

(4) The revised ASE Report adds reference to the enlarged East Hoathly Conservation Area but fails to fully analyse the impact of the proposed development on the settings of the Designated Heritage Assets, the Conservation Area or the Non Designated Heritage Assets in the vicinity.

(5) The original ASE Report failed to properly assess the impact on the Historic Environment of East Hoathly and the revised ASE Report has the temerity to even downgrade its initial assessment.

3. This objection is submitted by the Village Concerns Steering Group in response to new documents submitted to this Planning Application by the Agent.



Kathryn Richardson
Chair
Village Concerns