

# Objections to the WDC Sustainability Assessment for East Hoathly North(1) Sector – Hesmonds Stud

## Environmental SA Objectives (SA1-SA11)

### SA1: To protect and enhance biodiversity and geodiversity within the District

**WDC says:** *There will be some loss in biodiversity, however there are no significant biodiversity constraints.*

**VC says :**

There will in fact be a considerable loss in biodiversity as this is a large Greenfield site so fields, hedgerows and woodland will be lost. For example, species making this a rich wildlife habitat include skylarks; tawny owls and buzzards (as the hedges are abundant in field voles, mice and rabbits); foxes; fallow deer; badgers; slow worms; adders; crows, magpies, jays and common gulls which feed off the land and yellow hammers and bullfinches and bats. The bats roost in the large trees and feed off the abundance of flying insects over the fields. The Great Crested Newts at Long Pond, for instance, will be detrimentally affected by the destruction of their feeding grounds and disruption of their transit routes between breeding sites.

The wild flower meadow at the adjacent Croom Cottage is a Site of Nature Conservation Importance (SNCI) with an abundance of intriguingly diverse species. It is identified as an extremely unusual area of acidic grassland and calcareous loam pasture having records of rare Spiked Rampion which recommend its re-classification as a Biological SSSI.

This development site receives water from both Halland Park through the extensive soft sands (exposed when the by-pass was built), and from the North, the mineral rich Great Wood and through the stud which is predominantly a clay soil. It seems likely to have been wooded until the end of the sixteenth century and there are no indicators that it has been improved for agricultural purpose since. At very least the proposed development would interfere with the North South corridor between the existing SSSI of Park Corner Heath to Hawkhurst Common and beyond. This would be of great detriment to the biodiversity and geodiversity within the District for which WDC has a duty of care.

The concentration of rainwater runoff from houses and paved surfaces will affect the drainage of the land. It is noted that attenuation ponds are proposed. If they are intended to be open ponds with natural pond planting to the perimeter they would be beneficial to the biodiversity however during spells of dry weather these would likely dry up with disastrous affects to any wildlife using them. The site is edged with ancient woodland. Its water table must not be affected by housing and a minimum clearance even to gardens must be respected.

WDC has no Geodiversity Local Action Plan and there is no evidence that they have commissioned a professional evaluation of this particular site. Until or unless they are able to state that they have, and can identify other similar sites along with evidence of protective measures, it is imperative that this site is left undisturbed.

The plan fails to comply with the core planning principles of the National Planning Policy Framework to recognise the intrinsic character and beauty of the countryside, to conserve and enhance the natural environment and to reuse land that has previously been developed. The development is of a scale and nature on a Greenfield site in the open countryside, which would result in the loss of best and most versatile agricultural and stud land. The development would cause harm by the significant adverse visual and landscape character impact on the area of the development site and its surrounding valued landscape.

SA2: Conserve and enhance the District's countryside, landscape, historic environments and cultural assets

**WDC says:** *Has some degree of constraint due to the presence of pockets of ancient woodland that may be negatively affected by any development. However, measures can be introduced to mitigate any impacts.*

**VC says :**

Even with a mandatory 15 metre buffer zone to houses (and their gardens) the Ancient Woodland which edges the development site will be severely impacted: its water table is in real danger of being affected by the alteration of natural drainage forced by development on the clay soil; and the proposed siting of attenuation ponds will exacerbate the danger because of the slope of the land and their proximity to the woodland boundary. A proper Water Retention Survey (not the one taken on 11. 10. 16 after a very dry spell) will endorse concern for the poor drainage efficiency of this area. The presence of these Ancient Woodlands is a cultural and historic asset to this area, containing the footpaths used by Thomas Turner and described in his diaries.

In the Environment Strategy for East Sussex published by East Sussex County Council dated June 2011 it states that there are three key issues for East Sussex. One of these which will affect the Stud land is:-

“The deterioration, fragmentation and loss of the distinctive character of the East Sussex Landscape and the habitats it supports, through creeping suburbanisation in rural areas, loss of significant landscape features, trees and hedgerows, decline in quality and fragmentation of woodlands, and heritage assets at risk.”

The report states under the heading “What needs to happen”

1. Conserve the landscape and built heritage of East Sussex in a manner appropriate to its significance and protect the distinctive character of towns, villages and wider landscape of the county.
2. Develop high quality environments in our towns and villages and improve streets and other public open spaces so that people feel safer in, and make more use of, them.
3. Reduce the environmental impact of new and existing developments and create well planned environmental and green infrastructure that supports the landscape, habitats and wildlife.

East Sussex County Council also state that they will develop a countrywide approach to green infrastructure that supports the management and restoration of the county's landscape and the habitats it supports by March 2013.

The strategy states that Sussex Wildlife Trust, South Downs National Park Authority, High Weald AONB Joint Advisory Committee, Borough and District Councils and Natural England are responsible for ensuring that this policy is complied with.

In the Wealden District Council Landscape and Settlement Character Assessment dated November 2014 Item 5.11 Landscape Setting – East Hoathly pdf (5.12 Landscape Setting of East Hoathly) on the map prepared by Chris Blandford Associates it shows the Stud land being moderate sensitivity and Remnant Ancient Historic Landscape. Therefore, surely, this land should be protected. The land also abuts the “Sensitive Urban Edge” and is bounded on its northern and western edges by Ancient Woodland.

The land is also within Landscape Setting Area 4 which states:-

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

An exurban settlement into this well-defined village setting would irreversibly change the landscape, cultural assets and heritage aspects, losing Wealden an excellent example of village community with characteristics not commonly found elsewhere.

SA7: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment

**WDC says:** *Contains no flood risk area. However, significant development within and around East Hoathly would require greenfield sites which could result in increased runoff from heavy rainfall events.*

**VC says :**

The area of hard surfaces associated with the concentration of new houses will inevitably lead to a big increase in run off after heavy rainfall. The soil around our village is largely clay, which causes water to lie on the surface in a bog and the run-off quickly overwhelms the inadequate and under-specified drainage system. The present storm water and sewerage system serving East Hoathly is operating at almost maximum capacity and, without enlargement, would be unlikely to cope with the volume of waste water from the site.

One of the first improvements the existing landowner did was to install a raised boardwalk along the footpath within the proposed development area because of flooding. The proposed development area is the lowest point within the village and takes the water run- off from the existing village, via the playing fields, Halland Park and the Great Wood above Annandale. The playing fields opposite the site already suffer from water logging on a regular basis. ESCC and WDC Drainage SUDS report will show that any major development within East Hoathly will require substantial investment and engineering to deal with the subsequent increase in foul water and satisfactory dispersal of surface water.

SA8: Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

**WDC says:** *Issue of increases in emissions and air pollution due to the proximity of the settlement to the road network, principally the A22. This could encourage car use from new development. However, the settlement is well served by bus routes linking the settlement with Uckfield, Hailsham and Polegate and improvements to public transport links as part of any development could help achieve SA8 and SA11 in terms of vehicle emissions. Emissions from housing would need to be addressed through sustainable construction.*

**VC says :**

There will be a significant increase in air pollution as a result of increased traffic movements and the discharge of combustion gasses from heating systems.

The Village is not well served by a public bus service: 1 per hour to Hailsham, Easbourne and Uckfield; no bus service after 8pm; on Sunday 2 buses to Brighton returning by 5pm; no service to Lewes and Brighton Mon to Fri; no service to Heathfield and Tunbridge Wells. This is not convenient or affordable for commuting to work or for entertainment; shopping or a trip to the dentist or GP (local surgery is already overloaded) is a day's commitment. Since public transport is very limited, car usage will increase, possibly by 50%; and pollutants will increase proportionally. Already the A22 is a major pollutant with noxious emissions and noise. The traffic in rush hour often comes to a standstill already pushing polluted air into the village on mainly south westerly winds.

Tertiary education is largely based in Lewes and Brighton necessitating the need for a car in post 17 year olds. This development does not provide locally for more employment, education, retail or leisure activities. There is in fact very little employment in the village and this will be exacerbated if Hesmonds Stud reduces its operation. Note due to the proximity of the A22 people will use this route to travel north (No public transport) to the employment centres of Gatwick, London etc; hence travelling through the Ashdown Forest and worsening the level of nitrous oxides in an environmentally sensitive area. The recent Parish Survey showed an average of 2 cars per household so the 200 cars per hour currently recorded at the centre of the village could increase to at least 300.

It is unlikely that the bus companies will increase the frequency, or extend the timetable to allow evening use or new routes put on to Brighton and Tunbridge Wells to make it feasible for people to use the bus instead of their car as an everyday occurrence. In fact, the BBC announced on 12th Nov 2016: Councils have reduced bus services by more than 12% in the past year, local authorities say.

Very careful consideration would have to be made re construction of houses to minimise energy loss. There is no natural gas supply. Most houses are heated by oil fired central heating. Therefore unless a feasible alternative, economically viable method of heating there will be increased pollution from oil tanker delivery, fossil fuel burning and increased potential for oil spillage from tanks in gardens.

The development could not take place without having a severe impact on the existing highway network and it has not been proven to promote sustainable transport or conform to the strategic objectives to reduce congestion, inconvenience and hazards on the local highway network and therefore, would fail to accord with the advice contained in the National Planning Policy Framework.

SA9: Ensure the best use of previously developed land and existing buildings

WDC says: ***Offer the most potential for positive effects as it contains the majority of the existing built form.***

VC says :

This plan makes no use of previously developed land and is solely to be built on green fields: the site is currently fields bounded by woods on one side and along the roadway, a variety of mature trees and diverse hedgerows. It is a fitting and beautiful approach to the village. This new development does not constitute appropriate infill; in fact, it will be a huge swathe of buildings with no visual connection to the surroundings. This is particularly distracting as the old and historic hub of the village is only a stone's throw away.

SA10: Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

WDC says: ***Should contribute to improvements to walking and cycling routes as well as the public transport system.***

VC says :

Cycling or walking to urban areas for work from East Hoathly is not an option. We are situated almost equidistant between Uckfield and Lewes rail stations. Each is about 10mils or a 50min cycle ride. Besides, the roads are too fast and too dangerous for cycling. Since local employment prospects are very small, newcomers of working age will become commuters and since public transport is poor and there are no cycling routes, inevitably car usage and pollution will go up. There is nothing in the pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes. The scheme offers nothing but houses.

The Primary School is currently full with no room for expansion; the village shop is very small offering only a minimal selection of goods with no room for expansion. The Doctors Surgery is now part of a group of 3 surgeries and people have to travel to Buxted to appointments. Despite a new surgery when 75 houses were built in 2008 the actual service on offer in East Hoathly has been reduced. This all points to dependency on the car. Public bus service is likely to get worse given the recent BBC announcement (12th Nov 2016) that Councils have reduced bus services by more than 12% in the past year.

SA11: Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

WDC says: ***See response in SA8***

VC says :

There is no doubt that more cars will be on the surrounding roads if this development is to go ahead. A car (or multiple cars for a family) will be essential for travelling to work. Air pollution will increase which will not only affect the population but the flora, fauna and environment.

The development will result in an increase in greenhouse gas emissions. It is true that careful design of the fabric of the dwellings can reduce emissions of greenhouse gases however it is to be noted that there is no natural gas supply serving East Hoathly therefore heating of the dwellings will have to be either oil, electric, solar or ground source or air source heat pumps. Traffic movements and, probably, some form of heating will result in the emission of greenhouse gasses.

More houses, more cars, more heating oil tankers, more pollution

SA12: Improve access to services; facilities; the countryside and open spaces

WDC says: ***Offers the most potential for positive effects. Access to services and facilities is very good***

VC says :

Facilities and services within East Hoathly are minimal and barely manage to serve the present community. They will soon be overloaded by further housing. There is a very small general store offering only a minimal selection of goods with no room for expansion, a post office, a small book shop, a small cafe serving light lunches, a vet service, two public houses, a hairdressers and a nursing home. The Primary School is currently full with no room for expansion. The doctor's surgery is currently operating at maximum capacity. The majority of the residents will have to travel to nearby towns for services they require.

Countryside and open spaces around the village will be reduced. Thomas Turner walks go through this development site and will be spoilt by having to walk through a housing estate. There are present weaknesses in the infrastructure, particularly sewage, car parking, medical and education. These weaknesses must be addressed before any further housing is planned.

The plan does not seek to provide any dedicated employment land and as such, makes little contribution to the job needs of its population or the wider area exacerbating problems of out-commuting. The absence of any employment land in the mix of uses would not help to secure economic growth and weighs against the sustainability credentials of the scheme and would fail to accord with the advice contained in the National Planning Policy.

SA13: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

WDC says: ***Has the most potential for delivery of housing, both market and affordable. Has the least constrained and offers the best access to the settlement centre and its services and facilities***

VC says :

This planned development would result in a huge increase in vehicle traffic on roads, which are currently congested at times due to layout geometry and dimensions. This is exacerbated by the inadequacy of local services and facilities. The priority must be to build affordable housing near places of work. What is planned here does not achieve this in any way since there are very few employment prospects in the village.

Further observation questions the provision of 35% affordable housing on site, acceptable levels of education provision, leisure and equipped play provision, community facilities, environmental standards and necessary infrastructure either through on or off site provision or financial contribution.

SA15: Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

**WDC says:** *Has positive effect as because of good access to the services and facilities including the doctor's surgery and the recreation ground.*

**VC says :**

There are no indoor facilities of any sort for sport and the recreation ground is water logged for many months in Winter: the football club has been disbanded.

The air quality will decrease due to rise in car usage; the countryside will be damaged with over-development thereby impairing well-being; the doctors surgery is already overloaded so many have to travel to Buxted for appointments. Older residents do not have the option to stay independent because there is no wardened accommodation here for them.

Unless the medical centre capacity is increased to match the proposed population growth, it will not be able to absorb the increase in patient numbers, requiring more road use to outlying facilities. There are few jobs in the village. Nearly all employment will require commuting, adding to road traffic and pollution.

SA16: Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

**WDC says:** *Offers potential to create a cohesive and vibrant community*

**VC says :**

Cohesiveness depends on size. The current size of the village means that people know each other, look out for each other and are able to engage in the activities in the village. We are already a cohesive and vibrant community and would obviously welcome more people to the village; but the village could not absorb such a large number of people and retain that village atmosphere. The estate is on the edge of the village, most of the residents will commute to work, and the village primary school will not be able to accommodate all the children. In consequence, opportunities to integrate with the village will be minimal.

Rapid significant development could create resentment. When the most recent development was agreed (Juziers and Nightingale) it was with the promise that no further notable development will be undertaken. If the planners break their word on this then why should the community accept that this won't happen again in the future?

## Economic SA Objectives (SA17 and SA18)

SA17: Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

WDC says: ***Would offer some opportunity for small business unit development along the road frontage and there is good access to the rest of the settlement from this location***

VC says :

The plan does not seek to provide any dedicated employment land and as such, makes little contribution to the job needs of its population or the wider area exacerbating problems of out-commuting. The absence of any employment land in the mix of uses would not help to secure economic growth and weighs against the sustainability credentials of the scheme and would fail to accord with the advice contained in the National Planning Policy.

There is no capacity within the village to provide significant employment in addition to the opportunities currently existing and the current infrastructure deficiencies, notably broadband and parking, will not attract new business start-ups to the village, even if the absurd idea of new 'road frontage' business units obtains planning permission.

SA18: Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

WDC says: ***Offers potential for regenerating the settlement centre because of good access and close to the existing services and facilities in East Hoathly.***

VC says :

The plan will not strengthen the local economy or promote sustainable tourism. It will become an urban environment with rural inconvenience. Some of the public houses, shops and services in the village may benefit marginally from the development but we don't believe we need to be 'regenerated'. The beauty of this place is that the community is small enough for true neighbourliness, friendship and a feeling of belonging. How long will that exist if our population is doubled?

The historic centre of East Hoathly which is so important to the character of the village will be destroyed by the number of cars travelling through. The houses in the centre of the village are part of the conservation area and most have no garages necessitating on street parking. Double yellow lines are not an option. The new development does not allow parking for 2 cars per household therefore there will be more on street parking in the village.

It will destroy the tourism in the village because of the lack of parking and the urbanisation of the village. Many people come to access the walks around the village which will be spoilt.