

5th December 2019

Rother District Council
Town Hall, London Road
Bexhill-on-Sea
TN39 3JX

Foundry Close Planning Application (RR/2019/2194/P)

Dear Mr Cathcart,

As you will be aware, Hurst Green Parish Council are in the advanced stages of creating a Neighbourhood Development Plan. The relevant aims of the Hurst Green 2030 vision as it relates to this planning application are to:

- I. Protect against inappropriate and speculative development and to provide guidance and greater influence over how Hurst Green should be developed in the future.
- II. Improve public safety and reduce the harmful impact of road traffic, while providing sufficient parking for the community.
- III. Develop local planning policies for Hurst Green which development proposals should adhere to.
- IV. Create an environment that encourages residents to live active, social, meaningful lives that promote good health and well-being.
- V. Improve the visual appearance and overall perception of Hurst Green as a place where people want to live, work and visit.
- VI. Enhance our existing, and create new open green spaces and improve access to the countryside.
- VII. Conserve and enhance the built and historic environment and improve the general street scene around the parish.

We have welcomed the open and constructive engagement that the owners of the Foundry Close (HG 35) site have had with the Parish Council and our Neighbourhood Plan group. However it is the view of the Council, having considered the submitted application materials, that while the submitted application and scheme represents a considerable improvement on the previous housing scheme proposed for this site and the adjoining land, the Council must **object** to the proposal in its current form.

If the objections (outlined below) are addressed and an alternative application submitted, then the **Council would look more favourably on an application for the HG 35 site** - and extend an offer to continue dialogue with the owners of the site to achieve a mutually agreeable scheme.

Our principal reasons for objection are outlined in this letter and summarised here:

- 1: Overdevelopment for the site (we propose a reduction from 20 to 18 dwellings)
- 2: Parking Accommodation for Residents/Visitors Cars (we propose an increase, see detail)
- 3: Lack of affordable housing (we seek further clarification that this is not economically viable)
- 4: Lack of provided clarity for a full planning application
- 5: Integration with Hurst Green master planning
- 6: Insufficient green space

The above objections are explained in detail in the following pages.

Objection 1: Overdevelopment

1.1) Number of dwellings: as referenced within the applicant's design and access statement, the professional site assessment report produced by AECOM for the Neighbourhood Plan group concludes that relative to existing Hurst Green housing density, that the HG 35 site has the ability to support between 5 and 19 dwellings. Since the AECOM report was written the total size of the HG 35 site has been reduced by the applicant due to the need to provide a considerable dormice habitat – for these reasons, it is therefore logical to concede that the total proposed dwellings on the site must be reduced to a maximum of 18 dwellings, firstly to reduce by 1 dwelling, in line with AECOM report, and then reduced by at least a further dwelling, due to the loss of development taken by the dormice habitat.

1.2) Cramped outdoor/garden space: the scheme proposes 6 x two-bed unit, and in particular 4 x three-bed units and 10 x four-bed units, which would suggest these properties will be marketed at families – with indicative household sizes of between 3 and 6, and likely to include children who require access to adequate external space. The proposed scheme features irregular garden shapes, mostly less than 5m in width and in the majority of cases, barely meeting the minimum depth of 10m – these gardens would create a cramped and close environment that is incompatible with good design and wellbeing, and would not result in meaningful areas for residents to relax, play or socialise, thus forcing overspill to the road, and/or nearby fields in private ownership. **This would be resolved by a reduction in the number of dwellings to 18.**

1.3) Air Quality at junction with A21: Access is a concern for the Parish Council and local residents, the A21 is an extremely busy road, and whilst Highways have not objected, the waiting times to safety turn onto the A21 from the proposed access are likely to be long, and this will have a knock-on effect of likely causing an air quality issue for nearby properties due to idling cars – the number of cars using the junction must therefore be limited, this can be achieved by ensuring there is no overdevelopment of the site. It is also unclear whether the access road will support a lane of traffic in both directions, or whether with on street parking that cars entering and exiting the site will be forced into waiting at either end of a line of cars, playing 'chicken' to access/leave. If the access road is to be kept clear, we would seek the addition of a blue badge parking space on the access road.

Objection 2: Parking Accommodation for Residents/Visitors Cars: Hurst Green suffers from poor transport options, leaving residents with no option but to use cars to complete basic tasks such as shopping, travelling to the nearby rail station, getting to work, and with all amenities such as doctors, dentists, chemists, libraries and sporting/recreation facilities all provided in nearby villages and towns. Roads in the parish are single carriageway, including the A21, are heavily trafficked and are mostly unlit making alternative options such as cycling simply not an option for all but a brave few. Therefore residents and their visitors parking provision for any new development must be set at a practical and sensible level, taking care also to not exasperate the existing parking challenge, which sees many properties using Foundry Close, a confirmed adopted public highway, as well as the surrounding roads to park on as they have no off street parking of their own.

We acknowledge the applicant has provided some parking provision; however the only way to bring this to a practical level is to reduce the number of dwellings on the site in line with the comment above which will allow for a greater number of parking spaces - fewer residents, and thus fewer cars needing to be accommodated. With the scheme as present we believe the scheme's roads and pavements will be a bumper to bumper car park, blocking the pavements, and will be the cause of likely resident altercations as seen elsewhere in the village - all of this looks very different from the applicant's supplied visualisations, these depict virtually no cars at all, and a young child on her bicycle riding around the access road. **We would seek at least 3 allocated resident parking spaces per house for a 3/4 bedroom house, and at least 2 allocated resident spaces per 1 or 2 bedroom property.**

Objection 3: Affordable housing

3.1) the scheme proposes no affordable housing and a contribution of 170k towards affordable housing provision in the area. However, there is no evidence provided to confirm the applicant's assertion that a housing association would not be willing to take on a low quantity of units, indeed the Parish Council have actively asserted a willingness to engage with developers on this matter. In addition, the applicant was introduced by the Parish Council on the 30th of August to Amy Fearn (Affordable Housing Development), there is no evidence that Amy supports the position asserted. In all cases, we would seek clarification that the offset amount proposed is based on sound evidence that can be verified by the District Council.

Objection 4: Provided clarity for a full planning application

4.1) Fresh Water: Hurst Green suffers from low water pressure in many areas, the applicant has not provided any evidence to suggest that the water network can provide sufficient pressure to the new dwellings, and equally important that this can be achieved without affecting existing properties.

4.2) Public Lighting: The submitted scheme has not provided any details on how the road, footpath and public areas such as the rear car parking areas will be lit after dark. These are important factors for public safety, security whilst preserving the needs to protect and preserve Hurst Green's dark skies.

4.3) Hedges, Dormice Habitat, Green Areas: The applicant has not provided information on how the hedges and greenspaces will be maintained in perpetuity. We would like to see as a condition of planning that there is a plan for these aspects to be maintained to appropriate dimensions. Likewise that it is a condition that occupants of the dwellings cannot remove any of the hedges and that if they die that there is swift provision for replanting.

4.4) Ash Tree TU11: It is unclear from the application why a tree with an accompanying arboriculture impact assessment of 'fair', albeit with deadwood in the crown and in need of attention, cannot be saved and is instead marked for removal when it is within the dormice protection area?

Objection 5: Fit with Hurst Green Master Planning

This application has been made on land that is in planning terms, classed as being within the wider countryside and is within the High Weald Area of Outstanding Natural Beauty.

The land is outside the Development Boundary for Hurst Green, and as with neighbouring site, HG 23 (RR/2019/1784/P) the applicant has referred to the Neighbourhood Plan AECOM site assessment report. This site assessments was not conclusive, nor did it recommend early development for any site, and as such planning permission for HG 23 was refused on the 14th October 2019, the same principle applies here also.

Fundamentally, as the applicant has proceeded to applying for planning ahead of the Neighbourhood Plan being made, this has meant (as part of a range of missed opportunities) that the applicant's scheme has not benefited from the benefit of the overall master planning for Hurst Green that is currently being undertaken.

5.1) Access to HG40: The applicant has provided a road to the boundary of the site with neighbouring site HG40. It is critical that this provision be mandated as part of the planning process, as is future access to the HG40 site via Foundry Close.

5.2) Public / Additional Car Parking on the HG 40 site: As referenced above, as part of masterplanning, the neighbourhood plan team are currently working with the owner of HG40 to bring to fruition additional parking for the village to solve the lack of parking currently available to properties in the village, as well as additional properties, which will likely, as per National and District Council Policy, include affordable housing. The applicant has missed the opportunity to contribute towards this wider vision, and/or leverage it as part of their scheme.

5.3) Roads Ownership: The preference of the neighbourhood plan group and Hurst Green Parish Council is that the existing and proposed roads within the scheme are transferred and adopted by East Sussex County Council as a condition of planning.

5.4) New Nearby Affordable Homes New dwellings being proposed on nearby sites will also have to provide affordable housing development, whilst the applicant states that this scheme would only need to include a low number of units and that a housing operator might not want to take these on, combined with other nearby new affordable units, there is no evidence that this is the case, or that the scheme has considered the wider provision of affordable housing in the village being provided as part of the neighbourhood plan.

Objection 6: Proposed Green Space

6.1) Size of peace garden: The applicant has in conjunction with the Neighbourhood Plan proposed the creation of a small green space as part of the greenspace planning for the site, however this green space was originally designed to be of a depth close to the boundary of the site, affording broken views through to the wider landscape beyond and providing a connection to the AONB – the garden in its proposed format is unacceptably small, appearing to being less than 10m in depth at its deepest point.

6.2) Furnishing/Creation: The garden must be designed and initially landscaped and established as a result of the development, it cannot be handed over to the Parish Council as a 'blank canvas'.

6.3) Future Ownership: The Parish Council are willing for the development to transfer the ownership and upkeep of this public area to the parish, however this must be done via the Land Registry and as a condition of planning, and is not an alternative to proper ongoing upkeep of the green space, for example, the hedges, boundary areas, dormice habitat etc. which must also be mandated by planning condition.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Graham Browne', written in a cursive style.

Graham Browne

*Chairman Hurst Green Parish Council /
Rother District Councillor*

A handwritten signature in black ink, appearing to be 'Andrew Brown', written in a cursive style.

Andrew Brown

*Parish Councillor /
Hurst Green Neighbourhood Plan Steering Group*