Watercress Field off Strand Meadow

Response to consultation exercise on 8 January 2020

Format and attendance

1. Those who attended were grateful for the answers given by the architect and his assistant to their questions.

2. Those who attended were able to see a) a leaflet, b) eight computer-generated images, c) a site plan and two response forms (one from the developer and one from the Parish Council). There was no other information available. There was no laptop with the opportunity for attendees to see the computer files of the draft designs. Those who attended the Parish Council consultation exercise on 26 November 2019 saw on a public screen the architect's assistant using a laptop which displayed a list of the files available when a file was opened. At this exercise the public could not ask questions after the plans were revealed.

3. Unlike the consultation exercise with the Parish Council, there was no attendance by the developer to the consultation exercise, which meant that attendees were unable to have many of their questions answered. The form produced by the architect asked for people's views on the design, which is only one of the many issues that needed to be considered. It was difficult to make proper comments on the design when there were no architect's drawings for the housing units. The site plan only showed the design of the site and not of the housing units. Many engineering and structural questions could not be answered.

4. The eight computer-generated images were too few to give an overall impression of the design and looked as if they had been selected to give the best impression of the development. As the architect's assistant admitted, the images were not wholly accurate. The information available was wholly inadequate.

5. Another problem was that some people came and left and were unaware that there was a form to fill in. As a result, the forms do not give a proper record of the views expressed or the number opposed to the scheme. There were only four copies of the leaflet. By Saturday there was only one left. The leaflet lacked any proper information about the development. It had too much self-congratulation and contained false information. The leaflet said that the proposed footpath 'will provide an important connection with the recreation ground and the Burwash village centre beyond'. The architect said that the statement was only an intention, which was not a tenable position to take if the introduction to the section is read. Few had the opportunity to read and consider it.

6. When the inaccuracies in the leaflet were pointed out to the architect, the architect said he didn't write it.

7. It is regrettable that the consultation exercise did not enable the local community to properly understand the scheme.

Affordable homes

8. Houses of the type and likely cost proposed are not currently selling in Burwash and its surroundings. The real housing need is for houses which the young and the elderly can afford. The greatest need is for social housing and to a lesser extent affordable housing. The scheme currently proposed contains no social housing and no affordable housing. It is believed that when outline planning permission for this multi-million pound scheme

was applied for, the viability problems must have been identified and that Park Lane Homes obtained the permission for the houses intending to make a later application for the affordable homes to be reduced or removed entirely. That is what happened. It is to be regretted that the development has no housing to meet local housing needs.

The AONB

9. The proposal does not satisfy the provisions for building houses in the AONB. The reduction in the height of the units is wholly insufficient to reduce the impact on the AONB to acceptable levels.

10. In their submission to Rother District Council dated 9 August 2018, the High Weald AONB unit said the following about the previous application:

    a) The development has potential ecological impacts on the site and adjacent ancient woodland which are not addressed in the application material contrary to Objectives G1, W2 and FH3 of the Management Plan.

    b) **Geology, landform, water systems and climate**: The topography of this site is very challenging for built development. It is a steep sided valley with a spring / springs issuing from near the southern boundary, cutting down through the site to the north-western boundary where it flows north-east into Shrub Wood, an ancient woodland and then into the River Rother.

    c) **Settlement**: Burwash is a medieval village with most of the historic development along the ridgetop route, now the A265.

    d) **Routeways**: Historic public rights of way cross land to the north and west of the site, connecting into the wider countryside and back into the centre of Burwash. Shrub Lane is also a historic route.

    e) **Woodland**: As mentioned above, the main area of ancient woodland is Shrub Wood to the north-east, but there are also smaller areas of woodland and shaws within the fields to the north and west.

    f) **Field and Heath**: the application site comprises three Medieval (AD 1066 - AD 1499) assart fields with historic field boundaries.

    g) The High Weald AONB Unit objects to the proposed development on the following grounds:

        - The proposal does not address the declining affordability of housing in the High Weald, providing only market housing which is unaffordable for most existing residents;
        - [An objection to the then design]
        - The development has potential ecological impacts on the site and adjacent ancient woodland which are not addressed in the application material contrary to Objectives G1, W2 and FH3 of the Management Plan.

11. Following this appraisal, the developer made some minor changes to the scheme. After that the High Weald AONB unit said they affirmed all their objections. The new proposal has a significantly worse impact on the AONB than the previous application because the new proposal requires such significant soil removal to cut the housing units into the hill side.

12. It is ironic that the author of the leaflet seeks to rely on the High Weald AONB Plan with his or her totally unconvincing attempts to seek to say the objectives of the plan had been met when they clearly have not been met. The reality is none of the High Weald AONB unit's concerns has been addressed except the designs are improved, but not to an acceptable standard.

Sustainability and Access

13. The development is not a sustainable development. It fails to pass the NPPF test namely 'development must meet the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning' It has, poor connections to the village hub and the hub is too far away for pedestrians.
14. The proposed development claims to 'provide an important connection between Strand Meadow and the recreation ground and sports facilities and Burwash village centre beyond (sic)'. This is a false statement and it is only an aspiration. The proposed footpath only goes to the boundary fence and would cause significant trespass and Health and Safety issues as the grounds are used for cricket and football.
15. The lack of a link means that the development is cut off from the village hub and is not a sustainable project.

Ecology

16. Until Park Lane Homes permits an independent ecologist to examine the site, no proper evaluation of the ecological situation can be made. The ecologist for the previous application made significant errors. If an application is submitted in the spring of 2020 it will be premature, as there has been no proper ecological assessment made.

The design of the development

17. The designs were much better than those in the previous application. However, the real problem is that leading architects across the country use the design guide issued by the Greater London Authority for their designs. This ensures that developments have adequate space, adequate provision for those with mobility issues etc. The architect's assistant accepted this but said that because of the difficulties of the site it was not possible to use the Greater London Authority's guide. This means that the whole design is unfit for purpose.
18. The other main problems were:
    a) The designs were too 'bricky'.
    b) Many thought the designs were too suburban. It lacked sufficient East Sussex features.
    c) Many of the units had steps, which would make them inappropriate for those with children and very difficult for those with mobility issues.
    d) The slope of the hill up to Rother View makes the back gardens too steep and of little use. As there would be substantial removal of the soil there would be no proper area at the back as the garden area would be surrounded by high retaining walls.
    e) The brief to the architect was for 30 housing units. This means that the units are concentrated at the bottom of the site and the housing over all the site is too dense. The problems of density are exacerbated by the development being north facing.

f) The Inspector who determined the recent appeal for Watercress Field had concerns about the impact on the AONB of the increase in the number of housing units from 17 to 30, see para 23 of his Appeal Decision. The same problem applies to this proposal.

g) There are only 65 parking places for 30 housing units, which is insufficient for the units when the majority of units would have two cars, with visitors and delivery vans calling. The ratio of two places for each housing unit was decided many years ago and does not reflect modern car usage.

h) The site road is narrow, and the architect's assistant said he didn't know whether a bin lorry could pass a car.

i) Thirty units would, if built, create considerable traffic both pedestrian and vehicular. There is no footpath by the side of the road if the computer-generated images are correct. This means the access road is not safe.

h) The architect has tried to mitigate the effect on Rother View by planting a lot of trees. If the new units were built, these trees would cast serious shadows over them.

Traffic

19. There was no reference to the problems the extra traffic would create in Strand Meadow and Shrub Lane. The difficulties were well documented in the responses to the previous application. This remains a serious problem for this application.

The alternative

20. The developer is invited to consider the suggestion made by Burwash Parish Council that the site should be used for a small development of social housing for local people. Indications show this would be welcomed by the village.

Conclusions

21. There was no adequate consultation exercise.

22. The consultation exercise was well attended and created very great interest in Burwash. There has been extensive conversation from those who attended about the poor information available and serious problems this proposal has in being successful.

23. The sub-text of the leaflet and the two presentations by the architect to the Parish Council and the village was that the design of the development had been addressed so there are now no problems with the application. This is a serious and inevitably fatal miscalculation. The proposed development has significant problems and it does not properly address the issues raised by Rother District Council and the Inspector when the application was refused, and the appeal dismissed. If the planning committee and an inspector, if appointed, approach this application in the same way as they approached the last one, this application will be refused. This persistence will cause bitterness within the local community and significant waste of money for Rother and the developer.

24. The developer and the architect should consider the development afresh.

This statement was agreed to unanimously by a meeting of Burwash: Save our Fields on Saturday 18 January 2020.