

FRAMFIELD PARISH COUNCIL

Planning Committee **Details of Delegated Comments** **May 2020**

Decisions can be delegated to the Chairman (or Vice-Chairman) plus two other members if agreed by the Chairman.

The following decisions were made under delegated authority by Keith Brandon (Chairman), Bob Bather, Tony Hall, Maria Naylor (excluding WD/2020/0594/F & 0595/LB) and Sam Sharples (excluding WD/2020/0594/F & 0595/LB). (The Chairman has the casting vote in any tie).

- **WD/2020/0700/MAO – Outline application for the erection of up to 80 dwellings. Lands south of Framfield Road, Blackboys**
<https://planning.wealden.gov.uk/plandisp.aspx?recno=149499>

The Parish Council strongly objects to these proposals and is very concerned with the submission of the application. Blackboys is a small rural community with limited amenities. The village has seen more than its fair share of single and multiple property builds over the past few years and this application will change the setting irrevocably. The village was classed as an unsustainable settlement in Wealden District Council's Core Strategy and that was even prior to the current approved proposals and already built properties.

Wealden District Council's lack of Local Plan should not be used as a sound reason to approve this application, and there are many local issues that should be taken into account before any determination is given and not just based on need for housing land supply.

The application site itself is an agricultural field with no sustainable features. It is pushing the boundaries on sustainability and by all accounts, is a field in open countryside. It is far from 'adjacent' to a core area. As part of the SHELAA exercise for the Wealden Local Plan, the actual land within the application was deemed as unsuitable and unsustainable due to the effect it would have on the existing village and rural character, along with a lack of services to support it. Nothing has changed.

Wealden's Local Plan Policy – RAS 1 highlights that development will only be permitted within and adjoining to the core area. Blackboys was allocated 20 dwellings, of which this quota has already been used, so adding another 80 dwellings is obscenely over the prescribed allocation. As there is a lack of detail to support or mitigate against a village and Parish that is already unsustainable, it therefore does not meet Policy WLP7. The Local Plan may well have been withdrawn but the evidence base for these assertions must be just that, factual evidence on what housing numbers are sustainable for a village such as Blackboys.

Building 80 houses on this plot of land is not proportionate to the size and generally open format of the village, and by all accounts will project a 100% increase (approx.) in properties that are within a 500m radius, highlighting that this is far from the village core area.

The Parish Council have been petitioning ESCC and Sussex Police for several years with a view of reducing the speed limit through Blackboys to 30MPH. This has been unsuccessful despite evidence to support the need. The footpaths are inadequate, the road is 50MPH and the site entrance approaches a sweeping bend with a junction on it.

When you factor in local knowledge and behaviours of road users, the access and egress to this site will be extremely dangerous. The Parish Council are concerned that if this is approved, limited requirements will be put on the developer to make the area safe, and the Parish Council cannot support any traffic mitigations, as there is no funding available for such works.

The bus services stated are woefully inadequate and are constantly subject to reductions or cancellation by operators. The village does have a café, but it is on the far outer boundary, and is approximately 1.3km away.

Blackboys is generally unspoilt, rural and surrounded by open countryside. With over 1000 houses approaching the boundaries of the Parish from the likes of Ridgewood in Uckfield and many more planned, this development is another notch towards urban dominance. There is a drastic need for affordable housing, but it has to be in the right area, and this is not it. Not all houses currently have mains sewers, and no one has piped gas in the whole Parish.

Whilst an ESCC issue, roads and services such as schools and doctor's surgeries are already over prescribed and that is without the surrounding new builds taking occupancy. The whole Parish and surrounding areas cannot cope with the strain on infrastructure. There is a need to use vehicles. There are limited footpaths that are not fit for purpose, no cycle routes, especially for young people to traverse safely, and a limited bus service as mentioned. This application if approved will have far reaching impacts across the whole of East Sussex, especially Uckfield and Heathfield, as well as surrounding villages and hamlets.

The applicant uses current and past local and national policies to support their application. By all accounts, these policies should be used to prevent such a build of this scale. The policies were not designed to allow developers to build housing estates in open countryside and so would implore WDC not to allow approval, based on sound planning policy, without it being twisted to suit by greed. In the context of the size of Blackboys, this application should be compared as building another small village or housing estate when compared to its current size, layout and street scene, making it totally unacceptable.

The application is packed full of quite blatant falsehoods; a couple of examples of their misguided assertions from their 'Planning Balance and Conclusion' by which they close the so-called 'Design and Access' statement are as below:

"Given the topography of the site and surrounds, the development of this site with up to 80 dwellings can be achieved in a way that will not significantly erode the rural character of the area and overall visual quality of the village.

and their final conclusion is :-

"It is submitted that the substantial benefits that would result from the provision of these dwellings should be given very significant weight in the overall balance and that this would outweigh the limited harm that would result from developing a site outside of the defined planning boundaries but which is close to an existing settlement with reasonable facilities and links to other settlements."

To even try and imply this vast housing estate 'will not significantly erode the rural character of the village' and that there would be 'limited harm' is, of course, utter nonsense, as are the majority of the statements made in this application.

The Parish Council will be conversing with local residents during the notice period and will be writing a further response in due course.

- **WD/2020/0538/MAJ – Change of use of land from agricultural to mixed agricultural and equestrian use, and re-profiling of western field.**
Glebe Farm, Brookhouse Lane, Framfield TN22 5NH.
<https://planning.wealden.gov.uk/plandisp.aspx?recno=149290>

The Parish Council supports the application (subject to conditions and the requirements of the WDC Enforcement Officer) in principle but is concerned about the motive for the change. If the land, as detailed in the applicant's statement is predominantly for grazing horses, why is a change of use required?

The Parish Council support the re-profiling to a standard that is acceptable to the WDC Enforcement Officer.

The Parish Council would also like noted that as a public right of way crosses the land, if this area is to be used for the grazing of cattle, will other measures be implemented to keep walkers and cattle apart?

The Parish Council is aware that whilst the previous works to in-fill the land were taking place, significant debris and mud was deposited on the highway, and for a considerable length of the road. ESCC were informed of this on more than one occasion. The Parish Council would like to see conditions to prevent this whilst reverting the land back to its former state, such as wheel washing.

- **WD/2019/2578/F – Proposed conversion of existing detached garage into habitable unit.**
Hobbs Barton, Streele Lane, Framfield TN22 5RY
<https://planning.wealden.gov.uk/plandisp.aspx?recno=148295>

The Parish Council supports the application (subject to conditions). This Grade II Listed Building C16 is a substantial property but with no recent modifications or additions. The detached garage was built prior to the Listed grading (1982) and would therefore expect any works to be subservient of any conditions under heritage grounds. The changes make no difference to the street scene as the property cannot be seen from the road.

The Parish Council do support the conversion of this garage but will support the recommendations of the WDC Conservation Officer. The Parish Council would like to see a condition that if this is approved, the applicant cannot later rebuild a garage in an alternative location.

- **WD/842/CM - Wood recycling operations including erection of building.**
Holley Woodshavings, Squires Farm Industrial Estate, Office 1, Palehouse Common, Framfield, TN22 5RB
https://apps.eastsussex.gov.uk/environment/planning/applications/register/Detail.aspx?appno=WD/842/CM&typ=dmw_planning

The Parish Council strongly objects to this application. In addition, there is no heritage statement or ecological survey included within the proposals.

Whilst the Parish Council welcomes some of the mitigations that the applicant has proposed to protect residents and the wider community from dust, noise and water pollution, there are still concerns:

The applicant has suggested that there is no impact on wildlife or the local environment and therefore has not included an ecological assessment. There are plans to install a large bund on one side of the site, and this should therefore be assessed.

The Noise Impact Assessment is woefully inadequate and makes no effort to analyse or predict noise levels with the proposed mitigations. It simply refers to previous data that was collated on a previous date in different conditions.

There is reference to flood and water mitigations but there is limited detail on the recovery of dust suppression waste from within the building and how it will be recycled/processed.

There are multiple Listed Buildings within the immediate area, yet there is no impact assessment by means of a Heritage Assessment. In such a rural location, these buildings need protecting from what is becoming an over industrialised estate.

The application states that noise and dust impacts are in line with planning guidance. The Parish Council have little confidence that this will be effective or adequate, based on the previous enforcement issues and disregard for planning policies. Many neighbours have raised concerns for these issues and still do, which would suggest that there are substantial failings.

There has been poor corporate behaviour by the applicant over the past few years. With previous enforcement action not being adhered to or closed out, it has resulted in adverse effects on surrounding neighbours. This is an unacceptable way of conducting business, especially in such a rural area.

The Planning Statement quotes:

“The activity does generate levels of noise and dust, however the proposal is for a small scale operation and restricted in its nature, hence its impacts are considered to be limited”. No valid evidence is provided for this view, and they refer to volumes of wood up to 500 tonnes will be involved – this is not a ‘limited’ or small-scale business.

“At a rate of less than one lorry movement every half hour the traffic generated from this development will not be perceptible”. The Parish Council disagrees with this statement completely. There will be inevitably be substantial audible and other effects from traffic movements.

“There are no known safety issues with the access”. Whilst Holley’s have previously provided evidence that their vehicles do and will use the proposed route from the site onto the B2192, there is still concern that there are technically no restrictions on HGV’s using the road through Palehouse Common. This road has been subject to petitioning by the Parish Council and residents for many years due to the layout and narrow form, along with over use by ‘other’ HGV’s. It is becoming more dangerous each day, and the Parish Council would like to see enforceable conditions put on the users of the industrial estate(s) to not use this route, and stick to the proposed method suggested by Holley’s.

“The current pandemic situation and crisis for the country’s economy reinforces the need for this development.” It is beyond description and bad form to try and use a national tragedy such as the unprecedented one we are all struggling with, to provide support for an application. The Parish Council is acutely aware of the impact that the current pandemic is having on the economy and sympathise with business owners. However, to use it as a reason to approve an application is formidable.

If the application is approved by ESCC, the Parish Council would like to see reduced hours from 8am – 6pm Mon -Fri and no plant operating on Saturdays, especially as the applicant’s own report states that noise pollution will be low to ‘adverse’ on a weekend. The

recommendation for no Sunday/Bank holiday working is supported. The Parish Council is also aware of, and is concerned at the noise of plant machinery that is used currently and with the proposal – outside of the building. The scraping of machinery to lift wood and “push” around the yard is loud, and reverberates to surrounding areas.

If this application is approved by ESCC, the Parish Council would like to see the conditions mentioned adopted, and strict monitoring of noise, dust, traffic and water pollution to enable Enforcement action to be taken if required.

The Parish Council still recommends that ESCC should conduct a full review of the suitability of the entire site for such businesses. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Site Plan (ESSDBHWMSP) (adopted February 2017) does not highlight this site directly as a suitable recycling site. Therefore, others listed should be considered first, where all of the impacts raised will have minimal/less effects. Just because the policy states other sites can be considered, it doesn't automatically mean it should be.

- **WD/2020/0594/F & 0595/LB – New single storey extension to east with small two storey addition attached to the existing western elevation.**
Upper Brookhouse Farm, Brookhouse Lane, Framfield TN22 5QJ
<https://planning.wealden.gov.uk/plandisp.aspx?recno=149360>
<https://planning.wealden.gov.uk/plandisp.aspx?recno=149361>

The Parish Council objects to this application. Incidentally, Section 8 of the Application Form shows that no alterations to the building are to be carried out – this would be incorrect.

The Parish Council supports the minor change to the western end of the main building. However, they do not support the major addition to the eastern side. The building is Grade II Listed; C15 century. The Parish Council has over the years been supportive of amendments and additions to listed buildings. This proposal is neither sympathetic or representative of an enhancement to such a building. Whilst the applicant suggests that the proposal is contrasting to the existing building to reduce the disruption of its special qualities, it is completely out of character, size, scale, style and mass that it will impact the significance of the Grade II Listed building with irreparable damage.

The Parish Council is supportive of environmentally friendly design and build, but the mass of this structure is overbearing. The photo on Page 4 of the D&A Statement highlights well the negative impact the proposal will have when approaching the listed property.

The rural setting of this property does not support the deference to its heritage that the applicant suggests. There is reference to the original footprint of the property being much larger than it is now, although records are inconclusive to what extent. However, this was over centuries and decades ago, and the current proposal is of no significance to its past heritage that has long since gone.

The mass and scale of this proposal alone is over development, and the scale absurdly out of proportion to the current property.

The only apparent reason for the proposals being needed is for the provision of more space for a “modern family” – there may be a need for more space as a “modern family”, but the effective devastation of a listed building's setting is in no way justified by their personal space pressures. Heritage asset protection legislation and planning policy should support the refusal of this application.

06.05.2020

Circulation: Planning Committee/All other Parish Councillors.