Wadhurst Neighbourhood Plan

Regulation 16 Consultation

EAST SUSSEX COUNTY COUNCIL RESPONSE, JULY 2023

Thank you for the opportunity to comment on the Submission Version of the Wadhurst Neighbourhood Plan (NP). The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference.

Our response considers whether the NP meets the basic conditions and also highlights the recommended amendments raised by County Council Officers at the previous consultation stage (Pre-submission version, Regulation 14) which have not been included in the Submission Version of the plan. Although many of the changes that we suggested have been made there are some outstanding issues we feel should have been addressed. Where appropriate the specific section, policy or document within the consultation documents has been referred to.

If you have any queries on the County Council's comments, please contact:

Infrastructure Planning & Place Team
Communities, Economy & Transport
East Sussex County Council
strategicplanning@eastsussex.gov.uk

1. Highways Authority

1.1 Policy WAD8 (Mitigating Traffic Congestion) and Paragraph 7.17 Policy WAD8 (Mitigating Traffic Congestion) and Supporting Paragraph 7.17 is inaccurate and does not meet the basic condition a): have regard to national policies and advice, such as the National Planning Policy Framework.

Within the draft Plan:

- criterion A of policy WAD8 states: 'Where required, Transport Assessments / Transport Statements must address…….'.
- Supporting paragraph 7.17 states: '*Since the traffic situation is already severe, it is considered that any further development will add to this significantly. Therefore, a Transport Assessment is required for major development and a Transport Statement for smaller sites, to ensure that potential impacts can be assessed and mitigated.*'
- Finally, the footnote to policy WAD8 provides the definition of major development (10+ dwellings) and smaller developments (fewer than 10 dwellings).

Read as a whole, the policy requires Transport Assessments for developments of 10+ dwellings and a Transport Statement for developments of under 10 dwellings. This is not in conformity with local guidance.

In line with DfT guidance, Highway Authorities have been encouraged to develop their own local guidance to complement the national advice where it is considered necessary. East Sussex County Council's Guidance on Transport Assessments, Transport Statements and Transport Reports requires:

- Transport Assessments for developments greater than 80 dwellings
- Transport Statements for developments between 35 and 80 dwellings
- Transport Reports for developments between 5 and 34 dwellings

Although the ESCC guidance does allow for some flexibility in when a Transport Assessment or Transport Statement is required this should be specific to local circumstances rather than reflecting the definition of 'major' or 'smaller' developments.

To ensure that the Wadhurst NP is accurate and in line with County guidance it is suggested that paragraph 7.17 is revised (as below) and the Note (definition) to policy WAD8 is deleted:

'7.17. Since the traffic situation is already severe, it is considered that any further development will add to this significantly. ~~Therefore, a~~ **When a** Transport Assessment ~~is required for major development and a~~ **or a** Transport Statement **is required** ~~for smaller sites, to~~ **they must** ensure that potential impacts can be assessed and mitigated.'

1.2 Reference to the health benefits of active travel were highlighted at the previous consultation stage (ESCC Reg 14 Phase 2 response paragraph 1.5) but are considered to have not been carried through to the Submission Version of the plan. In order to comply with the basic conditions, the NP should have stronger reference to the health benefits of active travel. This can include where the purpose of the trip is active travel such as a walk or cycle, but also the inclusion of active travel as part of day-to-day activities (for example a walk to the bus stop/shops etc.). It is noted that point 4 of the key challenges and opportunities the NP seeks to address (paragraph 2.20) acknowledges that health and wellbeing underlie most challenges and opportunities. Stronger reference to the health benefits of active travel will help the NP meet the requirements of the NPPF to promote healthy and safe communities by enabling and supporting healthy lifestyles.

1.3 Paragraph 7.5. The inclusion of a map showing the walking and cycling network(s) in relation to the station was advised at the previous consultation stage (ESCC Reg 14 Phase 2 response paragraph 1.7) but has not been included in the submission version. It is suggested that this is included in the revised submission version.

1.4 Reference to Uplands School and its large catchment area was requested at the previous consultation stage (ESCC Reg 14 Phase 2 response paragraph 1.14). However, there is no reference in the Submission Plan. It is suggested that this reference is included in the revised submission version.

1.5 Section 12 Infrastructure improvements and provision and Section 13 Community aspirations – major projects There is limited reference to partnership working or funding in sections 12 or 13 contrary to the ESCC comment at the previous consultation stage (ESCC Reg 14 Phase 2 response paragraph 1.2 & 1.15). It is considered that the wording of paragraph 3 of Section 13 is ambiguous and could suggest funding solely for Wadhurst Parish rather than including delivery partners. Therefore, it is strongly recommended that the narrative around the need for partnership working should be strengthened, along with the need for funding to develop and deliver schemes, so the NP can meet the basic conditions in terms of achieving the provision of infrastructure to enable sustainable development.

1.6 Policy WAD9 A Public Car Parking The issues raised in paragraph 1.19 of the ESCC Reg 14 Phase 2 response, as set out below, does not appear to have been addressed and the wording remains much the same as in the pre-submission version of the NP.

'It is assumed that the off-street public car parking means public car parks and on street spaces relates to those areas in the High Street that are available for parking (even though in earlier narrative these are causing obstruction to emergency vehicles?) The High Street scheme that is ongoing seeks to address safety of vehicle flows and accommodating active travel, but to achieve this balance may result in rationing the level of on street parking. There is an ongoing problem in Wealden that parking is not decriminalised and so seeking to improve and expand public car parks to potentially address and offset the High Street parking problems would assist to overcome the wider issues. Long term parking in the public car parks caused by the college prevents short term visitor parking which results in on street parking'.

It is strongly suggested that the wording is revised to incorporate the previously provided comments to ensure effective provision of infrastructure and enable sustainable development.

1.7 Policy WAD9 B Public Car Parking There remains no reference to the management of parking in the High Street reflecting the ESCC comment at the previous consultation stage (ESCC Reg 14 Phase 2 response paragraph 1.20). Securing the management of on street parking in the High Street, subject to Wealden District Council adopting decriminalised parking during the NP period, would be an important tool in ensuring parking transfers to any additional off-road spaces and would ensure effective provision of infrastructure and enable sustainable development.

1.8 Since the Regulation 14 consultation a new government agency referred to as 'Active Travel England' has been established to transform the role of walking and cycling within the Country's transport system. Active Travel also incorporates 'wheeling' (using a wheelchair or mobility aid). Therefore, please ensure that this is reflected in the updated Plan when referring to walking and cycling in order to meet the 'social objective' of sustainable development and the requirement to promote sustainable transport as set out in the NPPF.

1.9 Chapter 7. Getting Around Following the Regulation 14 consultation, the County Council has received £41.4m of funding (Bus Service Improvement Plan for East Sussex County Council | East Sussex County Council) for the delivery of its Bus Service Improvement Plan (BSIP) (Bus Service Improvement Plan | East Sussex County Council)

Some of the funded proposals within the BSIP are now being realised, and in the context of Wadhurst, include:

- FlexiBus is now operational (FlexiBus | East Sussex County Council) (Flexibus All Zones (arcgis.com). Wadhurst is located in Zone 5. Flexibus Zone 5 (arcgis.com) shows Zone 5 with external destinations served to/from Zone 5).
- Bus network service enhancements start on 23 July 2023 (Wealden District Bus Service Improvements | East Sussex County Council and Improvements to Bus Services | East Sussex County Council for other districts and boroughs). This includes the Wadhurst – Route 254/304/305 (Hastings-Battle-Robertsbridge-Hurst Green-Hawkhurst-Flimwell-Ticehurst-Wadhurst-Frant-Tunbridge Wells) with new later evening journeys plus new 2 hourly Sunday service. Service renumbered to Route 1066".

It is suggested that these are reflected in the NP to meet the 'economic and social objectives' of sustainable development and the requirement to promote sustainable transport as set out in the NPPF.

1.10 We note the aspirations contained within the NP to improve safety and tackle speeding. We agree with the statement that addressing these issues sit outside of the neighbourhood plan. We welcome the chance to comment on any detailed/ specific road safety proposals as and when individual planning applications are put forward.

2. Education

2.1 There is no reference to early years provision in the NP. The project to improve nursery provision at Wadhurst CE Primary School, due for completion in summer 2023, will meet the anticipated requirements for childcare places in the Wadhurst area. However, moving forwards, it is too early to gauge the future impact of the government's proposed expansion of childcare provision to support working families on demand in the Wadhurst area.

2.2 In terms of school places, ESCC's primary and secondary forecasts continue to show that there should be sufficient capacity to meet the foreseeable levels of demand. This takes into account the latest modelling undertaken for Wealden District Council using emerging data related to evidence for the emerging new Local Plan. Should WDC's housing proposals for the area change we reserve the right to review our position.

3. Culture and Tourism

3.1 Policy WAD11: Supporting rural tourism We advise that specific recognition should be made of retail as a tourism activity (supported by SIC code allocations and the VisitBritain/VisitEngland strategy) to ensure the NP sufficiently meets the requirements set out in the NPPF in regard to 'supporting a prosperous rural economy' and therefore the economic and social objectives of sustainable development. It is implied in the current draft in so much as it is recognised that visitors might support local shops and farm shops through the High Weald AONB Unit definition of rural tourism but the role of retail experiences as part of a tourism draw falls between these two things and is an added consideration particularly when considering change of use applications and may have bearing on the high street redesign.

3.2 Section 10: Community Facilities Most cultural activity, particularly arts activity such as visual arts, dance and drama require indoor spaces. Whilst the community facilities listed do include indoor spaces it is not clear what capacity they have and how well used they are. A note on the particular need for indoor spaces for community activities to be possible throughout the year would be advisable and would support any future need to extend current indoor facilities if the community demand outgrows current availability and would ensure there is sufficient provision of community facilities in line with the NPPF and the social objective of sustainable development.

4. Public Health

4.1 Following on from the Reg 14 Consultation, we can see that many of our previous points have now been incorporated into the Reg 16 version, and anything outstanding we do not feel is significant or appropriate to raise as an objection at this stage of the plan.