



Wealden District Council
East Hoathly with Halland Neighbourhood Plan Regulation 16 Consultation

The following is a summary of the comments made during the Regulation 16 consultation on the East Hoathly with Halland Neighbourhood Plan which ran between Monday 8 January 2024 and Monday 26 February 2024. It is a summary written by Officers at Wealden District Council and is written to assist the Examiner and anyone who wishes to see a summary of the issues raised. It does not contain every point a consultee has made. The full comments are available to view on our website <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/neighbourhood-planning/>

Consultee	Summary of Comments	Would like to attend the examination in public, if it is deemed necessary	Would like to be notified of the LPA decision on the adoption of the East Hoathly with Halland Neighbourhood Plan (Reg 19)
Mr A Burdon	Acknowledges the enormous amount of time and work invested in this NP by individuals in the village. The plan has his full support. The consultee trusts the process to adopt the NP by Wealden District Council will not be prolonged to the disadvantage of East Hoathly with Halland.		X
Mrs J Burdon	Fully supports the submission of the NP on behalf of East Hoathly village. A great deal of time has been expended by individuals in the compilation of this plan. They are to be congratulated on their commitment.		X
Mr I Burt	Is the owner of the northern parcel of Moat Wood and opposes the inclusion of their woodland in the plan to make it a 'Local Green Space'. The consultee details the issues they have faced from some of the local community including abuse, vandalism, rubbish and dogs mess, damage from local children and bike tracks. They would like their section of the woodland removed from the plan.	X	X
The Coal Authority	The Coal Authority have no comments to make regarding planning applications or planning policies in areas which lie outside of the		

	coalfield and therefore will not provide a formal response to any consultations received.		
East Sussex County Council	<p>Highways Authority</p> <ul style="list-style-type: none"> • There is reference to census data from 2011 throughout the NP document. Some of these references could be updated to use census 2021 data, such as the demographic profile. • Section 4 – Housing and Housing Design, Bus Service, Paragraphs 50a), 59 and 60 (p34, p38, p39); Please note that, as reflected in paragraph 88 of the NP, £63,000 has been secured through a S106 agreement from a development of 205 dwellings at Hesmonds Stud in order to support the 54 bus service to run for seven days a week for three years. • Infrastructure, Car/ Van Ownership Paragraph 100, (p61); To be able to accurately measure infrastructure requirements in considering sustainable development, data for car ownership should be derived from the most recent 2021 census and not from overnight surveys. The overnight survey data is not at all accurate as this indicates car parking capacity and does not take account of, for example, overnight visitors, vehicles parked in garages. • Car Parking, paragraph 103-109 pages 62-64 and EHHNP Policy 3 – 3.2f, (p75); The text on the subject of car parking correctly states that East Sussex County Council is the responsible transport planning authority and as such has prepared the parking standards for both residential and non-residential development. It should be noted that this is currently being updated and, it is expected, will be published in spring 2024. 		

	<ul style="list-style-type: none"> • EHHNP Policy 3 – 3g, (p75); To ensure that the NP is in alignment with national guidance it should be noted that the road design standards (Manual for Streets guidance documents) are applicable when roads are offered for adoption, and where possible on-street parking prevention is considered at planning application stage through the statutory consultation stage. • Section 9 – Accessibility And Connectivity, Bus Service, Paragraph 223 (p137); In order to accurately measure infrastructure requirements in considering sustainable development, the assumptions and policies laid out in the NP need to be based upon accurate evidence. • Section 9 – Accessibility And Connectivity, East Hoathly and Halland Link, Paragraph 228, 229 and Aspiration 7 (p141); ESCC recommends that where cycling and pushchairs are referred to throughout the document, that reference is also made to ‘wheeling’. This will ensure that it is in alignment with both national and local active travel strategy. • Section 9 – Accessibility And Connectivity, East Hoathly and Halland Link, Aspiration 7 (P141); The inclusion of a connection by foot, cycle and wheeling between Halland and East Hoathly is supported although it should be noted that there is ancient woodland locally, which may be restrictive in terms of constructing infrastructure for this purpose, as has been the case for a recent appeal site at Downlands, Uckfield. • Section 7 – Health And Wellbeing and Section 9 – Accessibility And Connectivity ESCC is supportive of Section 7 – Health and Wellbeing and Section 9 – Infrastructure. However, we do recommend that consideration should be made of, and reference made to, 		
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	<p>the following County Council transport strategies, including;</p> <ul style="list-style-type: none"> • East Sussex Local Transport Plan 3 (LTP3) • East Sussex draft Local Transport Plan 4 (LTP4) 2024 – 2050 <p>Education</p> <ul style="list-style-type: none"> • East Hoathly Church of England Primary School, Paragraphs 53-55, (p35, p36) and Annex B; In order to accurately measure infrastructure requirements in considering sustainable development, the assumptions and policies laid out in the NP need to be based upon accurate evidence. Therefore, we do welcome that the NP makes some revisions regarding education following our Regulation 14 response, although Annex B continues to contain the Parish Council's own estimate of the deficit arising from the committed new housing. It should be noted, however, that the commentary still doesn't fully acknowledge the role of the school admissions system in restricting Reception year (Year R) inflows if required or the delayed impact on Year R. That said, additional educational infrastructure may be needed in the future depending on the combined quantum and trajectory of housing in the parish from current commitments and any additional housing uplift that comes forward through strategic allocations from Wealden District Council in their emerging Local Plan 		
The Environment Agency	States that their aim is to reduce flood risk, while protecting and enhancing the water environment and that they have had to focus their detailed engagement to those areas where the environmental risks are greatest. It has been confirmed that there will be no development coming forward as part of this plan. Therefore, based		

	on the information currently available, the proposed NP raises no environmental concerns for them.		
Ms L Griffiths	<p>Has deep concerns regarding the proposed development plans for East Hoathly with Halland. Whilst the necessity for urban development is understood, it is imperative that such plans prioritize environmental sustainability and community well-being.</p> <p>The current proposals fall short in several areas:</p> <ul style="list-style-type: none"> • It is evident that the proposed developments are not in alignment with carbon footprint reduction objectives. The lack of emphasis on renewable energy integration, energy-efficient building standards, and transportation alternatives in the current plan is deeply concerning. • In July 2019 Wealden District Council unanimously approved a motion to declare a Climate Emergency and committed to work towards achieving net-zero carbon emissions by 2050 for both the Council's own operations and the wider Wealden area. How will this be possible with the plans for East Hoathly and Halland? • The existing infrastructure in East Hoathly with Halland is already strained and the proposed developments lack sufficient plans to address this issue. • The environmental impact of these developments on biodiversity cannot be overlooked. <p>The consultee urges Wealden District Council to reconsider its development plans for East Hoathly with Halland. By prioritizing carbon footprint reduction, enhancing infrastructure, and safeguarding biodiversity, we can create vibrant communities that thrive in harmony with nature.</p>	X	X

Heathfield and Waldron Parish Council	The members agreed to congratulate East Hoathly with Halland Parish Council on their Draft Neighbourhood Plan and to seek further ways to collaborate and work with East Hoathly with Halland Parish Council on areas that affect both parishes, such as dark skies, drainage and flooding concerns, (both upstream and downstream), and transport, which includes cycle and footpaths, as well as matters such as maintaining local settlement gaps.		
Parker Dann on behalf of Hesmonds Stud Limited	<p>Responds on behalf of Hesmonds Stud Ltd which is one of the largest landowners in the Neighbourhood Plan area. Their primary interest in the Plan relates to the proposed allocation of 'Circle of Oaks' as Local Green Space under policy EHHNP Policy 7 - Local Green Spaces which they consider to be wholly inappropriate.</p> <p>The consultee:</p> <ul style="list-style-type: none"> • Is disappointed with the content of the neighbourhood plan. • Regrets the Parish Council chose not to contact us to meet with us prior to issuing the Regulation 16 consultation. • Considers the plan is an attempt to stymy sustainable development. <p>In summary in relation to Policy 7 Local Green Spaces, the consultee states:</p> <ul style="list-style-type: none"> • The neighbourhood plan contradicts the Planning Practice Guidance • The proposed designation of Circle of Oaks contradicts the NPPF and therefore the basic conditions. Its designation would interfere with the delivery of sustainable development and would undermine the delivery of sufficient homes. • The District Council's comments on this issue have been ignored by the Parish Council. 		

	<ul style="list-style-type: none"> • It is not capable of extending beyond the plan period because it would be superseded by the District Plan when this is adopted. • The designation of EHHNP Policy 7 is not supported by proportionate and robust evidence. Instead, it proceeds on the basis of largely unevidenced assertions. • The Parish Council has never informed the landowner of their intention for their land or made any contact with them regarding the Neighbourhood Plan. <p>In relation to policy 2 Housing Design- Resource Efficiency, the consultee states:</p> <ul style="list-style-type: none"> • This policy requires, inter alia, High Energy Efficiency Buildings that have a net emission rate of zero or are certified Passivhaus buildings. This is not consistent with strategic policies in the local plan or national policy. It is unreasonable to require a net zero emission rate. • The aspiration for energy efficient buildings is, however, supported. • This policy should be amended as it does not meet the basic conditions. <p>In relation to Policy 3- Housing Design- Layout and Materials</p> <ul style="list-style-type: none"> • Criteria F should be deleted. Providing excess parking encourages car use and dissuades future occupants from utilising more sustainable transport methods which conflicts with national policy. <p>Overall, the Neighbourhood Plan does not meet the basic conditions and should not proceed to referendum.</p>		
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Historic England	Do not consider it necessary for Historic England to provide detailed comments at this time. Refers to previous comments submitted at Regulation 14 and to detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found on their website.		X
Mr A Jackson	<p>Has deep concerns regarding the proposed development plans for East Hoathly with Halland. Whilst the necessity for urban development is understood, it is imperative that such plans prioritize environmental sustainability and community well-being.</p> <p>The current proposals fall short in several areas:</p> <ul style="list-style-type: none"> • It is evident that the proposed developments are not in alignment with carbon footprint reduction objectives. The lack of emphasis on renewable energy integration, energy-efficient building standards, and transportation alternatives in the current plan is deeply concerning. • In July 2019 Wealden District Council unanimously approved a motion to declare a Climate Emergency and committed to work towards achieving net-zero carbon emissions by 2050 for both the Council's own operations and the wider Wealden area. How will this be possible with the plans for East Hoathly and Halland? • The existing infrastructure in East Hoathly with Halland is already strained and the proposed developments lack sufficient plans to address this issue. • The environmental impact of these developments on biodiversity cannot be overlooked. <p>The consultee urges Wealden District Council to reconsider its development plans for East Hoathly with Halland. By prioritizing carbon footprint reduction, enhancing infrastructure, and</p>	X	X

	safeguarding biodiversity, we can create vibrant communities that thrive in harmony with nature.		
M McDougall	<p>The consultee is confused by the Development Objectives 1-5. The statement that the community wishes all 5 of these objectives is patently untrue.</p> <ul style="list-style-type: none"> • No one in East Hoathly wanted to see 600 new homes, a potential population increase of 2000 persons and another 1200 cars. • The sewage system barely functions and new development will put more strain on the system. • The plan is irrelevant and a waste of time. • The new development will ruin the character of the village. 		
National Gas	<p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.</p> <p>National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>A link to further information in relation to its assets is provided.</p>		
National Grid	<p>An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p>		

	<p>A link to further information on its assets is provided, as well as a link to information regarding the electricity distribution network. Guidance is attached for development close to NGET infrastructure.</p>		
National Highways	<p>The continued reference to sustainable travel is welcomed and it is acknowledged that East Hoathly with Halland has concerns about limited public transport links. Any improvement to cycle infrastructure, bus services and links to rail services would reduce the need to travel by car and thus lessen the need to use the Strategic Road Network. It is also noted that whilst the NPPF has been referenced, there is no reference to DfT Circular 01/22, which should, moving forwards, be the baseline for all Transport Statements/ Transport Assessments.</p>		
Natural England	<p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p>		

Mr M Priaulx	<p>Supports Neighbourhood Plan Submission Version EHHNP Policy 6 - Natural Environment (page 108) but it is not currently sound or effective due to a lack of reference to national policy regarding ecology which does not fall within the Biodiversity Net Gain metric, e.g. all building-based biodiversity such as bats, swifts, house sparrows and house martins. National Planning Policy Guidance NPPG Natural Environment 2019 paragraph 023 highlights the value to wildlife of swift bricks, bat boxes and hedgehog highways.</p> <p>Would like to see added, as a minimum 'Swift bricks, bat boxes and hedgehog highways to be included in new developments, in accordance with best practice guidance' and 'Swift bricks to be installed in new developments including suitable extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development' and 'Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in East Sussex return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.'</p>		X
Mrs K Richardson	Agrees with the plan, having been involved with the preparation.	X	X
Mr P Richardson	Agrees with the plan.	X	X
Southern Water	Have no comments to make further to those provided on the Pre Submission version of the Plan.		X
Surrey County Council	No comments to raise.		

Wealden District Council	The Council has provided extensive comments, including around the length of the plan and the layout and order. The main issues of concern that remain are around the Housing and Housing Design section and certain proposed Local Green Space allocations. However, a large proportion of the detailed comments that the Council made at the Regulation 14 stage have been addressed.		
Mr J Wenham	Is totally opposed to any further housing developments; they are not necessary. There are a large number of empty/ unsold properties in Sussex- when all of these are occupied there may be a case for some development but only in areas with adequate infrastructure and only on brownfield sites. The bus services quoted are out of date.		X
West Sussex County Council	No comments to make on the draft plan.		