

East Hoathly with Halland Neighbourhood Plan

Regulation 16 Consultation

EAST SUSSEX COUNTY COUNCIL RESPONSE, FEBRUARY 2024

Thank you for the opportunity to comment on the submission version of the East Hoathly with Halland 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 stages (Pre-submission version, Regulation 14) which have not been included in the submission version of the plan.

Whilst we appreciate that many of the changes suggested have been included there are some outstanding issues that 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:

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1. 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. This will ensure that the data underpinning the assumptions and policies laid out in the NP are accurate and up to date, particularly in considering infrastructure requirements in achieving sustainable development.
2. **Objectives, Development, d. Objective 4 (p24);** ESCC welcome that Objective 4 has been updated in regards to our comments at the Regulation 14 stage to include reference to wheeling (mobility scooters and wheelchair users) which will ensure alignment with the most recent national and local strategy in regard to active travel.
3. **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. This payment will be due prior to the occupation of 50 dwellings on the site. Therefore, there is an expectation that funding towards East Hoathly bus services and a timetable will be forthcoming, although it should also be noted that this is reliant on the progress of the development.

4. **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, residents that may be away from their properties, vehicles being repaired off site. 2021 census data is available on [East Sussex in Figures](#) for super output area 13C.
5. **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. The emerging ESCC guidance considers parking for all types of vehicles (including the increased size of modern vehicles) and seeks to balance the need to provide an appropriate parking provision, ensure the safe operation of the public highway and encourage travel by sustainable modes. 2021 census data has been used to understand local levels of car ownership and informs the updated guidance and the accompanying Parking Calculator to be used for residential development proposals.
6. **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.
7. **Section 9 - Accessibility And Connectivity, Bus Service, Paragraph 223 (p137);** ESCC welcomes that the NP has referred to and referenced the East Sussex Bus Service Improvement Plan (BSIP) 2021 in relation to bus services serving the area.
8. **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. The NP states that;
‘This Parish has seen no evidence to show that new developments lead to increased use of the bus service and this is evidenced by the very low level of bus usage in the Parish. This Parish fully understands the intent behind the policy to provide an alternative to the car, but the reality is that unfunded aspirations and ineffective new development Travel Plans do not appear to be improving levels of usage in this Parish’.
From our records there have not been any recent completions of housing schemes in East Hoathly with Halland of a major scale (which would require a travel plan or contributions to bus services). Therefore, there is no evidence available as no monitoring has been undertaken through the travel plan process.

The Hesmonds Stud site and South Street site are major development sites in the NP area which have planning consent, but are not yet occupied, and so it is too early to discern whether bus patronage has or will increase as a result of new residents moving into these developments.

9. **Section 9 - Accessibility And Connectivity, Cycleways/Routes, Paragraph 227 (p140);** ESCC is satisfied that the NP has referred to and referenced the East Sussex Local Cycling & Walking Infrastructure Plan (LCWIP) 2020 - 2030 in reference to cycle routes. Please note that the LCWIP is subject to review during 2024.
10. **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.
11. **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.
12. **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, the following County Council transport strategies, including;
 - East Sussex Local Transport Plan 3 (LTP3)
 - East Sussex draft Local Transport Plan 4 (LTP4) 2024 - 2050

All of these documents have a strong emphasis on supporting sustainable development and the draft LTP4, which is currently out to consultation, also specifically refers to the opportunities for supporting the development of connected communities and healthy places. Therefore, to ensure that the NP meets the basic condition of achieving sustainable development and is in alignment with national, regional and County Transport strategy, reference to these documents should be included.

Education

13. **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.