

<p style="text-align: center;">Horam Neighbourhood Plan Regulation 16 Consultation</p>
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EAST SUSSEX COUNTY COUNCIL RESPONSE, FEBRUARY 2024

Thank you for the opportunity to comment on the submission version of the Horam 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 the:
Infrastructure Planning & Place Team
Communities, Economy & Transport
East Sussex County Council

strategicplanning@eastsussex.gov.uk

1. Highways Authority

1.1. As previously advised reference should be made to the following County Council transport strategies. These include:-

- East Sussex Local Transport Plan 3 (LTP3)
- East Sussex draft [Local Transport Plan 4](#) (LTP4) 2024 - 2050
- East Sussex Local Cycling & Walking Infrastructure Plan (LCWIP) 2020 - 2030
- East Sussex Bus Service Improvement Plan (BSIP) - 2021

1.2 All of these documents have a strong emphasis on supporting sustainable development and the draft LTP4 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.

1.3 Objective 10 should be updated, and where walking and cycling is referenced in chapter 8, to include reference to wheeling (mobility scooters and wheelchair users): To encourage walking, wheeling, cycling, and public transport services. This will ensure alignment with the most recent national and local strategy in regard to active travel.

- 1.4 **Policy HTM2: Active and healthy travel** - ESCC is supportive of this policy and the content, however as stated above, please ensure reference is made to the East Sussex LTP4 and LCWIP. Where walking and cycling is referred to it is also suggested that reference is also made to 'wheeling' as outlined in paragraph 1.3. This will ensure that it is in alignment with both national and local active travel strategy.
- 1.5 **Policy HTM3: The Cuckoo Trail** - ESCC is supportive of this policy and would emphasise the importance of opportunities to enhance access to this from any new development, as outlined in the East Sussex LCWIP.
- 1.6 **Policy HTM4: Public transport** - ESCC is supportive of this policy. However, please ensure reference to the East Sussex LTP4 and BSIP.
- 1.7 **Traffic Management, p70-72** - Whilst we previously outlined our support to work in partnership to help improve safety for all users. We note references in the plan to aspirations regarding implementing speed limits, HGV restrictions and traffic calming measures. Therefore it is important that, to ensure conformity with National Guidance and East Sussex Road Safety and Highways Policies, we highlight the following;
- 1.8 **Restricting HGVs** - Our policy ([PS 4/5 Control of Heavy Goods Vehicles](#)) in East Sussex sets out that, as few roads in the county are ideally suited for HGV use, it is expected that the "A" and "B" roads in the county should be available to carry heavy lorries thereby allowing them to disperse over the available road network rather than to concentrate them on selected roads.
- 1.9 **Speed Limits** - Our policy ([Local speed limits and 20 zones](#)) is based on National guidance for the setting of local speed limits.
- Speed limits should be evidence-led, self-explaining and seek to reinforce people's assessment of what is a safe speed to travel. They should encourage self-compliance.
 - Speed limits should be seen by drivers as the maximum rather than a target speed.
 - Speed limits are only one element of speed management. Local speed limits should not be set in isolation. They should be part of a package with other speed management measures including engineering and road geometry that respect the needs of all road users and raise the driver's awareness of their environment.
 - The full range of speed management measures should always be considered before a new speed limit is introduced.
 - The underlying aim should be to achieve a 'safe' distribution of speeds. The key factors that should be considered in any decisions on local speed limits are:
 - history of collisions.
 - road geometry and engineering.
 - road function.
 - Composition of road users

- existing traffic speeds, and
 - road environment.
- In respect to 20mph limits specifically, appropriately set 20 limits need to be self-enforcing. The mean (average) speed of traffic would need to be already at or below 24mph. On roads where mean speeds are higher, appropriate traffic management/calming measures would need to be introduced. This is based on research carried out which shows that by introducing a speed limit by signs alone, speeds are reduced by just under 1mph.

1.10 **Traffic Management/Calming** - All measures must be designed in accordance with current standards, advertised in line with the relevant legislation and will be subject to the road safety audit process. Vertical traffic calming features (speed cushions/raised tables etc) are not appropriate for A-class roads.

2 Culture and Tourism

- 2.1 In our Regulation 14 response (Para 3.2) we stated, *“Sporting facilities are specifically named, a mention of arts activities would also be welcomed, and the recognition that these usually require an indoor space, so the maintenance of community spaces is key.”* However, in the Regulation 16 document, arts activities are still not mentioned. In line with Paragraph 20 of the NPPF and the East Sussex Cultural Strategy we suggest that mention of arts activities is included.
- 2.2 Arts activities can require specialist equipment such as dance bars, flexible staging and lighting, access to water/drainage, suitable tables for craft activities and ideally sprung floors. All of these items need specifying in a new build including the necessary storage. Therefore, setting out the principle that arts activities can support community cohesion and health and wellbeing need to be taken into consideration when managing current facilities or commissioning new/replacement community facilities would be advisable.

3 Education

- 3.1 The Horam NP does not mention an overall quantum of new housing. We understand that you are yet to receive a definitive or indicative number of dwellings, to be accommodated within the Neighbourhood Plan, from Wealden District Council (WDC). However, the testing for school places forecasting we have undertaken based on WDC's housing growth options, over the last couple of years, has led us to previously estimate that additional early years and school places would be required.
- 3.2 This estimated requirement for additional early years and school places has been based on approximately 1,000 additional new dwellings for Horam Parish.
- 3.3 Therefore, as we identified in our Regulation 14 response, it may be prudent for the NP to specifically identify the need for additional school and early years places in line with paragraph 99 of the NPPF.

4 Infrastructure Provision

- 4.1 Policy HCF3: Infrastructure - ESCC is supportive of this policy in the context that the NP meets the basic condition of achieving sustainable development.