Herstmonceux Parish Council Neighbourhood Plan

Summary of representations made as part of the Regulation 16 consultation on the draft neighbourhood plan

Wealden
District Council

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1. Wealden District Council published the Herstmonceux Parish Council Neighbourhood Plan for consultation between 25th September 2017 and 6th November 2017 in accordance with Regulation 16 of the Neighourhood Planning (General) Regulations 2012 (as amended). This document provides a summary of the representations received during this consultation. A total of eight representations were received.
2. This document is produced in compliance with Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendum) Regulations 2012 (as amended).
3. Paper copies of the representations can be viewed on request at Wealden District Council offices, Vicarage Lane, Hailsham, BN27 2AX and are also available to view on the council's website at; http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/NeighbourhoodPlanning/NeighbourhoodPlans/ppolicy_Herstmonceux_Neighbourhood_Plan.aspx

Name/ Organisation	Date Received	Summary of representation
Highways Agency	23rd October 2017 (by email)	No specific comment to make
East Sussex County Council	26th October 2017 (by email)	(representation in full) **County Ecologist** Objectives on Page 35 The County Ecologist would like to re-iterate the comments made in paragraph 5.4 of the previous Regulation 14 response submitted in May 2017: 5.4 The Objectives include the need to protect the natural beauty of the Parish landscape but there is no objective to protect and enhance the natural environment and the ecosystem services it provides.

		In response to the previous ecology advice the following text has now been added to the list of objectives on page 35: 'to protect the natural environment'. Whilst this is welcomed, there has been no mention of the word 'enhance' –we suggest that the text should be amended to 'protect and enhance the natural environment' as the need to enhance is a requirement under the NPPF and the NERC Act. An understanding and recognition of ecosystem services gives greater weight to the natural environment, and hopefully therefore to its protection and enhancement, as it is more than just conserving wildlife. A healthy natural environment contributes to heat amelioration, climate change adaptation, flood risk management, carbon sequestration, health and wellbeing, recreation, cultural services, food production, timber production, agriculture (including pollination) etc. To achieve the objective of protecting and enhancing the natural environment, it is essential that all developments are informed by an Ecological Impact Assessment (see comments regarding paragraph 5.6 below). Policy 1: Spatial Planning Principles for the Parish The County Ecologist would like to re-iterate the comments made in paragraph 5.5 of the previous Regulation 14 response: 5.5 Policy 1 – development proposals need to ensure that there are no adverse impacts on biodiversity. The policy specifically includes the need to conserve and enhance the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty (AONB). The need to avoid adverse impacts on biodiversity is of equal importance. The consultation statement says that reference to biodiversity will need to be included in Policy 1, but the document is not currently in accord with this statement. Ecological Impact Assessments The County Ecologist would like to re-iterate the comments made in paragraph 5.6 of the previous Regulation 14 response: 5.6 All developments should be informed by an Ecological Impact

		Assessment (EcIA) in line with BS42020:2013 'Biodiversity – Code of Practice for planning and development' and CIEEM guidance. The Sussex Biodiversity Record Centre should be included in the evidence base. The consultation statement says that they are unsure where reference to EcIA should be made in the plan. We would recommend that it is included in section 10.0 Delivery Plan, specifically under 10.3. The Sussex Biodiversity Record Centre should be included in the evidence base which is listed in Appendix C of the plan. Transport We would like to re-iterate the transport comments (paragraph 2.1) which were previously made in the Regulation 14 consultation. 2.1 Policy 7: Refurbishment & extension to car park at Recreation Ground –This policy indicates that the access road to the recreation ground will be improved by widening it and creating passing spaces; however, I note that land available to provide these improvements is very limited at the access junction with Hailsham road. With this in mind it is likely to be difficult to provide an access width that can comfortably accommodate two-way traffic. If further discussion is required then Ben Lenton (Transport Development Control) can be contacted on 01273 336114 or ben.lenton@eastsussex.gov.uk We note from the consultation statement that it is of course the supporting text rather than the policy itself that refers to the improvements of the access road by widening and passing spaces. However, if two-way traffic cannot be accommodated, then cars are likely to be forced to wait on the main road whilst the access clears thereby impacting on highway safety and the flow of traffic on the A271. This may compromise the ability to deliver further parking spaces (and the increase in vehicle movements to and from the car park) that this policy seeks to deliver. Archaeology We would like to re-iterate the archaeology comments (paragraphs 6.1 & 6.2) which were previously made in the Regulation 14 consultation: 6.1 The NP has a heritage section but it only has limited text about listed

		buildings, the lack of a conservation area and some text about Herstmonceux Castle. 6.2 The description of the historic environment is therefore very weak and the plan is therefore very weak as the full potential of the historic environment, including archaeological interest is not celebrated sufficiently or drawn upon as a basis for the sustainable development of the plan area. 6.3 We would be happy to provide information from the Historic Environment Record.
Mr L. Keeley	1st November 2017 (by email)	(representation in full) There is a lot to read, and a lot of work put into this document, haven't got it all in my head, for example I spotted my comments on the ring road and relocation of the school, I can respond to this saying to Wealden this should be considered at the examination, but I would like to see if residents have considered this or even read it, so one should have yet another option to put this and others idea to a public vote, to support or not support seems the option ,but one can't say one agrees with everything in the document, a lot of it is status-quo, the school is over full, I didn't see where this is in the consultation or options on another or enlarge what is there now, while traffic in the village is mentioned, there is not a answer or have i not seem it? As in Hailsham they are doing a plan, while developers are taking no notice of it, there should not be any planning applications while the plan is in consultation
Natural England	2nd November 2017 (by email)	No specific comment to make.

S H Voght	5th November 2017 (by email)	(representation in full) Congratulations to the Herstmonceux Parish Council on developing and delivering a NP which genuinely and intelligently hears and addresses the needs of its parishioners. However, there is one glaring strategic disconnect between what the parishioners of Herstmonceux and its Parish Council believe is right for their parish - in order to maintain both its character and the effective infrastructural function of Herstmonceux - and two major housing development proposals recently approved by WDC. Whilst most parishioners have always been clear that a number of smaller developments is the most appropriate strategy for a settlement defined by WDC as a Local Service Centre ("a settlement that has a more limited supply of social and economic infrastructure including employment") , such as the development of 17 houses at Collins, WDC have chosen to approve two major developments for the parish of 70 (Lime Cross) and 40 (Lime Roughs) in the last couple of years, simply ignoring the considered arguments of parishioners. The windfall development guidelines produced by HxPC are, in contrast, strategically appropriate for the settlement size and character. This, however, raises another issue - the lack of clarity around the significance of windfall developments both in Herstmonceux and Wealden generally. Given that there is a solid history of significant numbers of windfall dwellings, why is it that WDC consistently refuse to include windfalls in their calculations of 5YHLS?
Environment Agency	6th November 2017 (by email)	We are particularly pleased to see sentence 3) - natural environment, biodiversity and wildlife corridors, 4) – biodiversity and wildlife corridors, 8) – water efficiency and 10) - sustainable urban drainage systems incorporated in Policy 11 page 63. We cannot see any reference in the document as to how wastewater will be dealt with. We recommend that relevant policies make reference to the

		fact that future development should be connected to the mains foul sewer. This could be included within Policy 11 and Policy 12 Windfall Sites. Generally, we will only agree to developments involving sewage effluent, trade effluent or other contaminated discharges to ground or surface waters if we are satisfied that it is not reasonable to make a connection to the public foul sewer. Full justification would be required as to why the development cannot connect to the sewer. An Environmental Permit may be required for treated effluent to ground or surface water. This position will not normally apply to surface water run-off via sustainable drainage systems and discharges from sewage treatment works operated by sewage undertakings with appropriate treatment and discharge controls.
Southern Water	6th November 2017 (by email)	No specific comment to make.
Historic England	6th November 2017 (by email)	Historic England supports the draft neighbourhood plan as now submitted. In view of the comments made in our letter of 19 May 2017 in response to the pre-submission version of the plan, we agree that our views have been adequately incorporated into the revised draft plan. Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).