RESPONSES TO CLARIFICATIONS

Policies HaCF1 and HaCF2

The Town Council notes that no response is needed.

Policy HaCG3

Your understanding in respect of the third and fourth parts of the policy is correct. The Town Council is comfortable with your suggested approach to these parts of the policy.

In respect of the supporting text and whether there are any specific facilities to which these parts of the policy apply, there are no specific facilities currently at risk of loss. However, these sections of the policy have specifically been drafted in response to community concerns about the need for supporting infrastructure in Hailsham, that the quality and provision of existing facilities is limited, and that if any of these were to be lost, it would be detrimental to community inclusion and cohesion.

Policy HaCF5

The Town Council is happy with the second part of the policy being repositioned within the supporting text.

Policy HCF7

The Town Council notes that no response is needed.

Policies HaTC1 and HaTC2

In part 3 of Policy HaTC1, the words 'may be appropriate' refers to uses being suitable where they meet the criteria in sub-parts (a)-(d).

In respect of part 5 of Policy HaTC1, the Examiner's understanding is correct. Maintaining the quality of the premises and their ability to be used for retail and other functions that contribute to the quality and attractiveness of the town centre (including the upkeep of frontages) would be welcomed.

Part 3 of Policy HaTC2 is seeking to ensure that if and where new development does take place, then it retains public space of sufficient size and space that allows for continued operation of the market. This might be through the arrangement of buildings and public space, and orientation of buildings to activate that space. In this regard, the Town Council considers that this is a and use policy. The Town Council is happy for the Examiner to advise on the appropriate form of wording.

Policy HaTC3

Although Part 2 of the Policy is perhaps a process point rather than a land use matter, it is important that the design of the space involves collaboration with the people using it, such that it is inclusive and fit for purpose. The intention is that such an approach is clearly demonstrated through the application material.

Policy HaTC4

The Town Council is happy for the Examiner to suggest how parts 2 and 4 of the policy might be combined.

In respect of Part 2, 'outside this' does indeed refer to locations outside of the Conservation Area.

Policy HaTC5

The Town Council is comfortable with the Examiner's suggestion.

Policy HaTC8

There is no current proposal for a multi-storey car park in the town centre. However, the idea has been explored before. The made Neighbourhood Plan, at Policy HAIL TC4, includes reference to provision of parking over multiple levels. Inclusion of a multi-storey car park was explored in the 'Aspires' development project for the Town Centre led by the District Council, although that project has since been withdrawn. Provision of a multi-storey car park remains an important consideration, supporting effective use of land and thus potential for delivery of mixed use development in the town centre (including town centre living) in line with the NPPF. The Town Council has recently acquired land on South Road and is exploring opportunities as to how this might be utilised. One opportunity includes a decked car park linked to the bus network.

Policy HaHD1

The Town Council notes that no response is needed.

Policy HaHD3

This policy has been included in the draft Plan in direct response to concerns raised through consultation, with sustainability and energy efficiency being one of the main issues raised. It attempts to further develop national policy by having more of a design focus as opposed to establishing standards to be applied. However, it is recognised that this is an area where national guidance, policy and building regulations are moving at pace, and where the scope of neighbourhood plan level policy is limited. The Town Council is happy for the Examiner to consider whether it adds value to existing policy.

Policy HaHD4

The Examiner is correct in that the first part of the Policy refers to Table 1.

Policy HaGI6

The reference to 'can' in para 8.40 is not meant to infer that this is acceptable, rather that it might be an unintended consequence of the provision of off-street parking, and why this needs carefully considering alongside overall on-street capacity. The Town Council would be keen to retain this part of the policy in full if considered acceptable to the Examiner. The Town Council is happy to amend the supporting text if that would provide clarity.

Projects

The Town Council notes that no response is needed.

Reviewing the Plan

The draft Neighbourhood Plan was prepared with the emerging Local Plan in mind and thus an early review is not considered entirely necessary. However, it is recognised that the adopted version of the Local Plan may be different in form to the current version and that this may have a bearing on policies in the Neighbourhood Plan. The Town Council is thus happy for the Examiner to insert an additional paragraph to say that the Town Council will consider whether there is a need for a further review following adoption of the Local Plan.

REPRESENTATIONS

Thank you for inviting the Town Council to comment on the Regulation 16 representations. Comments on the representations from the County and from Southern Water are set out below, followed by a summary of the other representations. Comments on the representations from Wealden District Council are appended in the separate table.

East Sussex County Council

The regulation 16 response from the County says that the Neighbourhood Plan meets the Basic Conditions, but some text / sections could be strengthened. The following points are made:

- Wheeling should be mentioned along walking and cycling.
- The concept of a 'green street' is similar to a 'home zone' and terminology could be updated accordingly.
- The requirement for Transport Assessments etc should only be required where proportionate to do so and following a monitor and manage approach.
- Further information on the benefits of walking and cycling could be incorporated in the Plan, cross-referencing the LCWIP.
- Reference could be made to freight, sustainable movement of goods and use of low-carbon last-mile deliveries.
- Cycle parking should be covered in the town centre parking section.
- It is noted that an update to the LCWIP and a new Active Travel Strategy is forthcoming, which could be referenced in the Plan.

The Town Council notes the support for the Plan and although it doesn't think that all suggested changes are necessary, is happy to make amendments where advised by the Examiner.

Southern Water

This response expresses support for all policies in the Plan in respect of SuDS, noting that these are well-integrated within the Plan. The response also suggests that Policies HaGI5 and HaGI6 should include reference to new the National Standards for SuDS published by Defra. The Town Council is happy to amend policies to include such references should the Examiner consider this necessary.

Other respondents

The table below summarises the responses received at the Regulation 16 stage (other than those from the County Council, Southern Water and District Council).

RESPONDENT	RESPONDENT TYPE	SUMMARY OF KEY POINTS AND COMMENT ON RESPONSE FROM HAILSHAM TOWN COUNCIL
Arlington Parish Council	Neighbouring Parish Council	• Support Plan. • Question feasibility and likely use of A22 tunnel. Suggest a traffic light controlled crossing would be better. • Support concept of 'Country Line'. *>> The Town Council notes the comment on the A22 tunnel. This is an ongoing project subject to discussion with the County Council. It is not considered that any changes are required to the Neighbourhood Plan.*
Dudley	Resident	• Concerned about damage to green corridor to rear of Hailsham Rec and Diplocks Way. • Vision for green infrastructure needs to be informed by advice from Natural England and that a holistic approach to interventions is required. *>> The comments are noted. The green infrastructure policies in the Plan have been informed by supporting evidence. Natural England has not provided any specific comments on the Plan. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Environment Agency	Statutory Consultee	• No environmental concerns raised by the Plan. *>> The response does not raise any issues, concerns nor objections. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Ezekiel	Resident	• Supports the Plan • More efforts required to slow speeding traffic on existing wide roads in Hailsham and Hellingly.

		>> The Town Council notes the support for the Plan and desire for additional traffic management measures. This is reflected in projects within the Plan. The Town Council does not consider that any changes are required to the Neighbourhood Plan.
Ferrell	Resident	• Building of the Sports Hub has caused the respondents home to flood. • Further development in the flood plain should be avoided. *>> Comments are noted. The Town Council agrees that development should be avoided in areas that are at risk of flooding. The Neighbourhood Plan includes policies in respect of sustainable drainage that are intended to supplement wider national and Local Plan policy in respect of flooding. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Fox	Resident	• Respondent didn't understand much of the Plan. • Concerned that it means Council Tax will go up. • Concerned that if trees are planted at Vicarage Fields these will be vandalised. *>> An Executive Summary of the Plan has been prepared to help understand its role, purpose and content. The Plan will not result in an increase in Council Tax. Rather it seeks to direct funds where they can be used effectively to deliver change and improvement in Hailsham. Comments about vandalism are noted. The Neighbourhood Plan includes policies in respect of safer places and the need to deliver green infrastructure to contribute towards the quality of the environment and respond to climate change issues. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Historic England	Statutory Consultee	• No comments provided *>> The response does not raise any issues, concerns nor objections. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*

Martin	Resident	• No time to make a comment as the consultation was not advertised sufficiently. *>> Response noted. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Mitchell	Resident	• Supportive of the Plan, Projects and Design Guidelines. • A22 Connectivity, Street Art and High Street pedestrianisation highlighted as important projects for the town. *>> Support for the Neighbourhood Plan noted. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
National Highways	Statutory Consultee	• No objections raised. The Plan will not have an unacceptable impact on the Strategic Road Network. *>> The response does not raise any issues, concerns nor objections. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Natural England	Statutory Consultee	• No specific comments provided on the Plan. *>> The response does not raise any issues, concerns nor objections. The Town Council does not consider that any changes are required to the Neighbourhood Plan.*
Walsingham Planning obo Harvey & Sons	Agent of Landowner	• Response suggests the Plan should identify broad locations for housing outside of Hailsham in locations such as Magham Down (clients site location). • Client supports the Plan and notes there is a need for windfall housing sites to come forward. • Development of Client's site would satisfy housing policies in the Plan. • Notes that the Design Guidelines do not cover Magham Down. *>> Support for the Plan noted. The response seeks to promote a site for development. Appropriate locations for development are established through the emerging Local Plan. The Neighbourhood Plan does not seek to allocate*

		sites but instead puts in place principles to help determine applications. The Town Council does not consider that any changes are required to the Neighbourhood Plan.

Wealden District Council

Comments on the representations made by Wealden District Council at the Regulation 16 stage are attached.

The Examiner has asked the Town Council to comment on points made by the District Council in respect of the length of the Neighbourhood Plan.

It is important to note that there is no set format for a Neighbourhood Plan, with the focus and content of a Plan being for the Qualifying Body (i.e.: The Town Council in this instance) to determine, responding to matters of importance to the local area as raised through the consultation process.

The length is the length. It directly responds to comments raised through consultation and knowledge of the effectiveness of policy in Wealden and how this has (or hasn't) influenced good growth, including how the made Neighbourhood Plan has been used to influence and help determine planning applications. A health check of the existing made Neighbourhood Plan was undertaken before the formal review of the Plan commenced. This identified numerous areas where further detail was required to help make it more effective, including those in respect of matters such as design, housing mix and community facilities. This was submitted as part of pack of material for examination.

The review of the Neighbourhood Plan seeks to capture and respond to local issues and prepare policy around these. It is noted that the Neighbourhood Plan is considerably shorter than the emerging Local Plan and which contains very little (if any) specific policy of relevance to Hailsham. Until such time as this adopted the District Council remains reliant on saved development management policies that date back to 1998. These are out of date and have little relevance to Hailsham as it is today. The NDP fills this gap.

Responses to the comments from Wealden District Council are set out in the appended table. The Town Council notes that:

Many of the comments make reference back to earlier comments provided through the Regulation 14 process. The Town Council considered these carefully and responded to these in full as set out in the Consultation Statement. The Town Council's position has not changed. Responses are set out in the table and cross refer back to the Regulation 14 stage as appropriate.

The District Council has also suggested that some of the policies should be removed from the Neighbourhood Plan and the associated Design Guidelines relied upon

instead. The issue here is that the Design Guidelines are not policy and although the Neighbourhood Plan contains policies that say applicants should 'have regard' to the Guidelines, this is not a requirement. Where matters on design are embedded in policies in the Neighbourhood Plan this is because they are important to the quality of place, the growth and evolution of the town, and where previous developments and permissions have not addressed these concerns. Removing these policies will risk continue existing patterns. To have weight and be effective it is thus important that the design related policies are retained in the Neighbourhood Plan.