ESCC Representation Hellingly Reg 16 Neighbourhood Plan

General comments

Hellingly NP Regulation 16 response

As recommended in the Government’s Planning Practice Guidance on Neighbourhood Planning, you might wish to consider removing the ‘recommendation’ text boxes from the main Neighbourhood Plan document and putting them into an annex or companion document. The recommendation boxes appear to be the same as what are sometimes referred to as ‘aspirations’ or ‘non-statutory aspirational policies’.

We also have concerns that confusion could be caused by having reference numbers/codes which are very similar for both the actual planning Policies and the Recommendation statements. For example, Lower Horsebridge ‘Policy LHB1’ and ‘Recommendation LHB R1’ could easily be confused.

Transport

We would like to re-iterate several of our previous comments from the Regulation 14 consultation.

Policy RP2 Specific Design Criteria (Roebuck Park) and other policies that cover parking

The last bullet point of Policy RP2 sets criteria for parking. In our previous response we advised that all development needs to comply with the County Council’s Guidance for Parking at New Residential Development and Parking Standards Guidance at non-residential Development. Therefore this and any other policies which consider parking issues need to make reference to these documents.

Amendments and deletions to the ‘Roads and Transport –Recommendation’ text box

Our previous advice and the changes we requested under paragraph 1.5 of our Regulation 14 response still stands (for the full extract of this see Appendix 1 below). But the main point is to delete the paragraph below regarding speed restrictions (point ii. from the blue text box on page 56 of the Submission Version –previously page 47 of the Regulation 14 version), due to the fact that this issue was recently reviewed by ESCC and the Police as part of our Speed Management Programme. It was agreed that the speed limits on this part of the A267 were considered to be the most appropriate for the characteristics of the road, however some signing and lining improvements are being considered, subject to when funding is available.
Paragraph to be **deleted** from ‘Roads and Transport – Recommendations’ on page 56 of Regulation 16 Submission Version:

   ii) To extend speed restrictions (40mph) along on the A267 to include the length between the Wellshurst Golf Club and its junction with North Street at the Village Hall and to consider the introduction of speed restrictions on developed sections of the presently unrestricted C207.

See Appendix 2 below for an extract of the full version of the ‘Roads and Transport – Recommendations’ blue text box from the Regulation 16 version of the plan.

**Flood Risk and Drainage**

Policy HDNP 4 (i)

At the previous consultation stage we had stated that HDNP4 (i) “was not unacceptable” although it did nothing to add local distinctiveness and partially reiterated the NPPF.

Given that this policy identifies only one or two aspects of the necessary work that the NPPF, the Lead Local Flood Authority and the Pevensey & Cuckmere Water Level Management Board would require of developers, it is not clear what added value the policy brings.

**Education**

For information, we would like to provide further clarification on a number of points relating to the provision of school places in the area.

Development of a new primary school on land east of Park Road is well under way, with the first intake of reception children due to start in September 2019. The new school, which will be run by Hailsham Community College Academy Trust as part of an all-through school, will have capacity for 420 primary children aged 4-11. Should further primary school provision be required in the wider Hailsham area to serve new housing developments during the Wealden Local Plan period, this will be brought forward at the appropriate time.

Additional secondary school places are likely to be needed in the Hailsham area during the Local Plan period. Additional capacity will be created as required to serve the expected increase in demand for places. With regard to post-16 provision, local authorities have responsibilities to support young people into education or training, but it is the Education and Skills Funding Agency (ESFA) which commissions and funds education and training for young people aged 16 to 19 years (and those aged 20 to 24 years with an Education, Health and Care Plan). The Local Authority
receives no capital funding for post-16 provision. Should additional post-16 provision be required in the future it would be the responsibility of the ESFA to ensure this is provided. Development contributions secured for additional post-16 places in Hailsham would be used towards the expansion of provision should this be necessary.

**Ecology**

Regarding our previous comments relating to Policy HNDP3, we note that the Local Green Spaces are still not shown on the Proposals Map. We would therefore like to reiterate the need to address this point.

**Historic Environment**

It is encouraging the plan assesses the potential for a local list and puts forward a number of historic buildings.

However it is very disappointing that the plan has not taken on board our Regulation 14 comments regarding the lack of archaeological information within the plan and regarding the assessment of risk that should be adopted in relation to new development within the parish.
Appendix 1

Extract from previous ESCC consultation response (Regulation 14)

Roads and Transport - Recommendation

1.5 In this context the County Council is unable to support Recommendations: Roads and Transport (in Section 3 – Infrastructure) and part (ii) of this recommendation needs to be removed. The issue has recently been reviewed by the County Council and the Police, as part of our Speed Management Programme. It was agreed that the speed limits on this part of the A267 were considered to be the most appropriate for the characteristics of the road, however some signing and lining improvements are being considered, subject to when funding is available. Therefore, the following are suggested changes to the Recommendation.

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<tr>
<th>Roads and Transport - Recommendations</th>
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<td><strong>i) Explore the options within</strong> Provide a comprehensive road design for the area west of the Cuckoo Trail and North of the A271 to provide suitable and safe access to and egress from the present and proposed developments using Park Road and the A271. Such design to discourage and reduce use of Station Road by through traffic and improving traffic calming through Hellingly Village. <strong>This will be considered as part of the Movement and Access Strategy Hailsham and Hellingly 2 (MASHH2) and the A271 Corridor Study.</strong></td>
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<td><strong>ii) To extend speed restrictions (40mph) along the length of the A267 from the Boship roundabout to Welshurst Golf Club and on the entire length of presently unrestricted C207 (Grove Hill – North Corner – Horebeech Lane from Mill Lane to Horam).</strong></td>
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**Appendix 2**

*Extract from page 56 of Hellingly NP Submission Version*

**Roads and Transport – Recommendations**

**That East Sussex County Council as Highways Authority be asked to**

i) **To work in partnership with Wealden District Council and Hellingly Parish Council through existing and proposed work programmes to explore options and bring forward proposals for a comprehensive traffic movement and access plan in the area west of the Cuckoo Trail and north of the A271, particularly the local road network in and around Hellingly, having regard to the needs of pedestrians and cyclists and the protection of residential amenities and heritage assets.**

ii) **To extend speed restrictions (40mph) along on the A267 to include the length between the Wellshurst Golf Club and its junction with North Street at the Village Hall and to consider the introduction of speed restrictions on developed sections of the presently unrestricted C207.**

iii) **To consider imposing a speed limit of 30mph for Park Road as adjoining land is developed.**

iv) **To review opportunities for delivering improved cycling and walking infrastructure within the area of the Neighbourhood Development Plan.**