

2017.05.10

Hailsham Neighbourhood Plan

Response to Town Council comments on initial draft policies

(responses shown in red text)

DRAFT GROWTH AREAS POLICY

I support the principle of including a policy of this nature given the amount and impact of development previous, now planned and likely to be promoted in the future. A clear overall message of what is expected of development to deliver in terms of “place making” is overdue. Reference to best practice and a specific standard is helpful and also the wording to date makes clear that draft schemes will be assessed and that applicants are expected to present and demonstrate their own assessments.

Noted.

Without knowing the sites to which this policy would apply and the relationship between them it is difficult to comment on the detail but the policy needs to be future proofed to take account of any number of sites that may emerge over time of the Plan. Not all of these will have a logic relationship to one another in location terms and therefore need to ensure policy will apply to individual dispersed sites when necessary.

Noted: We have been reviewing the latest version of the draft Wealden Local Plan and have questions for the Council with regard to the clustering of sites and how they relate to each other. We agree that greater clarity is required as to the sites / broad areas of sites being discussed and will break this down within the next iteration of the policies / emerging neighbourhood plan.

Also I think it should not all be about housing and therefore some adjustment to ensure economic aspects of sustainable development needs to be included as well as the social dimensions.

Noted: the policies in the draft Wealden Local Plan include reference to other supporting uses and facilities which will be reflected in the neighbourhood plan to help shape and deliver comprehensive and sustainable development.

Need to be clear as to what scale/use of development would engage the policy.

These policies apply to the strategic growth areas / sites identified within the draft Wealden Local Plan. This will be clarified in the text / graphics of the emerging neighbourhood plan.

DRAFT TOWN CENTRE POLICY

I support the principles and aspirations that the draft emerging policy is seeking to deliver.

Noted.

Again need to be clear as to what scale/use of development would engage the policy.

We suggest that any change / development that comes forward in the town centre should contribute to the objectives and emerging concept for the town centre.

There is a lot going on in the extent of wording covering various aspects. All are important but I wonder if the policy needs to be broken down into a number of separate but linked policies.

Noted and agreed. To be reflected in next iteration / emerging neighbourhood plan.

The supporting text to the policies will be key in the messages intended but I suggest that policy wording itself needs to be clear about what is key for certain scales and types of development. May be a first section of policy that addresses big issues of place making followed by other policies that address more specific scales and or types uses, or locations (parts of TC) and criteria to be met re transport, green space etc

Noted and agreed. We suggest that in terms of the structure of the neighbourhood plan, a section on overarching issues / sustainable development / the placemaking agenda is included after the vision and objectives, and which apply to all following sections.

We full support town centre car parking but additional is required we cannot sacrifice current spaces.

The draft Wealden Local Plan suggests that there should be no reduction in overall spaces and that, as new development comes forward, additional parking will be required proportionate with the scale of development. It does though suggest that parking provision should be rationalised, potentially minimising land take and providing parking in more suitable locations.

We have asked Wealden to provide any evidence they have on parking utilisation in the town centre and, if parking is to be rationalised, whether they have any work to suggest what the suitable locations for re-providing parking might be.

A key challenge for the neighbourhood plan is to balance parking with wider principles for sustainable development. If walking, cycling and public transport are to be promoted as attractive modes then space needs to be reprioritised in some places to provide people with this choice.

Subject to any evidence to be provided by Wealden, we would suggest investigating parking provision in the town centre to better understand:

- How parking is used at different times of the day / week.
- How important businesses perceive parking to be.
- How visitors access the town centre and by what modes.

- Where people are driving from the access parking and is it provided in the right place.
- If improvements were made to other modes of transport, would these be used instead.

Answers to these questions (which could be undertaken by the transport sub-group using existing survey templates, such as those prepared by Sustrans etc) would then help inform a strategy for parking in the town centre and also influence improvements to the overall retail and visitor experience.

Multi story was not supported at south road because of view and location.

Noted and agree - this is an important gateway location to the town centre which could benefit from improvements to the highway network.

Consider locating at back of WDC as its most of there staff that take long term parking spaces

Noted, particularly given the landscape and potential for using this to create additional parking layers. This would need to be undertaken sensitively given views into (and out of) the town centre at this point.

Uterlise the 999 in Victoria Road as mix of parking .retail and housing

This is identified as a site for housing in the draft Local Plan. We agree that a mix of uses should be provided in this town centre location (and on all town centre development opportunities).

Where parking is to be provided (particularly multi-storey) the plot needs to be of a certain size to allow for access, turning and circulation (including provision of ramps). Consideration also needs to be given to the street front, particularly at ground floor. Active frontages, with 'eyes on the street' will help create more attractive and vital places. This can be achieved by 'wrapping' the car park with development. This then further emphasises the need for sufficient plot sizes to accommodate a mixed parking and development scheme.

also the Town Councils land on diplocks uterlised for the community in multi story as hidden by trees and a park and ride could operate into town .

Park and Ride provision would need to go hand in hand with restrictions on parking within the town centre and associated measures that provide for bus priority. The viability of any Park and Ride would need exploring with the County Council.

Current car parking must not be lost .need more mum and baby spaces and wider disability spaces for motorised hoists from backs of cars and cars with sliding doors .

Noted: See previous comments about the need for a wider parking study.

Tighter requirements in written policy of mix Neptunes a good example of best practice. Need to look pleasing to the eye .incorporate living roofs and greenery .

Noted.

We felt this no 6 was a bit obscure needed further clarity A clear marketing strategy required and visual i.e. electronic board and disability friendly .

Agree that a marketing and place branding strategy should be pursued alongside the neighbourhood plan.

Support the clean up of backs of shop by creativity of living walls .Art and textile finish i.e. reflective panels .

Noted. Also, the exposed backs of properties could also be enclosed with new development creating new active street frontages.

Full support but with a clear targeting of list below in public realm it requires the basics first (ie Cleaner streets)

Noted. A neighbourhood CIL priority (Projects) list needs to be agreed with you (and the wider community – this could form one of the questions at the next round of consultation).

A tight policy on the local vernacular.

Noted. This will be informed by the emerging character area assessment

We felt should be a linkage policy joining up high street and St Mary's walk and carriers path.

Noted.

Separate policy on access and disability and installation of a changing places to reflect our aging residents and current need .

Noted.

A clear policy of prioritizing the CIL monies and to gauge residents views on projects we will provide .visualization is required to show what we can invest in .

Noted. See previous comments. Good practice examples can be used within consultation material and the emerging neighbourhood plan to illustrate 'the art of the possible'.

Support the use of redundant and brownfield sites incorporating a wide mix of housing types, e.g., Neptunes in North Street.

Noted.

Require a policy for additional car parking over and above existing provision which must be protected. Encourage construction of a multi-storey carpark by Wealden District Council offices and reuse the current 999 area for a complex of 2 level parking, and accommodation and retail.

See comments above.

Town Council to use land in Diplocks Way for car multi-storey parking to ease congestion.

See comments above.

DRAFT INFILL / DESIGN / CHARACTER AREA POLICY

Suggest needs to say something re uses, if only to confirm that regardless of uses involved expected deliver / meet criteria and requirements.

Noted.

Maybe need to say something to put across that all development of any scale/type is expected to make positive contribution to objectives (physical/social/economic) for the TC. These objectives need to be clear in the Plan.

Noted.

We support the ethos of infill but if its a new build we need something that is aesthetically pleasing and promotes advances in design. The new architecture should incorporate sustainable construction such as green roofs, solar panels, etc. while respecting the character of the current setting. The new architecture should not be a pastiche of bygone eras.

Noted. Character Assessment to help identify local characteristics and positive elements to help inform design approach for development.

We support a mix of retail premises and residential accommodation that meet the needs of our local people taking into account the age profile of residents. Mews cottages, bungalows, first-floor flats within the high street or on new commercial sites.

Noted. New housing in the town centre is likely to take the form of flats or duplexes above ground floor level. Adaptable, flexible and step-free housing types could perhaps be explored across the town, allowing for people to change and modify their property over time without the need to move.

Require a revised car parking standards policy to reflect cars per household plus visitor parking.

We will review what the emerging Local Plan says about car parking. However, parking problems in housing areas are often caused by parking not being provided in the right place, and so it is not used in the way it is intended. Commentary and guidance can be provided in the neighbourhood plan around this, with reference to studies and research undertaken elsewhere. Identifying what works well and what does not work well across the town could be a great way of illustrating this and building an evidence base.

Increase the width of roads and include separate cycle lanes that link all areas.

Agree that cycle infrastructure needs provision. This can be achieved through a variety of ways, including provision of segregated lanes, safe junction designs and the slowing of traffic, which could involve narrowing road space for vehicles.

Provide easy and adequate access for emergency and services vehicles, e.g., dustmen. Parking standards must reflect the size of modern cars, e.g., vans and 4x4 cars. A minimum standard of 2.5 m wide by 5 m length should be promoted.

Noted.

TOWN WIDE POLICIES

Cuckoo trail / green infrastructure:

Agree with intentions/suggestions.

Noted.

Suggest need to consider designation of Local Green Spaces (as defined by NPPF) as part of NP.

We previously circulated a pro forma for the Town Council to identify suitable green spaces within Hailsham that might warrant such a designation. If these pro formas can be completed and returned we can then review and insert an appropriate policy around this.

Public transport:

Need to be clear on what covered by “public transport”

Essentially buses, plus the potential ‘express’ route to Polegate (the form of which is not yet known).

By its nature this is about infrastructure provision and so need to be clear what wanting, ie financial contributions?? Is that from all scales/types/uses of development or only certain defined??

Noted. See previous comments about the use of CIL and identifying a CIL spending list/priority list. All development in the strategic growth areas should incorporate bus provision and improvements to the quality of services (and facilities)

Supporting electric cars and hybrid motors with charging facilities in existing car parks.

Noted.

Access to local bus routes with shelters and seating in all-new housing development. Learn from existing housing areas that have no transport. Enhance existing estates by providing further transport and parking facilities. Provide multi-purpose transport systems and parking uses and incorporate public access routes.

Noted. This should form an important sphere in relation to comprehensive development of the strategic sites and wider movement network. It is clear that recent development around the town has failed to do this.

All additional roads to have cycle lanes linked to the Cuckoo Trail with facilities, e.g., Cafes, Toilets, Bike Racks, Bike hire, etc.

Noted. We have identified existing cycle network. Further work to be undertaken to identify potential connections and junction improvements.

A park and ride service is required with small electric buses providing travel into the town centre.

See previous comments in regard to Park and Ride.

Provide cohesive links to all main bus routes.

Noted.

Encourage and support social mobility and access to employment.

Noted.

Encourage utilisation of under-used Council land to facilitate traffic improvements.

Noted. Could you indicate which junctions / locations this refers to? Were the junctions mostly those previously identified for the Vision and Objectives consultation event?

Community facilities:

Possible policy element to protect / safeguard specific named facilities or more general type of facilities unless exceptionally justified, or criteria to be met ie replaced in kind, demonstrate no longer a need etc.

Pro formas were previously circulated asking the group to identify community facilities, how well they were used, what for, and what condition they were in.

If these can be completed and returned we can incorporate commentary in the neighbourhood plan.

Employment:

Possible policy element to protect / safeguard specific uses / floorspace or in specific locations (named estates etc) unless exceptionally justified, or criteria to be met ie replaced in kind, demonstrate no longer a need etc.

Certain types or sizes of premises encouraged ie starter units etc.

Both comments noted. We have asked Wealden for a copy of the supporting evidence documents for the Local Plan, of which an up-to-date employment land study should be part of. The previous version is dated 2008: we need to be careful how much is read into this given economic changes that have taken place in the intervening period.

Heritage and Design

I have looked at the parts of the Draft Local Plan proposals concerning Conservation Areas and Historic heritage buildings etc (Policies HE 1 and HE 2) and am quite pleased that they say that all development within these areas should enhance and continue the built form as it is. They also say that demolition or changes to these buildings will only be allowed in extreme circumstances and after meeting strict criteria, all of which are very positive things.

Noted. We too have reviewed the heritage policies. We should be careful not to duplicate these policies in the Neighbourhood Plan.

I am still trying to get an accurate map of Wealden's new proposed Hailsham Conservation Area.

Noted. The adopted 2017 boundary map can be found here:
http://www.wealden.gov.uk/Wealden/Planning_and_Building_Control/Listed_Buildings_And_Conservation_Areas/Conservation_Areas/Planning_Conservation_Areas.aspx

Environmental Policies

The development proposals for the margins of the Pevensey Levels has been one of the significant areas with which I have been involved, leading the community and neighbourhood response to the potential plans.

Noted.

There has been extensive action by Hailsham as both a Town and as individuals in objection to any form of planning. The decision might have been deferred because of NO2 issues

(Ashdown), but with objections from the Environmental Agency, the CPRE, Southern Water, Highways, Hailsham TC (unanimous from Planning Committee) and various water agencies as well as the petition (800 strong) and letters the plan looks set to be on hold. This is not good enough, and we are asking that the development edge be redrawn or this area excluded.

Therefore I feel, with the documented support, that any reference to the Pevensey levels should emphasise the extent of the opposition and the policy should be rephrased to object to any potential development on the margins.

The neighbourhood plan reflects the strategic growth areas allocated within the emerging Wealden Local Plan. We have asked Wealden for copies of all masterplans prepared and submitted to the Council for consideration through their call for sites process and how that has informed the identification of the growth areas.

Receipt of these will enable us to consider how groupings or clusters of sites can come together to help deliver comprehensive development. A key part of this is considering the relationship to the surrounding landscape and the Pevensey Levels, including any 'buffering' and or lower density development towards the edge of the growth areas, and integration of green spaces, SUDS and Swales etc.

We have indicated this in the emerging plans we have prepared and will look to strengthen once further information has been received from Wealden.

WDC have yet to produce any consultation documents on biodiversity, green infrastructure, green planning or development, provision of space.

We have also asked for copies of these documents but have not received them.