



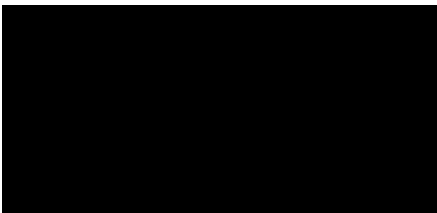
Lorna Ford
Chief Executive

Town Hall
Bexhill-on-Sea
East Sussex TN39 3JX

7th November 2023

Ninfield Submission Neighbourhood Plan

Attached are Rother District Council's representations as a response to the Submission Version of the Ninfield Parish Council Neighbourhood Development Plan. The representation is comprised of general comments on the overall content, previously made at Regulation 14, and a more detailed response on Policy N6 - Areas of Locally Valued Landscape.



[Redacted Signature]

Director of Place and Climate Change

Ninfield Neighbourhood Plan 2020-2039
Submission Version
Regulation 16 Comments of Rother District Council

Rother District Council reiterates its representations for the Regulation 14 consultation (attached). Further to this we would like to comment on the following policy:

Policy N6 - Areas of Locally Valued Landscape

The policy highlights the character of the Moorhall Stream Valley and Catsfield/Watermill Stream Valley as being valued landscapes. The third paragraph sets out that '*public views over the landscape... will be safeguarded from detracting by obtrusive or incongruous development.*' Both areas sit close to the Rother district boundary and therefore these public views over the landscape could affect development proposals within Rother District. We would like to highlight that if the policy is 'made' in the neighbourhood plan, RDC will need to take the policy into account in considering relevant planning applications that could affect views into and from these landscape areas. RDC request clarification on the potential implications of this policy on development proposals in the Rother district, including any need for additional consultation with Wealden District Council/ Ninfield Parish Council on relevant planning applications, and the extent of area affected by any additional consultation requirements.

Ninfield Neighbourhood Plan 2020-2039
Pre-Submission Consultation Version
Regulation 14 Comments of Rother District Council

Overview

As a neighbouring District Council, we would like to congratulate you on the production of a valid and relevant draft Plan which clearly represents the values and aspirations of the local community whilst also addressing substantial issues that extend much further than the village i.e. climate change and the biodiversity emergency. We are particularly pleased to read that all policies in the Plan are written with climate change and carbon reduction in mind and the Parish Council should be commended for taking this forward-thinking approach. The Plan is well-produced, user-friendly and the use of parish photos and maps throughout gives context to the supporting text and policies.

Generally, the encouragement and enhancement of natural capital in the parish will have a positive impact on the neighbouring parishes including the Rother settlements of Ashburnham, Catsfield and Bexhill. Clearly, the contrary also applies, therefore we support your positive environmental policies and the benefits they will also bring to Rother District.

We appreciate the acknowledgement that a Neighbourhood Plan exists to complement and enhance policies in the Local Plan when appropriate, which reflects Planning Practice Guidance (PPG) on a neighbourhood plan, paragraph 041: 'It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.' The Ninfield NP reflects this approach and ensures the Plan remains relevant for decision makers.

We support the Community Aspirations section as a non-statutory action plan of community wishes for the parish and appreciate the variety of projects included here including community and transport infrastructure and priorities for CIL.

We have commented below on policies that may impact on the neighbouring Rother settlements of Ashburnham, Catsfield and Bexhill. We recognise that successful local employment and sustainable rural enterprise policies may increase the flow of traffic across the Rother/Wealden boundary but in the absence of previous figures we have not explicitly commented on these.

Neighbourhood Plan Policies

In addition to our comments above, we have the following comments on specific Neighbourhood Plan policies:

N1 Sustainable Location of Development – We support the inclusion of this policy as the eastern side of development boundary is located at the Rother/Wealden district boundary. Some of the text is a little confusing '*(including any enlarged development boundary forming part of any adopted replacement Wealden Local Plan)*', however we are confident that advice on wording will be given by Wealden District Council.

N3- Flood Risk and Drainage – We support the inclusion of this policy as flooding and run-off created by new development in Ninfield may impact on Rother District and on the Pevensey Levels designated habitat. We agree with the approach of taking into account flood risk at all stages in the development process, as we aim to in Rother District, right from the initial design and construction stages despite Ninfield being a low flood-risk area in Flood Zone 1.