

General Points on the Regulation 14 Draft Neighbourhood Plan

Structure

Within the introduction would it be worth setting out why you are not allocating sites and how the decision was reached?

The report is currently structured under chapters as outlined below:

- 7. Climate Change and Sustainability- Sustainable Location, Renewable Energy, Flood Risk
- 8. Environment and Countryside – this only contains the dark night skies policy
- 9. Landscape and Natural Environment- key views, ALVL's
- 10. Local Green Spaces
- 11. Biodiversity
- 12. Development and Design- Built Heritage
- 13. Design of New Development- Design, Housing Mix
- 14. Economy, Infrastructure and Facilities- Communications, Local Employment, Sustainable Rural Enterprise, Infrastructure, Community Facilities
- 15. Transport and Access- Travel, Parking

We wonder whether some of the titles and groupings could work better. For example, chapter 8 is titled Environment and countryside yet only contains the dark skies policy. Could this be moved to the landscape and environment chapter? Local Green Spaces also relates to the landscape and natural environment and could be moved to chapter 9.

Chapters 12 and 13 could be combined to form a heritage and design chapter.

Chapter 14 and 15 could be split up differently between an economy chapter and a transport and infrastructure chapter.

Formatting Issues

Each figure/ map should have a number i.e. figure 1, figure 2.

The numbering of paragraphs is sometimes erratic, for example the first few chapters just use two figures in the numbering e.g. 1.0, 1.1, 1.2, 1.3 etc. but later chapters use a three figure system e.g. 8.0, 8.1, 8.1.1, 8.1.2

NPPF references

NPPF references need to be relevant. Sometimes they refer to paragraphs that don't directly relate to the policy.

WCSLP references

We consider that this should be looked at again as not all relate to the policies in the NP as revised. For example, Policy 1 includes reference to SPO14 which relates to maximising the use of brownfield land which no longer relates to the NP policy.

WLP references

These should be tightened up as sometimes they do not directly relate to the policy e.g. Policy 7 the Local Green Spaces Policy refers to saved policy LR1 which is to do with outdoor play space and doesn't directly relate to Local Green Space. Occasionally there could be other paragraphs which are relevant which have not been included e.g. the Design Policy could include reference to HG6, HG7, and HG10. We consider that a review of these should be undertaken to ensure they are correct to assist the usability of the Plan.

New Local Plan

It will be important to also consider the emerging policies in the Local Plan once published to ensure that the policies within the neighbourhood plan and local plan are aligned. This is something that can be picked up following the publication of the Regulation 18 draft Local Plan in the near future.

Justification for each policy

This needs to include any background document relevant to the policy that provides support/ justification for the policy's inclusion. Sometimes you just list the community questionnaire results when you have other evidence available.

Detailed Comments on Policies and Background Documents

Policy N4 Dark Night Skies

It is worth looking at how other councils have dealt with dark skies policies e.g. Haslemere [here](#) or Benenden [here](#). You could consider changing this policy to a criteria-based policy i.e. development proposals will be supported that/ where....

8.1.2-8.1.4 These paragraphs are quite difficult to understand. It needs to be made clearer what is from another source and what is part of the NP policy. If some of this information is from other sources, it needs to be properly referenced.

Table at 8.1.4-Which part of the parish is in which zone? If the table is what you are recommending applicants follow, then the policy needs to refer to it. You could just cross reference it to save time and avoid repetition. If it is design guidance only, then perhaps it would be better to incorporate it within the design guide?

The zones in the table don't match the map. Where is the map from? Is it from the CPRE website? What is it being used to illustrate? It should be referenced.

On your website you have a document labelled Dark Skies Policy. If this is a background report it should be labelled as such. As with the policy it needs to be

clear where evidence has come from and what exactly you are requiring applicants to do and why.

Policy N5 Key Views.

In Appendix E you have the criteria for the identification of important views. How were these criteria arrived at? i.e. what is the reasoning behind the criteria? How were views nominated? Were there any views that were considered but that did not meet the criteria? What is the threshold for meeting the criteria? Who is carrying out the assessment? See example of Stanton Drew protected views document [here](#) where they use a short table to explain the reasoning behind the criteria.

Until we have the above information it is very difficult for us to comment on each individual view and whether it meets the threshold. Therefore, we are unable to comment on the views at this stage, however, we would be happy to consider this when the information is available, ahead of your Reg. 16.

The mapping is not very clear for a decision maker – Hawkhurst NDP has a clearer map for example - [Hawkhurst NDP](#)

The wording of the policy itself could be more specific. For example, it states 'Development proposals which would have an unacceptable impact on a Key View will not be supported'. What type of impact are you thinking of and what would you like to prevent? The word unacceptable is open to interpretation and you do not define it. Could be reworded to provide clarification e.g. development proposals which would result in an adverse/ negative impact on the landscape character of a Key View as defined in the Ninfield Key Views Assessment will not be supported.

Alternatively, what would be supported – if you are to plan positively? Could the policy be worded positively rather than negatively? i.e. development proposals will be supported where they.....?

'Development proposals should be located and designed to take account of these Views'- what do you mean by take account of? Using them as a positive design feature?

Also, as the policy only relates to development within the parish, but some of the views extend beyond the parish, is it worth making this clear in the policy e.g. development proposals **within the parish** which would have...

Policy N6 Areas of Locally Valued Landscape and Landscape Study

Policy

The proposed Locally Valued Landscape Designation seeks to identify and then protect and enhance 'valued landscapes' of local significance through policy N6. This policy has regard to the NPPF para 174(a). A similar policy has been adopted in the Hellingly NDP.

- 'as identified on the Policies Map' – It would be helpful to clarify the policies map that you are referring to and where this is.
- 'Distinctive character and inherent scenic qualities of the area concerned'- you could add 'as identified in the Landscape Study'.
- 'Shall be harmonious and minimise the effect of development on the landscape' - could change the wording of this slightly to say 'should aim to minimise the impact on the landscape'.

Do you still need to refer to views in the policy when you now have a separate policy on views?

The proposed policy must be supported by appropriate evidence as required by national policy and guidance. It would be helpful if the policy justification therefore includes reference to the landscape study you have carried out.

Landscape Study

It is worth noting that new landscape evidence bases will be published to support the Local Plan in the coming months and it may be prudent to consider these to ensure that both the neighbourhood plan work and the local plan evidence correlate. Ideally the Landscape Study will need to reflect the latest evidence. The Landscape Character Study was published on our website in July 2022. Further work to be published in the coming months will consider landscape sensitivity and capacity for residential and employment growth around settlements, including considering SHELAA sites at a high level.

The NP Landscape Study identifies five local Landscape Character Areas plus the ridge top village itself. The proposed character areas recognise the AONB boundary and the broad location of the Pevensey Levels. Somewhere in the study, perhaps in section 3, you need to justify why the Character Area boundaries have been drawn as they are, as this does not correlate with our studies, previous or most recent study. Your landscape work should be fully justified including reasons for deviating from local plan evidence bases.

The NP Landscape Study sets out clearly that there are distinct differences in the landscape value in the rest of the Parish (outside of the Pevensey Levels and High Weald AONB), with those areas adjacent to the AONB being of more value than the more southern areas of the parish. The policy seeks additional protection for those areas adjacent to the High Weald AONB in the Moorhall Stream Valley and the Watermill Stream Valley as a 'transition zone'.

The Low Plateau to the south of Ninfield and the built up area of the settlement are not identified as a valued landscape in the NP. Of the Low Plateau, the NP Landscape Study concludes (amongst other things) that it has more regular reorganised field, less wooded areas, greater numbers of sporadic houses and more

prominent pylons. The evidence base has set out the reasons for differentiating the landscape value of different areas of the parish at a local level. In seeking to designate LVLDs the Parish Council should consider whether the Watermill Stream Valley /Catsfield valley is of equal value to the Moorhall Stream Valley.

The proposed Locally Valued Landscape Designation (LVLD) boundary does not entirely map onto the local landscape character area boundaries as set out in the supporting Landscape Study but includes the Moorhall Stream Valley, Pevensey Levels and Catsfield / Watermill Stream Valley (except a small area to the south-east of Pipes Wood). The precise boundaries should be reviewed to ensure they are justified as the plan making process develops. For example, the SHELAA site reference 165/3170 has also been included. This site is a larger field on a less pronounced slope and it is worth considering if this falls into the wider characterisation of the Watermill Stream Valley as a heavily wood area, with steep sided valley or smaller irregular ancient field.

Ultimately it will be for the Inspector to determine if the Areas of Valued Landscape are sufficiently justified as such.

Policy N7 Local Green Spaces and Local Green Space Report

It is noted that some of our previous comments have been taken on board in this version of the plan, notably the omission of Combe Wood and 20 Acre Field as proposed Local Green Spaces. However, we would still make the following comments;

No.	Local Green Space	Comments
LG3	Church Wood and	Church Wood- Designated as Ancient Woodland and therefore already has protection through national policy. No additional benefit would be gained from LGS designation
	Church Field and Church Path	<p>The site contributes to the setting of Ninfield and the nearby listed building (the church) and offers wider ranging views across the levels to the South Downs with a PROW network allowing public access. As such, there is an arguable case that the site meets some of the criteria for LGS as set out in para 102(b) of the NPPF.</p> <p>However, the site is also an extensive tract of land and is therefore unlikely to meet the strict definition for a LGS as set out in the NPPF. The site has been refused planning permission for 70 homes under reference (WD/2020/1166/MAJ). National Guidance on LGS note that ‘blanket designation of open countryside adjacent to settlements will not be appropriate’. Part of the justification for the designation appears to be based on the threat of</p>

No.	Local Green Space	Comments
		possible future housing development. It is important LGS designations should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name. There is little to distinguish the adjacent agricultural fields from the proposed LGS and the site reads as part of a wider landscape rather than a particular self-contained site. The boundaries appear to have been drawn with reference to potential housing site boundary rather than an obvious area of particular local significance. For the reasons outlined, it is unlikely to meet the strict definition of LGS in the NPPF.
LG6 a, b and c	Roadside verges	<p>Appears to be designated for their contribution to biodiversity and natural beauty. The sites are not formally designated as wildlife sites. Therefore, they are unlikely to meet the very high bar for LGS designations set out in the NPPF.</p> <p>The Bexhill Road verges LGS includes the access to the Ingrams Farm site within its boundaries which it can't do as this has planning consent.</p>
LG7	Proposed Recreation Area behind Sparke Garden, Manchester Road	<p>Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation.</p> <p>The LGS boundary appears to include the entrance to the proposed development site behind, which it can't do. The boundary could be reduced to not include the access.</p> <p>Noted there is a pp which sets it aside as public space but it will be difficult to demonstrate it is demonstrably special to the local community when it hasn't been developed yet.</p>

Green Space Report

Table 2

If GS27 is not being carried forward it should be included in table 2 with an explanation of why.

Table 3

Some of the original references are incorrect e.g. the allotments, Standard Hill verges (east).

Table 4

You have the allotments listed as an AG as opposed to a LGS.

Policy N9 Built Heritage

The policy itself

The policy actually needs to refer to the assessment of buildings for the non-designated heritage assets list e.g. the buildings as listed in appendix x and shown on map x have been assessed as being non-designated heritage assets.... Or the following are identified as non-designated heritage assets:....

'significance of the area, building or feature concerned'- are we not here talking about the significance of the heritage asset?

Size of Appendix C

'Proposals involving the non-designated heritage assets listed in Appendix 3'- do you mean Appendix C? Appendix C is now quite sizeable (pages 93 to 122). Might it be advisable to move this to a separate document on the identification of non-designated heritage assets, much as you have done for local green spaces, and perhaps just keep a list of designated heritage assets and proposed non-designated heritage assets at Appendix C? It may also be easier if you keep the list of designated heritage assets separate to the non-designated heritage assets as they are not directly related to the process of identifying non-designated heritage assets. Also is a list of Listed Buildings required when you have the same list in the state of the parish report?

Process

More explanation needs to be given of the process involved e.g. how were non-designated assets nominated? Who carried out the assessment of NDHA? Was it an inclusive process? Have owners been consulted? What were the Selection Criteria? Whether any nominated buildings were rejected? This information either needs to be in the Plan or a supplementary document. Clear guidance on the necessary process can be found in Historic England Advice Note 7 Local Heritage Listing: Identifying and Conserving Local Heritage [here](#).

Criteria

As the heritage officer stated in their initial guidance to you, 'the value of a local heritage list is reinforced when its preparation is informed by selection criteria, thereby encouraging a more consistent approach to the identification and management of local heritage assets. The preparation of local heritage lists is a way for communities, neighbourhood plan-making bodies and local planning authorities to identify and celebrate the historic buildings, places and spaces, archaeological sites

and historic parks, gardens and other designed landscapes which enrich and enliven their area’.

The guidance says that it is important that the community develops criteria which respond to the local heritage of their area. The criteria in the NDP does not seem to have been adapted far from the generic guidance. They should be more locally specific than just those listed as the generic criteria in the HE guidance (Asset type, Age, Rarity, Architectural and Artistic Interest, Group Value, Archaeological Interest, Historic Interest, Landmark Status).

The criteria once 'localised' can be used to identify buildings with more community input – in effect, the criteria needs agreeing and then people can nominate buildings/ structures/ areas/ sites etc. for wider community discussion throughout the whole parish.

The quality threshold that needs to be met and the location-specific local criteria need to be publicly available and then this will help to make clear how the significance of the buildings and sites have been judged.

Identification

More critique of the NCAs for the High Weald and Pevensey Levels as refer to Ninfield (as a parish and not just as a village) will help to identify types of NDHAs you should be looking at within your criteria.

The NP is still very Ninfield village centric and more work on the influences on the surrounding parish landscape by man over the centuries would help - i.e. iron making, farmsteads, brick making etc. Only buildings and areas are identified - what about sites of archaeological interest or with local significance/links to specific periods or people?

Justification

The table you have created on page 95 is a start but the list also needs a full explanation of why each asset was chosen/ how it meets the criteria. For example, you might have stated a building meets criteria c for inclusion on the list, aesthetic interest, but you need to explain why. You do have a basic explanation of each building underneath the table but it needs to go further as to why that particular building deserves to be locally listed i.e. a thorough justification. It is important that buildings are selected based on objective robust criteria rather than subjective preferences so that any decisions can be backed up at examination.

The guidance recommends an illustrated list and I can see you have now added photos, but it would be much easier if they form part of the list e.g. Cumnor Parish assessment [here](#). Photos need to show each subject building face on and at a close enough distance to be able to see it clearly.

Over 50 locally listed buildings would appear to be a lot for a parish of Ninfield’s size. Certain features such as for kerbstones cannot be designated non-designated

heritage assets. If they are an important feature, you could consider referring to them under the design guidance.

There needs to be a mechanism for review, revision and updating of the local list.

Given all the above comments we cannot currently agree to the local list as it stands until you have responded to the points above and have provided a thorough justification of why each building you are proposing to put on the list merits inclusion. We will then be able to assess if we are in agreement with the list. This should happen prior to the Regulation 16 consultation.

Village Character Assessment and Heritage

This document needs an introduction explaining at the very least:

- What were the aims of the survey/ its purpose?
- What are the benefits of having one?

The document would benefit from a methodology explaining the process i.e.:

- Who carried it out?
- How were the different areas defined/ identified?
- Resources used
- What elements were considered?

After your analysis of each character area, you could have a section on what information can be drawn out of the assessment and how this feeds into your design guide and policies.

As an example you could look at Ewelme village character assessment [here](#)

Please note any number plates in the document should be obscured. Any photos of people where they are recognisable should be obscured or consent obtained for their use.

Policy N13 Local Employment

- 'Within the Ninfield village development area'. Is this a term for the development boundary?
- There is a specific omission on this policy in that it does not talk to 'new' employment uses within Ninfield Village, rather just the retention of business/commercial land uses. In principle, the Parish Council would support new commercial floorspace within the existing development boundary surely (subject to other policies in the Local Plan), and potentially outside the development boundary in exceptional cases (i.e. as part of an existing commercial/industrial estate)? This is something that would be supported in the Local Plan, subject to other relevant policies.
- In terms of sui generis employment generating uses, is this all we would like to include in the policy (i.e. fuel stations, pubic houses) or should other sui generis employment generating uses also be included (i.e. car sales,

takeaways, car repair garages etc.) or should this be a catch all? You have not specified below the sui generis employment generating uses for sites outside the development boundary?

- 'Outside Ninfield village development area, proposals for expansion' - Is expansion of employment sites what you want to be promoting? The 'intensification' of existing employment site perhaps is the more important wording.
- Is there a requirement to differentiate between inside and outside the development boundary here? Is the criteria for outside the development boundary really needed and is this not covered by other policies in the plan including on landscape, residential amenity, highway safety etc. Would this criteria not equally be applied inside a development boundary?
- Under point (2) it states 'no detrimental effect on any dwellings on the locality'. I think this would be better worded as 'no detrimental harm on the amenity of neighbouring residential dwellings'.
- 'The loss of land and buildings in employment use will not be supported'. This does not confirm the type of employment use that would be retained. At the moment, this reads as all employment uses (i.e. B2, B8, E and Sui Generis). I am not sure sui generis uses should be included in this retention policy in any case and there is limited evidence for this. You can use our evidence for justification of retaining employment uses, given the substantial demand for it in the wider district, but this only relates to light industrial (Use Class E (G)), general industrial (Use Class B2) and Distribution/Warehousing (Use Class B8).
- Under point (5) - is this criteria strictly needed as it is either PD or not?
- The numbering within the policy needs to be looked at, 5 and 6 are different list of criteria to 1-4

State of the Parish Report

A very useful document with some interesting statistics and tables.

Page 59- You have put in brackets that there are 61 Grade II Listed buildings but according to the English Heritage website there are 23.

Sustainability Appraisal

Section 8 needs to show that reasonable alternatives to the proposed / preferred policies in the NP have been considered and assessed against the SA Objectives, not just the final draft policies. This needs to include some type of 'scoring' mechanism (as set out in the SA Scoping Report February 2021) in order to differentiate between alternatives and the chosen draft policy. This does not need to be complicated and could adopt the approach followed in the SA Scoping Report (February 2021) [here](#)

You could also refer to the SA's done by Hailsham, Hellingly and Herstmonceux as these are good examples. These can be found on our Neighbourhood Planning page.

Any analysis need only be proportionate to the policy area and give enough detail to explain the choices made.

Policy N4- Protect and enhance dark skies

Development should not adversely impact the Dark Night Skies of the Parish and must avoid light pollution by careful design, location and mitigation measures where lighting is necessary for health and safety reasons. Security, outside lighting and floodlighting should be designed to be deflected downwards and incorporate control mechanisms to dim or switch off external lighting schemes when not required. All development proposals should adhere to the guidance on lighting provided in the Institute of Lighting Professionals (ILP) Guidance Note GN01: The Reduction of Obtrusive Light (and any subsequent revisions).

[illegible]

Option A: To have a policy that sets out the criteria for the protection of dark skies
Option B: To not have a policy and rely on the National Planning Policy Framework regarding advice on Dark Skies and request that Wealden District Council assess Dark Skies in the emerging Wealden Local Plan

Option A is....[set out the assessment findings and justification for taking forward]

Preferred / Chosen Policy Option: A

Specific Points in Main Plan Document

Para/Policy Reference	Comment	Suggested change/recommendation
Contents page	Is currently 5 pages long and could be more succinct. Could have a separate list of figures/maps underneath. Policies are already in a separate list, no need to be in contents as well. Could add a page number to the list of policies for ease of reference. Overall, consider usability of the document.	Just list the chapter headings and perhaps subheadings. Could make the chapter headings stand out more by using colour or bold type.
Page 5	Strategic Environment Assessment	Strategic Environmental Assessment
	There are other acronyms you use that could be listed here e.g. SDNP	Consider extending list and putting in alphabetical order.
Page 6	'Pevensey Levels RAMSAR site' The Pevensey Levels has other designations as well as being a Ramsar site.	Pevensey Levels Ramsar Site, Special Area of Conservation, Site of Special Scientific Interest
	'And parish mentioned'	And the parish is mentioned
	'The National Planning Policy Framework, however, introduced a requirement for a 5-year supply of housebuilding land with planning permission which Wealden District could not meet. Combined with much higher housing targets, the housing policies of the Core Strategy and Local Plan are out-of-date'.	Suggest re-wording- The National Planning Policy Framework (NPPF) (July, 2021) at paragraph 74 confirms that there is requirement for Wealden District Council to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. At the time of writing, the statutory development plan for Wealden District Council is considered out of date (over 5 years old) and therefore, the Council's Five Year Housing Land Supply position is considered against 'local housing need', which is far higher (1,212 dwellings per annum (dpa)) than the previous housing target in Wealden District Council Core Strategy (February, 2013) of 450 dpa. This has resulted in Wealden District

Para/Policy Reference	Comment	Suggested change/recommendation
		Council not being able to meet its Housing Delivery Test (HDT) measurement in recent years (it was 82% in 2021)
Page 7	‘Rother- Hastings area’	Hastings and Rother Housing Market Area
	‘1% of the District’s housebuilding need of 1,225 dwellings per annum’	The current need based on the standard methodology is 1,212 dpa (it changes each year)
Page 8- Vision	The two versions of the Vision in the Plan are currently slightly different ‘cherished countryside and its diversity’ differs from the wording of the vision later in the document which states ‘cherished countryside and its biodiversity’	Make sure both versions of the vision are the same
Page 10	Inclusion of map of designated area in text.	Consider removing from page 10 as it is already included in Appendix A
Page 11	‘This arises from para 11d and its footnote’	This arises from para 11d and its footnote 8
Page 15- section 3	Numbering of paragraphs needs to be looked at as is not consistent	
Page 25- Policy N1 Sustainable Location of Development	<p>‘minimise loss of countryside its biodiversity’.</p> <p>This last part of the sentence does not currently make sense and I am not sure the term ‘biodiversity’ is required in this planning policy as written.</p>	Consider amending.
	‘Development outside this boundary will in principle only be supported if it needs a countryside location in terms of meeting the policy requirements of the NPPF and the adopted Wealden Development Plan documents and it accords with the relevant policies of this Neighbourhood Plan’	<p>Need to justify what development is in principle acceptable outside development boundaries. This could be done by listing each circumstance or referring specifically to which part of NPPF and WLP it is in.</p> <p>There is a list at paragraph 80 of the NPPF for rural housing (that includes some options for this, i.e. the development would involve the subdivision of an existing residential building) and some paragraphs of the</p>

Para/Policy Reference	Comment	Suggested change/recommendation
	The question would be what defines 'it requires a countryside location', as this may unduly restrict sustainable development in such rural locations. What development are we actually looking to restrict?	NPPF that deal with rural economic development (paragraphs 84 and 85 of the NPPF) that provides examples as to what to include. There may be others to consider. I am not sure you can rely on the NPPF (that may be replaced in any case) for this.
	Introduction and Justification Both the introduction and justification to this planning policy includes commentary on 'brownfield' and 'greenfield' land, but this is no longer included within the policy following my comments on the earlier draft.	Consequently, this will need to be reviewed as you can get both brownfield and greenfield sites either inside or outside the development boundary in any case.
Page 26 Policy N2 Renewable Energy	'Small-scale energy production schemes'.	Small-scale renewable energy production schemes
Page 28 Policy N3 Flood Risk and Drainage	'Major developments shall include details of proposed maintenance arrangements to ensure an acceptable standard of operation for the lifetime of the development'.	Consider removing, if we require these details, they will be requested by validation team or via condition or S106 agreement. If you still wish to reference such a requirement, you could consider changing the policy emphasis to putting the onus on the applicant to demonstrate how maintenance arrangements can ensure an acceptable standard of operation for the lifetime of the development. This is the approach Examiners have taken elsewhere.
	Justification	This needs further explanation. It refers to a climate emergency but not to flooding.
Page 29/30 Policy N4 Dark Night Skies		See separate comments above on this policy

Para/Policy Reference	Comment	Suggested change/recommendation
Page 31	Special Conservation Area	Special Area of Conservation
Pages 33-36	Landscape Character Areas section. This is repeating what is in the Design Guide and the Landscape Study	This could be moved out of the main plan to help make the plan more succinct and reference made to the other documents, leaving the section on views which relates to the next policy.
Page 38 Policy N5 Key Views. (New policy- views separated out from ALVL's policy)	'identifies Key Views as shown on the Policies Maps'	And at 9.7.2? Where are the policies maps referred to? See separate paragraph with comments on this policy above
	justification	This could be expanded further to refer to the work in appendix E
Page 38-39	Landscape Policy context Section. This is repeated within the Design Guide.	Consider removing from Plan document to avoid duplication and make more succinct. Perhaps just keep in the end part re the hierarchy of landscape areas.
Page 40	Map	It would be useful to annotate this plan to show which valley is which.
Page 43 Policy N6 Areas of Locally Valued Landscape		See separate comments on AVL's above
Page 45	List of proposed LGS	Would help if these were numbered e.g. LG01, LG02 to correspond with numbering on map.
Page 48 Policy N7 Local Green Spaces		See separate comments on LGS designations above.
		What policies map and where? If the verges are now all one designation it would make sense to put them together as one bullet point
	'Development requiring planning permission will not be permitted'. The policy does not currently make clear	Will not be permitted within the Local Green Spaces

Para/Policy Reference	Comment	Suggested change/recommendation
	where development will not be permitted.	
	'in line with national policy' What does this mean, do you mean the NPPF policy for greenbelts? Or do not all of these criteria apply?	The policy needs to be more specific.
	Justification refers to views, which are not listed in NPPF as a reason for designation.	Justification needs to be reworded
Page 48- 51	Within the supporting text it would be beneficial to explain what green and blue infrastructure is	
Page 51 Policy N8 Biodiversity (Green and Blue Infrastructure)	You could use the phrase 'where possible' in some parts	i.e. It should retain and enhance existing green and blue infrastructure (GBI) corridors, including watercourses of all sizes, ponds and wildlife features, with restoration of lost natural features such as historic hedgelines, wherever possible .
	'Developments larger than this shall provide a measurable net increase of at least 10% in the biodiversity value of the on-site habitat from its pre-development condition to its condition on completion of the development as calculated using Natural England's Biodiversity Metric 3 (or any updated Metric)' Consider re-wording this part of the paragraph	Developments larger than this shall provide a measurable net gain in biodiversity of at least 10% from the pre-development biodiversity value of the site and use Natural England's Biodiversity Metric 3.0 (or any subsequent Metric) to calculate losses and gains. This gain should be delivered onsite as a priority and offsite provision will only be considered where opportunities for onsite provision have been exhausted.
Page 54-56	Built Character Areas. Large parts of this text can be found in the Design Guide and/or Character Assessment.	Consider removing from the NP document with a link to the other documents to make the plan more succinct.
	Within some of these character areas you have some proposed suggestions for what should be allowed/supported in each character area in bold italics	Consider moving these to the guidelines within the design guide, with appropriate justification.

Para/Policy Reference	Comment	Suggested change/recommendation
Page 59	‘Little or no account has been taken of them in the past resulting in harm to their setting or even their destruction’ This is a very sweeping statement	Consider rewording
Para 12.2.10	Part of this paragraph is out of order.	Rewrite in the correct order
Para 12.2.13	There is some repetition in this paragraph with the previous paragraph	Rewrite to avoid repetition
Page 61 Policy N9 Built Heritage		See separate comments on this policy above.
Page 64 Policy N10 Design	(a)‘It respects the character of the High Weald landscape and is locally distinctive in respect of Ninfield’s landscape features’ It is difficult to know what you are trying to achieve with this part of the policy. Also views are now covered by their own separate policy	Consider rewording
	‘Account shall be taken of public views’ need to be careful with the wording of this as the public/ householders do not have the right to a view in planning terms.	Consider rewording
	(b) currently includes a number of different points/ subjects e.g. locally distinctive, sustainability, appropriate to its setting	Consider moving sustainability to a separate point
	(c)Ensuring soft transitional edge is applicable to almost the entirety of all rural settlement as it transitioning from the built form to the countryside with ‘soft edges’ is quintessential. Why pick out these specific areas?	Needs justification
	(e)not strictly necessary.	

Para/Policy Reference	Comment	Suggested change/recommendation
	This policy gives little scope for contemporary architecture	
Page 65	‘There is housebuilding land already committed in Ninfield Parish to last until 2040 based on a simple ‘pro-rata’ apportionment of the ‘standard methodology’ figures’.	We have to think of the district as a whole and consider other constraints in the settlements. The growth strategy in the Local Plan is determined by a number of factors e.g. sustainability, AONB, Ashdown Forest, Flood Risk, infrastructure etc. as well as land availability. Some settlements have very limited opportunities for growth. Growth will not be evenly spread across the district or distributed to parishes on a proportionate basis.
	1,225 dpa	The current housing need figure is 1,212 dpa.
	‘a Regulation 18 Direction of Travel consultation’	Regulation 18
Page 67	‘It was a cornerstone of planning policy in this country from its inception in 1947 that the countryside should be protected for its own sake’	This needs clarification, what specifically are you talking about? Is there a better way of explaining what you mean? There is a presumption against development in certain circumstances e.g. in greenbelt, but not all development.
Page 68	‘Therefore, new housing in the countryside is typically regarded as unsustainable development’	This is not always the case
Page 70 Policy 11 Housing Mix and Space Standards	I see that the comments from previous plan have in part been followed.	<p>I would state that if Ninfield wishes to proceed with the housing mix policy, it would be helpful to have a table to follow the exact housing mix reported in the LHNA rather than combine totals for either smaller or larger dwellings. It will be more helpful to be clear on the exact % the Parish Council would require from new housing development.</p> <p>Flexibility (for applicants) is still an issue for this policy and we would need to outline potential reasons why this housing mix (in the LHNA) could not be met by applicants (i.e. site characteristics, topography, character of the area etc.)</p>

Para/Policy Reference	Comment	Suggested change/recommendation
	<p>‘All new residential development should meet the Government nationally described space standards’.</p> <p>Apologies if this was missed last time, but I am not sure we can use the term ‘should meet’ as there is no evidence on this for Ninfield Parish in terms of either viability, or examples of schemes that have not met the nationally described space standards in the Parish</p>	I think the terminology above should be used instead (i.e. support). The Council is working on a policy of this nature in its emerging Local Plan so rest assured, this evidence will be gathered on a district basis.
	Justification	Should include reference to the housing mix in the LHNA, as well as the Ninfield’s own survey work.
Page 76 Policy N13 Local Employment		See separate comments on this policy above
Page 76	The supporting text needs further work.	Needs supporting text to include examples of what is a sustainable rural enterprise.
Page 78 Policy N14 Sustainable Rural Enterprise	<p>‘contained within suitably located buildings which are appropriate for conversion’</p> <p>Which are suitable for conversion? Does that mean you only want converted existing buildings or any new buildings built should be suitable for conversion in the future. Neither is acceptable really.</p> <p>Does this mean that all rural diversification schemes should first consider the reuse of existing agricultural buildings that are capable of conversion. What is a suitably located building?</p>	The wording of this policy needs to be looked at again.

Para/Policy Reference	Comment	Suggested change/recommendation
	<p>What do we mean by capable of conversion, as almost all buildings are capable of conversion subject to cost/viability? Should this specify somewhere what should be included?</p>	
	<p>'In exceptional cases, new buildings or other development in the rural area may be acceptable'</p> <p>If there is a genuine rural enterprise new build development can just be acceptable, not just in exceptional cases – not aware of any local or national policy that would justify otherwise. The appropriateness of its size and location can easily be controlled by other policies.</p>	<p>Perhaps a less heavy handed reference in this policy to something 'appropriate' subject to other policies is all that's needed</p> <p>'exceptional circumstances' are not needed in all cases (which is insinuated here) and the NPPF does not prevent rural commercial activity in this way. As suggested, the scale of development may be different dependant on the existing employment use in the countryside (that could be small or large) and can be controlled by other planning policies.</p>
	<p>N14(a) – 'In exceptional cases, new buildings or other development in the rural area may be acceptable if it is small scale and in keeping with the rural character including biodiversity and landscape'.</p>	<p>I am not sure this end part makes sense and suggest that you just use the term 'rural character of the area and supports sustainable economic growth towards balanced living and working communities'. The other issues with regards to landscape and biodiversity should be covered by other policies in the Plan.</p>
	<p>As noted previously, Policy N13 safeguards employment uses within Ninfield Parish. I am not sure that anything is needed in the same way for agricultural/rural buildings and enterprises. Why should we seek to safeguard rural enterprises, particularly when we are safeguarding retail/employment uses in the other policy in any case.</p>	<p>In short, I think this policy, if brought forward, should concentrate on rural diversification only and ensure that the criteria laid out is appropriate, as is identified above.</p>

Para/Policy Reference	Comment	Suggested change/recommendation
	There is no evidence specifically to safeguard agricultural uses and I have not seen this done anywhere before. If Ninfield PC have the evidence for this, then this could be considered, but I am not sure I have seen enough on this. The final paragraph should therefore be removed.	
Page 79 Policy N15 Infrastructure	<p>'and the associated Design Guide'</p> <p>The policy cannot insist that development should be in accordance with the design guide, it is not part of the development plan, i.e., a separate document with a different status</p>	I would suggest that infrastructure 'should have regard to' the associated Design Guide.
	You have added in a list of infrastructure projects to this policy.	The Neighbourhood Plan will have no direct control over the provision of these, perhaps move to community aspirations.
	'or the necessary financial contribution secured by a section 106 obligation'	Subject to tests for S106 agreements in NPPF, paragraph 57.
Page 80 Policy N16 Community Facilities	'shall be protected from change of use to other purposes'	Consider deleting. Perhaps this first part only needs to identify those buildings you have identified as community facilities as you then go on to list the circumstances as to when a change of use will be supported
	Clarification is needed in the supporting text as to how have these been identified? Have you spoken to the owners?	
	'Development proposals which would result in the loss of any of these existing	Consider changing permitted to supported

Para/Policy Reference	Comment	Suggested change/recommendation
	community facilities and land will only be permitted if':	
Page 85 Policy N17 Safer and More Sustainable Travel	<p>'Wherever possible, the existing network of public footpaths in the Parish (including the countryside) shall be expanded to provide better linkages between existing public footpaths and to secure new public footpaths in areas where they are currently lacking or limited in extent. This shall be secured by legal agreement where appropriate as part of development proposals'.</p> <p>This is more of a community aspiration as it covers works across the parish, not just a particular site.</p>	Move to community aspirations as it covers works across the parish rather than just a particular site.
Page 87 Policy N18 Parking		
Page 90 Delivery Plan	At least 25%	At least 25% of the Community Infrastructure Levy
Appendix D		Title needs to be clarified. There is also some duplication with the community aspirations. What is the difference between the two lists? Can they be combined or duplications removed?