Ninfield Neighbourhood Development Plan 2022 to 2039

Consultation Statement

August 2023

Published by Ninfield Parish Council (Qualifying Body) to fulfil Reg 15 of the Neighbourhood Planning (General) Regulations 2012

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Introduction & Background

This Consultation Statement has been prepared in order to meet the legal requirements contained in Regulation 15 under Part 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended). It requires that the consultation statement should:

Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan;
Explain how they were consulted;
Summarise the main issues and concerns raised by the persons consulted; and
Describe how these issues and concerns have been considered, and where relevant, addressed in the proposed Neighbourhood Development Plan.

The Parish Council and NNDP Steering Group have undertaken a series of consultation activities with residents, statutory bodies and interested parties to enable extensive engagement and involvement in the preparation of the NNDP.

Ninfield Parish Council (the qualifying body) has received consultancy support from Action in Rural Sussex during the preparation of the NNDP. This consultation statement sets out details of all the events and activities carried out in the parish and with key bodies identified as stakeholders. All activities were carried out to ensure full inclusivity in the decision-making throughout the development of the plan.
A successful neighbourhood plan is dependent on the involvement of sufficient, representative, community-minded individuals, associations and groups to drive the project forward to completion. Appropriate community engagement is therefore key to the success of the Ninfield Neighbourhood Development Plan (NNDP).

The 3 main stages up to the submission stage are comprised of the following:
Scoping Report and Evidence Reports – these reports summarised the scope of the NNDP and key data about the Parish of Ninfield and are supported by Steering Group and Working Group documents.
Pre-Submission Plans – comprised of the draft vision, objectives and policies that were submitted for the statutory six-week consultation period.
Submission Plans – revised version of the pre-submission document taking account of the representations made by consultees.

Community Involvement –

A summary of NNDP Consultation Activities from 2020 to 2023

As part of the plan making process, the Parish Council agreed to establish a Steering Group (SG) with the aim of driving forward the neighbourhood planning process. This Steering Group first convened on 10th October 2019 following a call for volunteers in the Parish News, the Bexhill Observer and Parish Council social media pages. This exercise included an explanation of the role that a NDP would fulfil in the community and how it would interplay with the District Council Local Plan. The SG comprised around 20 individuals (6 of these were Parish Councillors) and at a subsequent meeting in December 2019, Officers were elected and Action in Rural Sussex were chosen to act as consultants to assist the preparation of the NNDP. The Steering Group have undertaken a number of public events and led Focus Groups as part of their consultation activities. These consultation activities were advertised to the residents through flyers, websites (Parish Council website and social media), notice boards, The Parish News and the local press (Bexhill & Battle Observer).

Launch and SWOT Survey –

An initial survey of Parish residents was carried out in June and July 2020 to identify and gather resident's views on what they consider to be the **s**trengths, **w**eaknesses, **o**pportunities and **t**hreats (SWOT) to Ninfield Parish. This work was publicised on social media pages, in the Parish News magazine and also in the local press (Bexhill & Battle Observer). Face to face surveys were carried out at several village events including the Book Exchange, the Village Markets and a dedicated drop-in session was held in the Methodist Hall. 108 responses were received to this survey. The results of this survey are shown on page 18 of the NNDP and also in section 5 of the State of the Parish Report.

Initial Survey Feedback to Residents -

Two online sessions were held in September 2020 with residents participating via Zoom. The purpose was to feedback the outcome of the SWOT consultation as well as to discuss key topic areas for the Ninfield Neighbourhood Plan to focus on, based on the findings. The dates of these sessions were advertised within the survey for interested residents to provide details to be sent a link to join. 25 people in total attended these two feedback sessions.

Photographic Competition -

In July and August of 2020 there was a photographic competition to raise awareness of the NNDP and residents were invited to take pictures of life in Ninfield (scenery, people events etc). The submitted photos were put forward to help illustrate the draft Plan. The competition was publicised on social media, the Parish News, the local press and posters around the village.

Ninfield Parish Photo Competition

The Neighbourhood Development Plan will need lots of photos to help illustrate what local residents value in our environment and community. We need images of green spaces, woodlands, play areas, sports etc. as well as our beautiful views into and out of the Parish. We also want pictures of local facilities (church, pubs, shops, businesses, people at work etc.). **Please record where your pictures were taken.**

Photos will feature in the plan for at least a decade and the best image in each category (under 16 and over 16) will win a prize!

Email photos to the Parish Clerk: clerk@ninfieldpc.co.uk

Closing date 31st August 2020. Good luck and get snapping!!

15 people submitted pictures and 8 went forward as finalists (judging was carried out by a subgroup of the SG).

Topic Based Online discussions –

A series of 5 topic based online discussions with residents were carried out during the months of October and November 2020. These sessions were carried out in the evenings to enable as many residents to attend. The sessions were advertised in advance using posters, Facebook, Parish Council website, the local press and notice boards. They were independently facilitated by colleagues from Action in Rural Sussex and lasted between 60-90 minutes per session. A summary of the outcomes is available in the State of Parish Report.

Village Character & Heritage Assessment - 20th Oct 2020
Environment & Countryside – 27th Oct 2020
Infrastructure, Economy, Transport & Travel – 4th Nov 2020
Design & Development – 18th Nov 2020
Community Resilience & Cohesion – 25th Nov 2020

Publicity Poster for workshops

Parish-wide Survey –

A comprehensive Parish-wide survey was carried out in March and April 2021. It comprised a 20-page questionnaire with 50 questions seeking information and views on a range of subjects relevant to neighbourhood planning (see Appendices). A paper copy of the questionnaire was delivered to every adult on the Electoral Roll. However, residents were encouraged to complete the on-line version (Survey Monkey link on Parish Council website) where possible to ease the subsequent data analysis workload. Paper forms were collected in a “post box” in the

Village Stores and the data from these was uploaded to Survey Monkey by volunteers from the Steering Group. In all 347 responses were received.

The full report of the results of this 2021 Survey can be viewed on the Parish Council website as one of the supporting documents for the NNDP. This important survey clearly identified the views of the community on key issues and was fundamental in guiding the preparation of the NNDP and its policies.

Working Groups –

Six working groups were set up comprised of both residents and Parish Councillors. Some of these working groups were led by residents who responded to the call for volunteers to take part in the process of preparing a neighbourhood plan for Ninfield Parish.
The working groups set up were as follows:

Local Green Spaces (LGS)
Landscape Study (LS)
Character and Heritage Assessment (CA)
State of the Parish Report (SOP)
Design Guide (DG)

The aim of each group was to gather evidence and foster further engagement followed by the drafting of detailed reports on each subject area to form the Background Documents for the NNDP.

Consulting the Community on the Background Reports –

Once completed, these 5 evidence base documents (LGS, LS, CA, SOP, DG) were displayed on the Parish Council website for an extended period during September/October 2021 and residents were encouraged to read and comment on these. Invitations to do so were widely distributed on social media, the Parish News and the Bexhill Observer.

To enable residents without internet access, as well as those who prefer to view paper copies, an exhibition was held on 10th October 2021 in the Methodist Hall, to allow residents and interested stakeholders to view and comment on the reports, This exhibition was publicised on social media, in the local press and by posters distributed locally.

Engaging with Wealden District Council (Local Planning Authority)

An initial meeting between Wealden District Council Officers, Action in Rural Sussex and Steering Group members was held on 28th July 2020 via Zoom. Topics of discussion included and update on the WDC Local Plan timetable, a summary of development in Ninfield, the Settlement Hierarchy and NNDP support available from WDC. The timescales for NNDP production were also discussed.
A follow up meeting was held on 26th April 2021 via Zoom between WDC Officers, Steering Group and AiRS to update on items discussed previously, progress made and to decide next steps.
Following these meetings, there has been informal email correspondence with WDC as well as further meetings at key stages of the NNDP. The Parish Council and Steering Group developed a healthy relationship with the planning officers at WDC who have been helpful and supportive on most aspects throughout the process.

Ongoing Engagement with Residents

Central to the development of the NNDP was to ensure the local community had sufficient opportunities to contribute to the process and were kept informed. This was achieved primarily through regular updates on the Parish Council website, notice boards, the local press, posters and flyers also by word of mouth (see Appendices for detailed account of community engagement).

Regulation 14 Consultation

The Pre-submission NNDP and associated documentation was published for its Regulation 14 consultation from Thursday **22nd September 2022 until noon on Friday 4th November 2022** a period of 6 weeks and 1 day. The documents were made available on the Ninfield Parish Council website (ninfieldpc.co.uk) and hard copies were available for inspection in different location across the parish (see below). There was an online response form (Survey Monkey) together with the draft Plan and supporting documents available on the Parish Council website.
Ahead of the advertised start date a postcard was sent to every household/postal address in the parish to advise residents and businesses that the consultation was taking place and to invite comments. The postcard stated where to find the documents online and listed the opportunities provided to view physical documents and discuss the proposals with Parish Councillors and Steering Group members. A list of statutory consultees was provided by Wealden District Council (see Table 1) and each body was emailed by the Parish Clerk and invited to comment on the draft Plan and its supporting documents. A link to the Regulation 14 Consultation page on the Ninfield Parish Council website was included in each email.
2 drop-in exhibition events were held (Tuesday 27th September from 6.30pm to 9pm and Saturday 8th October from 1pm to 4pm). At these events, printed copies of the draft Plan and the supporting documents were available and key areas from both the draft Plan and its supporting documents were displayed including the proposed policy wording, justifications, relevant maps and evidence. Members of the Steering Group and Parish Council were on hand to assist residents and answer questions.
Printed copies of the draft Plan and supporting documents, together with paper response forms, were made available at every Friday morning Community Café event in the Methodist Hall (from 10am to 11.30am) during the consultation period. Steering Group members were present to

answer questions. Paper response forms were collected in a “post box” in the Village Stores and these results were added to Survey Monkey by Steering Group volunteers. All publicity material made it clear that the draft Plan and supporting documents could be viewed privately by appointment with the Parish Clerk.

Consultation Questions

Resident Response Form for the pre-submission (draft) Ninfield Neighbourhood Plan for Regulation 14 public consultation.
Consultation period from 22nd September - 4th November (Noon) 2022.

1) Do you agree with the draft Plan overall? Yes/No (delete as necessary)
Comment:

2) Do you agree with Policy N1- Sustainable Location of Development? Yes/No
Comment:

3) Do you agree with Policy N2- Renewable Energy Yes/No
Comment:

4) Do you agree with Policy N3 – Flood Risk & Drainage? Yes/No
Comment:

5) Do you agree with Policy N4 – Protect & Enhance Dark Night Skies Yes/No
Comment:

6) Do you agree with Policy N5 – Key Views? Yes/No
Comment:

7) Do you agree with Policy N6 – Areas of Locally Valued Landscape? Yes/No
Comment:

8) Do you agree with Policy N7 – Local Green Spaces? Yes/No
Comment:

9) Do you agree with Policy N8 – Biodiversity (Green & Blue Infrastructure or GBI) Yes/No
Comment:

10) Do you agree with Policy N9 – Built Heritage? Yes/No
Comment:

11) Do you agree with Policy N10 – New Development & its Design? Yes/No
Comment:

12) Do you agree with Policy N11 – Housing Mix & Space Standards? Yes/No
Comment:

13) Do you agree with Policy N12 – Communications? Yes/No
Comment:

14) Do you agree with Policy N13 – Local Employment? Yes/No
Comment:

15) Do you agree with Policy N14 – Sustainable Rural Commercial Acitvities? Yes/No
Comment:

16) Do you agree with Policy N15 – Infrastructure? Yes/No
Comment:

17) Do you agree with Policy N16 – Community Facilities? Yes/No
Comment:

18) Do you agree with Policy N17 – Safer & More Sustainable Travel? Yes/No
Comment:

19) Do you agree with Policy N18 – Parking? Yes/No

Comment:

20) Do you have any other comments you would like to make about the Ninfield Neighbourhood Plan? Yes/No

Comment (if you need more space please continue on a separate sheet, which states your name and address, and affix firmly to this questionnaire):

Collection box for completed forms in the Village Stores or bring to Friday morning café.

We need your name, address and contact details to enable the Examiner to contact you about your comments/responses. Any forms which **DO NOT** have the following section completed will be **disregarded.**

Name: ……..

Address:……..

Postcode:……

Telephone:……

Email:……

NINFIELD NEIGHBOURHOOD PLAN

2020-2039

Public Consultation

The Draft Plan Policies

Local Green Spaces Designations

Dark Skies

Character Assessment

Key and Distinct Views

Landscape Study

Local non-Designated Heritage Assets

Community Facilities

How can I view a hard copy of the Plan?

Hard copies of the proposed plan can be viewed at the **Methodist Hall** at the **Community Café** the following Friday mornings

23rd Sept from 10am -11.30am.

30th Sept from 10am - 11.30am.

7th Oct from 10am - 11.30am.

14th Oct from 10am - 11.30am.

21st Oct from 10am - 11.30am.

28th Oct from 10am - 11.30am.

Hard copies may also be viewed (by arrangement with the Parish Clerk) at Sparke Pavilion.

Paper copies of the feedback form can be obtained from Jackie Scarff, Parish Clerk at clerk@ninfieldpc.co.uk or Tel: 07725 843505. They will also be available at the Community Café and the Drop-in sessions.

Your Feedback is Important

A postcard to every household

NINFIELD NEIGHBOURHOOD PLAN

2020-2039

Regulation 14 Public Consultation

Pre-submission (Draft) Neighbourhood Plan

22nd September - 4th November (noon) 2022

DROP-IN EVENTS (at the Methodist Hall, Church Lane, Ninfield, TN33 9JN)

An opportunity to view plans and meet with representatives of the Parish Council

Tuesday 27th Sept from 6.30pm – 9pm

Saturday 8th Oct from 1pm – 4pm

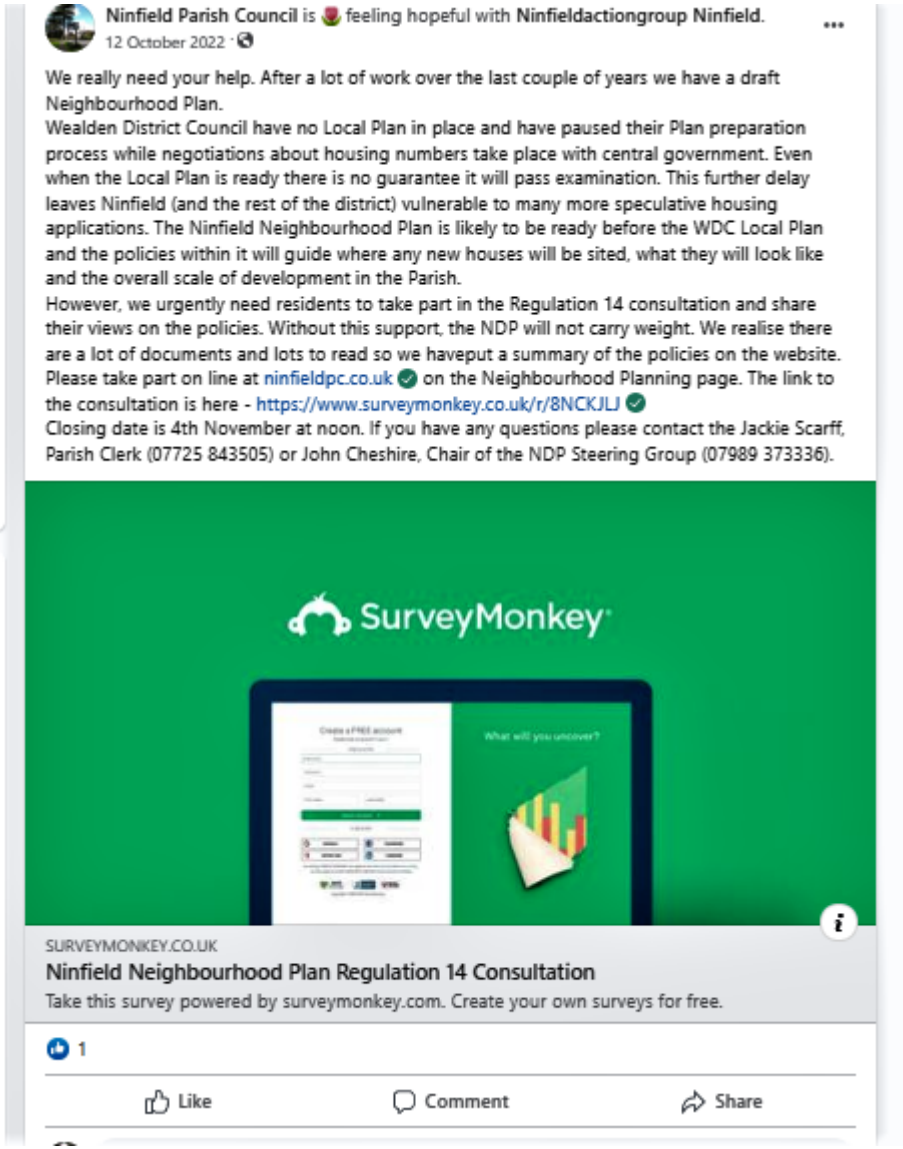
Residents are invited to come along to these drop-in events to learn more about the proposed policies and ask any questions relating to them.

The plan will be on the Parish Council website www.ninfieldpc.co.uk

A poster used to publicise the consultation

Social Media (Facebook) was used throughout the Ninfield NDP preparation process to keep residents informed and to encourage participation.

There are 3 sites in general use in Ninfield:
1) The Parish Council Facebook page,
2) the Ninfield Community Facebook page and
3) the Ninfield Action Group Facebook page.



Statutory Bodies

Consultation of local, regional and some relevant national bodies is an important part of the wider consultation process. The organisations listed in Table 1 were emailed with a link to the draft Plan and the supporting documentation.

Table 1: List of Statutory Consultees (as provided by Wealden District Council):

Consultee	Subgroup
Environment Agency	Duty to Co-operate
Historic Buildings and Monuments Commission (Historic England)	Duty to Co-operate
Marine Management Organisation	Duty to Co-operate
Natural England	Duty to Co-operate
Network Rail	Duty to Co-operate
Highways England	Duty to Co-operate
Tunbridge Wells Borough Council	Duty to Co-operate
Mid Sussex District Council	Duty to Co-operate
Rother District Council	Duty to Co-operate
Eastbourne Borough Council	Duty to Co-operate
Tandridge District Council	Duty to Co-operate
Sevenoaks District Council	Duty to Co-operate
Lewes District Council	Duty to Co-operate
Hastings Borough Council	Duty to Co-operate
Brighton & Hove City Council	Duty to Co-operate
South Downs National Park Authority	Duty to Co-operate
East Sussex County Council Infrastructure Development	Duty to Co-operate
West Sussex County Council	Duty to Co-operate
Kent County Council	Duty to Co-operate

High Weald, Lewes & Haven CCG	Duty to Co-operate
Eastbourne, Hailsham & Seaford CCG	Duty to Co-operate
Hastings & Rother CCG	Duty to Co-operate
Surrey County Council	Duty to Co-operate
Homes England	Duty to Co-operate
Ashburnham & Penhurst Parish Council	Neighbouring Parishes
Barcombe Parish Council	Neighbouring Parishes
Bexhill-On-Sea Town Council	Neighbouring Parishes
Burwash Parish Council	Neighbouring Parishes
Catsfield Parish Council	Neighbouring Parishes
Chailey Parish Council	Neighbouring Parishes
Chiddingstone Parish Council	Neighbouring Parishes
Cowden Parish Council	Neighbouring Parishes
Dallington Parish Council	Neighbouring Parishes
Dormansland Parish Council	Neighbouring Parishes
East Grinstead Town Council	Neighbouring Parishes
Firle Parish Council	Neighbouring Parishes
Glynde & Beddingham Parish Council	Neighbouring Parishes
Horsted Keynes Parish Council	Neighbouring Parishes
Lamberhurst Parish Council	Neighbouring Parishes
Lindfield Parish Council	Neighbouring Parishes
Newick Parish Council	Neighbouring Parishes
Penshurst Parish Council	Neighbouring Parishes
Ringmer Parish Council	Neighbouring Parishes
Seaford Town Council	Neighbouring Parishes

South Heighton Parish Council	Neighbouring Parishes
Speldhurst Parish Council	Neighbouring Parishes
Ticehurst Parish Council	Neighbouring Parishes
West Hoathly Parish Council	Neighbouring Parishes
Coal Authority	Specific Bodies
UK Power Networks	Specific Bodies
Southern Gas Network	Specific Bodies
National Grid	Specific Bodies
Southern Water	Specific Bodies
South East Water	Specific Bodies
Virgin Media	Specific Bodies
Cable & Wireless	Specific Bodies
British Telecom	Specific Bodies
EE	Specific Bodies
O2	Specific Bodies
Vodaphone	Specific Bodies
Arqiva Communications Limited	Specific Bodies
Alciston Parish Meeting	Wealden Parishes
Alfriston Parish Council	Wealden Parishes
Arlington Parish Council	Wealden Parishes
Berwick Parish Council	Wealden Parishes
Buxted Parish Council	Wealden Parishes
Chalvington with Ripe Parish Council	Wealden Parishes
Chiddingly Parish Council	Wealden Parishes
Crowborough Town Council	Wealden Parishes

Cuckmere Valley Parish Council	Wealden Parishes
Danehill Parish Council	Wealden Parishes
East Dean & Friston Parish Council	Wealden Parishes
East Hoathly with Halland Parish Council	Wealden Parishes
Fletching Parish Council	Wealden Parishes
Forest Row Parish Council	Wealden Parishes
Framfield Parish Council	Wealden Parishes
Frant Parish Council	Wealden Parishes
Hadlow Down Parish Council	Wealden Parishes
Hailsham Town Council	Wealden Parishes
Hartfield Parish Council	Wealden Parishes
Heathfield & Waldron Parish Council	Wealden Parishes
Hellingly Parish Council	Wealden Parishes
Herstmonceux Parish Council	Wealden Parishes
Hooe Parish Council	Wealden Parishes
Horam Parish Council	Wealden Parishes
Isfield Parish Council	Wealden Parishes
Laughton Parish Council	Wealden Parishes
Little Horsted Parish Meeting	Wealden Parishes
Long Man Parish Council	Wealden Parishes
Maresfield Parish Council	Wealden Parishes
Mayfield & Five Ashes Parish Council	Wealden Parishes
Ninfield Parish Council	Wealden Parishes
Pevensey Parish Council	Wealden Parishes
Polegate Town Council	Wealden Parishes

Rotherfield Parish Council	Wealden Parishes
Selmeston Parish Meeting	Wealden Parishes
Uckfield Town Council	Wealden Parishes
Wadhurst Parish Council	Wealden Parishes
Warbleton Parish Council	Wealden Parishes
Wartling Parish Council	Wealden Parishes
Westham Parish Council	Wealden Parishes
Willingdon & Jevington Parish Council	Wealden Parishes
Withyham Parish Council	Wealden Parishes

Landowners of proposed Local Green Spaces

The owners of the land proposed as LGS (other than the Parish Council) were identified and contacted by letter at the start of the of the Regulation 14 consultation period as follows:

NINFIELD PARISH COUNCIL

Jackie Scarff - CLERK & Responsible Financial Officer
The Red House, Lower Street, Ninfield, Battle, TN33 9ED
TELEPHONE : 07725 843 505
E-MAIL: clerk@ninfieldpc.co.uk

Dear Sir/Madam,

The Ninfield Pre-Submission Neighbourhood Plan Regulation 14 Consultation (Neighbourhood Planning (General) Regulations, 2012. Landowner Consultee

Ninfield Parish Council has published the draft Neighbourhood Plan for public consultation. The consultation period runs for six weeks from 22 September 2022 to 4th November (NOON) 2022.
You have been identified as a landowner of land that is included under one of the policies of the Neighbourhood Plan – Local Green Space and I am writing to you to make you aware and also to ask for your comment on the plan.
To assist you the policies map that is available on the website www.ninfieldpc.co.uk

Copies of the plan and supporting documents can be viewed online **HERE**

We welcome all comments on the draft Plan and you can do this in four ways:
By completing the survey form that can be accessed on the website
By Visiting one of our Friday morning Community Cafes

23rd Sept from 10am -11.30am.	30th Sept from 10am - 11.30am.
7th Oct from 10am - 11.30am.	14th Oct from 10am - 11.30am.

21st Oct from 10am - 11.30am. 28th Oct from 10am - 11.30am.

Or by visiting one of our drop in events

Tuesday 27th Sept from 6.30pm – 9pm Saturday 8th Oct from 1pm – 4pm

These events will be at the Methodist Hall, Church Lane, Ninfield, TN33 9JN

Or by completing the survey form that we can post to you if requested.

If you require any further information please contact me by any of the means in the header above.

Yours Sincerely

Jackie Scarff
Clerk & RFO

For and on behalf of the Parish Council

Details of Landowners

(see separate document for names and contact details)

LGS 1	Landowner 1
LGS 2	Landowner 2
LGS 3	Landowners 3, 4, 5 & 6
LGS 4 & 5	Landowner 7
LG 6	Landowner 2
LG 7	Landowner 8

Responses to Regulation 14 Consultation

A total of 40 representations were received including a late response from Gladman Developments Ltd. These are set out in Table 2 below. The Table contains the issues and concerns that they raised and their consideration by the Steering Group including whether or not they are addressed in amendments to the proposed NNDP. Please note: the full response from Wealden District Council can be found in the Appendices.

Table 2: Ninfield Neighbourhood Plan Regulation 14 Schedule of Representations and Changes Made (statutory body representations are shaded in green).

Organisation/ Respondee	Comment subject or Section of NNDP	NNDP Para	Page	Consultee's Suggested Amendment	Steering Group's Consideration of amendments to NNDP
	General				
East Sussex County Council (ESCC)	**Public health/wellbeing**			It is acknowledged that many of the policies within the Plan will have possible benefits on health and wellbeing however this has not been fully acknowledged or developed in the Plan. The Plan needs to recognise the need to protect and improve the health and wellbeing of its population. The following comments therefore highlight the links and areas where health and wellbeing benefits in the plan can be strengthened.	NNDP is unlikely to have a significant role in improving health and wellbeing except very indirectly hence the limited references. However, it is agreed as desirable and the Vision in the NNDP has been amended accordingly. Other references have been added to the text as mentioned below
ESCC	**Parish data**			It is therefore suggested that the data is put in a table where key aspects will be	Agree this should be mentioned in NDP text as the difference from

				clearer to see, it is also suggested that data is compared not only with Wealden District but with the wider South East and England. For example, the percentage of people over 65 in Ninfield is 26.6, compared to 26.2 in Wealden, 19.7 in the South East and 18.5 in England.	Regional and national is substantial and it has been taken into account in amendments to Housing Mix policy N9
ESCC	**SWOT**	5	20	Vision & Objectives – suggest the opportunities section should consider inclusion of the reference to 'the better access to local facilities by walking, cycling and public transport'.	The Opportunities section derives directly from the findings of the 2020 community SWOT survey so it is inappropriate to add to it as now suggested by ESCC.
				This section needs to integrate health and wellbeing issues more comprehensively particularly around 'opportunities' including active travel, social cohesion through better connectivity and improved facilities and access to nature.	Agree should be some minor rewording of text, but not reason enough to amend policy N17
ESCC	**Vision**		8	The vision and objectives need to include references to health and wellbeing. It is suggested that the following text in bold is included:	See above - the Vision in the NNDP has been amended to include this but not the objectives.

				…retained its character as a **healthy,** safe, vibrant…… sustainable way, **protecting and improving the population's health and wellbeing.** Development…. of community, **health and wellbeing,** green spaces, a	
WDC	**Vision**		8	Identified 2 versions, make sure both are the same	Amended to be identical.
ESCC	**Objectives**	5	22	TA01 Suggested amendments indicated in bold texts and to be made to page 52 as well …. and on foot increasing connectivity **and physical health and mental wellbeing** benefits and …..	Have amended TA01 to take account of ESCC suggestions about EV charging and cycle parking.
ESCC	**Objectives**	5	22	EC02 Suggested amendments indicated in bold texts … opportunities **for both the environment and the area's population**.	Amended but with reference to parish rather than area's population.
ESCC		15.1.12	81	Suggest reference to the potential to align with the East Sussex Cycling & Walking Infrastructure Plan. East Sussex Local Cycling & Walking Infrastructure Plan Public Consultation 2020 - East Sussex - Citizen Space.	Agreed and amended

ESCC	Objectives			Suggested a general health and well-being objective to be added with provided pointers	Disagree, see earlier comment
Coal Authority	No comment			No comment	Noted
National Grid	Identified a national grid asset - overhead transmitter line route: Bolney-Ninfield located within the Neighbourhood plan area boundary.			No suggestions to change plan	Noted
Rother District Council	support your positive environmental policies and the benefits they will also bring to Rother District				Noted
Rother District Council	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.				Noted
Environment Agency	We are pleased to see the emphasis that has been placed on the environment through the many relevant policies such as drainage and flood risk. As there are no allocations within the plan, we have no specific				Noted

	comments to make on the content at this time.				
Natural England	Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.				SEA and SA have already been determined by WDC as unnecessary. WDC consulted all the requisite consultees including the Environment Agency.
Historic England	We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our				Noted

	advice on successfully incorporating historic environment considerations into your neighbourhood plan				
WDC	Introduction			Set out why Plan is not allocating sites	Agreed and amended
WDC	Structure			Suggest merging some and splitting up other chapters/ titles. Eg. put Dark Night Skies and LGS under Landscape and Natural Environment; combine Heritage with Design; split Economy from Transport and Infrastructure	Noted
WDC	Contents page too long			Just list chapter headings & sub headings	Agreed and amended
WDC	Formatting issues			Each fig/ map should have a number and para numbering needs to be consistent.	Agreed and amended.
WDC	List other acronyms e.g., SEA, SDNP		5, 6	Consider extending list and putting in alphabetical order.	Agreed and amended
WDC	“and parish mentioned”		6	Change to “and the parish is mentioned”	Agreed and amended
WDC	‘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		6	Detailed rewording provided by WDC in comment form	Agreed and amended text as per WDC wording but with minor correction to figs (see below)

	meet. Combined with much higher housing targets, the housing policies of the Core Strategy and Local Plan are out-of-date'.				
WDC	Rother-Hastings area		7	Hastings and Rother Housing Market Area	Agreed and amended
WDC	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)	The 1,225 figure is for 2019-2031 whereas the 1,221 and 83% (1,212 and 82% appear to be typos) is 2021-2031. Text amended.
	Agree/Disagree with Draft Plan				
Resident 1	A good plan, well thought through.				Noted
Resident 2	A comprehensive document to guide development over the next decade and beyond				Noted
Resident 3	A very thorough and substantial reflection of the village				Noted
Resident 4	An excellent, detailed plan with carefully thought-out recommendations which properly represent our village.				Noted
Resident 5	But it is too late. My part of the village is ruined.				It's very unlikely it could have stopped WDC in their determination to

					implement the housing sites allocated in their 2019 withdrawn Local Plan
Resident 6	In the current Global climate, war, cost of living crisis etc. I believe there should be NO DEVELOPMENT. Wildlife is also in crisis and every effort should be made to prevent ANY ENCROACHMENT onto green spaces and farmland. With grain markets being affected by the Russian aggression towards Ukraine every inch of arable land should be used to grow our own crops.				NNDP has probably gone as far as it can to discourage excessive further development – it cannot stop all development but identifies the environmental and other constraints and the particular features warranting protection
Agent on behalf of Resident 18	Supporting covering letter to be submitted via separate email to Parish Clerk. It raises objections on behalf of the owner of a proposed LGS (see subsequent section on policy N7)				See comments under policy N7
Resident 7	We need a Ninfield plan to allow our village to remain a real place				Agree NNDP aims to do this
Resident 8	Yes, Ninfield must be protected from				Agree NNDP aims to do this

	overdevelopment causing loss of character and heart.				
Resident 31	I love the countryside and village life, and have lived here for 28 years. I am very concerned about what the future holds for our village. Developers can cause misery for residents, please don't let this happen.				NNDP has probably gone as far as it can to discourage excessive further development – it cannot stop all development but identifies the environmental and other constraints and the particular features warranting protection
	Referencing				
WDC	NPPF refs			should directly relate to policy	Checked and amended
WDC	WCSLP ref			should relate to policy e.g. policy 1 and SPO14 not related	Agreed and amended
WDC	WLP refs			Relevance should be checked (eg. delete LR1 from LGS policy but add HG6, HG7, HG10 under Design policy)	Agreed and amended but Hellingly NDP policy on LGS does include ref to LR1 plus other LR policies in WLP
WDC	New Local Plan			Consider emerging policies in Reg 18 draft WLP when published to ensure NNDP policies align with it.	We await sight of these emerging policies, depends on their timing relative to NNDP
WDC	Policy justifications			Include relevant Background documents and not just survey results.	Agreed and amended
	Maps				
WDC	Formatting			Number each map/figure	Agreed and amended

			10	Amend erratic paragraph numbering	Agreed and amended
WDC	Inclusion of map of designated area in text.			Consider removing from page 10 as it is already included in Appendix A	Disagree as need map at outset of Plan
			11	This arises from para 11d and its footnote 8	Agreed and amended
	numbering of paragraphs not consistent	Section 3	15		Agreed and amended
		Key Views	40	It would be useful to annotate this plan to show which valley is which.	The Fig on ALVL (not Key Views) is already annotated
	Policy N1- Sustainable Location of Development				
WDC	'minimise loss of countryside its biodiversity'.		25	Consider amending. This last part of the sentence does not currently make sense and not sure the term 'biodiversity' is required in this planning policy as written.	Agreed and amended, deleted 'biodiversity' and simply stated '…loss of countryside.'
WDC	'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'			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. detailed ref about list on para 80 of the NPPF	Disagree as the relevant requirements are mentioned later under 'Houses in the Countryside' etc – it would make N1 too complicated if all the circumstances were listed here – WDC previously requested simplification of N1

	What development are we actually looking to restrict?				
WDC	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.			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.	Text states that ‘brownfield’ sites ripe for redevelopment are far too few to warrant inclusion in a policy. Carwash site is only significant one and is shown as an ‘Employment site’ with potential for redevelopment under N13
RDC	Support			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.	WDC have not criticised it as confusing but see above response to their comments about expanding N1
Resident 9	Must utilise brownfield sites as a priority.				See above – very little scope and would probably mean losing employment sites to build new houses
Resident 10	Yes, It is important to keep Ninfield a rural village. we need to protect wildlife & the environment				Agree NNDP aims to do this

Resident 11	Yes, Ninfield must remain a village to protect all forms of wildlife and their habitats				Agree NNDP aims to do this
Resident 8	Yes, the future of our planet is dependent upon sensible and sensitive planning decisions.				Agree
	Policy N2 – Renewable Energy				
WDC	'Small-scale energy production schemes'.		26	Small-scale renewable energy production schemes	Agreed and amended adding 'renewable' to policy N2
Resident 6	Only if it doesn't create an eyesore such as offshore and onshore wind turbines. These are responsible for a massive loss of birdlife and I cannot see how they are carbon economical in their construction and transportation costs.				N2 does not refer to major proposals and already includes provisos as safeguards. It is doubtful NNDP could reasonably have a policy to ban large solar or windfarms in the parish
Resident 10	Yes, absolutely. Green energy options must be pursued. It is important any green facility is sensitively sited.				Agree NNDP aims to do this
Resident 11	Yes, Green energy in all its forms must be pursued, but sited sensitively to fit in with the environment.				Agree NNDP aims to do this
Resident 8	Yes, In our efforts to minimise the adverse				Agree NNDP aims to do this

	effects of climate change we must ensure our plans do no harm locally.				
	Policy N3 – Flood risk and Drainage				
WDC	'Major developments shall include details of proposed maintenance arrangements to ensure an acceptable standard of operation for the lifetime of the development'.		28	if we require these details, they will be requested by validation team or via condition or S106 agreement.	Agreed and amended
	Justification - This needs further explanation. It refers to a climate emergency but not to flooding.				Agreed and added Southern Water's comments under 'Justification'
RDC	Support			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.	Agree NNDP aims to do this

Southern Water	Southern Water is the wastewater undertaker for Ninfield. We support the aim of the parish council to address future impacts of climate change through adopting sustainable drainage principles. However, we would encourage this policy to go further and require consideration of SuDS for all development.			Proposed amendment Having regard to the above, Southern Water proposes the following addition (new text underlined) to Policy N3; Surface water drainage for all development shall be based on sustainable drainage principles allowing for future climate change.	Agreed and added under 'Justification', not the actual wording of Policy N3
Resident 12	Developers should be required to include improving the current drainage infrastructure rather than simply connecting to the current one that will not cope with the increase in the level that will go through it as use increases.				N3 goes as far as it reasonably can. Statutory undertakers can probably require upgrading of existing systems where sound evidence of shortfall exists
Resident 9	More attention to water supply and sewerage disposal.				Any current evidence of shortfall from the statutory undertakers themselves? Not aware of this.
Resident 13	We already have new flooding from surface water draining in Manchester				This does not justify amending policy N3.

	Road which is currently under investigation				
Resident 8	Yes, It is no longer acceptable for the developing builders to avoid their responsibilities for problems they have caused.				This does not relate to the policy but to the ability of the statutory consultees and WDC to identify problems at application stage and for enforcement action to be taken where needed.
	Policy N4 – Protect and Enhance Dark Night Skies				
WDC	Look at other examples e.g. Haslemere and Benenden NDPs		29/30	Consider changing to a criteria-based policy	Considered but not felt warranted.
WDC	Referencing regarding source of information	8.1.2 – 8.1.4		These paragraphs are unclear you need to identify what is part of NP policy. If from another source, it needs to be properly referenced.	Revised to take account of these comments.
WDC	Inconsistencies and lack of clarity	Table 8.1.4 and map		If you want applicants to follow Table, it needs to be referred to in policy. Otherwise, better in Design guide. Unclear as to which parts of parish are in which zone. Zones in table do not match map. Source of Map needs to be stated.	Table contains additional information from ILP Guide referred to in policy N4 and is too detailed to be part of policy. The legend on Fig 3 Map shows it was prepared by High Weald AONB Partnership using SQM light readings taken by volunteers in the parish but have now made this

					clear in the main text. Zone boundaries on the Map have not been defined due to insufficient data. We refer to zones in para 60 (previously section 8.1.2) which has been reworded to reflect revised ILP guidance issued in 2021.
WDC		Background document status queried		NNDP parish website has a document titled 'Dark Skies Policy'. If this is a Background Document, it needs to be labelled as such and needs to identify the source of the evidence in it.	Noted. This is a separate parish policy adopted prior to the NDP.
Resident 14	New developments should have a byelaw that only low lighting sensor-controlled lighting to be used by residents, and the village as a whole should be encouraged to adapt the policy too				Neither NNDP nor WDC Planning have the power to impose bylaws
Resident 10	Yes, dark skies are so special. The wildlife can live in natural rhythm. Its unique in the area and encourages tourism to the area.				Noted
Resident 8	Yes, this is important for all creatures.				Noted

Resident 11	Yes, we need to preserve our dark night skies. It can become a form of tourism and natural habitat for wildlife.				Noted
Resident 15	Yes; There is excessive light from the quarry at Hazards Green.				This may be necessary for safety during winter working hours?
	Policy N5/N6				
WDC	Special Conservation Area		31	Special Area of Conservation	Agreed and amended
WDC	Landscape Character Areas section is repeating what is in the Design Guide and the Landscape Study		33-36	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.	Disagree as it is necessary for understanding the background to the later sections on proposed Key Views and ALVL
Resident 12	Areas section. This is repeating what is in the Design Guide and the Landscape Study				See above
Resident 16	This is imperative to keep the village nature				Noted
	Policy N5 – Key Views				
WDC	Questions reasoning behind criteria, how Views were nominated, the threshold and who carried out the assessment				Minor amendments made to Appendix E in response to these questions where considered necessary.
WDC	Mapping unclear			And at 9.7.2? Where are the policies maps referred to?	Agree to check references

WDC	Justification			This could be expanded further to refer to the work in appendix E	Appendix E is now specified in the policy itself.
WDC	Very difficult to comment on individual views at this stage without more information on the criteria. Would be happy to consider when info available, ahead of Reg 16.			How did final views come about? Show criteria used and process of elimination- see Hawkhurst NDP	Appendix E already clearly listed the criteria that were applied. Added brief reference about Views that were not selected but do not consider it necessary to do this in detail. Approach taken is similar to some other NDPs. Recognise that there are also some other NDPs with more detailed studies but but overall consider the Reg 14 NNDP had sufficient information to enable WDC to have commented on the Key Views selected.
WDC	Policy wording could be more specific, identifying what is meant by unacceptable impact.			Could be reworded to 'Dev proposals which would result in an adverse/negative impact on the landscape character of a Key View as identified in the Ninfield Key Views Assessment will not be supported',or 'Dev proposals will be supported where….'	Agreed and N5 amended to include these words but also with a more positive approach to designing development to be in harmony with the main features of the View concerned.

WDC	Alternatively, policy wording could be reworded to be positive			Be clear on what will be supported	See above
WDC				Make clear it relates to development proposals within Parish	Not considered necessary to amend policy N5 as NNDP only relates to Ninfield parish
WDC	Landscape Policy context Section is repeated within the Design Guide.		38-39	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	Disagree as it is necessary for understanding the background to the next section on ALVL, etc
	Section. This is repeated within the Design Guide.				Noted
Resident 17	Mention should be made in text of long-distance views from Crowhurst road (near Catsfield parish church) and from Wartling				Agreed and amended Landscape Study and add to text of NNDP where appropriate
Resident 8	Yes, We must preserve our rural beauty and heritage, and visual beauty is important for people's health				Agree NNDP aims to do this
	Policy N6 – Areas of Locally Valued Landscape				
WDC	Check Hellingly policy				This was done at the outset and closely follows their example including the term 'ALVL', also taking account of their

					Examiner's comments about the need to include descriptive detail of the landscape in the policy itself.
WDC				Clarify policies map being referred to	Agree to check
WDC				add as identified in Landscape study	Agreed and added
WDC				Change wording slightly to 'should aim to minimise the impact on the landscape'	Amendment not considered warranted
WDC				Policy justification should include ref to Ninfield Landscape Study	Agreed and amended
WDC	Relationship of Ninfield Landscape Study to Wealden District Landscape Assessments			Justify in section 3 why the CA boundaries have been drawn as they are as does not correlate with WDC studies, previous or most recent.	WDC studies are area-wide, not local to parish level – there is no conflict with them and reasons are already clearly stated.
Resident 10	Yes Absolutely. The hedgerows, field and stream are integral to the local area and way of life.				Agree NNDP aims to do this
Resident 8	Yes, we have no right to decimate these treasures.				Noted
Resident 11	Yes, we must ensure we keep our hedgerows and streams, its important to our area & again wildlife contains resources for				Agree NNDP aims to do this

	mammals, birds and Insects.				
	Policy N7 – Local Green Spaces				
WDC	List of proposed LGS		45	Would help if these were numbered LG01, LG02 to correspond with numbering on map.	Agreed and amended
WDC	'Development requiring planning permission will not be permitted'.			Will not be permitted within the Local Green Spaces	Agreed and amended
WDC	The policy does not currently make clear where development will not be permitted.				It states 'unless there are very special circumstances including where…' so no amendment considered needed.
WDC	Justification refers to views, which are not listed in NPPF as a reason for designation.			Justification needs to be reworded	Disagree. There is no reference to views in the policy only in the 'Justification' where it is just one aspect of the public comments – views relate to appreciation of 'beauty' in any case
WDC	'in line with national policy' - do you mean the NPPF policy for greenbelts? Or do not all of these criteria apply?			The policy needs to be more specific.	Disagree about need to be more specific and have deleted reference to national policy and simplified as per LGS policies in most other NDPs

WDC	Church wood - already designated as ancient woodland and no added benefit from LGS designation	LG3			But other important reasons are identified in text for LGS designation including that it is the central feature of a distinctive small valley (see below).
WDC	Whilst accepting site contributes to setting of Ninfield and listed church and provides extensive views from a PROW network, it is an extensive tract of land reading as part of wider landscape rather than a self-contained site. 'Blanket' designation of open countryside is not appropriate' and should not be used as a 'back door' way of achieving a Green Belt. Justification appears partly based on threat of future housing development. The boundaries appear drawn with reference to potential housing site boundary rather than an obvious area of particular local significance. For these reasons, it is unlikely to				Disagree that it is an extensive tract of land or akin to a Green Belt. There are other larger LGS in some other NDPs (for example, a 50 hectare LGS in nearby Crowhurst was passed by the Examiner without comment). At 12.8 hectares, LGS07 is much smaller than this. The CPRE study of LGS (2022) analysed 18% of all made LGS and found widely varying sizes up to 46.5 hectares. NNDP text explains detailed reasons as to why it is considered a relatively well-defined self-contained site, namely the tiny wood in its upper valley setting. Much of the site has already been

	meet the strict definition of LGS in the NPPF.				refused for housing development on landscape and biodiversity grounds. Its boundaries do not reflect those of this previous application or any potential future housing site. It is valued as sufficiently special by the community and felt to meet the criteria for LGS in the NPPF.
WDC	Unlikely to meet high bar for LGS designation as, although selected for biodiversity and natural beauty, they are not formally designated as wildlife sites. Bexhill Road verges LGS wrongly includes access to the Ingrams Farm site - which already has planning consent	LG6 a, b and c			Consider the verges are sufficiently special for the reasons set out in the Plan and LGS Report. There is no requirement for a verge to be a wildlife site in order to be LGS. Have deleted parts where access roads have been constructed. ESCC have not objected as highway authority.
WDC				If the verges are now all one designation it would make sense to put them together as one bullet point	Agreed amended
WDC	Designation is compatible with the planning permission as it sets it aside	LG7		reduce boundary to exclude access	Text explains reasons for designation. Boundary

	as public space but difficult to demonstrate it is special to the community when it hasn't been completed yet. Also, its boundaries wrongly include the access road.				changed to exclude access road.
WDC	GS27 - if not being carried forward should be included in T2	Table 2			Checked and amended
WDC	Some original references incorrect	Table 3			Checked and amended
WDC	Allotments listed as AG rather than LGS	Table 4			Agreed and amended from AG to LGS
ESCC				The policy and supporting text should acknowledge the physical health and mental wellbeing benefits of green spaces. Reference should be made to maintaining and improving the accessibility of green spaces for all ages and abilities and improving the quality and linkages between local green spaces and key destinations.	These are not mentioned as reasons for LGS in the Government's NPPF or other guidance. They relate more to section on 'Sustainable Travel' and already briefly mentioned in that text.
ESCC	Allotments			Reference should be made to maintaining and improving the accessibility of green spaces for all ages and abilities and improving the quality and linkages between local green spaces and key destinations.	See above

Gladman Developments (late submission)	Concerns there is no robust justification for designating LG6c 'Bexhill Road Verges' (Molly's Corner)			suggest deleting 'planning permission will not be permitted'	The reasons for designation are considered robust enough and not negated by the construction of the footway required by ESCC to serve the permitted housing development of Crouch Field. No need to delete the words quoted.
Agent (on behalf of Resident 18)	Strongly disagree with allocating LG3 (Church wood and Fields) as a Local Green Space as respondents land forms part of potential site for allocation			it is considered that Church Wood would, by itself, fulfil the appropriate criteria for inclusion within the NDP, whereas the land within Ms M. Godden's ownership and the wider tract of agricultural land, which surrounds the woodland to the north, east and west, which is also currently drafted for inclusion as a Local Green Space (as site LG3) does not fulfil the relevant criteria, is an extensive tract of land and thus should be omitted in its entirety.	Disagree for reasons stated above under WDC comments. The detailed justification for LG3 as an LGS as set out in the NNDP is explicit as to how it meets the criteria. It is considered of sufficient strength not to warrant its deletion or reduction in response to the objections raised by this landowner. As to its extent, at 13ha it is smaller than others in some other NNDPs (Crowhurst NDP has a 50ha site).
Resident 5	Coombe Wood is not included despite extensive local use				Reasons for exclusion set out in LGS background

					report – too large and no rights of way
Resident 19	I think the underground reservoir between should be included as although it is not publicly accessible it is a valuable wildlife corridor that connects many of the other green spaces.				Reasons for exclusion set out in LGS background report – too well-screened from public view and no public access
Resident 20	YES, particularly Church Wood and surrounding fields. They are at the heart of the village and a valued community asset.				Agree NNDP aims to do this
Resident 21	Yes, development on this land should not be allowed.				Noted
Resident 22	Yes, it is important that these remain for the benefit of the community and local ecology/ Biodiversity.				Noted
Resident 23	Yes, there should be no circumstances that development is allowed on these spaces.				Noted
Resident 8	Yes we need these				Noted
Resident 10	Yes. Saying development in the area will be allowed in line with national policy gives a green light to all developers as it is national policy to build everywhere.				Have deleted reference to national policy and refer only to special circumstances such as incidental buildings etc

	Policy N8 Biodiversity (including Green and Blue infrastructure or GBI)				
WDC	Within the supporting text it would be beneficial to explain what green and blue infrastructure		51		Agreed and amended
	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.	Agreed and amended
	'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)'			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	Agreed and amended

				provision have been exhausted.	
ESCC				The policy needs to acknowledge the potential benefits to the population of Green and Blue infrastructure. (wording provided) make ref to how this supports life.	Cannot see this warrants amendment of N8
Resident 23	Yes, again no development should be allowed where biodiversity is threatened.				Agree NNDP has this aim
Resident 8	Yes, So important, possibly one of the most important points.				Agree NNDP has this aim
	Policy N9- Built Heritage				
WDC	'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	Agreed and reworded
WDC	Part of this paragraph is out of order	12.2.10		Rewrite to avoid repetition	Agreed and amended
WDC	There is some repetition in this paragraph with the previous paragraph	12.2.13		Rewrite to avoid repetition	Agreed and amended
WDC	Built Character Areas. Large parts of this text can be found in the Design		54-56	Consider removing from the NP document with a link to the other documents to make the plan more succinct.	As with Landscape, its inclusion is necessary to give background to later sections and policies

	Guide and/or Character Assessment.				
WDC	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.	Removed bold type and reworded but do not wish to move to Design Guide as partly explanatory to the design policy.
WDC	Policy should refer to the assessment of buildings for the non-designated heritage assets			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:….	Agreed and made minor rewording
WDC				Check whether Appendix 3 or C	Appendix C
WDC		Appendix C		Move into a separate document and keep list of designated assets separate from non designated ones	Strongly disagree as much too closely related to policy N9 and its interpretation.
WDC	More explanation of process used to determine non-designated assets, owners engagement and criteria used.	Criteria & Justification		See Historic England guidance on necessary process. The criteria need to be more localised than the HE generic criteria and have a quality threshold. They need to be publicly available so people can nominate buildings/structures/ areas/sites for wider	As with most other NDPs the HE guidance provided the basic criteria but were adapted to local circumstances. The list reflects the criteria as endorsed by the steering group and made publicly available through the NDP publicity and

				community discussion throughout the whole parish.	viewable on the website. Owners/ occupiers were subsequently specifically notified and their comments invited (see separate section of this report).
WDC	Very Ninfield village centric and only buildings identified.	Identification		Could consider sites of archaeological interest or with local significance/links to specific periods or people? Refer to High Weald and Pevensey Levels national character areas to identify types of NDHAs you should be looking at for criteria.	Includes whole parish, so not village centric. The Local List includes areas as well as buildings plus the only known archaeological feature (Castle Croft). ESCC as the relevant archaeological authority have made no comment although on a recent planning application stated they consider their archaeological notification areas to be NDHAs. No links to specific people of note. NCAs relate more to landscape than buildings.
WDC	Justification for local list			Table is a start but each asset needs a full explanation of why it was chosen and how it objectively meets robust criteria rather than subjective preference. Present	The amount of descriptive detail is considered appropriate for the assets concerned, being comparable with those of many statutory

				explanations are too basic. The photos need to be face on and close so as to be clear and should form part of the list. Over 50 locally-listed buildings is a lot for Ninfield's size; kerbstones cannot be included. There also needs to be a mechanism for review.	LBs and with other NDPs. Face on photos are impractical in many cases. The selection is clearly based on explicit and objective criteria, not subjective preference.
WDC	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.				Strongly disagree for the reasons stated above. The study of the whole parish has been comprehensive. WDC comments seem unreasonable and inconsistent with e.g. Hellingly NDP. There is no reason why WDC cannot comment on each building/ feature/ area on the basis of the info in Appendix C. Cannot see any sound justification to reconsult WDC.
Resident 5	My home is considered to have character so can't be extended to make it more liveable despite now being in a new home ghetto.				The inclusion of this semi-detached cottage as an NDHA is considered justified notwithstanding the unsympathetic nearby new development.

Resident 21	Yes buildings should be in keeping				Agree NNDP has this aim
Resident 10	Yes, new buildings should be in keeping with the other buildings in the area.				Agree NNDP has this aim
Resident 8	Yes, preserve our identity				Agree NNDP has this aim
Resident 23	Yes, we must not approve ticky tacky boxes to be built.				Agree NNDP has this aim
	Policy N10 - Design				
WDC	Background document Village Character Assessment			Needs intro and explanation, methodology and process involved with templates	Brief introduction added
WDC	Design Guide for Ninfield (see detailed comments under Supplementary Planning Guidance at end of this section)			Duplication of the High Weald AONB Housing Design Guide and the need to be locally specific - suggestions provided in separate detailed paper	Disagree. See positive advantage in following HWDG and adapting it to Ninfield (as agreed with their officer) – it is easier for users of the guide and draws on HW AONB expertise. Ninfield does not have the size or historic importance to warrant a DG comparable with the other examples such as Battle DG as suggested by WDC.
WDC	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	a		Consider rewording	Agreed and amended

WDC	'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.	a	64	Consider rewording	Difference between 'Public' and 'private' views has already been made clear in the NNDP
WDC	currently includes a number of different points/ subjects e.g. locally distinctive, sustainability, appropriate to its setting	b		Consider moving sustainability to a separate point	Agreed and amended
WDC	Why pick out these specific areas?	c		Needs justification	They have already been identified as sufficiently distinctive to warrant extra protection
WDC	Not strictly necessary	e			Noted
WDC	This policy gives little scope for contemporary architecture				Not necessary as it is in the Design Guide where it is considered more appropriate.
WDC	'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		65	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	WDC miss the point of this. Yes, we know the Govt requires figures for the whole District. That is the problem. The NDP shows through this local calculation how Ninfield's share is wholly disproportionate and contrary to the Core Strategy objective of

				opportunities for growth. Growth will not be evenly spread across the district or distributed to parishes on a proportionate basis.	restricting development in villages.
WDC	1,225 dpa		65	The current housing need figure is 1,212 dpa	1,221 for 2021-31 according to the published 5-year Land Supply. 1,225 for 2019-39.
WDC	'a Regulation 18 Direction of Travel consultation'			delete Regulation 18	Agreed and amended
	'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'		67	This needs clarification, what specifically are you talking about? Is there a better way of explaining what you mean?	This sentence is correct but the para has been slightly reworded to be clearer on current policy.
	'Therefore, new housing in the countryside is typically regarded as unsustainable development'		68	Not always the case	Agreed and amended
ESCC				Policy and supporting text should refer to the health and wellbeing benefits of good neighbourhood design both physical and mental.	Disagree as too indirect
ESCC				There should be reference to the 'Building for a Healthy Life' guidance. Dementia & Town Planning, RTPI 2020 and East Sussex Dementia	Not sure this is really necessary – these other docs keep changing and their status is not always clear

				Joint Strategic Needs Assessment	
Resident 6	I DO NOT support any development. This area is already saturated. Traffic levels and speeds are far too high, major roads such as A21 and A22 are saturated with commuters, accident levels too high and this is exacerbated by the lack of employment in this area of the South-East.				This is regional and well outside the scope of any significant influence by the NNDP
Resident 24	Most definitely- recent development off Manchester Road not in keeping with local architecture in the village				NNDP and DG refer to this
Resident 25	The Development off Manchester Rd, "Carmenfields" is totally inappropriate in design. It does not relate to local traditions in any way. Hopefully this sort of design will never be approved again.				NNDP and DG refer to this
Resident 5	What's the point now? I have to look at the ugliest house in the village.				NNDP and DG refer to this
Resident 10	Yes, ditto above, Any new building not in character				NNDP and DG refer to this

	dilutes the quality of the village and around.				
Resident 8	Yes, the impact on current residents must be taken into account				NNDP and DG refer to this
	Policy N11 – Housing Mix and Space Standards				
WDC	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		70	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.)	Amended to give weight to local environment, etc but disagree about following LHNA % split in detail as Ninfield's housing needs may not reflect those identified in LHNA's conclusions and need more flexibility.
WDC	'All new residential development should meet the Government nationally described space standards'. 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			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.	Amended wording to allow for future WDC space standards but cannot see sound justification for deleting 'should meet' national space standards.
WDC	Should include reference to the housing mix in the	Justification			Agreed and amended

	LHNA, as well as the Ninfield's own survey work.				
ESCC	Consider affordable move on accommodation and Care ready accommodation			Some reasons provided	Appears beyond scope of NNDP although agree desirable.
Resident 26	I think the mix is too weighted towards starter homes. There is also a need to help people stay within the village when they move past this stage. there is very little churn in this area and therefore many people leave the village when they are in a position to support / help the community.				Evidence indicates general need for small starter homes although fixed % may be too weighted for Ninfield. N11 reworded to state provision of elderly persons' and disability-adapted bungalows is 'encouraged'.
Resident 27	It's my belief that there shouldn't be allocated percentages, instead housing mix should be based on local needs				% split is already less exact than WDC wish. There is no available housing needs survey of Ninfield and adjoining rural parishes.
Resident 10	NO, any further developments should be kept small - 10 or less. elderly accommodation should be considered. Ingrams is supposed to be rented dwellings.				Tend to agree but as the NNDP excludes any housing allocations or overall housing growth figure for 2021-39 a blanket ban on any new site having more than 10 dwellings would be held unreasonable

Resident 8	yes, any new dwellings built should be to provide a needed type of home - not the most lucrative for builders.				Noted
Resident 11	Yes, providing they are small developments on brownfield sites, i.e. disused farm etc and in with the character of Ninfield.				See earlier comments above
	Policy N12 - Communications				
ESCC	Agree				Noted
Resident 22	Yes, Good communication is essential, especially for those who work from home.				Noted
Resident 8	Yes, this needs close controls				Noted
	Policy N13 – Local Employment				
WDC			76	Policy should provide for new employment uses within village development boundary (not just on the identified sites), and in exceptional cases outside the boundary. For existing employment sites outside the development boundary, reference to 'intensification' would be more appropriate than 'expansion'. Question whether it is	There is a lack of any potential new sites for employment development within village development boundary. The existing identified sites both within and outside the dev boundary offer much scope for intensification or redevelopment. N13 reworded so that list of

				necessary to distinguish between sites inside the development boundary and those outside as provisos and other policies apply. Suggest restrict new dev to Use Classes B2, B8 and E(g) as per evidence for Local Plan and delete ‘sui generis’ uses.	provisos now apply to all the identified employment sites, removing differentiation between village and rural sites. Owing to the need to retain and increase local employment in face of weak local demand, it is not considered that restriction to B2, B8 and E(g) is justified especially as the two ‘sui generis’ sites are locally significant.
Resident 6	But not if it involves unsightly commercial buildings				Policy N13 has been amended to include more provisos requiring new development not to be detrimental to the built environment, landscape, etc
Resident 27	Great in principle but shouldn’t be restrictive so as to cause recruitment issues for employers				Do not think N13 is overly restrictive. N14 is restrictive regarding sites in countryside but do not see how either would cause recruitment issues
Resident 8	Yes, I also believe that planning applicants should cover more of the cost involved due to their				These suggestions are outside the scope of an NDP and would probably

	applications; for example, adjacent and other affected neighbours should have a copy of the plans sent to them, with costs covered by applicants.				require new regs from Govt.
Resident 10	Yes, retention of local employment is important and could be expanded. Not just food and drink - farm projects an rural life, wildlife, council maintenance, workshops, teaching areas. i.e. behind the carwash is good viable employment which is not intrusive.				Policy N13 and N14 allow for these
Resident 23	Yes; Loss of agricultural land should not be allowed. Development of existing buildings to be supported.				Noted
Resident 15	Yes; Would not support any expansion of Tarmac site as already noisy and (as above) light polluting.				Noted
	Policy N14 – Sustainable Rural Enterprise				
WDC	Question what is meant by 'contained within suitably located buildings which are appropriate for conversion'. Does this mean that you		78	The wording of this policy needs to be looked at again. Needs supporting text to N14 to include examples of what is a sustainable rural enterprise.	N14 has been looked at again and made clearer and more succinct without changing its meaning in any material

	only want converted existing buildings or any new buildings built should be suitable for conversion in future – neither is acceptable really. Does this mean that all rural diversification schemes should first consider reuse of existing agric buildings capable of conversion? What is a suitably located building? What is meant by capable of conversion as, subject to cost/viability, almost all buildings are. Should this specify somewhere what should be included?				way other than in response to WDC comments. It is now much less restrictive in respect of new buildings. Individual cases of existing buildings for conversion are likely to differ widely and specific definitions are considered impractical. It has been reworded to refer to buildings appropriate for conversion in respect of construction and location which leaves enough scope for judgement by decision maker in individual cases. Disagree that examples of sustainable rural enterprise are needed.
	'In exceptional cases, new buildings or other development in the rural area may be acceptable'			Perhaps a less heavy-handed reference in this policy to something 'appropriate' subject to other policies is all that's needed	Deleted 'in exceptional cases' and reworded.
	In exceptional cases, new buildings or other development in the rural area may be acceptable if it is small scale and in	N14 a		suggest that you just use the term 'rural character of the area and supports sustainable economic growth towards balanced living and	Agreed and amended but added proviso mentioning compliance with other policies of NNDP.

	keeping with the rural character including biodiversity and landscape'.			working communities'. The other issues with regards to landscape and biodiversity should be covered by other policies in the Plan.	
	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.			this policy, if brought forward, should concentrate on rural diversification only and ensure that the criteria laid out is appropriate, as is identified above	Agreed and amended
	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.	Final paragraph deleted.
Resident 21	Don't want to lose any more agricultural land.				NNDP goes as far as possible. Cannot ban dev on agricultural land. Some greater safeguard for grade 3A agricultural is desirable but probably beyond inclusion as policy in a NDP.
Resident 8	Yes, Important if properly controlled, and welcomed if				Noted

	within keeping and causing no problems.				
	Policy N15 - Infrastructure				
WDC	'and the associated Design Guide '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		79	I would suggest that infrastructure 'should have regard to' the associated Design Guide.	The Design Guide does not contain specific guidance on infrastructure design, so these words have been deleted from N15.
WDC	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.	Disagree as these are all important
WDC	'or the necessary financial contribution secured by a section 106 obligation'			Subject to tests for S106 agreements in NPPF, paragraph 57.	Noted
ESCC	Agree				Noted
Resident 28	In the south along Bexhill Road the water pressure is much too low. Given the new developments already approved Ingrams, 20 Acre Field, Catsfield Road), there must be a modernised and properly pumped water supply, or the area will be frequently without water.				Needs SE Water to assess this

Resident 6	Not Sure. Existing Infrastructure is not capable of supporting more development.				Noted
Resident 8	Yes				Noted
Resident 20	YES- adequate infrastructure must be in place before additional housing is approved.				Noted
	Policy N16 – Community Facilities				
WDC	'shall be protected from change of use to other purposes'		80	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	Disagree as this would weaken the policy.
	'Development proposals which would result in the loss of any of these existing community facilities and land will only be permitted if':			Consider changing permitted to supported	Agreed and amended
	Clarification is needed in the supporting text as to how have these been identified? Have you spoken to the owners?				Residents were asked specifically about their usage of each of the facilities identified in the NNDP questionnaire 2021.

ESCC				proposals should also refer to community food growing opportunities in addition to allotments	Added to justification text
				The plan should emphasise the physical health and mental wellbeing benefits of providing these additional community facilities and the importance of connected accessible places for all to meet reducing social isolation and improving the social cohesion of the area.	Added to justification text
Resident 9	Don't know if agree. Headstart School have a poor record of sticking to the planning rules and need to be watched.				Noted
Resident 10	NO, I agree with section A, unless it becomes unviable. Kings Head is a family pub franchise providing affordable food for families. Many cannot afford Blacksmiths.				Cannot justify 2 pubs or 2 pub/restaurants as ‘essential’. Previously considered whether Kings Head should be a ‘community facility’ but felt it was more appropriate to protect it as an ‘employment site’. Kings Head nowadays seems more of a restaurant with a bar and v large car park serving a

					wide area whereas the Blacksmiths Inn although a ‘gastropub’ has more the character of a village pub that does food. Although important to users, affordability is totally outside any planning controls.
Resident 29	The evidence of lack of viability must be genuine				Policy N16 wording is as tight as it can reasonably be.
Resident 12	The Kings Arms should be included given it’s age and use by the local community.				Disagree for above reasons. The KH was historically the only pub but that is not now a reason.
Resident 20	YES, and add CHURCH WOOD to the list of community facilities				Church Wood is most appropriately safeguarded as LGS
Resident 8	Yes, we cannot manage without the facilities listed; also, some are already fully committed without more demands on them.				Noted
Resident 11	Yes, I agree with the policy but think that the Kings Arms should be added to the list. It is a vital and important resource for Ninfield and the surrounding area.				Disagree as above

	Policy N17 – Safer and More Sustainable Travel				
WDC	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'.		85	Move to community aspirations as it covers works across the parish rather than just a particular site.	Disagree as the policy wording includes reference to improvements related to development sites
ESCC	Agree			It is suggested that this policy references the need to consider government guidance in relation to the design and delivery of cycle infrastructure – Local Transport Note 1/20 Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk). This will be updated shortly to provide more guidance for cycle infrastructure design for more rural locations.	Agreed and added to text, not policy N17

ESCC				Footways and footpaths should be explicit in terms of the policy, recognising the differences between them. Footways are generally part of the highway fabric (adjacent to carriageways) or adopted routes connecting residential estates; and footpaths are Public Rights of Way. With regard to point 4, it is worth noting that footpath networks can only be expanded if the landowner agrees to dedicate as such, and this may not be in the control of a site proponent	Text checked
ESCC				The policy and supporting text should emphasise the physical health and mental wellbeing benefits of increasing active travel in the area.	Already mentioned in text albeit briefly and not considered justified in policy.
Resident 27	Car use can / should only be restricted once sufficient public transport is available, 1 hour service to Bexhill and 2 hour service to Battle with no service after 6:00pm or on Sundays is unacceptable				Outside scope of NDP

Resident 28	The speed limits need to be reduced along the High Street (down to 20 mph) and Bexhill Road (down to 30 mph south of the Memorial Hall and to about 200 metres past the car wash.				Outside scope of NDP
Resident 15	Yes how about fixed cameras?				Outside scope of NDP
Resident 22	Yes, particularly as the figures show how car dependent the local population is.				Noted
Resident 8	Yes, We are heavily dependent upon our cars out here, but I wonder if more buses etc would tempt folk from their car comfort.				Already mentioned in text
	Policy N18 - Parking				
ESCC	We welcome the reference to our Guidance for Parking documents.				Noted
Resident 6	No comment				
Resident 30	Parking is an issue to the residents of Church Lane and Downsview. I welcome the increased usage of the recreation ground and understand the need for parents to drop off and collect their children at the				Outside scope of NDP

	Village School, but some form of control should be made to control the parking so that the residents are not inconvenienced.				
Resident 8	Yes, there is already a high degree of road parking on our narrow lanes causing a danger				As above
	Community Aspirations				
	Delivery Plan				
WDC	At least 25%		90	25% of the Community Infrastructure Levy	Agreed and amended
	Appendices (NB. comments have mostly been referred to above under the associated policies)				
WDC	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?	Noted
	Supplementary Planning Guidance 'Design Guide for Ninfield'				
WDC	Recognise attempt made to respond to previous			Need to justify each point with relevant photos next to it	Much consideration has been given to these

	comments but still too heavily reliant on High Weald Housing Design Guide using large tracts of same text and headings, particularly as most of parish is outside AONB. Guide is Ninfield village centric but other settlements need to be included and rural hinterland with scattered farms. Suggest look at other design guides eg. Battle, Chiddingfold, Ilminster, Eye, etc. Rather than finding evidence to fit pre-formed guidelines, these use their intros to set out aims, analyse the settlement to identify key distinctive elements, and use these to create guidelines to enhance their character.			rather than in preceding section. Need intro to each topic area and explain what type of devs bullet points relate to.	comments but they are felt to be disproportionate. The draft Guide has already been modified greatly, after further analysis, to contain much more detail and illustration of the distinctive buildings and features in Ninfield parish which give its identity. These are very similar to those in the HWDG as Ninfield is in the High Weald NCA albeit with the larger part outside the AONB. The HWDG refers to its approach being also applicable to adjacent settlements and, at the outset in 2020, its officer agreed that it could be used for Ninfield. It is a positive advantage to users that there is similarity of layout of the Ninfield DG to the HWDG.
WDC	Notwithstanding above, specific detailed points are raised regarding the some				These detailed points are agreed and amendments to the exact wording have

	of the wording of the Guide in its present form.				been made as suggested.
WDC	Specific points: 'significance of Stocks'		3	Consider rewording/rephrasing first paragraph	Agree: amended
WDC	'5-year supply of housing'		5	Consider rewording	Agree: amended
WDC	'Church Path, as an historic route, is a heritage asset		11	Needs further explanation, a path cannot be a heritage asset	Reworded
WDC	'The local vernacular is best reinforced by using small module clay tiles'			Too prescriptive. The local vernacular includes a wide range of materials.	The Guide asks for this 'wherever possible'. There have been some unfortunate examples of wholly inappropriate materials being used in recent new builds.
WDC	Sustainable Building Design: sound like policy wording		38	Consider rewording e.g. as part of new schemes we would like to see….	Agree: introductory sentence added.

Further Consultation on Local Listing of Proposed Non-Designated Heritage Assets (NDHA):

In their response to the Regulation 14 consultation, Wealden District Council asked how the list of NDHAs had been prepared and whether the owners of these properties had been consulted. With one exception, the relevant policy, the criteria and the local list had not been the subject of any negative responses from either owners or other residents under the Reg 14 consultation. The criteria for selection are clearly set out in Appendix C and the preparation of the local list was prepared by a subgroup of the Steering Group. However, to strengthen the case for a local list, the Steering Group decided to consult directly with the property owners and occupiers involved.
A letter from the Chair of the Parish Council (see below) was delivered to the 86 properties on 1st December 2022 and responses were collected by email to the Parish Clerk or by paper copy in a "post box" in the Village Stores. The consultation closed on 30th December 2022. As stated below, this resulted in 19 replies of which 15 were in agreement, 2 were neutral and 2 were negative.

Copy of Letter to NDHA property owners:

Dear Owner/ Occupier

NINFIELD NEIGHBOURHOOD DEVELOPMENT PLAN – **PROPOSED INCLUSION OF YOUR PROPERTY ON A LOCAL LIST OF NON-DESIGNATED HERITAGE ASSETS**

You may be aware that Ninfield Parish is in the process of producing a Neighbourhood Development Plan (NDP). Several other Wealden Parishes are also working on their NDPs. The purpose of these plans is to enable local people to produce planning policies for their area, which nevertheless must conform with national and local strategic policies. Our own draft NDP sets out the Vision, Policies and Objectives to help shape the future of Ninfield Parish until 2039.

With the recent pressure for new housing in Ninfield and the District Council's past rejection of a Conservation Area, it has been felt necessary to consider how the character of the village and parish and its 'sense of place' can be protected. The powers available through NDPs are limited but one of the methods of protecting local character and heritage is through the adoption of a Local List of 'non-designated heritage assets' (NDHAs).

This designaton falls far short of the stringent controls exerted over statutorily listed buildings and does not affect normal 'permitted development rights' to carry out alterations and extensions to dwellings. However, it does mean that, when planning permission is required (such as for a large extension or building on the same plot or other property in the vicinity), due consideration is given to its effects on the non-designated heritage asset during the planning application process.

The draft Ninfield Neighbourhood Development Plan can be viewed on the Parish Council's website Neighbourhood Planning - Ninfield Parish Council - Ninfield Parish Council, Ninfield, Battle (ninfieldpc.co.uk) If you do not have internet access, please contact the Parish Clerk (tel 07725 843505) to arrange to see a printed copy.

In the draft Plan, the relevant pages on Heritage Assets are 57 to 62 and the proposed Criteria and the draft Local List of non-designated heritage assets are in Appendix C on pages 93 to 122. This includes your property because it is considered to meet the criteria. A brief description is given of your dwelling.

The criteria for inclusion in this list are one or more of the following: **Age**; **Rarity**; **Aesthetic interest**; **Group Value** (eg where a group of buildings' design or historic relationship make them a heritage asset): **Archaeological or Archival interest; Historical Association**; **Landmark status** and **Social and Communal value.**

We would welcome your views and comments about the inclusion of your property as an NDHA. If you are not the property owner, please forward this letter to them. Please would you complete the slip on the reverse of this letter by 30th December 2022 and place it in the box marked Non-Designated Heritage Assets in the village shop/PO. Alternatively, you can e-mail the Parish Clerk: clerk@ninfieldpc.co.uk

Many thanks

Kamala Williamson
Chair
Ninfield Parish Council

November 2022

REPLY FORM

NAME: ……

SIGNATURE: …….
ADDRESS:……

Do you agree with the Selection Criteria? YES/ NO If no, please state the reason under COMMENTS below.

Do you agree with inclusion of your Building on the List? YES/ NO If no, please state the reason under COMMENTS below.

Do you consider the brief description of your Building to be correct? YES/ NO. If no, please suggest how it should be amended under COMMENTS below.

COMMENTS:……..……

Results of consultation on NDHAs: A total of 19 responses were received, details of which are in Table 3 which follows.

In reply to the question “Do you agree with inclusion of your property on the list” 15 agreed, 2 disagreed and 2 were neutral.

The Chair of the Steering Group replied to the 2 negative responses individually to clarify that Wealden District Council remained the decision makers in the Planning process and that their statutory rights as householders would not be affected by local listing. It was also pointed out that further opportunity to comment on local listing would arise during the examination stage.

In respect of ‘Lynwood’, the Steering Group considered the objection raised by the owner on the basis that this pair of cottages (including ‘Lemon Cottage’) had been enlarged too much to be worthy of NDHA status but, after discussion, concluded that sufficient care had been given to the design and construction materials of the enlargements to ensure the historic character was preserved. This was also the case with a number of other cottages and houses in Ninfield proposed for NDHA status, including Newhouse Farm where the owner had commented about it being modified but not objected to NDHA designation.

In respect of the owner’s objection to Thorne Oast, the Steering Group considered that NDHA status was warranted because it was one of the few surviving remnants of hop-growing which had been so important in Ninfield in the c19th. However, it was decided to make it clear that NDHA status should only apply to the oast house and not to the other buildings on the site.

Table 3: Responses to Further NDHA Consultation:

Address	Agree/Disagree - Comments
The School House, Church Lane	Agree
1 Rose Cottages, The Green	Agree
Thorne Mill, Ninfield Road	Agree
Lynwood, Manchester Road	Disagree – We are currently seeking advice on this matter. However, as it stands, we are disinclined to have our home, Lynwood in Manchester Road listed as a "non-designated heritage asset". Lemon cottage attached was significantly extended in the 1980s and Lynwood itself was extended significantly in the late 90s early 2000s approximately five years before we purchased it. Therefore, only about 50% of the whole structure dates to the 1800s. We have already had planning for a reasonable proposed addition of a small utility room declined by Wealden. We do not see NDHA status as

	anything other than a further disadvantage to any future attempts for planning approval. We appreciate the motivation of such a proposal but do not wish to be used as pawns in the on-going campaign of the village against Wealden planners.
Little Orchard, Marlpits Lane	Agree
Rose Tree House, Manchester Road	Agree
Glendale Cottage, Catsfield Road	Agree - Glendale Cottage circa 1620 is one of the oldest cottages in Ninfield
Sunnyside House, Church Lane	Agree
Nara	Not specified
2 Church Path, The Green	Agree - It would be nice to think that this could help stop overdevelopment in Ninfield
Stepping Stones, Lower Street	Agree
1 Southview Cottages, High Street	Agree – no internet
Fir Tree House, The Green	Agree
The Reading Room, Church Lane	Agree
1 Church Path, Lower Street	Agree
Thorne Oast Farm, Ninfield Road	Disagree - Apologies in the delay in getting back to you we have been away for some time. We do not agree with your proposed property inclusion scheme for our property to be listed on a non designated heritage list and be controlled in any way shape or form. It is Wealden Councils responsibility to decide this as this is who are taxes go to and any planning applications paid and made to. We feel the local parish council telling any home owner what they can and do with their own property and listing it is absolutely disgusting and goes against our home owner rights. We have worked hard for our home and are not going to be dictated by the village what we can and cannot do with it, we do not feel this is safe nor fair especially for larger home owners. Thorne Oast Farm will not be going on the list should there ever be one.
2 Moor Hall Cottages, Moor Hall Drive	Agree - Apologies, I have been meaning to comment on the proposals but have missed the deadline. I also couldn't find the documents on-line. Anyway, I do not have a problem if you want to include my house 2 Moor Hall Cottages Moor Hall Drive in the list.

Yew Tree Cottage, Moons Hill	Agree - Please forgive my delay in not responding sooner to your letter it slipped to the bottom of my list as Christmas and unfortunately Covid took over, I do hope I'm not too late to respond ? Yes very happy for our property to be included as an NDHA, so please consider this email as confirmation.
New House Farm, Hooe Road	Not specified - Apologies for late response. My house is mainly 200 years old however it has had several alterations over the years. 1994 extension, very modern inside. New front doors in place of windows. Enclosed cellar steps, double glazed windows on extension.

Full postal addresses of all NDHAs are provided in the Ninfield NDP Consultee Contact Details document.

Conclusion

This document sets out the consultation activities with local residents and businesses as well as statutory bodies that have been carried out since the Parish Council first decided to embark on developing a neighbourhood plan for Ninfield Parish. It shows the opportunities provided to become informed about and engaged in the preparation and progression of the NNDP. This has included opportunities to provide information, express their views and concerns and make suggestions for improvements to the proposals as they were drafted.

It sets out details of the persons and bodies who were consulted and the method as to how they were consulted. It sets out the issues and concerns that they raised and describes how these issues and concerns were considered and, where relevant, addressed in the proposed NNDP. It complies with Regulation 15 under Part 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

Table 4: Main Documents Produced for the Ninfield Neighbourhood Development Plan

Document	Description
NNDP Pre-Submission Plan	The draft plan which was put out for consultation to residents, organisations and statutory consultees under Regulation 14
NNDP Consultation Statement	Statement of how consultation was carried out to meet statutory requirements
NNDP Basic Conditions Statement and Equalities Impact Assessment	Statement of how the Plan meets the statutory basic conditions and how equalities were considered during the plan preparation process.
NNDP State of Parish Report	Profile of the parish with census statistics, summaries and evidence of focus groups and survey findings
NNDP Design Guide	A detailed guide for the design of dwellings and similar buildings with an emphasis on safeguarding the features that give Ninfield its sense of place.
NNDP Character Assessment Report	A detailed report of the various built character areas of the parish, their associated features.
NNDP Local Green Spaces Report	A detailed report describing the proposed Local Green Spaces and how these were identified including other potential sites that were also assessed but rejected.
NNDP Landscape Study	A detailed report of the distinct landscape areas that comprise the Parish of Ninfield

Appendices

Community Consultation: A Detailed Account

Date	Day	Title	Venue/Medium	comments	Publicity	Publicity
23 July 2020		Open Air Event	Pavilion			VV/PN/SM
01 August 2020		Strengths Weaknesses Opportunities Threats	Methodist Hall	community café/book exchange		VV/PN/SM
01 August 2020	Saturday	Strengths Weaknesses Opportunities Threats	Memorial Hall	Village Market		VV/PN/SM
10 August 2020	Friday	Appeal for Road Champions	Press			VV/PN/SM
31 August 2020		Photo Competition		By email		VV/PN/SM
20 October 2020	Tuesday	Village character & Heritage Assessment	Zoom			VV/PN/SM
27 October 2020	Tuesday	Environment & Countryside	Zoom			VV/PN/SM
29 October 2020	Thursday	Infrastructure & Economy	Zoom			VV/PN/SM
04 November 2020	Wednesday	Transport & Travel	Zoom			VV/PN/SM
18 November 2020	Wednesday	Design & Development	Zoom			VV/PN/SM
25 November 2020	Wednesday	Community Resilience & cohesion	Zoom			VV/PN/SM
19 February 2021	Friday	Update, news about Questionnaire	Press			VV/PN/SM
March April 2021		Parish-wide survey		delivered to every household		VV/PN/SM
02 April 2021	Friday	Update, news about Questionnaire	Press			VV/PN/SM
28 May 2021	Friday	Update, preliminary Questionnaire results	Press			VV/PN/SM
23 July 2021	Friday	Update, general	Press			VV/PN/SM
10 September 2021	Friday	Update, evidence base with details of forthcoming exhibition	Press			VV/PN/SM
09 October 2021		Exhibition	MH	Questionnaire/reports		VV/PN/SM
16 September 2022	Friday	Update, Regulation 14 consultation publicity	Press			VV/PN/SM
23 September 2022	Friday	Reg 14 drop in	Meth	community café/book exchange	post card	VV/PN/SM
27 September 2022	Tuesday	Reg 14 drop in	MH		post card	VV/PN/SM
30 September 2022	Friday	Reg 14 drop in	MH	community café/book exchange	post card	VV/PN/SM
07 October 2022	Friday	Update, reminder about drop-in sessions	Press			VV/PN/SM
07 October 2022	Friday	Reg 14 drop in	MH	community café/book exchange	post card	VV/PN/SM
08 October 2022	Saturday	Reg 14 drop in	MH		post card	VV/PN/SM
14 October 2022	Friday	Update, reminder about drop-in sessions	Press			VV/PN/SM
14 October 2022	Friday	Reg 14 drop in	MH	community café/book exchange	post card	VV/PN/SM
21 October 2022	Friday	Reg 14 drop in	MH	community café/book exchange	post card	VV/PN/SM
28 October 2022	Friday	Reg 14 drop in	MH	community café/book exchange	post card	VV/PN/SM
06 January 2023	Friday	Update, progress report	Press			VV/PN/SM
14 April 2023	Friday	Update, Regulation 15 submission	Press			VV/PN/SM

Key; MH=Methodist Hall, VV= Village Voice (Bexhill & Battle Observer), PN= Parish News, SM= social media (Parish Council Facebook, Ninfield Community Facebook, Ninfield Action Group Facebook).

Articles placed in the local press:

Neighbourhood Plan Update (17th July 2020 Village Voice – Bexhill Observer & Parish News).

The new plan is progressing well despite the current difficulties with holding meetings etc. We have appointed Action in Rural Sussex as consultants to help us develop the plan and it is hoped that we will get it completed towards the end of 2021. Steering Group members are currently working on a SWOT analysis (Strengths Weaknesses, Opportunities and Threats) but we want to hear from everyone in the Parish. We are holding and open-air event on Thursday 23rd July from 7pm to 8pm outside the Pavilion. Come along to see the ideas people have come up with and add anything we may have missed.

Another important job is to take photos of village life to use as illustrations in the new plan. We are launching a photographic competition for everyone to take part in. We need pictures of our green spaces, play areas, sports on the Rec, ponds, woodlands, wildlife. Also views into and out of the village/parish that are important and we don't want to lose. It would also be good to have pictures of buildings, businesses and people at work represented too.

To enter please email the photos to the Parish Clerk (clerk@ninfieldpc.co.uk) with the subject line "photo competition" and please tell us where and when the picture was taken (for example "taken from Church Path facing SW towards Eastbourne 10.30am Monday 27-07-2020"). Entries close 31st August 2020. The aim is to use as many pictures as possible but an overall winner will be selected and an age-appropriate prize awarded. Good luck!

Appeal for Road Champions (10th August 2020 – Bexhill Observer & Parish News)

Wanted! Road Champions to deliver information to residents on behalf of the Parish Council

The Parish Council is embarking on a Neighbourhood Plan to safeguard Ninfield and enable residents to have a say in the future of the village. We are also facing an unprecedented number of Planning Applications due to Wealden Council's decision to withdraw the Local Plan.

We need volunteers to deliver information to residents and occasionally to collect information from residents, in a timely fashion.

If you are willing to volunteer on behalf of your road please email clerk@ninfieldpc.co.uk and provide both your name and the name of your road. The more volunteers we have the lighter the burden on each person!

Neighbourhood Plan Update

The photo competition is continuing until 31st August so please send in your entries. We need views of the landscape throughout the Parish, village features (buildings, businesses, people) to be used to illustrate the plan. Also, send pictures of problem areas and examples of things we do not want to see repeated! Email pictures to clerk@ninfieldpc.co.uk there will be a prize for the best under 16 and the best over 16 entrant.

There will also be an on line questionnaire coming in the next few weeks to lay the groundwork for putting together the Parish Survey. Watch out for this on the Parish Council website https://www.hugofox.com/community/ninfield-parish-council-15069/full-council/?fbclid=IwAR3OTc_2GqW0cXCmZbbkVFZcTzLEw3B4uN9gun7OwgSQw33u5IUzkjXYZeE and social media pages. If you know anyone who does not use the internet but wants to take part please ask them to call John Cheshire on 892248.

Neighbourhood Plan Update: (2nd October 2020, Village Voice – Bexhill Observer). "Following our Strengths Weaknesses Opportunities Threats survey, we have held a couple of online workshops to identify the next steps for developing our plan. The next stage will be to review 6 areas and begin to develop policies. These are: • Infrastructure/economy • Transport & travel (including parking) • Local character/heritage • Design and development • Green spaces/environment • Social cohesion/resilience There will be an opportunity to get involved in workshops and surveys around these topics so if you would like to help, please let us know. Email: ndp@ninfieldpc.co.uk or call John on 892248.

Neighbourhood Plan Update: (23rd October 2020, Village Voice – Bexhill Observer). Neighbourhood plan workshops continue on line throughout October and November. Please look at the Parish council website to register and get your invitation. Topics include environment and green space, traffic and transport, design and development, community cohesion and resilience.

NDP Update: (6th November 2020 Village Voice – Bexhill Observer & Parish News). "Online workshops for the Neighbourhood Development Plan continue during November, please sign up and share your views on Design and Development on Weds 18th November and Community Cohesion & Resilience on Wednesday 25th November. Both sessions are at 7pm and you need to register beforehand, please see Ninfield Parish Council website: http://www.ninfieldpc.co.uk/community/ninfield-parish-council for details of how to join in."

NDP Update: **(19th February 2021, Village Voice – Bexhill Observer & Parish News).** It has been a difficult year for everyone and moving forward with a Neighbourhood Plan without the ability to hold public meetings that everyone can get involved with has been very challenging. However, a great deal of work HAS been done by Steering Group members, Parish Councillors and our Parish Clerk and we have had numerous on-line workshops and planning sessions that many residents have joined in with. The aim of these sessions was to analyse in detail the current character of the Parish and its setting in the landscape and to start thinking about policy areas that will be important to all of us over the next 15 to 20 years.

Having done this ground-work we are almost ready to put out a Parish Questionnaire. With this big project we want to gather information about our current community and to find out the ways in which people want to see the Parish develop and what aspects need to be protected. This will be the cornerstone of our evidence base and important policies will be developed using this information.

Each household will receive paper copies of the questionnaire (hopefully in early March). However, there will be an **on-line version** with a link to it available on the Parish Council website & Social Media and we want to encourage everyone (each adult) to complete it electronically if possible, we would prefer this to a single “consensus” version for the household. If you do not have access to the internet, paper copies can be dropped off into a collection box in the Village Stores.

More details to follow and watch out for the form. There will be a prize draw for all entrants with a chance to win vouchers redeemable at local businesses.

Update on the Neighbourhood Plan: (2nd April 2021 Village Voice – Bexhill Observer & Parish News). By now**,** most houses in the village should now have received a copy of the NDP Questionnaire. The NDP will guide decisions about where any new housing goes and what type of housing that might be. The Plan will be key to protecting our natural environment (countryside, green spaces, Church Wood etc.). We also need your views on what shops, businesses and other infrastructure is needed to support our parish community, including sports/leisure, youth and children's facilities, footpaths, renewable energy etc. Please

complete the form (online if possible), a link can be found on the Parish Council website just search for Ninfield Parish Council and the link is on the Neighbourhood Planning page.
If you do not use, or have access, to the internet please complete the paper form and drop it into the collection box in the Village Stores. The survey is completely confidential and any data you provide will not be passed to any other organisation outside the Parish Council.
There is a Prize Draw offering the chance to win one of several vouchers available to be spent in one of our excellent local businesses (Village Stores, Blacksmiths Inn, Hope Farm Cottage etc). All entries should be submitted by 22nd April. "

NDP Update: (28th May 2021 Village Voice – Bexhill Observer & Parish News). "The Neighbourhood Development Plan questionnaire generated a good response from residents with 350 people completing their forms. Preliminary analysis shows there was a general consensus against more large estates being built here in Ninfield over the next 20 years. Most people (around 68%) were in favour of individual houses or small developments of up to 10 houses (although around 18% wanted no further development). The biggest housing issue identified was the cost of buying a home here.
People said they wanted Ninfield to remain rural, tranquil, safe and friendly and there was general agreement that our countryside and woodlands should be protected.
Other than housing, people wanted to see more small shops (especially a bakery), small office/commercial units, a community orchard and specific areas for nature conservation.
The analysis will go into more depth over the next few weeks and will add to our evidence base for the NDP. "

Neighbourhood Plan Update: **(23rd July 2021 Village Voice – Bexhill Observer & Parish News).** Most of the evidence on which policies in our parish wide plan will be based has now been gathered. You can view all the documents on the Ninfield Parish Council website, just search Neighbourhood Planning Ninfield.
Please take some time to have a look and give us your feedback. If you have questions or comments either email the clerk at clerk@ninfieldpc.co.uk or call John Cheshire on 892248."

Neighbourhood Plan Update: **(10th September 2021 Village Voice – Bexhill Observer & Parish News).** "Documents that form the evidence base for the Neighbourhood Plan have been updated in light of comments received and are nearly ready to share with Wealden District Council. Please take a look by searching Ninfield neighbourhood plan.
I am aware that many residents do not have internet access so we will be holding an exhibition on Saturday 9th October between 1pm and 4pm to show the results of the questionnaire and also summaries of the key documents. Free refreshments provided."

Neighbourhood Plan Update: **(22nd August 2022, Village Voice – Bexhill Observer).** "The Ninfield NDP is almost ready to go forward to the Regulation 14 Consultation stage. This is when you, the community, get to see the draft Plan and its policies and have a chance to comment on it before we move forward to the next stage. It is really important to get your views on this key document that will help shape how our Parish develops over the next 15 or so years. Protecting the countryside and getting the right kind of new housing were the main issues raised by Ninfield residents in the 2021 Questionnaire and the draft Plan has been written with that in mind.
In the next couple of weeks every household will receive a flyer with details of how to access the draft Plan. The consultation will start in September (exact dates to be announced next week) and you will be able to view and comment on the draft Plan on line via the Parish Council website. For those people not on line, there will be 2 mini exhibitions to enable you to see and comment on the key information and proposed policies. These exhibitions will be held in the Methodist Hall, dates and times will be on the flyer and listed here next week. You will also be able to view hard copies of the plan at the Community Cafe session during the 6 weeks that the consultation will run."

Neighbourhood Plan Update: **(16th September 2022 Village Voice – Bexhill Observer & Parish News).** Ninfield Parish Council are pleased to announce that the Regulation 14 Public Consultation on their draft, Pre-submission Neighbourhood Plan will begin on Thursday 22nd September and run until noon on Friday 4th November. We need to hear your views on the proposed policies being put forward that we hope will influence future development in the Parish. During the consultation residents can view the draft plan on the Neighbourhood Planning page of the Parish Council website - www.ninfieldpc.co.uk. There will be a response form alongside all the documents to enable you to give us your views.
In addition to the online version, you can view the Plan at drop-in events on Tuesday 27th September 6.30 to 9pm and also on Saturday 8th October, 1 to 4pm. Both events will be held in the Methodist Hall, Church Lane, Ninfield TN33 9JN.
In addition to these exhibitions, the Plan and supporting documents will be available at every Friday morning Community Cafe session during the 6-week period. Paper feedback forms will be available at every event but you can also get one by contacting Jackie Scarff the Parish Clerk (email clerk@ninfieldpc.co.uk or telephone 07725 843505).

Neighbourhood Plan Update: **(7th October 2022, Village Voice – Bexhill Observer & Parish News).** Ninfield Neighbourhood Plan Drop in event on Saturday 8th October 1 to 4pm in the Methodist Hall. A chance to view the policies, ask questions and talk about issues to representatives from the Parish Council over tea coffee and cake.
View the Plan, Design Guide and the supporting documents here:
http://www.ninfieldpc.co.uk/.../neighbourhood-planning/

It is a huge document (sorry!) but the key thing to focus on is the policy wording.
Also view hard copies of the Plan at the Friday morning Community Café on the following dates:
23rd Sept from 10am -11.30am.
30th Sept from 10am - 11.30am.
7th Oct from 10am - 11.30am.
14th Oct from 10am - 11.30am.
21st Oct from 10am - 11.30am.
28th Oct from 10am - 11.30am.

Neighbourhood Plan Update: **(14th October 2022 Village Voice – Bexhill Observer & Parish News).** Wealden District Council have no Local Plan in place and have paused their Plan preparation process while negotiations about housing numbers take place with central government. Even when their Local Plan is ready there is no guarantee it will pass examination. This further delay leaves Ninfield (and the rest of the district) vulnerable to many more speculative housing applications. The Ninfield Neighbourhood Plan is likely to be ready **before** the WDC Local Plan and the policies within it will guide where any new houses will be sited, what they will look like and the overall scale of development in the Parish.
However, we urgently need residents to take part in the **Regulation 14 consultation** and to share their views on the policies. Without this support, the NDP will not carry sufficient weight. Please take part on line at www.**ninfieldpc.co.uk** on the Neighbourhood Planning page. We have added a short form document with just the policy wording to make things easier but you can refer to the main document for a full explanation if you wish.
Closing date is **4th November at noon.** If you have any questions, please feel free to contact the Parish Clerk or John Cheshire, Chair of the NDP Steering Group (892248).

Neighbourhood Plan Update: **(6th January 2023, Village Voice – Bexhill Observer).** The NDP Steering Group are assessing all the comments from both individuals and the statutory consultees that we received in relation to the recent Regulation 14 Consultation. Wording of the draft Plan is being adapted where necessary and once this is all agreed, the amended draft will come forward to the Parish Council for adoption. After this, we will send it to Wealden District Council who then conduct .....another consultation!! There will be publicity for this nearer the time and I hope you will all (once again) confirm you agree with our policies. Watch this space!

Neighbourhood Plan Update: **(14th April 2023, Village Voice – Bexhill Observer & Parish News).** The Ninfield Neighbourhood Development Plan has been amended to take account of comments made during the recent Regulation 14 consultation. The new draft Plan and the supporting documents have been agreed by both the Steering Group and the Parish Council and all documents have now been sent to Wealden District Council. WDC need to confirm that all the statutory requirements have been met before they move forward to conduct the Regulation 16 consultation but we know they will not start this process until the local elections are over. Hopefully all will be well and the consultation will begin as soon after May 4th as possible. We will let you know the consultation dates in the next few weeks.

Table 4: Results of Regulation 14 Consultation:

In answer to Question 1 “Do you agree with the Draft Plan Overall?” 97.5% said yes.

Policy Number	Agree (%)	Policy Number	Agree (%)	Policy Number	Agree (%)
N1	89.2	N7	82.5	N13	89.5
N2	92.1	N8	92.3	N14	91.9
N3	89.7	N9	89.8	N15	94.9
N4	86.8	N10	92.1	N16	81.6
N5	94.7	N11	92.1	N17	92.1
N6	92.1	N12	94.6	N18	94.7

The Ninfield Neighbourhood Development Plan Questionnaire

NINFIELD NEIGHBOURHOOD DEVELOPMENT PLAN

Don't miss out!

Have your say!

Please complete your Resident Questionnaire

Complete it on line if possible, find the link at

https://www.hugofox.com/community/ninfield-parish-council-15069/neighbourhood-planning/

Register to take part in the Prize Draw!

We are offering a number of ***vouchers*** redeemable at a number of local businesses.

Parish Wide Questionnaire for the Ninfield Neighbourhood Development Plan

The Parish Council have agreed that having a Neighbourhood Development Plan (NDP) in place would be a useful way for our community to have more influence over how the Parish develops over the next 15-20 years.

The NDP will guide decisions about where any new housing goes and what type of housing that might be. The NDP will be key to protecting our natural environment (green spaces, Church Wood etc.). The plan would also influence what shops, businesses and other infrastructure is needed to support the community. This would also include sports/leisure, youth and children's facilities, footpaths, renewable energy etc.
To find out what changes the residents of the Parish want to see, we would like everyone over 18 years old living in the Parish to complete the survey. This survey is CONFIDENTIAL and the information collected will be not be used for any other purpose.
Thank you for your help in this matter.

1. Where in Ninfield Parish do you live? (please tick)

Ninfield Village	Russell's Green
Lunsford Cross	Other (please specify)

2. What is your age? (please tick)

18 -24	25 -44	45 -64	65 or over

3. How long have you lived in Ninfield Parish? ……..years

4. About your housing, do you own or rent your home?

Own	Rent	Neither

5. How many bedrooms are there?.....

6. Who lives in your household? (please tick and state number of children if any)

Live alone	One other Adult	Single parent
2 or more other adults	Children under 18	State number of children

7. What is your work-related status? (please tick all that apply)

Employed	Self Employed	Student
Part time worker	Retired	Other

8. How far do you travel in your daily life? (please tick all that apply)

	Work	School	Shopping	Leisure	Sport	Entertainment
0 miles						
1-5 miles						
6-20 miles						
> 20 miles						

9. How do you travel to work? (please tick all that apply)

Car	Cycle	Walk
Bus	Train	Motorcycle
Work from home	Other	N/A

10. What changes in the Parish would make it easier to get to work? (please tick all that apply)

More frequent buses	Dedicated Cycle paths	Improved pavements/footpaths
More bus destinations	Other (please state)	Better network of paths
Express Buses		N/A

11. Do your children attend the Ninfield Primary School? (yes / no / not applicable) please circle.

12. Do your children travel outside the Parish for Primary School? (yes / no / not applicable) please circle. Which Primary School do they go to?.....

13. If your children attend a Secondary School, which one/s?.....

14. How do you travel for school, shopping and other activities? (please tick all that apply)

	Shopping	Entertainment	Sport	Leisure	Primary School	Secondary School	College
Walking							
Public Transport							
Private Car							
Cycling							
Motorcycle							

15. What do you like about living within Ninfield Parish? (please tick up to 3)

Close to family & friends	Green spaces	Accessibility	Village atmosphere
Close to work	Countryside	Sense of community	Other

If you ticked Other please specify……..

16. What do you think could be improved in the Parish and how?.....
……

17. How would you like to see Ninfield Parish described in 20 years?
(please tick 3)

Accessible	Affordable	Rural
Friendly	Prosperous	Safe
Traditional	Tranquil	Vibrant
Small	Unchanged	Other

If you ticked Other please specify……..

18. Within the past five years, has anyone in your household had to move away or stay living with you due to lack of alternative housing in the Ninfield Parish? (yes/no)

19. If you answered Yes to Question 18 please provide details (tick all that apply).

Available housing too large	Available housing too small
Available housing too expensive	Need sheltered/supported housing
Transport issues	Other

If you ticked Other please specify……..

20. What sort of new housing do you want to see built within Ninfield Parish? (please tick all that apply)

Starter homes	Homes for rent	Shared ownership
Flats	Family homes	Disability/elderly adapted

Smaller Homes (1 or 2 bedroom)	Elderly adapted	Residential care
Bungalows	Park Homes	Other

If you ticked Other please specify…….

21. If new housing development does take place, which style would you prefer it to be? (please tick all that apply)

Traditional style	Eco/sustainable	Bungalows	Large Executive
One off design	Terraced	Semi detached	Detached
Other (please state)			

22. Do you have any concerns about further development within Ninfield Parish? (please tick up to 3)

Loss of countryside	Increased traffic	Impact on GP surgery
Lack of school places	Parking problems	Impact on views
Loss of village identity	Loss of farmland	Not worried
Unsafe for pedestrians	Clash with existing character	Other

If you ticked Other please specify…….

23. Where should housing development in Ninfield Parish be sited over the next 15 years? (please tick all that apply)

Increase housing density of existing built areas	Convert farm buildings	Brownfield sites
Green field sites	Only within development boundary	Other

Other? please specify…….

24. What size of housing developments do you think would be most appropriate in Ninfield Parish? (please tick all that apply)

Large estates (over 30 dwellings)	Medium estates (10 to 30)	Groups of less than 10
Individual houses	None	Other housing e.g. park homes

25. Are there any sites you think suitable for new housing development within Ninfield Parish? (yes/no)

If yes, **where** are they?.....

Why do you think they are **suitable**?.....

26. Are there any areas of land you think should be protected from development? (yes/no)

If yes, please say **where** and **why** they should be protected……..

…….

27. How important is it that new development, including extensions, are sympathetic to the following? (please tick all that apply)

	Very Important	Important	Slightly Important	Not Important
The scale of surrounding buildings				

	Very Important	Important	Slightly Important	Not Important
The character and positioning of surrounding buildings				
The design of surrounding buildings				
The materials of surrounding buildings				
The character of the Parish and it's High Weald setting.				
Sustainable design e.g. solar power, water harvesting, well insulated				

28. Would you like to see any land used for purposes other than housing? (yes/no)
If yes, what for……

29. Should new businesses be encouraged within Ninfield Parish?

Yes	No	Don't mind

30. If yes, what sort of businesses would you like to see?.....

31. Are there any non-residential sites in the Parish that you want to see protected from development?

Pub	Car wash	GP Surgery	Garage	Working Mens Club
Other, please state				

32. Do you run a business in Ninfield Parish? (yes/no)
If yes, what is the nature?.....

33. How could operation of your business be improved by the Neighbourhood Plan?
……
……
……

34. Do any of these traffic issues affect you directly? (please tick all that apply)

	Major problem	Minor problem	Not a problem
Traffic Speed			
Traffic Volume			
Traffic Noise			

35. Are you concerned with any other road safety issues and what is the problem?

Locations……
Problems……

36. Which of the following measures do you think might improve road safety? (please tick all that apply)

More pavements	Traffic calming	Speed indicators
More signage	Cycle ways	Other

If you ticked Other please specify…….

37. Is car parking causing a problem for you? (yes/no)

If yes, please specify where parking is a problem and tell us what that problem is:

……

38. Much of the land in the Parish is graded for agricultural use and this is subject to pressure for change. Do you wish there to be policies that control the development of this land?

	Yes	No	Don't mind
Conversion of agricultural buildings for housing			
Different use of the land e.g. stables, livery, tourism, leisure)			
Different use of farm buildings e.g. for small businesses			
Diversification to specialised agricultural use, e.g. market gardening, poultry etc.			

Other comments related to land use……

39. How important to you are the following features in the landscape? (please tick all that apply)

	Very important	Not important	Don't mind
Hedgerows			
Public Footpaths			
Woodland			
Trees in the landscape			
Water courses			

Please comment on any other aspect of the countryside or wildlife that is important to you……

……..

40. Are there any specific areas of land (public or private) that you especially value as **Local Green Space** for their intrinsic beauty, tranquillity, views, wildlife, historic significance or recreational benefit? (Yes/No) delete as appropriate.

If yes, where are they and what is it about them that you enjoy?.....

…….

41. How often do you (or your children) use the following facilities in Ninfield Parish? *(please tick all that apply and in the case of temporarily closed facilities, please state level of use before closure)*

	Once a week or more	Once a month or more	Few times a year	Never
Churches				

	Once a week or more	Once a month or more	Few times a year	Never
Halls (Memorial, Methodist, Reading Room)				
Recreation Ground				
Church Wood				
Coombe Wood				
Village Stores				
Post Office				
Playground				
GP Surgery				
Blacksmith’s Inn				
Garage				
Convenience Store				
King’s Arms				
Bowls Club				
Public footpaths				
Working Mens Club				
Car Wash				
Five Oak Country Store				

Other comments about facilities? Anything missing? and would you like to see anything else in the Parish?.....
……..

42. Do you support the use of sustainable energy on either a domestic or large-scale basis in Ninfield Parish? (please tick any that apply)

	Support for domestic purposes	Don't support for domestic purposes	No preference (domestic)	Support large scale schemes	Don't support large scale schemes	No preference (large scale)
Solar power						
Battery Storage facilities						
Air or Ground Source Heat Pumps						
Wind turbines						
Biomass schemes						
Rainwater harvesting						

Do you have any of these on your own home? If so which?.....

43. Is reliable broadband access and fast speed important to you? (yes/no)

44. Is local mobile phone signal a problem for you? (yes/no)

45. Which other utilities do you use and do you experience problems with any? (please tick all that apply)

	I use this	Problem, please specify
Electricity supply		
Mains Water supply		
Mains drainage		
Cess pit or septic tank		
Oil		
Bottled gas or tank		

46. Do you think there is a need for more allotments within Ninfield Parish? (yes/no)

If yes, where do you think they should be sited……..

47. Do you belong to any clubs or societies in the village? (yes/no) Please list:

……
……

48. Is there a need for additional clubs or societies and if so what would you like to see?.....

If you have any other comments about the Neighbourhood Plan or if you wish to expand on any of your earlier comments then please do so below (or write a separate letter to us - the more you say, the better!)

……

……

……

……

To take part in the Prize Draw please give us your contact details:

Name……..

Phone…….

We would like ***every adult*** **living in the Parish** to give their views rather than a consensus for the household. If you need extra copies for other adults in your household or have any questions please email: ndp@ninfieldpc.co.uk or call John Cheshire 01424 892248 or Jackie Scarf 07515861921.

Please complete it ***on line*** if you can, using the link at:

https://www.hugofox.com/community/ninfield-parish-council-15069/neighbourhood-planning/

Or alternatively, drop the paper version into the collection box in the Village Stores. If you are house bound and need to have it collected please call us.

Thank you for helping us by providing this essential information.

Published by Ninfield Parish Council

Regulation 14: Detailed Comments from Wealden District Council

Covering Letter:

02 November 2022 katherine.matthews@wealden.gov.uk 01892 602008

Dear Ninfield Neighbourhood Plan Steering Group,

Re: Representations on the Ninfield Neighbourhood Plan Pre-Submission (Regulation 14)

Thank you for consulting Wealden District Council on the draft Ninfield Neighbourhood Plan (Regulation 14).

Wealden District Council supports the Parish Council's work to develop a neighbourhood plan. We recognise that reaching this stage has involved significant work and effort on behalf of all those involved and we congratulate the Steering Group for reaching this milestone in the plan's production.

The Council's formal response on the Regulation 14 Draft Neighbourhood Plan is set out in the following pages and covers general overarching points followed by more detailed comments on some of the draft neighbourhood plan policies. We have also provided comments on the supporting documents. We hope that you find our advice helpful in progressing the Neighbourhood Plan to its next stage.

I trust that the below comments are helpful at this stage. If you have any further queries, then please do not hesitate to contact us. If you would like to have a meeting to discuss any specifics then please let me know and I can arrange.

Yours sincerely, Katherine Matthews Planning Policy Officer

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 -

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 /Catfield 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;

LG3 Church Wood and Church Field and Church Path Church Wood- Designated as Ancient Woodland and therefore already has protection through national policy. No additional benefit would be gained from LGS designation 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.

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 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:- 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. 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. LG7 Proposed Recreation Area behind Sparke Garden, Manchester Road 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. 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. 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.

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 nondesignated 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?

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 nondesignated 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.

This section may be more useful if each policy was set out in its own 'table' and each 'table' included the reasonable alternatives that were considered for that policy area. Summary commentary and the scoring could then accompany each of the reasonable alternatives with justification for the chosen draft policy given at the end. Something along the lines of Table 1 below (this is just an example!). The SA will need a conclusion but could then relate this to the NP as a whole, taking account of the individual analyses. Any analysis need only be proportionate to the policy area and give enough detail to explain the choices made.

Example

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).

Policy N4 options	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16	SA 17	SA 18
A																		
B																		

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

Appraisal

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

Option B is….[set out the assessment findings and justification for not taking forward]

Preferred / Chosen Policy Option: A

Specific Points in Main Plan Document

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 -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 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 ‘minimise loss of countryside its biodiversity’. 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. 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’ - 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.

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 NPPF that deal with rural economic development (paras 84 and 85) 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. 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? 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 Energergy -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

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.

Page38 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 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.

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. 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. 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. 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.) Suggested change/recommendation- ‘All new residential development should meet the Government nationally described space standards’. 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 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 ‘contained within suitably located buildings which are appropriate for conversion’ 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. 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? The wording of this policy needs to be looked at again. Para/Policy Reference Comment Suggested change/recommendation 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? ‘In exceptional cases, new buildings or other development in the rural area may be acceptable’ If there is

a genuine rural enterprise new build development can just be acceptable, not just in exceptional cases – not aware of any local of national policy that would justify otherwise. The appropriateness of its size and location can easily be controlled by other policies. Perhaps a less heavy-handed reference in this policy to something ‘appropriate’ subject to other policies is all that’s needed ‘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. 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’. 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. 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. 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. 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 ‘and the associated Design Guide’ 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 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 -Suggested change/recommendation community facilities and land will only be permitted if’:

Page 85 Policy N17 Safer and More Sustainable Travel ‘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’. This is more of a community aspiration as it covers works across the parish, not just a particular site. 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?

Ninfield Design Guide

General Points

It is clear that an attempt has been made to respond to our previous comments, particularly in the early sections, and that the guide has been made more locally specific, with the use of local examples and photos. There is a good, detailed section on national design guidance. However, the Guide from page 22 onwards is still heavily reliant on the High Weald AONB Housing Design Guide with large tracts of text and all of the headings taken from it. Whilst understanding that the High Weald AONB Guide is a detailed, recent, design document, it covers a wide area and more work is needed to make your guide locally specific.

It is debateable whether the High Weald AONB Guide should be referenced at all, given the majority of the parish is outside the AONB but I note you do argue your case for using it on page 7. This would not however justify copying the guide verbatim. Have you discussed and shared the Design Guide with the AONB unit? They may have dealt with similar situations where part of the Parish is in the AONB and part is outside.

Generally, it would be helpful for points to have further justification. For example, if the guide states that dwellings should be no more than two storey in Ninfield then it needs to be justified/ explained why. The Character Appraisal and photos can be used as evidence to support the guidelines. You have started to do this but you need to justify each point. For example, on page 38 you have a guideline stating ‘characteristic of Ninfield, in addition to full height brick buildings, are tile-hung buildings’ yet your photos of tile hung buildings in the village, which would help to provide justification for the guideline, are on page 18.

Once the design guide starts on page 22 you need an introduction to each topic area rather than just a list of bullet points. This needs to explain what the bullet points are. Are they what new development proposals should do? I.e. all new development should….or all new development including extensions to existing buildings should….or some guidelines for landscaping on new developments are…..or as part of new developments we would like to see…

The guide is quite Ninfield centric but there are other settlements within the parish that need to be included. Also there is much rural hinterland with scattered farms etc.

Consider the use of paragraph numbers, and/ or numbering each guideline under each heading e.g. i, ii, iii, iv. This will make it much easier later on to reference the guide.

Number plates should be obscured throughout.

Notwithstanding the general points made above about the duplication of the High Weald AONB Housing Design Guide and the need to be locally specific, we have still made comments on the Ninfield Design Guide in order to provide what we hope is helpful advice.

Specific Points

The contents page is quite long at two pages. The contents page could be condensed.

3 ‘It is also known for its c17th iron stocks but these are an insignificant feature.’ The stocks are Listed so I am not sure they can be called insignificant. Re phrasing necessary

3 The opening paragraph does not relate directly to the aim of the guide Consider moving either after the second paragraph or later in the document.

4 ‘High Weald national character area’ High Weald National Character Area

5 ‘However, this has not been adopted by WDC as supplementary planning guidance because of the absence of any associated policy in an up-to-date Local Plan’ We may not have adopted the document but it has been published and officers do refer to it and use it. It’s still a material consideration. The fact the Local Plan is out of date makes no difference to whether we adopt the document or not. This section needs to be re-written.

‘5-year supply of housebuilding land’ Inability to meet the Council’s 5 year housing land supply requirement ‘The village development area is out-of-date so several of these large housing estates have been permitted ’ Do you mean development boundary? Also, this section is inaccurate. Development boundaries are still in place and are not the reason that housing estates have been permittedThis section needs to be re-written. Suggested Change/ Recommendation - has more to do with the housing land supply issues in the District.

7 The Joint Advisory Committee published a ‘High Weald Housing Design Guide’ for new housing in 2019 …for new housing in the AONB in 2019 7 You need to make it clear when you are quoting from the High Weald Design Guide e.g. in paragraph 4 References should be clear, ideally using the Harvard system or footnotes but whichever method is used the referencing should be consistent.

11 ‘Church Path, as an historic route, is a heritage asset’ This needs further explanation. A path cannot be a non-designated heritage asset on its own. It needs to be part of a wider identified area and would be a contributing feature.

22 ‘Consider the impact not only on designated heritage assets, such as Listed Buildings, but also on non-designated heritage assets such as other historic buildings and areas, features including routeways, banks, ditches, hedges, woods, trees and field patterns.’ Needs to also refer to the setting of heritage assets by name. Consider splitting this into 2 and having a separate group of guidelines for

1.heritage assets/ works affecting heritage assets and

2.biodiversity assets.

30 ‘Where required (see Validation requirements on Wealden.gov.uk website), include ongoing management proposals for the open space and habitats as part of a Landscape and Ecological Management Plan (to be included in the planning application)’. These are not required on every type of application, see the validation criteria on our website. The validation criteria will determine whether they are required or not, also, sometimes they are required by condition, post decision. Consider rewording or removing as our validation criteria already covers this.

37 ‘Use the detailed High Weald colour study’ Is this too prescriptive bearing in mind that most of the houses in the parish are outside of the AONB? This guideline needs to be reconsidered. The title of the study is the High Weald AONB colour study.

38 ‘The local vernacular is best reinforced by using small module clay tiles with a camber closely resembling traditional hand-made tiles so as to avoid an entirely flat surface’ Too prescriptive. The local vernacular includes a wide range of materials and for roofing this would also include traditional slates,

38 Sustainable Building Design. At the moment parts of this paragraph sound like a policy rather than design guidelines. Consider re-wording e.g. as part of new schemes we would like to see……

39 Signage and Lighting. There is some duplication here with your dark skies policy, are both needed?

Going Forward

It would be of great benefit for you to look at what other parishes have done in their Design Guides e.g. Battle, Ilminster, Eye, Chiddingfold. The Little Shelford Design Guide is a good example of how the guidelines have stemmed from the character analysis including photos. They all have certain things in common;

- They use their introduction to set out aims for the Design Guide.

- They use an analysis of the existing settlement to ascertain what are the key elements that form the local distinctive character e.g. in terms of pattern and layout of buildings, building height, key architectural details, materials (I note the Conservation Officer gave you some key characteristics in our previous advice to you) and that the community most value. You have already carried out some of this work in the village character assessment.

- They then use this to create the guidelines for how new development should enhance the existing character, often using photographic examples of both good and bad design to demonstrate this. The guidelines should stem from the evidence rather than be pre formed and finding the evidence to fit.

- Both the photographic examples and the supporting text to each guideline should justify why a guideline is included.

- There is usually some form of public engagement.