HORAM NEIGHBOURHOOD PLAN
ADDENDUM TO CONSULTATION STATEMENT: VOLUME 5a
NOVEMBER 2023

INTRODUCTION

This Addendum to the Consultation Statement accompanying the submitted Horam Neighbourhood Plan (HNP) supplements and amends responses to certain comments made to the Draft (Regulation 14) Horam Neighbourhood Plan.

It specifically addresses queries relating to the submitted Consultation Statement set out by Wealden District Council (WDC) in paragraphs 2 and 3 of its decision letter on the submitted HNP, dated 26 October 2023 (This is attached as Appendix 1 for ease of reference.)

Relevant responses in the submitted Consultation Statement are shown in *italics*, with new text highlighted in ***bold*** and deleted text highlighted by ~~*strikethrough*~~.

WDC QUERY	**HPC RESPONSE**
Policy HLE2 Criteria 2 and 2(f)	
The Parish Council within the Consultation Statement just states '*noted. To update*' or alike, but this does not explain how our comments have been addressed/ what the changes are.	Amend HPC response to WDC comment on Criterion 2 to read: ~~*Noted. To update*~~ ***The WDC comment has been carefully considered, but it is believed that the policy is clear on the circumstances in which employment proposals would be supported, with sufficient safeguards to prevent inappropriate development in unsuitable locations. No change.*** Amend HPC response to the WDC comment on Criterion 2(f) to read: *Noted. No need to remove. No change.* ***(This is on the basis that criterion 2(f) is an important safeguard and hence should be contained within the policy. It is noted that it is consistent with the active travel policy.)***
Policy HTM1 Part 1	
There is an addition to the policy wording that states 'or severe impacts on the road network, including congestion,	Amend HPC response to WDC comment on Part 1 to read:

either alone or in combination with other development'. This is similar wording to what was suggested by WDC at Regulation 14 stage, but not the same wording. The Consultation Statement just states 'to update' and does not provide a reason for the updated wording.	*Noted. To update.* ***(NB The comment relates to the first sentence and, while the wording regarding road safety is accepted, a varied wording regarding other highway impacts is favoured, for greater consistency with the NPPF.)***
Policy HTM4 Part 3	
We recommended suggested wording changes at part 3 of this policy at the Regulation 14 stage but there is no explanation within the Consultation Statement as to why this was not amended; it just states 'no change'.	Amend HPC response to WDC comment on Part 3 to read: *No change.* ***(NB The suggested alternative is essentially a different construction, with somewhat less detail, so no change to the Regulation 14 policy wording is regarded as necessary.)***
Policy HCF4	
The Consultation Statement does not explain how our comments at the Regulation 14 stage have been addressed.	No amendment to the comments is necessary, as the first comment in relation to the definition of '*major development'* is given, by cross-reference to the response to a similar comment on Policy HCF4, with a definition in the Glossary. The second comment is clearly responded to.
Policy HCD1	
Additions have been made at 2a and 2c of this policy, but it is not clear from the Consultation Statement why these have been made. This was not as a result of comment made by WDC or other consultees as far as we are aware.	The Consultation Statement sets out, on page 29 of the volume relating to comments on the Draft HNP: "*A response was received from the High Weald AONB unit after the consultation period closed. It has though been considered. The comments expressed support for the Plan and made some suggestions intended to help strengthen policy wording. These have been reviewed and incorporated into the revised version of the NDP for submission purposes where appropriate.*" The amendments to 2a and 2c of Policy HCD1 (and to other relevant parts of the HNP) were made based on the consideration of the Unit's comments. For clarity, additional text to follow the above paragraph, is proposed to read:

	In particular, these include influencing some amendments to Policies HCD1 (parts 2a and 2f), Policy HCD4, Policy HCD5 (part 2), Policy HCD6, Policy HHD1, HCE1, HCE2, and HCF2. NB The High Weald Unit's comments are included as Appendix 2.
Policy HCD4	
Additions have been made to the important local views that includes the addition of view 17 (Nettlesworth Lane) and changes to the viewpoints (in terms of direction) of view 8 (Gap between Horam and Maynards Green) and view 26 (Footpath 16) at Figure 13 (page 28). There has been wording changes to Table 1 (page 29-30) at views 17, 26 and 27. It is not clear from the Consultation Statement why these changes have been made.	In summary, it is proposed that the following additional clarifications and explanations be made in relation to Policy HCD 4: ***The Consultation Statement explains (in Volume 5b, on page 40/77) that View 17 was identified following the Regulation 14 consultation. It goes on to explain why it is regarded as an important view. It is added that this was the result of further Steering Group consideration of important views associated with the Waldron Ghyll valley.*** ***Other changes in views/angle of view/description have been made which are considered to better represent the importance of the relevant view:*** - ***View 8 – more panoramic view towards field*** - ***View 17 – new description for new view, as above*** - ***View 26 – description updated as position of view changed from Cuckoo Trail to adjacent footpath, although still looking across fields towards Horam and Marle Green*** - ***View 27 – description changed as photograph is actually from the footpath adjacent to the Cuckoo Trail, rather than from the Trail itself***
Policy HCD5- Part 2- 'or within the setting of' the High Weald AONB has been added but this change has not been explicitly discussed or dealt within the Consultation Statement and does not appear to be as a result of our comments.	This followed consideration of a letter from the High Weald Unit – see response under Policy HCD1 above.

Policy HCD6- the wording of the policy has changed from 'enhancing the heritage significance of the parish' to 'enhance the local distinctiveness of buildings and structures which are of local architectural and historic interest and contribute to the heritage significance of Horam Parish'. We presume this is a result of our comments, but the Consultation Statement does not refer to changes to the text of the policy, or why they were carried out.	This followed consideration of a letter from the High Weald Unit – see response under Policy HCD1 above.
Policy HHD1- Part 1	
The housing mix has changed from the Regulation 14 version of the NDP to the Regulation 15 version, but the Consultation Statement does not explain why this is the case. We note that the HNA supplement endeavours to explain why this mix has changed, this was not as a result of formal comments at the Regulation 14 stage.	The Consultation Statement sets out that the changes to Policy HHD1 have followed the consideration of WDC's comments at regulation 14 and that: "*The reasoning is set out in an Addendum to the HNA for the Parish.*" Given that this Addendum is also a submission document, it cannot be seen what further clarification is necessary.
Policy HHD1- Part 4	
The phrase 'and accord with other policies of the Neighbourhood Plan' has been added to the end and the Consultation Statement does not explain why this is.	This followed comments from the High Weald Unit regarding other, essentially landscape impacts that may arise. However, as these matters are already covered by other policies, it is considered more appropriate to simply cross-refer to other policies, for completeness. See additional text proposed to the Consultation Statement, as set out in relation to Policy HCD1 above.
Policy HCE1- Part 2	
The first sentence has been quite significantly changed between the Regulation 14 and 15 versions. The Consultation Statement does not explain why – this was not as a result of comment made by WDC or	This followed comments from the High Weald Unit. See additional text proposed to the Consultation Statement as set out in relation to Policy HCD1 above.

other consultees as far as we are aware.	
Policy HCE2- Part 3f	
The word 'regeneration' has been added into the sentence. The Consultation Statement does not explain why – this was not as a result of comments made by WDC or other consultees as far as we are aware.	'Regeneration' is a term suggested by the High Weald Unit in its comments. See additional text proposed to the Consultation Statement as set out in relation to Policy HCD1 above.
Policy HCF2	
Reference has been added to another policy within the Neighbourhood Plan. The Consultation Statement does not explain why this has been added and it was not as result of comments made by WDC or other consultees as far as we are aware.	This cross reference to an existing policy that provides elaboration on lighting detail was in response to a suggestion by the High Weald Unit.
Policy HLE3 - Part 3a	
In response to our comments regarding Policy HLE3, Part 3a, the Consultation Statement has stated that a change to the policy has been made with suggested alternative wording. However, this change is not evident.	The Consultation Statement Volume 5b included a draft rewording (on page 53 of 77), which was ultimately not approved, as there is a concern that the policy intention to retain camping and caravan sites would be effectively dis-applied on cessation if the word "active" was included. The response to WDC's comments to Policy HLE4 (now HLE3) part 3a in Volume 5b should read: ~~*Change to 'they would result in the loss of sites in use for camping and caravans'.*~~ ***No change. Viability is recognised as a planning consideration. While there would be no objection to including a qualification along the lines of "unless demonstrated to be unviable", this is not considered necessary as a site would not be retained – as sought under the policy – in such circumstances.***

Appendix 1 WDC letter of 26 October 2023

Wealden
District Council

26th October 2023
[redacted]@wealden.gov.uk
www.wealden.gov.uk
01892 602457

Via Email

Dear Steering Group

Ref: Horam Neighbourhood Plan Regulation 15 Submission.

Thank you for submitting your Neighbourhood Plan to us on 4th October 2023 for consideration under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). Having reviewed the submission material against the requirements set out under Regulation 15, we consider that some further work is required before we are able to issue a positive decision statement. The issues we have identified are outlined below, along with how they can be rectified. We consider that addressing these matters will assist you in the Examination process as well as to meet the Neighbourhood Planning (General) Regulations 2012, in particular Regulations 15(2) and 15 (1)(d).

Consultation Statement Requirements:

1. The Neighbourhood Planning (General) Regulations 2012 15 (1)(b) states that the submission of a Neighbourhood Plan at the Regulation 15 stage must include a Consultation Statement and your submission does include one. However, there is some clarification needed in regards to Regulation 15 (2)(a), which states that the Consultation Statement needs to contain details of those who were consulted about the proposed neighbourhood development plan. On page 3 of volume 5a of the Consultation Statement, there is a list of those consulted, but this varies slightly to the list you have provided to us separately for the Regulation 16 consultation. This will need further clarification / amendment as required. If the High Weald AONB unit were consulted, they need to be added to the list cited above in your Consultation Statement. Also, can you confirm if Mayfield and Five Ashes Parish Council were consulted, as they are listed in the Consultation Statement but not on the separate list provided to us? Hopefully this is a minor matter to address.

2. The Neighbourhood Planning (General) Regulations 2012 15 (2)(d) states that the Consultation Statement should describe how the issues and concerns raised by the persons consulted have been considered and, where relevant, addressed in the

proposed neighbourhood development plan. On the whole, this has been carried out. However, at times it just states 'noted, to be updated' or similar. This is adequate where changes have been made exactly as recommended. However, where changes differ to what was recommended, it needs to be clear how the comments have been addressed.

- **Policy HLE2**- Criteria 2 and 2(f)- the Parish Council within the Consultation Statement just states 'noted. To update' or alike, but this does not explain how our comments have been addressed/ what the changes are.
- **Policy HTM1**- Part 1 – There is an addition to the policy wording that states 'or severe impacts on the road network, including congestion, either alone or in combination with other development'. This is similar wording to what was suggested by WDC at Regulation 14 stage, but not the same wording. The Consultation Statement just states 'to update' and does not provide a reason for the updated wording.
- **Policy HTM4**- Part 3 – We recommended suggested wording changes at part 3 of this policy at the Regulation 14 stage but there is no explanation within the Consultation Statement as to why this was not amended; it just states 'no change'.
- **Policy HCF4**- The Consultation Statement does not explain how our comments at the Regulation 14 stage have been addressed.

Just to reiterate, it would be helpful for the Regulation 16 and Examination process to address these matters in the consultation statement.

3. Sometimes additions or alterations to policies have taken place since the publication of the Regulation 14 NDP, but it is not explained within the Consultation Statement why they were carried out and whether they were in response to consultation responses. It is easier to regard changes as legitimate at the Regulation 15 stage when they respond to the consultation comments, than where they constitute what appears to be policy updates/new proposals inserted after the Regulation 14 consultation without formal comment at the previous stage. It would therefore be helpful for the reason for changes to be explicit. For example;
    - **Policy HCD1**- additions have been made at 2a and 2c of this policy, but it is not clear from the Consultation Statement why these have been made. This was not as a result of comment made by WDC or other consultees as far as we are aware.
    - **Policy HCD4**- additions have been made to the important local views that includes the addition of view 17 (Nettlesworth Lane) and changes to the viewpoints (in terms of direction) of view 8 (Gap between Horam and Maynards Green) and view 26 (Footpath 16) at Figure 13 (page 28). There has been wording changes to Table 1 (page 29-30) at views 17, 26 and 27. It is not clear from the Consultation Statement why these changes have been made.
    - **Policy HCD5**- Part 2- 'or within the setting of' the High Weald AONB has been added but this change has not been explicitly discussed or dealt within the Consultation Statement and does not appear to be as a result of our comments.
    - **Policy HCD6**- the wording of the policy has changed from 'enhancing the heritage significance of the parish' to 'enhance the local distinctiveness of buildings and structures which are of local architectural and historic interest and contribute to the heritage

significance of Horam Parish'. We presume this is a result of our comments, but the Consultation Statement does not refer to changes to the text of the policy, or why they were carried out.

- **Policy HHD1**- Part 1- the housing mix has changed from the Regulation 14 version of the NDP to the Regulation 15 version, but the Consultation Statement does not explain why this is the case. We note that the HNA supplement endeavours to explain why this mix has changed, this was not as a result of formal comments at the Regulation 14 stage.
- **Policy HHD1**- Part 4 – the phrase 'and accord with other policies of the Neighbourhood Plan' has been added to the end and the Consultation Statement does not explain why this is.
- **Policy HCE1**- Part 2- the first sentence has been quite significantly changed between the Regulation 14 and 15 versions. The Consultation Statement does not explain why – this was not as a result of comment made by WDC or other consultees as far as we are aware.
- **Policy HCE2**- Part 3f- the word 'regeneration' has been added into the sentence. The Consultation Statement does not explain why – this was not as a result of comments made by WDC or other consultees as far as we are aware.
- **Policy HCF2**- reference has been added to another policy within the Neighbourhood Plan. The Consultation Statement does not explain why this has been added and it was not as result of comments made by WDC or other consultees as far as we are aware.

We note that you have undertaken a summary of comments from other people in volume 5a of the consultation statement, so it may be the case that the above changes have been made from these and the relevant points haven't been included in the summary? Either way the reasons for the changes need to be made clear in the consultation statement. **If changes have been made that were not as a result of any comments received at Regulation 14 and the changes make material changes to the policy they should revert back to the original wording.**

4. In response to our comments regarding Policy HLE3, Part 3a, the Consultation Statement has stated that a change to the policy has been made with suggested alternative wording. However, this change is not evident.

Basic Conditions Statement

Chapter 4 of the Basic Conditions Statement discusses the need to demonstrate general conformity with the strategic policies of the development plan. The Planning Practice Guidance (PPG) confirms what is meant by strategic policies and states that paragraph 20 of the NPPF sets out the strategic matters which are expected to be addressed through policies in local plans or spatial development strategies. It notes that the basic condition addresses strategic policies no matter where they appear in the development plan.

Chapter 4 of the Basic Conditions Statement only covers policies from the Wealden District Core Strategy Local Plan (2013). However, the 'saved' policies of the 1998 Local Plan also form part of the development plan for the district and does contain strategic policies for example on landscape and ecological designations (EN6-EN9). It is suggested that this chapter of the Basic Conditions Statement is expanded to also assess how the neighbourhood plan is in conformity with the 'saved' strategic policies of the 1998 Local Plan.

I would also note that the policy on Affordable Housing (WCS8) within Wealden Core Strategy Local Plan cited at page 26 of the Basic Conditions Statement has been superseded by Policy AFH1 (Affordable Housing) of the Affordable Housing Delivery Local Plan (May, 2016). The Basic Conditions Statement will therefore have to consider Policy AFH1 (Affordable Housing) of the Council's statutory development plan, in relation to Horam's own policy on affordable housing (HHD2: Affordable Housing).

Actions required to address the omissions set out above

Consultation Statement

In order to address the omissions set out above, in summary the following elements need to be included in a resubmitted Consultation Statement:

- Clarification of who has been consulted at Regulation 14. This could be tabularised as an appendix or simply made as an addition to page 3 of the Consultation Statement 5A.
- An amended table in volume 5b of the Consultation Statement which makes it clear how our comments on the policies at the Regulation 14 stage listed in point 2 have been addressed.
- An amended table in volume 5b of the Consultation Statement that is explicit as to why the changes listed in point 3 between the Regulation 14 and Regulation 15 NDP have been made.
- Policy HLE3 needs to be updated to incorporate the change that the Consultation Statement states has been carried out.

Basic Conditions Statement

It is suggested that chapter 4 of the Basic Conditions Statement is expanded to assess how the neighbourhood plan is in conformity with the 'saved' strategic policies of the 1998 Local Plan and to ensure that consideration has been given to Policy AFH1 (Affordable Housing) of the Affordable Housing Delivery Local Plan (2016) that forms part of the statutory development plan.

Accessibility

We have noticed that there are still some issues with accessibility on some of the documents submitted. We recommend running the accessibility checker again on the documents and making any necessary amendments.

I appreciate this is not the decision that you wanted at this stage, but you will appreciate that these documents need to meet the Regulation requirements as set out above in order that any appointed Examiner in due course will have all the requisite information in front of them to come to a view about the basic conditions. We look forward to hearing from you soon with the necessary changes which will then enable us to proceed to the next stage. If you would like a meeting to explain any of our points contained in this letter, then please advise and we can arrange this for you. Please be aware that you only need to resubmit the documents that have been amended as set out above.

Yours sincerely

[redacted]
Planning Policy Officer.

Appendix 2 High Weald Unit comments on Draft HNP

High Weald Joint Advisory Committee
Woodland Enterprise Centre
Hastings Road
Flimwell
East Sussex TN5 7PR

Tel: 01424 723011
Email: info@highweald.org

www.highweald.org

Working together to care for one of England's finest landscapes

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and Dee Valley
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Tamar Valley
Wye Valley

Landscapes for life .org.uk
HIGH WEALD One of the AONB Family

12th September 2023
Emailed to: [redacted]

Dear [redacted]

Horam Neighbourhood Plan Regulation 14

Thank you for consulting the High Weald AONB Unit on your draft Neighbourhood Plan. It is noted that a proportion of Horam parish (approximately the northern third) lies within the High Weald AONB, and we consider that a further amount of the parish could be considered as being within the setting of the AONB.

The Unit supports the production of neighbourhood plans in the AONB as providing an opportunity for communities to learn more about and connect with their places; appreciating how they have evolved over time and how they can grow in a sustainable way that conserves and enhances the character of the High Weald Area of Outstanding Natural Beauty.

General Comments

In general, the Unit supports the objective of the neighbourhood plan to preserve the historic landscape character and the natural environment, green spaces, and biodiversity for the health of people and wildlife. However, the importance of the AONB designation, and the character of the High Weald AONB, could be more strongly reflected in the plan, through inclusion of reference to the High Weald AONB Management Plan, and the components of natural beauty that it sets out.

The objective to preserve distinctive character of the built environment through high quality design is also supported and references in the document to the High Weald Housing Design Guide are welcomed.

We do have a number of detailed comments on the draft plan, and these are set out below: (paragraph numbers refer to full draft NP)

General comments

- Figure 1 could helpfully include the AONB boundary (or include as a separate, subsequent map – potentially at the start of chapter 4).
- Para 2.13 – typo- needs to refer to High Weald Area of Outstanding Natural Beauty
- Para 4.3 – should include reference to the High Weald AONB Management Plan for those parts of the parish that lie within the AONB, and the components of natural beauty that it sets out, potentially as an additional, subsequent paragraph. Also this supporting text could usefully include a short description of the AONB designation and its statutory context, and a description (associated with a map) of the extent of the AONB in Horam parish.
- Para 4.7 – could include reference to the settlement gap being an important part of the landscape setting of Maynards Green within the AONB.

Comments on Policies

Policy HCD1: Settlement pattern & landscape character

2 a) or b) could helpfully include reference to the topographical setting of settlements within the parish.

2 c) it is advised this be expanded to include reference to the components of natural beauty set out in the High Weald Management Plan, and having regard to the Management Plan objectives for each.

Also, that development in or affecting the setting of the AONB should be limited in scale and not represent major development unless justified under the exceptional circumstances set out in the NPPF.

Policy HCD3: Waldron Ghyll valley

The references to wanting to maintain the 'overall openness' of the valley and then to promote 'new woodland' seem contradictory in a landscape character sense. The restoration of wetlands in itself will be a better way of helping carbon sequestering in any case, and we advise deleting the phrase 'new woodland' and instead add refence to the more appropriate strategy of '*supporting natural regeneration of gill woodland*'.

We recommend the reference to biodiversity net gain is replaced with the term 'nature recovery' - nature recovery is a more inclusive term, encompassing a range of initiatives, including LNRS, BNG, and farming practices and environmental land management schemes, so it would be the more appropriate term to use in this context. Recommended re-wording: "*including opportunities that contribute towards nature recovery and carbon sequestering through supporting natural regeneration of gill woodland and through the restoration of wetland areas*."

Policy HCD4: Important local views

This policy seems weaker and less detailed than the supporting text, in particular para 4.18 – some of this text could helpfully be included in the policy, e.g. "*Proposals for development which would have an adverse impact on important local views identified on Figure 13, for example by virtue of the height, massing or obstructive location of buildings, will be not be supported."*

Fig 13 - Its not clear how the numbering system for the important views has been constructed, but its quite a confusing diagram to read, and the views might be better numbered by category, e.g. views out to High Weald AONB, views in to the settlements/parish from the HWAONB, views out to the Low Weald and the South Downs, and so on. Also, clearer arrows to show direction of view.

Policy HCD6: Design of development

Point 2 – the inclusion of reference to the High Weald Housing Design Guide is welcomed, however the wording here should be amended to '*housing development in, or within the setting of, the High Weald AONB…."* (the guide is intended to inform the location, form and design of all such development, reflecting advice in the NPPG regarding the setting of AONBs.)

Policy HCD6: Non-designated Heritage Assets

Whilst noting that the production of a 'Local List' of NDHAs is set out in the NP as a 'Project', nevertheless the policy itself could be more specific, e.g. "*Development proposals should seek to conserve, and where possible enhance, the local distinctiveness of buildings and structures which are of local architectural and historic interest and contribute to the heritage significance of Horam Parish, having regard to……"*

Policy HHD1: Housing type, size and mix

Point 4: - the inclusion of the phrase 'will be supported where…' seems, by what it omits, inconsistent with other policies in the NP, in particular HCD1, HCD4, and HCD5. It needs to include some reference to these, or the intentions of them, e.g. adding *" and where they would not have adverse impacts on settlement character, landscape character, including the AONB and important views, and would align with policy HCD5 of this plan with regard to design."*

Policy HCE1: Nature and biodiversity

Point 2 appears negatively written with regard to conserving biodiversity, appearing to accept certain loss of natural habitats, sites and features as 'unavoidable'. Off-site provision should only ever be a last resort, is not necessarily appropriate in all circumstances, and should not be promoted as an option in a NP. We advise this part of the policy be re-worded, e.g. "*Development proposals will be expected to retain well-established features of the landscape, including mature trees, species-rich hedgerows, watercourses and other ecological networks together with the habitats alongside them. Any loss of trees and hedgerows should be replaced elsewhere on the site*."

Policy HCE2: Trees and hedgerows

Point 3 (and/or the supporting text to the policy) should include specific reference to new tree planting within the HW AONB, setting out that the importance of the High Weald's small-scale medieval fieldscape means large woodland creation schemes are usually unsuitable. Instead, increases in tree cover can be accommodated in the AONB through increased scrub habitat (managed), thickened hedgerows, in-field trees (agroforestry), natural regeneration, and 'urban' tree planting within villages, including in development.

Point 3 e) – advise deleting the word 'screening' – while a treed backdrop can provide a positive landscape setting for new development, the concept of 'screening' is less appropriate; the High Weald Housing Design Guide sets out that new development should be good enough to be seen, not justified on the basis that existing or proposed planting will screen it from view, and structural landscaping should not be used to screen or disguise inappropriately sited or poorly designed development.

Policy HCE3: Dark Skies and lighting

The inclusion of a policy which seeks to maintain the dark night skies of the parish is welcomed, and reflects the HW AONB Management Plan. Para 6.16 could be expanded to include refence to the High Weald AONB having some of the darkest skies in the south-east of England, with the least skyglow. This gives the AONB a sense of remoteness and peacefulness and connects the natural environment to the cultural and historic landscape, while a number of nocturnal species for nature recovery within

the High Weald are dependent on dark skies for feeding, including a variety of bat species, numerous species of night-flying moths which are UK BAP Priority species, dormice, and glow-worms.

Policy point 2 a) and c) – could be re-worded/combined to be stronger; its not just 'bulbs' that are the issue, and instead could be reworded/combined to say "*Following the Institute of Lighting Professionals guidance on reducing obtrusive lighting (ILP Guidance Note 01/21, The Reduction of Obtrusive Light), including ensuring that lighting designers use exterior light control environmental zone E1 to inform any proposed lighting in, or affecting the setting of, the AONB, particularly with regard to light colour temperature, skyglow (ULR) and lux levels, and ensuring new external lighting is installed at the lowest height possible to achieve lighting levels, is angled downwards, and uses dark sky friendly fixtures such as shielding.*"

Policy HCF2 b) (Sports and recreation facilities) should also refer back to policy HC3E with regard to lighting detail.

I hope these comments are helpful. Please contact me if you want to talk through any of them. The above comments are advisory and are the professional views of the AONB Unit's officers on the potential impacts on the High Weald landscape. They are not necessarily the views of the High Weald AONB Joint Advisory Committee.

Yours sincerely,

Diane Russell BSc Hons Dip Arch PgDip Arch Cons
Planning & Design Advisor, High Weald AONB Unit

Advising on an outstanding medieval landscape; connecting people, protecting beauty, restoring soils and nature.

Background Information about the High Weald AONB

The High Weald was designated in 1983 as an Area of Outstanding Natural Beauty. It is an exceptionally beautiful medieval landscape covering 564 square miles across the counties of East and West Sussex, Kent and Surrey.

The High Weald AONB Joint Advisory Committee is a partnership established in 1989 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory AONB Management Plan. The JAC is supported by a small, dedicated staff team, the High Weald AONB Unit, which provides advice on how to conserve and enhance the AONB. The advice provided by the AONB Unit assists public bodies and statutory undertakers to meet their duty as set out in Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect it.

Unlike National Park authorities, the High Weald AONB Unit is not a statutory body but an advisory one. It is not a local planning authority and the responsibility for determining planning applications remains with the 15 local authorities. The AONB Unit is not a statutory consultee on planning matters and it remains each local planning authority's decision whether or not they seek its advice on a particular planning application.

The scope of the advice in this letter is set by the statutory High Weald AONB Management Plan, which has been adopted by all partner authorities, as 'their policy for the management of the area and for the carrying out of their functions in relation to it.