

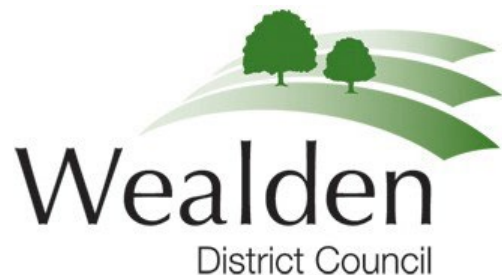
WEALDEN DISTRICT COUNCIL CONSULTATION

Horam Neighbourhood Plan Regulation 16 Consultation

Consultation Response Form

Consultation Period

11 December 2023 – 6 February 2024



Introduction

Wealden District Council is publishing the Horam Neighbourhood Plan for consultation in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The purpose of this consultation response form is for you to make your comments on the draft Horam Neighbourhood Plan.

Under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended), we are required to undertake a minimum six-week consultation on the Neighbourhood Plan. This will be the last opportunity to comment on the plan before it is submitted for independent examination. The consultation on the Horam Neighbourhood Plan is open between **9am on Monday 11 December 2023 and 5pm on Tuesday 6 February 2024.**

The documents submitted by Horam Parish Council include:

- Horam Neighbourhood Plan 2023-2040. Submission Version (September 2023).
- Horam Neighbourhood Plan 2023-2040. Basic Conditions Statement (Including Area Statement) (September 2023).
- Addendum to Basic Conditions Statement (November 2023)
- Habitats Regulations Assessment (HRA) Screening Report Horam Neighbourhood Plan (Pre-Regulation 14) (May 2023).
- Strategic Environmental Assessment (SEA) Screening Opinion Horam Neighbourhood Plan (Pre-Regulation 14) (May 2023).
- Horam Neighbourhood Plan 2023-2040. Consultation Statement Volume 1: Summary (September 2023).
- Horam Neighbourhood Plan 2023-2040. Consultation Statement Volume 2: Initial Consultation (September 2023).
- Horam Neighbourhood Plan 2023-2040. Consultation Statement Volume 3: Consultation on Objectives (September 2023).
- Horam Neighbourhood Plan 2023-2040. Consultation Statement Volume 4: Policy Ideas (September 2023).
- Horam Neighbourhood Plan 2023-2040. Consultation Statement Volume 5a: Regulation 14 (September 2023).
- Horam Neighbourhood Plan 2023-2040. Consultation Statement Volume 5b: Appendix to Regulation 14 Consultation Report (WDC Comments and Response) (September 2023).
- Horam Neighbourhood Plan. Addendum to Consultation Statement: Consultees (November 2023).
- Horam Neighbourhood Plan. Addendum to Consultation Statement: Volume 5a (November 2023).
- Horam Neighbourhood Plan 2023-2040. Equalities Impact Assessment (August 2023).
- Background Paper- Respecting and retaining the separate identities of settlements in Horam Parish (September 2023).
- Background Paper- Approach to identifying and protecting local heritage assets (September 2023).
- Background Paper- Landscape Character (September 2023).

- Background Paper- Important Views (September 2023).
- Background Paper- Water Management and Flood Risk (September 2023).
- Horam Parish Neighbourhood Plan Design Guidelines (September 2023).
- Horam Parish: Historic Overview, Character and Issues Statement (November 2021) v6.
- Horam Housing Needs Assessment (October 2022).
- Horam Neighbourhood Plan Housing Needs Assessment- Supplementary Note Regarding Housing Mix.
- Horam Neighbourhood Plan Local Green Space Assessment (September 2023).

Viewing the Neighbourhood Plan

The Neighbourhood Plan and the supporting documents are available to view on the following website;

<https://consult.wealden.gov.uk/kse>

Printed copies of the Neighbourhood Plan and the supporting documents can be viewed at the following locations:

- Horam Parish Council, The Horam Centre, 3 Bank Buildings, High Street, Horam, TN21 0EH. Office open Tuesday 9.30am-12.30pm, Wednesday 9.30am-12.30pm, Thursday 9.30am-12.30pm, Friday 10am-1pm.
(office closed from 20 December up to and including 1 January 2024)
- Wealden District Council, Council Offices, Vicarage Lane, Hailsham, BN27 2AX. Open Monday, Tuesday, Thursday, Friday 8.30am-5pm, Wednesday 9am -5pm.
(office closed from 25 December up to and including 1 January 2024).

How to Comment on the Neighbourhood Plan

- By post: print and complete this form and send it to Planning Policy, Wealden District Council, Vicarage Lane, Hailsham, BN27 2AX
- By email: complete this form and send it to Nplans@wealden.gov.uk

You can make comments on any of the information submitted for the consultation. Please make it clear which document you are commenting upon alongside the paragraph/page number. Your comments should address whether the Neighbourhood Plan meets the basic conditions. These are outlined in the Regulation 16 Guidance Notes.

Queries

If you have any queries relating to the consultation or submitting your comments, please contact the Planning Policy Team on (01892 602008) or email Nplans@wealden.gov.uk. If you or somebody you know, would like this form in large print, braille, audio tape/CD or in another language, please let us know.

1. Personal Details

For your comments to be considered, you must at least provide your name and address (this can be an email address). Representations cannot be treated in confidence and copies of all representations, along with your name or organisation, will be made publicly available on the Council's website (in due course) and sent to the Examiner. However, the Council will not publish your personal contact information such as telephone numbers, email or private addresses. By submitting your views on the Horam Neighbourhood Plan, you confirm your consent to the above and that you accept full responsibility for your comments.

Personal Details	Answer
Title	Mr
First Name	Michael
Last Name	Priaulx
Job Title and Organisation (if relevant)	
Address	
Postcode	
Contact telephone number	
Email address	
Interest in the area (for example are you a resident, business owner or do you work in the proposed neighbourhood area)	

2. Comments on the Neighbourhood Plan

Please use the space below to tell us your comments on the Neighbourhood Plan and / or supporting documents. It would be helpful if you can provide reasons and evidence for your comments. Please use additional sheets if necessary.

We strongly support Neighbourhood Plan Submission Version Policy HCE1: Nature and biodiversity item 4 and in particular the reference to swift bricks, which correctly reflects National Planning Policy Guidance NPPG Natural Environment 2019 paragraph 023.

However, at present there is a lack of information to implement this effectively and also hedgehog highways (which are referenced in NPPG) are omitted.

In summary, as a minimum, please add: " and hedgehog highways." and relating to all items in HCE 1 (4): "These should be implemented in accordance with best-practice guidance."

Please also add: "Swift bricks to be installed in new developments including suitable extensions, in accordance with best-practice guidance such as BS 42021 or CIEEM which require at least one swift brick per home on average for each development", and

"Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in East Sussex return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected."

In more detail, the reason for this is that bird boxes/ bricks and other species features, plus existing nest sites, are excluded from the Biodiversity Net Gain metric, so do require their own clear policy. However, if these features are installed in unsuitable locations or insufficient numbers they will not be effective.

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023).

Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM: <https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as the Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>), so this enhanced level should also be considered.

The protection of existing nest sites is a vital part of the conservation of building-dependent species which return to traditional nest sites.

3. Examination Participation (please tick if appropriate)

☐

I would like to attend the examination in public, should it be deemed necessary by the appointed examiner.

4. Notification of Adoption (please tick if appropriate)

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I would like to be notified of the local planning authority's decision on the adoption of the Horam Neighbourhood Plan (under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012(as amended))

Data Protection Statement

Wealden District Council is committed to ensuring that your privacy is protected and will only use and store your personal data in line with the UK General Data Protection Regulation 2021 and Data Protection Act 2018. We are required to collect and hold your personal information as part of the consultation process in formulating the Neighbourhood Plan. All comments will be publicly available and identifiable by name and (where applicable) organisation. We will not disclose your personal data to any third parties, unless we need to do so to provide a service to you or we are legally required to do so. We may share your personal data with other Council departments in order to provide the service you have requested.

Our Privacy Policy sets out how we collect, use and securely hold your data and can be viewed at: <https://www.wealden.gov.uk/transparency-spending-and-performance/data-protection/privacy-policy/> and our planning policy privacy notice at: <https://www.wealden.gov.uk/transparency-spending-and-performance/data-protection/privacy-policy/>

Signature	Michael Priaulx	06/02/24 Date
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Please print name if submitting electronically