



Wealden District Council
Ninfield Neighbourhood Plan Regulation 16 Consultation

The following is a summary of the comments made during the Regulation 16 consultation on the Ninfield Neighbourhood Plan which ran between Monday 25 September 2023 and Monday 13 November 2023. It is a summary written by Officers at Wealden District Council and is written to assist the Examiner and anyone who wishes to see a summary of the issues raised. It does not contain every point a consultee has made. The full comments are available to view on our website <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/neighbourhood-planning/>

Consultee	Summary of Comments	Would like to attend the examination in public, if it is deemed necessary	Would like to be notified of the LPA decision on the adoption of the Ninfield Neighbourhood Plan (Reg 19)
Mr J Cheshire	Agrees with all the policies in the Neighbourhood Plan. The consultee states that it is essential that local policies prevail and steer the type of development away from large estates on farmland (comprised of mainly large houses), to small pockets of infill/conversion with small dwellings of the type we need most.	X	X
The Coal Authority	The Coal Authority have no comments to make regarding planning applications or planning policies in areas which lie outside of the coalfield and therefore will not provide a formal response to any consultations received.		
Mrs K Crittall	Fully supports the plan. There have been a number of consultations and opportunities for input to the plan, thus reflecting a well researched document, fairly reflecting residents comments.		X
Mrs W Dawkins	Supports the Ninfield Neighbourhood Plan. Raises concerns over too much development too quickly for the following reasons. <ul style="list-style-type: none"> • Already have a large number of new builds • Traffic • Pedestrian safety • Surface water drainage problems • Damage to road surfaces • Insufficient electricity • Reliance on car 		X

	<ul style="list-style-type: none"> • School oversubscribed • Impact on GP surgery • Erosion of areas for local wildlife • No stipulation made for green energy to any new build. 		
East Sussex County Council	<p>Highways Authority- In order to ensure that the plan is in alignment with current government transport guidance, when referring to walking and cycling, the consultee suggests they include wheeling – i.e. walking, wheeling and cycling, to capture the use of mobility scooters and wheelchairs as part of active travel networks.</p> <p>They advise that mention should be made of the opportunities for the increasing opportunities for the use of vehicles with cleaner fuels over the lifetime of the plan – i.e. Electric Vehicles and other fuel technologies as they come forward.</p> <p>They suggest a minor change to the wording of policy N17 and use of the word ‘enable’ rather than ‘promote’.</p> <p>They agree that aspirations to improve safety and tackle speeding sit outside of the neighbourhood plan.</p> <p>Public Health comment that following on from the Regulation 14 consultation many of their previous points have been incorporated into the Reg 16 version, and anything outstanding they do not feel is significant or appropriate to raise as an objection at this stage of the Plan.</p>		
Gladman	Gladman consider that a number of policies within the neighbourhood plan present unnecessary duplication of both national policy requirements and guidance set out in local authority guidance documents.		

	<p>Gladman have significant concerns regarding Policy N7 and specifically the proposed designation of LG6c 'Bexhill Road Verges, (Molly's Corner), Bexhill Road'. It is considered that the evidence base supporting Policy N7 does not provide a robust justification to the allocation of LG6.</p> <ul style="list-style-type: none"> • Suggest reference to 'planning permission will not be permitted' is deleted from the policy wording. • Gladman contend that the Local Green Spaces Report (January 2023) does not provide proportionate, appropriate or robust evidence as required by the PPG to designate such land. • The site description and assessment is not reflective of all the areas included within LG6 and therefore all the areas included do not meet the tests of the Framework • Gladman Developments has interest in the land to the west of Bexhill Road which lies adjacent to LG6. An Ecological Assessment and Arboricultural Survey were produced as part of the planning application. These do not demonstrate that LG6 has arboricultural or ecological significance. • Local Green Space 6 (LG6) and its relationship with the permitted application's pedestrian access conflicts with the Neighbourhood Plan's Policy N17 which seeks to promote sustainable travel <p>LG6c should be deleted from the NNP as it is not justified by robust evidence, conflicts with the approved planning application for residential development (WD/2021/2454/MAO) and does not meet the basic conditions.</p>		
Mr D Godden	<p>State that they are opposed to their properties at Moor Hall Farm, Ninfield; namely Moor Hall Farmhouse, barns and converted buildings being included on the Non Designated Heritage Assets list for Ninfield. The consultee explains that the buildings have been extensively altered. Were not aware of any earlier consultation.</p>		

Bloomfield on behalf of Ms M Godden	<p>Responds in relation to land that is within their client's ownership which is proposed as part of a Local Green Space, LG3 (Church Wood and Fields). They believe it does not fulfil the criteria for inclusion as a Local Green Space. They append their response to the Regulation 14 consultation as Appendix 2.</p> <p>They acknowledge that Church Wood is a valuable natural asset and the adjoining fields inclusion has merit. However, they argue that the land within their client's ownership;</p> <ul style="list-style-type: none"> • is private agricultural land which will continue to be used for agricultural practices. • There is no direct public access. • There is not a high level of wildlife richness. <p>Therefore, in light of the above comments and their initial Regulation14 response, the land within the client's ownership does not meet the criteria for designation as a LGS and the land shown in appendix 1 should be removed from LG3.</p>	X	X
Mrs L Goldsmith	Agrees with the content of the Neighbourhood Plan which puts forward a common-sense approach.		X
Mr R Goldsmith	<p>Thinks the Neighbourhood Plan is excellent and agrees with the forward, aims and aspirations as well as the policy documents.</p> <p>States that the plan quite rightly places emphasis on improvements to local connectivity and reducing car dependency by encouraging walking, cycling and use of public transport.</p>	X	X
Historic England	Do not consider it necessary for Historic England to provide detailed comments at this time. Refers to previous comments made at Regulation		X

	14 and to advice on successfully incorporating historic environment considerations into a neighbourhood plan which can be found on their website.		
Mrs C Hoad	<p>Supports the Neighbourhood Plan because the integrity of the village and its unique characteristics need to be protected.</p> <p>The consultee also supports the concerns about infrastructure being overloaded and that this should be a major consideration with any future development applications.</p>		
Mr I Moffat	<p>States that this is a well thought out plan that:</p> <ul style="list-style-type: none"> • Attempts to balance the needs of the community with the greater needs of the District. • The plan addresses the need to ensure that any future development fits in to the existing environment and is not simply a bolt on addition. • Helps identify the needs of the community. • Provides guidance to future planners. <p>Fully supports the plan and hopes that it will be adopted.</p>	X	X
Mr K Morgan	<p>Supports the vision, objectives and all the policies in the draft Ninfield Neighbourhood Plan, as well as the draft Design Guide.</p> <p>The text in the NDP, appendices and the supporting background documents provide ample justification to support the NDP and Design Guide as drafted.</p>	X	X
National Gas	An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that no		

	<p>assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>A link to further information on its assets is provided.</p>		
National Grid	<p>An assessment has been carried out with respect to National Grid Electricity Transmission assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>A link to further information on its assets is provided as well as a link to information regarding the electricity distribution network. Information is attached outlining guidance on development close to NGET infrastructure.</p>		
National Highways	<p>The continued reference to sustainable travel is welcomed and it is acknowledged that Ninfield has concerns about poor public transport links and limited local transport services. Any improvement to cycle infrastructure, bus services and links to rail services would reduce the need to travel by car and thus lessen the need to use the Strategic Road Network. It is noted in the Transport Policies section that whilst the NPPF has been referenced, there is no reference to DfT Circular 01/22, which should, moving forwards, be the baseline for all Transport Statements/ Transport Assessments.</p>		X
Natural England	<p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets.</p>		

	<p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p>		
Mr and Mrs S Parry	<p>Are very pleased with and supportive of the Ninfield Neighbourhood Plan:</p> <ul style="list-style-type: none"> • Feel strongly that green spaces in Ninfield should be preserved as outlined in the plan. • Existing scenic views and particular topography should be protected, particularly Church Wood and the land that surrounds it. • Dark skies are a feature of Ninfield and should remain so. <p>Would like to see in future development that:</p> <ul style="list-style-type: none"> • Any new housing should be equipped with sustainable sources of energy for heating and water heating as well as with solar panels and rain-water harvesting. • The increase in numbers of new residents is taken into account and new infrastructure planned for e.g. educational, medical, transport, shops. • Is essential that flood risk and drainage elements of the Plan are adhered to- during construction and for the life of the development. 	X	X
Mrs V L Payne	<p>Congratulates those involved in putting the plan together but fears it is already out of date. Objects to the access to their land being considered a public view. Does not think their house should be locally listed as half of it is modern and the rest has been significantly altered.</p> <p>Agrees with the Plan in essence but is too little, too late.</p>		

Mrs A Reid	This is a thoroughly well researched plan and there has been extensive consultation in the village. The consultee wholeheartedly supports its content.	X	X
Rother District Council	<p>Rother District Council reiterates its representations for the Regulation 14 consultation which it has attached, and comments further on policy N6.</p> <p>The policy highlights the character of the Moorhall Stream Valley and Catsfield/Watermill Stream Valley as being valued landscapes. The third paragraph sets out that 'public views over the landscape... will be safeguarded from detracting by obtrusive or incongruous development.' Both areas sit close to the Rother district boundary and therefore these public views over the landscape could affect development proposals within Rother District. We would like to highlight that if the policy is 'made' in the neighbourhood plan, RDC will need to take the policy into account in considering relevant planning applications that could affect views into and from these landscape areas. RDC request clarification on the potential implications of this policy on development proposals in the Rother district, including any need for additional consultation with Wealden District Council/ Ninfield Parish Council on relevant planning applications, and the extent of area affected by any additional consultation requirements.</p>		X
Southern Water	No further comments to make at this time.		X
Surrey County Council	No comments to raise.		
Heatons on behalf of Tarmac Trading Limited	Tarmac own and operate a Block Plant in the west of the Ninfield Parish area. An inconsistency is highlighted between the draft Ninfield Neighbourhood Plan employment site mapping, specifically site E7, and the actual extent of Ninfield Block Plant. It is considered that designation		

	<p>E7 should be amended to reflect the full extent of the site, particularly in the context of new policies related to landscape and visual impact.</p> <p>The representation:</p> <ul style="list-style-type: none"> • Provides an overview of the Tarmac Ninfield Block Plant planning history. • Outlines relevant areas of the draft Neighbourhood Plan and states that the draft Neighbourhood Plan excludes much of the existing Block Plan from its employment site designation where development is supported, whilst imposing potential landscape and visual policy constraints. • Current adopted and national planning policy <p>The representation suggests that:</p> <ul style="list-style-type: none"> • Employment designation E7 should be amended to reflect the extent of the operational Block Plant, as shown on the submitted drawings. Amending the designation in this way would remove the ambiguity of where to apply draft Policy N13 on the site. The importance of amending the designation is emphasised by proposed policies N5 and N6 which would introduce new potential landscape and visual constraints for the Ninfield Block Plant. It is crucial that the Ninfield Neighbourhood safeguards the Blocks Plant and that new policies are consistent with the Minerals and Waste Local Plan and NPPF. It is submitted that as currently drafted, the Neighbourhood Plan introduces a level of policy ambiguity for the Block Plant. This must be addressed by amending the boundary of site E7. • As Ninfield Block Plant is a safeguarded and established site, the emerging Ninfield neighbourhood plan must also not introduce policies which would constrain the future growth of the facility and thereby contradict the strategic policies of the Waste and Minerals Local Plan. 		
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	<p>Conclusion</p> <ul style="list-style-type: none"> Consider that in order for the draft Neighbourhood Plan to be consistent with the NPPF and adopted planning policy, and remove the above identified ambiguity, employment site E7 as shown on the draft Policies Map should be amended and extended to include the entirety of the Blocks Plant Site. The wording of new policies relating to landscape and key views should also be carefully considered to ensure they do not constrain this important, safeguarded employment site and contradict the strategic policies of the Waste and Minerals Local Plan as well as the objectives of the NPPF. 		
Wealden District Council	<p>The main remaining areas of concern are around the methodology and assessment of the Key Views and non-designated heritage assets, and some of the proposed designations in the Local Green Space Policy.</p> <p>The Council also commented on the Ninfield Design Guide including raising concerns about how reliant it was on the High Weald AONB Housing Design Guide.</p>		
West Sussex County Council	No comments to make on the plan.		
<p>Late Response: Strutt and Parker on behalf of the Ashburnham Estate</p>	<p>States that they did not receive notification about an earlier consultation by the Working Group.</p> <p>Coombe Wood is not an 'open' green space, nor has it any designated public rights of way through or around the woodland. Anyone accessing the estate is trespassing. Public access is disadvantageous for the Estate, potentially dangerous for residents, and we have not sought to encourage this in any way (as the many signs, sadly regularly defaced by residents, will demonstrate).</p>		

