

Ninfield Neighbourhood Development Plan 2022 – 2039



Final Version

(Adopted by Wealden District Council on 16th October 2024)

Contents

List of Policies.....	3
Foreword.....	5
Introduction to the Ninfield Neighbourhood Plan.....	8
Neighbourhood Planning: Legislation and Planning Policy Context	10
National Planning Policy Framework	10
Local Planning Context.....	10
The Link Between Development and Infrastructure.....	11
Strategic Environmental Assessment and Habitats Regulations Assessment	12
The Plan Preparation Process	12
The Examination Process	12
The Approval Process.....	13
Community Consultation	14
The Parish of Ninfield.....	16
Strengths, Weaknesses, Opportunities & Threats (SWOT), Vision & Objectives	18
Our Vision.....	19
Objectives	19
Environment and Countryside	19
Design and Development.....	19
Local Economy, Infrastructure and Facilities	19
Transport and Travel.....	20
Planning Policies	20
Introduction	20
Climate Change and Sustainability.....	22
Sustainability and Community Resilience	22
Renewable Energy	24
Flood Risk and Drainage.....	26
Environment and Countryside	28
Dark Night Skies	28
Landscape and Natural Environment.....	31
Landscape Character Areas within Ninfield Parish	33
VILLAGE RIDGE	34
LOW PLATEAU	34
MOORHALL STREAM VALLEY	35
CATSFIELD/WATERMILL STREAM VALLEY	35

Ninfield Neighbourhood Development Plan

NINFIELD STREAM VALLEY	36
WALLERS HAVEN LEVELS.....	36
Key Views	36
Landscape Policy Context	39
High Weald National Landscape (formerly the AONB)	40
Areas of Locally Valued Landscape (ALVL)	40
Other Countryside.....	46
Local Green Spaces	47
Biodiversity (including Green and Blue Infrastructure or GBI)	50
Policy N8 - Biodiversity	53
Development and Design.....	54
Built Environment and its Setting	54
Built Character Areas	56
Heritage Assets	59
Ninfield village in 1897 as shown on Ordnance Survey	60
Non-designated Heritage Assets in Ninfield Parish	62
Ninfield Local Heritage Areas (with non-designated heritage assets):.....	62
Ninfield Green/Cross Local Heritage Area	63
High Street/Manchester Road (East) Local Heritage Area.....	63
Lower Street Local Heritage Area	64
Church Lane Local Heritage Area	64
Design of New Development	66
Housing	69
Housing Growth Context.....	69
Housing in the Countryside.....	71
Affordable Housing	72
Housing Mix	74
Economy, Infrastructure and Facilities	76
Communications	77
Local Economy	78
Farm Diversification and Sustainable Rural Business	83
Infrastructure and Facilities	85
Community Facilities.....	86
Transport & Access	89
Safer and More Sustainable Travel	89
Parking	94

Ninfield Neighbourhood Development Plan

Delivery Plan	96
Introduction	96
Development Management	96
Infrastructure Projects	96
Monitoring and Review of the Neighbourhood Plan	96
Annex 1	97
Non-Statutory Community Aspirations	97
Introduction	97
Community Aspirations.....	97
Community Aspiration 1	97
Community Aspiration 2	97
Community Aspiration 3	97
Community Aspiration 4	97
Community Aspiration 5	97
Community Aspiration 6	98
Community Aspiration 7	98
Community Aspiration 8	98
Community Aspiration 9	98
Community Aspiration 10	98
Community Aspiration 11	98

For Appendices and Supplementary Planning Guidance ‘Design Guide for Ninfield’ – see separate documents.

List of Policies

- [Policy N1 - Sustainable Location of Development](#)
- [Policy N2 - Renewable Energy](#)
- [Policy N3 - Flood Risk and Drainage](#)
- [Policy N4 - Protect and Enhance Dark Night Skies](#)
- [Policy N5 - Key Views](#)
- [Policy N6- Areas of Locally Valued Landscape](#)
- [Policy N7 - Local Green Spaces](#)
- [Policy N8- Biodiversity \(Green and Blue Infrastructure or GBI\)](#)
- [Policy N9 - Built Heritage](#)
- [Policy N10 - New Development and its Design](#)
- [Policy N11 - Housing Mix and Space Standards](#)
- [Policy N12 - Communications](#)
- [Policy N13 - Local Employment](#)
- [Policy N14- Sustainable Rural Business](#)
- [Policy N15 – Infrastructure](#)

[Policy N16 – Community Facilities](#)

[Policy N17 – Safer and More Sustainable Travel](#)

[Policy N18 - Parking](#)

List of Maps

[Figure 1- The Designated Ninfield Parish Area](#)

[Figure 2- NNDP Policies Map](#)

[Figure 3- Ninfield Dark Night Sky Area](#)

[Figure 4- The Topography of Ninfield](#)

[Figure 5- Map of Ninfield Landscape Character Areas](#)

[Figure 6 – Map of Key Views](#)

[Figure 7- Areas of Locally Valued Landscape](#)

[Figure 8- Map of Ninfield Local Green Spaces](#)

[Figure 9- Woodland Areas in Ninfield Parish](#)

[Figure 10- Map of the Setting of Ninfield Village](#)

[Figure 11- Built Environment of Ninfield Village](#)

[Figure 12- Map of Ninfield Village in 1874](#)

[Figure 13- Map showing Statutorily Listed Buildings in the Parish of Ninfield](#)

[Figure 14- Map of Ninfield Employment Sites](#)

[Figure 15- Map of Existing Community Facilities in Ninfield](#)

Abbreviations used in this document

AONB	Area of Outstanding Natural Beauty (renamed National Landscape in November 2023)
CA	Character & Heritage Assessment
ESCC	East Sussex County Council
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LGS	Local Green Space
NNDP	Ninfield Neighbourhood Development Plan
NPC	Ninfield Parish Council
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SDNP	South Downs National Park
SEA	Strategic Environmental Assessment
WDC	Wealden District Council
WLP	Wealden Local Plan

Foreword

Ninfield occupies an elevated position on a prominent ridge on the edge of the High Weald National Landscape (formerly named AONB). We enjoy breath-taking views across the Pevensey Levels (RAMSAR site, Special Area of Conservation, Site of Special Scientific Interest) towards the sea and South Downs National Park (SDNP) to the south and west. The landscape around the village has been described as scenic and is predominantly agricultural with an ancient patchwork of small fields and many areas of ancient woodland.

Ninfield is an ancient settlement and the Parish is mentioned in the Domesday Book 1086. Local legend has it that Standard Hill is the place where William the Conqueror raised his standard prior to the Battle of Hastings and the village sign illustrates this legend today. In the c19th, with its dependence on agriculture, the settlement was relatively small and dispersed. The village comprised of 2 hamlets (Lower Street and Ninfield Cross) with the medieval church and the school located midway between and surrounded by open fields but linked by Church Path. From the 1920s, with major social and economic changes and the increase in car travel, new housebuilding was taking place in the village, no doubt attracted by the elevated location with its long views. This took place as a mixture of mainly low-density detached houses and bungalows built along the existing main roads and side lanes within the village area, creating a linear form without any central nucleus. Similar development also took place on a much smaller scale at Lunsford Cross. In the period from the 1950s, several small housing estates were constructed as cul-de-sacs behind the frontage development, consolidating the village built-up area to its present form.

The Wealden Local Plan 1998 describes Ninfield village as primarily residential in character, with a number of local services and a population estimated at 1,100. The Plan aims to maintain the essentially residential character of the village and to protect the high-quality scenic landscape setting with a tightly-drawn development area boundary (which remains extant together with 'saved' policies). The Wealden Core Strategy Local Plan 2013 subsequently designates Ninfield as a 'Local Service Centre' and makes an allocation of 50 dwellings for the period 2013-2027. However, the National Planning Policy Framework (2023) requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement. At the time of writing, the Wealden Local Plan and Core Strategy are both out of date (over 5 years old) and, therefore, the district's 5-year Housing Land Supply position is considered against 'local housing need'. As set out in the Wealden Five Year Housing Land Supply Statement April 2023, this 'need', as calculated for the period 2023-2024 under the Government's methodology, is far higher at 1,200 dwellings per annum (dpa) than the previous housing target of 450 dpa in the Wealden Core Strategy 2013. This has resulted in Wealden District not meeting its Housing Delivery Test (HDT) measurement in recent years, being 78% in 2022.

Since 2013, there have been a considerable number of speculative planning applications for relatively large housing estate developments in Ninfield. Including the above allocation, there have been applications for 6 housing estates (each between 40 and 80 houses), 3 of which have been granted despite much opposition from the community. For the period 2013 to August 2022, including the smaller sites, these total 243 (net) new dwellings, 138 of which are on current construction sites. This vastly exceeds the Core Strategy figure of 50 for the period 2013-2027 and will increase the village population by about 530 (+46%) and the parish by 570 (+36%). These estates differ from the existing ones in that they are peripheral "add-ons" which, coupled with their large size and design, are out of place with the character of the village. It will take very many years for this large increase to be assimilated, indeed it

may be many years before the developments are fully completed and occupied. Much depends on the local housing market conditions in the Hastings and Rother Housing Market Area within which Ninfield is located (as referred to in the Wealden Local Housing Needs Assessment 2021).

The Parish Council are seriously concerned that the large and rapid increase already approved is wholly disproportionate and detrimental to the village. This is made explicit in the community's responses to the questionnaire in April 2021 relating to the Ninfield Neighbourhood Development Plan. This urbanising process is considered fundamentally ill-conceived. There has been a failure to evaluate its effects on Ninfield's environment, landscape and community cohesion, as well as the social and economic well-being of residents of these new estates.

As the future distribution pattern of the large amount of new housing growth forecast in Wealden District has yet to be decided, the position is much too uncertain for the Ninfield NDP to include housing allocations. The NNDP is consequently largely concerned with the identification of particular characteristics and features that give Ninfield its sense of place and require being given sufficient weight in assessing future development proposals. Planning decisions in recent years have demonstrated that there is currently little to protect much of Ninfield's built heritage, trees or landscape.

The Localism Act of 2011 has the aim of giving parishes and other neighbourhood areas the ability to have more influence over future development in their community by creating their own Neighbourhood Plan. Following a decision by Ninfield Parish Council to initiate a Neighbourhood Plan, a Steering Group was set up to manage this process in October 2019. The aim was to produce a Neighbourhood Plan to: (a) guide future growth more carefully avoiding more large, self-contained estates in unsustainable locations: (b) to ensure that housing needs are met appropriately, focusing on smaller (1 and 2 bedroom) and truly affordable homes that remain available to the community in years to come and (c) to create an environment where the local economy is developed sustainably. We are clear that the climate emergency must guide the design of all future development.

The work of the Steering Group was for the most part, carried out during a global pandemic, no easy task. However, by using both traditional and on-line media we believe we have fully engaged with our residents.

Ninfield, although small and without a centre, is a close-knit, thriving and vibrant community and our residents value that aspect of life in the parish. Our vision states:

“By 2039, Ninfield will have retained its character as a healthy, safe, vibrant, rural parish, protecting the character of its position between the High Weald National Landscape and Pevensey levels whilst supporting small scale development opportunities for community, economic and residential uses that meet the needs of its residents in an environmentally-sensitive and sustainable way, protecting and improving the health and wellbeing of the population.

Development will have avoided sensitive landscapes and cherished countryside and its biodiversity, whilst retaining the area's strong sense of community, health & wellbeing, green spaces, and thriving natural environment, respecting and preserving the heritage of the Parish”.

Ninfield Neighbourhood Development Plan

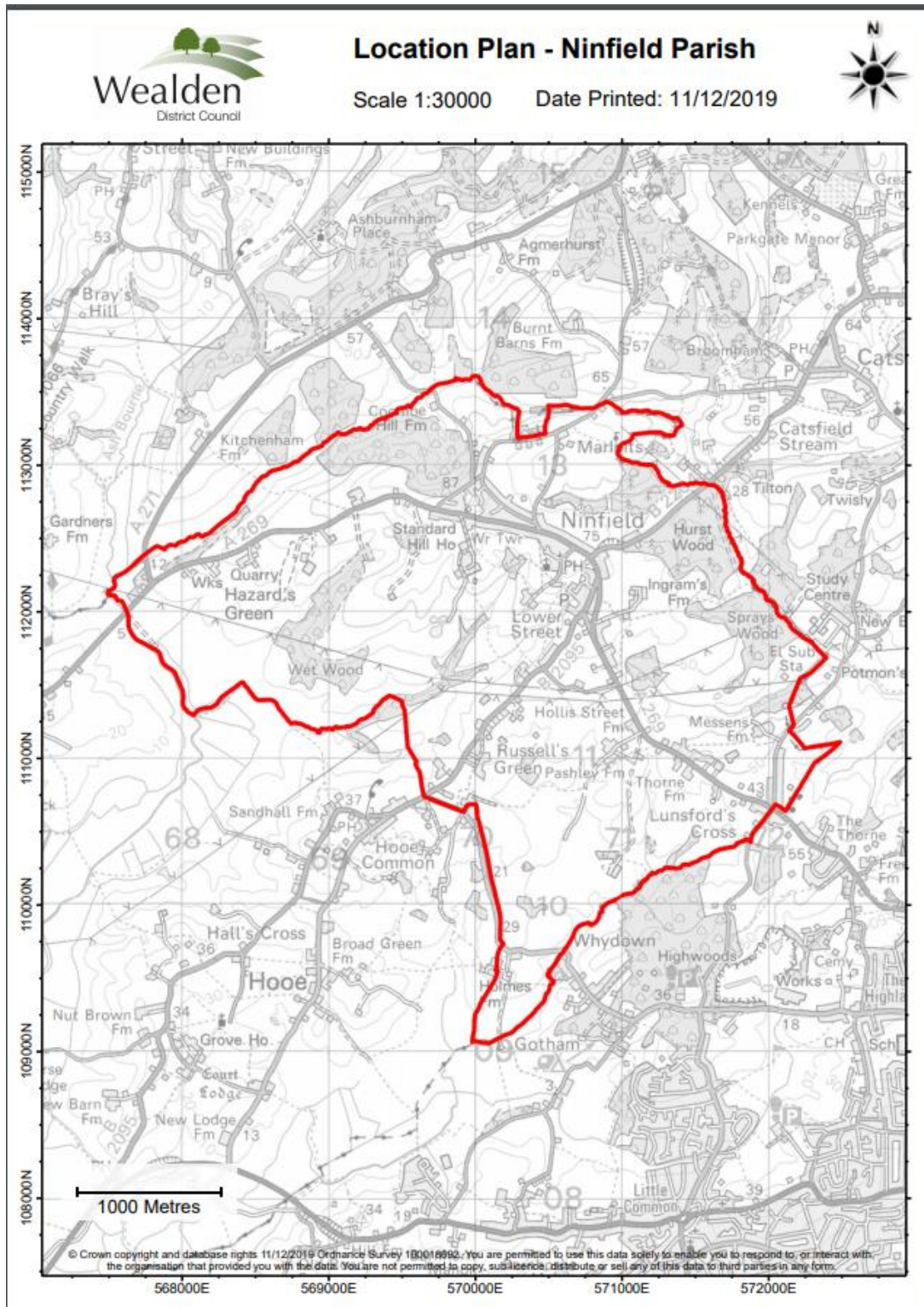
I would like to extend my sincere thanks to all members of the Steering Group who have helped with the hard work of putting this plan together. Thanks also to Ninfield Parish Council and the Parish Clerk for on-going support. We are grateful to Action in Rural Sussex who have provided excellent guidance and advice throughout the Neighbourhood Plan development process.

John Cheshire, Chair of the Steering Group.

Introduction to the Ninfield Neighbourhood Plan

1. Neighbourhood Development Plans enable local people to produce planning policies for their area but they must conform with national and local plan strategic policies. The NDP policies become part of the legal planning framework and must be considered alongside national and local policies by those determining planning applications.
2. The Ninfield Neighbourhood Development Plan sets out a Vision and Objectives for the future of Ninfield Parish up to 2039.
3. Ninfield Parish Council submitted its application to Wealden District Council on the 20th November 2019 for designation of the whole of the parish area for the purposes of neighbourhood planning. The application was approved by the Portfolio Holder for Planning and Development on 23rd January 2020. This enabled Ninfield Parish Council to prepare this Neighbourhood Plan. The designated area is in Appendix A.
4. This Plan, and its associated maps and policies should be used by residents, local authorities, developers and other stakeholders to understand how the local community wishes future development to occur. For a planning application to be considered favourably, all relevant policies contained within this plan should be considered and complied with.

Figure 1: The Designated Ninfield Parish Area



Neighbourhood Planning: Legislation and Planning Policy Context

5. The Ninfield Neighbourhood Development Plan is required to be in general conformity with both national and local strategic planning policies. Neighbourhood Development Plans are influenced by various higher-level plans, policies and guidance. The legal basis for the preparation of Neighbourhood Development Plans is provided by the:
- Localism Act 2011
 - Neighbourhood Planning (General) Regulations 2012
 - Planning and Compulsory Purchase Act 2004 (as amended)
 - Town and Country Planning Act 1990 (as amended, including by the Neighbourhood Planning Act 2017).
 - Strategic Environmental Assessment (SEA) Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
 - Conservation of Habitats and Species Regulations 2017 (as amended).

The following is a summary of the key planning policy context for the Ninfield Neighbourhood Development Plan.

National Planning Policy Framework

6. The National Planning Policy Framework (NPPF) December 2023 sets out the Government's planning policies for England and how they are expected to be applied. At its heart (NPPF para 11) is "a presumption in favour of sustainable development". The application of the presumption has implications for how communities should engage in neighbourhood planning. Critically, it means that neighbourhoods should:
- develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
 - plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and
 - identify opportunities to enable developments that are consistent with their neighbourhood plan to proceed.

Local Planning Context

7. The ambition of the Neighbourhood Development Plan should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the local planning authority, WDC. The key documents that comprise the statutory Development Plan for the District are the Wealden Core Strategy Local Plan 2013 and the saved policies of the Wealden Local Plan 1998 plus the Wealden Affordable Housing Delivery Local Plan 2016. As stated in the Foreword, from a development control aspect, owing to the provisions of the NPPF, these Local Plans are deemed out-of-date for housing and precedence is given to the policies of the NPPF. This arises from para 11d and its footnote 8 which require a 5-year supply of deliverable housebuilding sites (Wealden District having a supply of only 3.83 years in its Housing Supply Assessment April 2023 as calculated under the required methodology). This has given rise to the 'tilted balance' in respect of sustainable housing development whereby the need for housing is deemed to outweigh adopted planning policies and other material considerations "*unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole*". Nevertheless, NPPF (para 12) states "*The presumption in favour of sustainable*

development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted". NPPF (para 29) states "*Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies*". The footnote states that this means the strategic policies in the Development Plan (in this case the Wealden Core Strategy Local Plan 2013), the Affordable Housing Local Plan 2016 and Saved Policies of the Local Plan 1998).

8. The Neighbourhood Plan must also take into account emerging Local Plan policies. The Wealden Local Plan 2019 for the period until 2028 was withdrawn in February 2020 owing mainly to the Inspector's view that the Plan had not met the 'Duty to Co-operate' as set out in law. However, much of its evidence base remains relevant. The District Council is now undertaking work on a **new Local Plan for the period until 2040**, with the consultation draft version published in March 2024. New background evidence documents includes the Wealden Local Housing Needs Assessment 2021; the Wealden Landscape Character Assessment 2022; the Wealden Open Space Assessment Report 2022; and the Eastbourne and Wealden Employment and Economic Study 2022.
9. A 'Direction of Travel' consultation has taken place for the new Local Plan <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/wealden-local-plan-direction-of-travel-consultation/>. One of the key responses among the many submitted is that growth should be focussed in sustainable locations (not in AONBs, now known as National Landscapes) with good transport networks (rail and road) to ensure sustainable travel between developments and towns. Reference is made to the correlation between meeting climate change objectives and the location of growth and how it is important to reduce movement through co-locating housing and employment, thereby reducing the need for vehicle usage. Relying on the transition to electric vehicles is not enough. There is a mixed response as to the degree to which new development should be concentrated in towns and whether a new settlement should be planned but allowing for proportionate expansion of villages and smaller settlements.
10. In addition, a 'Sustainability Appraisal Scoping Report' was published in November 2020 and has recently been updated in January 2024 (also referred to in Sustainability and Community Resilience section below).

The Link Between Development and Infrastructure

11. Wealden District Council adopted a Charging Schedule for Community Infrastructure Levy in November 2015. This is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver community infrastructure to support the development of their area. On-site infrastructure and affordable housing will continue to be delivered through Section 106 agreements. Communities with a made neighbourhood development plan will receive at least 25% (instead of 15% with a cap) of the Community Infrastructure Levy to spend on infrastructure in their areas.

Strategic Environmental Assessment and Habitats Regulations Assessment

12. Wealden District Council produced, in May 2022, both a 17-page Strategic Environmental Assessment Screening Report for the draft Ninfield NDP and also a 74-page Habitats Regulations Assessment Screening Report. This followed the necessary consultation with the relevant statutory bodies. The conclusion is that neither an SEA nor HRA is required in relation to the current scope of the Draft Ninfield NDP. It is pointed out that if the scope or nature of policies were to change, the NNDP may need to be re-screened. However, whilst an SEA is not required, WDC advise that the Ninfield NDP should be accompanied by a Sustainability Appraisal as it is good practice and it will assist in showing how the 'basic conditions' are met. An SA has consequently been prepared for the draft Ninfield NDP (see separate document).

The Plan Preparation Process

13. The process of preparing the Ninfield Neighbourhood Development Plan is set out in the Neighbourhood Planning (General) Regulations 2012. This comprises:
- Undertaking background research and evidence baseline work, and informal public and stakeholder consultation;
 - Publishing a Pre-Submission Plan for a statutory six-week public consultation period;
 - Revising the draft Plan where appropriate in line with consultee responses;
 - Submission of the Plan to Wealden District Council for a legal check;
 - Publication of the Neighbourhood Development Plan for a further 6 weeks by Wealden District Council;
 - Examination by an independent Examiner appointed by the local planning authorities in consultation with Ninfield Parish Council (see section below).

The Examination Process

14. The independent Examiner must consider whether the Neighbourhood Development Plan meets the 'Basic Conditions'. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and are applied to neighbourhood development plans by section 38A of the Planning and Compulsory Purchase Act 2004. The Basic Conditions relevant to the Ninfield NDP (excluding (b) and (c) which relate solely to Development Orders of which none are proposed) are:
- *"(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan,"*
 - *(d) The making of the neighbourhood plan contributes to the achievement of sustainable development,"*
 - *(e) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),"*
 - *(f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, retained EU obligations,"*
 - *(g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order."*
15. The last Condition above should be taken to mean 'plan' (as well as 'order'). Its effect is to require that *"The making of the neighbourhood development plan does not*

*breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(3)*¹.” This means that, if the neighbourhood development plan is likely to have a significant effect on a European protected site, even if that effect could be mitigated, a full Habitats Regulations Assessment of the plan needs to be undertaken. However, as stated earlier, an HRA is not required for the NNDP as drafted.

16. The Examiner must also consider whether other legislative requirements are met namely:
- *“The Neighbourhood Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provisions relating to ‘excluded development’, and must not relate to more than one Neighbourhood Area) and*
 - *The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A”.*

The Approval Process

17. The Examiner must recommend one of three things:
- That the Neighbourhood Development Plan goes forward to referendum unchanged;
 - That the Neighbourhood Development Plan be modified and then goes forward to referendum;
 - That the Neighbourhood Development Plan should not go forward to referendum (because it does not meet the legislative requirements above and cannot be modified to make it compliant).
18. If the examination is successful then Wealden District Council in consultation with Ninfield Parish Council will consider making any modifications recommended by the Examiner. Wealden District Council will then make arrangements for a referendum of all the electorate in Ninfield Parish on whether the Neighbourhood Development Plan should be used to help make decisions on planning applications. If the referendum result is more than 50% ‘yes’ then Wealden District Council will make the Ninfield Neighbourhood Development Plan part of the statutory Development Plan for the area.

¹ The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which amends The Neighbourhood Planning (General) Regulations 2012(1).

Community Consultation

19. An initial survey of Parish residents was carried out in August 2020 to identify and gather resident's views on what they consider to be the strengths, weaknesses, opportunities and threats 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 drop-in session was held. 108 responses were received to this survey.
20. Two further online sessions for residents (via Zoom) were held in September 2020 to feed-back the results of the survey and, in addition, to discuss key topic areas for the Neighbourhood Plan based on the findings. These sessions were also publicised on line and in the local press.
21. A series of topic based online discussions with residents were carried out during the months of October and November 2020.



- 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
22. **Survey Work** – A Parish-wide survey was carried out in March and April 2021 with a paper copy of the questionnaire for every adult on the electoral roll distributed to households. Residents were encouraged to complete the on-line version (Survey Monkey) where possible to ease the subsequent data analysis workload. In all 347 responses were received.

23. A number of working groups were set up to undertake work on the following;
- Local Green Spaces (LGS)
 - Landscape Study (LS)
 - Character and Heritage Assessment (CA)
 - State of the Parish Report (SOP)
 - Design Guide (DG)
24. **Sharing 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.
25. **Exhibition** – to enable residents without internet access to view and comment on the reports, an exhibition was held on 10th October. This exhibition was publicised on social media, in the local press and by posters distributed locally.
26. **Consultation with Property Owners – Non-designated Heritage Assets (NDHA)**
The Chair of the Parish Council wrote to all owners of NDHAs on 1st December 2022 to draw attention to the proposed local listing of their building. This consultation closed on 30th December.
27. **Engaging with Local Planning officers-** an initial meeting between Wealden District Council Officers, AiRS 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 NDP support available from WDC. A follow up meeting was held on 26th April 2021 via Zoom between WDC Officers, Steering Group and Action In Rural Sussex to update on items discussed previously, progress made and to decide next steps. Additional meetings with Officers were held on 3rd March 2022 and 4th August 2022 to prepare for the Regulation 14 consultation.

The Parish of Ninfield

28. Ninfield is an ancient settlement and parish historically known as Nerewelle, Nymenfeld, Nemefeld and Nenfield. The size of the medieval church of St Mary the Virgin indicates that it was a small and impoverished parish (as described in the Domesday Book of 1086) although it did give its name to the small, ancient administrative area called the Ninfield Hundred. Local legend has it that Standard Hill is the place where William the Conqueror raised his standard prior to the Battle of Hastings, being the highest ground inland from Pevensey where his troops landed. The village sign illustrates this legend today.
29. In the c19th, with continued dependence on agriculture, the settlement was still relatively small and dispersed. What is now the village comprised of 2 hamlets (Lower Street and Ninfield Cross) with the medieval church and the school located midway between and surrounded by open fields but linked by Church Path. There were no other recognisable hamlets but there was a loose grouping of dwellings and farms with a chapel at Russell's Green. The Parish workhouse was midway between this area and the village. In the second half of the c19th the number of dwellings in the parish was only about 160 but, owing to large family sizes, the parish population (including the part transferred in 1886 from Ashburnham) was about 750. Around 50% of the working population were employed in agriculture as late as 1901 and most of the land formed part of the large estates of Ashburnham Place and Normanhurst Court (Catsfield). The parish was relatively self-contained with the rest of the working population engaged in ancillary trades such as corn millers, blacksmiths, bakers and butchers or serving the community in the school, shops, church and chapels. There were brickmakers in two very small local brickfields.
30. From the 1920s, with major social and economic changes and the increase in car travel, new housebuilding was taking place in the village, no doubt attracted by the elevated location with its long views. By 1931, the parish population had grown to 1,000 and a short length of new road was constructed to 'by-pass' Lower Street. The development in the 1930s and later took place as a mixture of mainly low-density detached houses and bungalows built along the existing main roads and side lanes within the village area, creating a linear form without any central nucleus. In the period from the 1950s to the 1980s, a number of small housing estates were constructed as cul-de-sacs behind the frontage development, consolidating the built-up area to its present form. The two large new estates now under construction are peripheral additions.
31. Ninfield Parish had a population of 1,562 in 2011 (estimated 1,622 by ONS in 2020). The village lies 6.4 km south west of Battle and 8km north west of Bexhill-on-Sea town centre. The A269 runs across the Parish from Bexhill in the southeast to the A271 junction at Boreham Bridge in the northwest where it continues as the A271 to Hailsham. The village lies at the intersection of the A269 with the B2095 (linking to the A259 via Hooe) and the B2204 (linking to Battle via Catsfield).
32. Ninfield Parish is in the High Weald national character area, except for a small part in the Pevensey Levels. The High Weald is one of the best surviving medieval landscapes in Britain. The village is situated on a prominent ridge extending eastwards from Standard Hill and is elevated from the surrounding landscape with long distance views afforded from the existing settlement edge. The landscape is characterised by a patchwork of ancient woodland and fields with historic farmsteads. Views from the north east of the settlement extend across the countryside towards

Catsfield and beyond. The sea and the South Downs National Park, on the opposite side of the Pevensey Levels, are clearly visible in the distance to the southwest.

33. Ninfield has for the most part retained its small, traditional Sussex High Weald village character. It lacks a central nucleus and has only limited facilities comprising of a small primary school, a public house, a carvery restaurant, a small general store with post office combined, a satellite GP surgery (with dedicated pharmacy service) and two churches (which join together for ecumenical services). There is also a petrol filling station with a small convenience store attached.
34. Most of the Parish countryside comprises agricultural land, nearly all of which is grade 3, but there are many areas of ancient woodland, some of which are extensive and designated as Local Wildlife Sites. Hedgerows and trees border fields, roads and lanes and most of their pattern is ancient or historic. The hedgerows, woodlands, green areas and grassland support a rich biodiversity with a wealth of protected species of flora and fauna. The Parish has distinctive, tranquil and unspoilt countryside and has retained its dark night skies which are much enjoyed by residents and are important for the nearby Herstmonceux Observatory where visiting students of Queen's University (Canada) can study astronomy and courses are offered to the general public.
35. The ONS mid-2020 population estimates for Ninfield Parish show that it has a generally similar age structure to the District. The largest age group in Ninfield is 45-64 (29%), the Wealden average being 29.1%), followed by Over 65 (26.6% compared to 26.2%). The percentage of those aged 0-14 (17.1%) is also slightly higher than the District average of 16.5%. The percentage of those aged 0-15 (18.5%) is higher than the Wealden average (17%) whereas 15-29 (11.4%) is lower than Wealden (12.7%) and 30-44 is similar (14.5% compared to 14.9%). The proportion aged 16-44 is much lower than nationally. In the 2011. The percentage of detached dwellings (57.3%) is much higher than the District average (44.5%). Semi-detached (31%) are similar to the District average (30%). However the percentage of terraced houses (5.7%) and flats (5.5%) is much lower than that of the District (12.7% and 11.5%). 2011 census data on households shows that Ninfield (69.3%) has a slightly higher proportion of family households than the District average (67.2%) and much higher than the national average (61.8%). The proportion of one-person households in Ninfield is 26.1% as compared to 27.6% in the District, although the proportion of single parent households is slightly higher (5.7% as compared to 5.0% for the District) but lower than 7.1% nationally.
36. In terms of the economy, the 2011 Census shows that of those aged 16-74 in Ninfield 69.2% are economically active, which is similar to Wealden's average (70.1%) whilst the percentage of those that are self-employed (19.5%) is significantly higher than the District average (15.7%). The Parish has double the proportion of those who are part-time employees than the District (28.1% compared to 14.8%). The percentage of unemployed persons (2.5%) is the same as the District. A slightly higher percentage are retired (18.9%) compared to the District (18.0%). In relation to type of employment, the 2011 census shows the highest proportion of the working population of 743 in Ninfield is in category G 'Wholesale and Retail Trade; Repair of Motor Vehicles and Motor Cycles' (15.1%), followed by Q 'Human Health and Social Work Activities' (14.3%), P 'Education' (12.0%) and F 'Construction' (11.2%). Category A 'Agriculture, Forestry and Fishing' accounts for 3.6%.
37. The East Sussex Indices of Deprivation 2019 show that Ninfield and the adjacent areas to the west have a slightly below average level of multiple deprivation whereas

the adjacent areas in Rother to the east have a higher level of multiple deprivation, as does the east of Bexhill. The west of Bexhill has a lower level.

Strengths, Weaknesses, Opportunities & Threats (SWOT), Vision & Objectives

Strengths

- Incredible Views, Surrounding Countryside and Green & Open spaces/Fields
- Small Village identity, Rural character, peace & quiet
- Continued Dark Skies – very little light pollution
- Strong sense of community/ friendly people, community spirit
- Heritage, including listed Buildings
- Footpaths in the countryside

Challenges/Weaknesses

- Speeding traffic, volume of traffic
- Insufficient parking – inconsiderate/dangerous parking
- Poorly maintained roads
- Too many houses already proposed, overdevelopment of village given the limited facilities
- Large estates, by reason of their location and design – disconnection and failure to integrate with the rest of the village and its character
- Residents feel they are not listened to in the planning process
- Lack of local employment
- Very limited local transport services

Opportunities

- Affordable Housing for local young people and Sheltered Accommodation for elderly and/or disabled people
- Increase opportunities for health and wellbeing including active travel & access to nature.
- Protect Green Spaces and Wildlife
- Improved Parking, Safer Roads
- Improved facilities
- Improved connectivity including fast internet connections and improved mobile phone coverage
- More Allotments with good access

Threats

- Overdevelopment & Associated Traffic Issues
- Loss of Green Spaces & Wildlife Habitats
- Pressure on existing facilities/services following new developments
- Urbanisation – Becoming a suburb – losing village identity
- Community cohesion breaking down following a large influx of new residents
- Climate change and its effects

Our Vision

By 2039, Ninfield will have retained its character as a healthy, safe, vibrant, rural parish, protecting the character of its position between the High Weald National Landscape and Pevensey levels whilst supporting small scale development opportunities for community, economic and residential uses that meet the needs of its residents in an environmentally-sensitive and sustainable way, protecting and improving the health and wellbeing of the population.

Development will have avoided sensitive landscapes and cherished countryside and its biodiversity, whilst retaining the area's strong sense of community, health & wellbeing, green spaces, and thriving natural environment, respecting and preserving the heritage of the Parish.

Objectives

Environment and Countryside

ECO1- Protect the distinctive landscape setting of the village - which includes the public enjoyment of the countryside with its important public viewpoints, the natural environment, biodiversity and dark skies - and conserve and enhance the High Weald National Landscape and its setting.

ECO2 - Enable Ninfield to make a contribution to reducing climate change and to build resilience, mitigate effects and maximise beneficial opportunities for both the environment and the population of the Parish.

Design and Development

DDO1- Conserve and enhance the unique rural heritage and character of Ninfield including its historic buildings and their settings, through sensitive design of new development which reflects the needs of the Parish.

DDO2 - Encourage sustainable design in the construction of new development and alterations to existing buildings and their facilities.

DDO3 - Support the provision of a mix of dwelling types including in particular, affordable housing, smaller dwellings for young families or those downsizing and starter homes.

Local Economy, Infrastructure and Facilities

EIFO1- Support proposals that provide local employment and are sustainable, environmentally appropriate and consistent with the rural location.

EIFO2- Retain, upgrade and expand facilities, infrastructure and communication networks to meet the social, leisure and health needs and interests of residents.

Transport and Travel

TAO1- Enable safer and sustainable access for residents to key facilities and services by bus, cycle and on foot and other future modes of mobility and ensure an adequate level of car parking is provided within new developments, supported by electric vehicle charging infrastructure and cycle parking.

Planning Policies

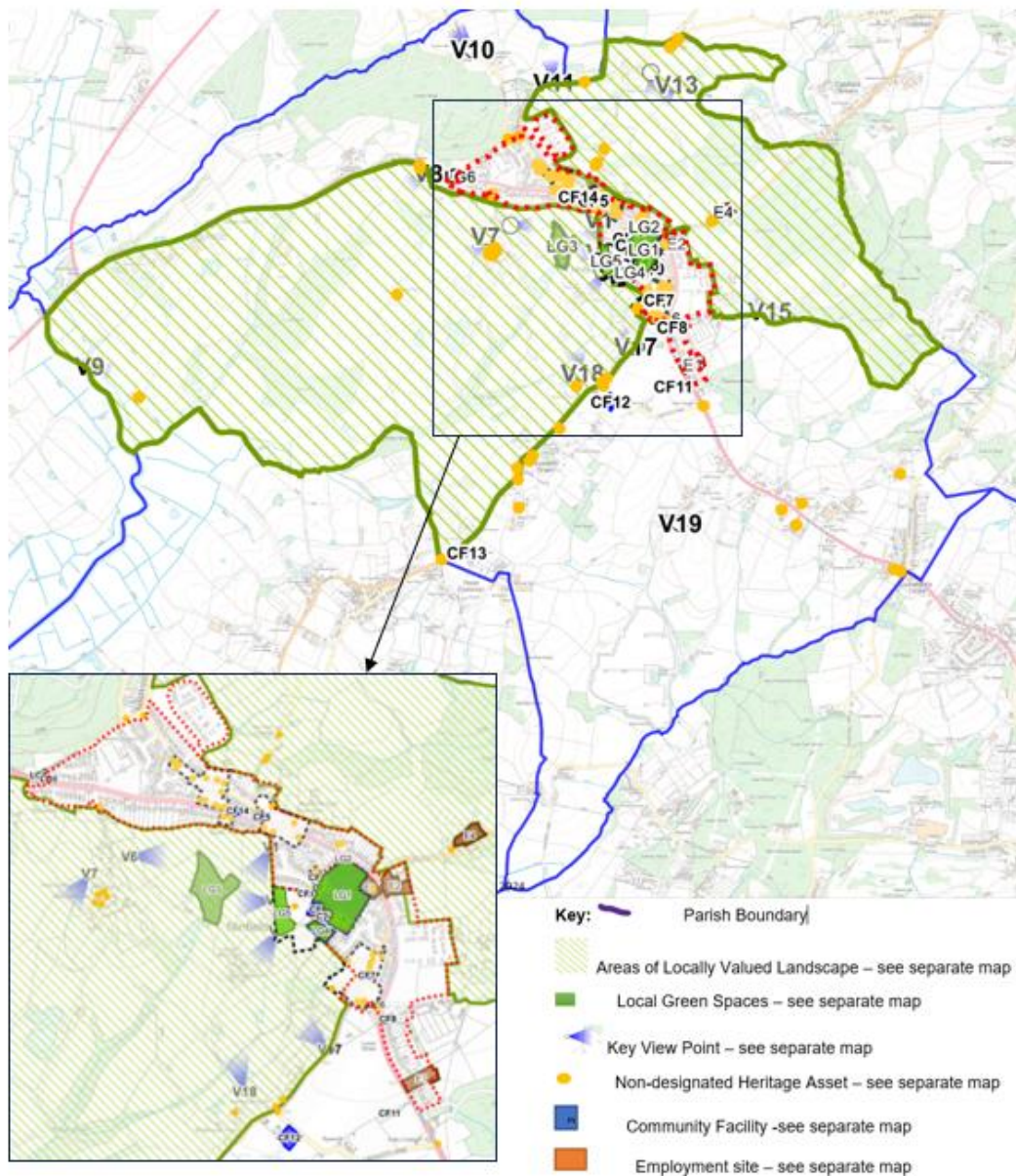
Introduction

38. The following sections set out the planning policies that will be applied to applications for planning permission. For those issues that cannot be addressed by such policies, non-statutory Community Aspirations are set out at the end of this NDP.
39. The Ninfield Neighbourhood Development Plan, as stated earlier, must have regard to national planning policy and be in general conformity with the Wealden Core Strategy 2013. It does not need to duplicate matters already covered by these existing policies but rather complements them by providing local detail and clarifying how they should be applied in the specific circumstances of Ninfield Parish. NPPF (para 29) states “*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*” (NB. This means the strategic policies in the Wealden Core Strategy Local Plan 2013). Each policy is preceded by explanatory text which refers to the national and Local Plan context and clarifies the intent of the policy to aid decision-makers.
40. The withdrawal of the 2019 Wealden Local Plan means that the overall housing numbers, and those to be allocated to Ninfield, are to be determined through the new Wealden Local Plan. These are strategic matters and it is not appropriate for the Ninfield Neighbourhood Plan to attempt to deal with these issues. Rather, it uses criteria-based policies to guide any further development that arises through the new Local Plan or planning applications that are determined ahead of that Local Plan’s adoption. These policies are based on background evidence as it has become available for the new Local Plan together with evidence collected by the Neighbourhood Planning Group such as the Design Guide, Village Character and Heritage Assessment, Landscape Study, Local Green Spaces Report and Key Views Study. The evidence base is listed at Appendix B.
41. The planning policy context and the community engagement work undertaken by the Steering Group and Working groups, bearing in mind the fundamental importance of sustainability, have raised a number of questions for the Ninfield NDP to consider:
 - What are the most important characteristics of the Parish that new development should respect?
 - How should new development be influenced through the use of design and development principles that deliver the plan’s objectives?
 - What are the design characteristics of the area that could be included in a policy?
 - What community facilities would be on the list of those to be protected from change of use?
 - Which spaces meet the criteria for designation as local green spaces?
42. Land use policies are used to determine planning applications made for development proposals. They can establish the principles for retaining or

changing the use of land in settlements and in the countryside. They can also set out the conditions against which development proposals will be judged in terms of their design, access, etc.

43. The proposed policies of the Ninfield NDP are set out below. For ease of identification and reading, each policy has a reference number and title, and the policy itself is contained within a solid-coloured box the colour of which relates to the subject matter. Beneath the box are listed the relevant NNDP objectives, justification from the NNDP community consultation, and the relevant NPPF and Local Plan policies.

Figure-2 NNDP Policies Map



See Appendix G for detailed Policy Maps

Climate Change and Sustainability

Objective ECO2 - Enable Ninfield to make a contribution to reducing climate change and to build resilience, mitigate effects and maximise beneficial opportunities.

Sustainability and Community Resilience

44. The changing climate of the planet, with global warming and extreme weather events, is now generally accepted as a matter that needs to be tackled both urgently and effectively. It is important that steps are taken at all levels from international/global level downwards through all tiers of government to the individual. The environment needs to be safeguarded rather than taken for granted and subjected to insufficiently controlled exploitation and degradation. This involves transitioning to a low carbon future by reducing greenhouse gas emissions, increasing the use of renewable energy and prioritising the reuse of existing resources, and improving resilience including reduction of vulnerability to flooding. Apart from flooding, rising temperatures and periods of drought, have serious implications for water and food supplies, biodiversity and all the elements of the landscape. As it is an ecosystem, most human activities can have some degree of impact on the environment, changes in one element causing an effect, often unforeseen, on other elements. It is an extremely complex subject with the problems deriving from the Industrial Revolution that took place 200 years ago in NW Europe and since spread across much of the Globe. Apart from industrial pollution, this started a change to a 'throw away' society driven by excessive consumerism and travel. The developed World may have since changed to a post-industrial society but it is still driven by unsustainable economic growth. The higher financial costs associated with the transition to a sustainable future have serious implications for the poorest countries and people and could worsen deprivation. However, whilst agreed action at World level is essential, every person has a part to play in adapting their everyday lives to be more sustainable.
45. The NPPF (paras 7-10) states that the high-level objective of sustainable development can be summarised as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*". Within this, there are 3 overarching but interdependent objectives under the headings of (i) Economic, (ii) Social and (iii) Environmental which should be delivered through the preparation and implementation of Plans and by applying the policies of the NPPF. At its heart is a presumption in favour of sustainable development (para 11).
46. In accordance with the above, the Wealden 'Sustainability Appraisal Scoping Report' was published in 2020. This sets out 18 **Sustainability Appraisal (SA) Objectives** to form the basis against which the new Wealden Local Plan will be tested. It has also been used to test the sustainability of the policies in the Ninfield NDP and these are contained in the separate 'Sustainability Appraisal of the Ninfield NDP'. It should be noted that a new Wealden SA Scoping Report (January 2024) was published and the updates to the Wealden SA Scoping have not been incorporated in the SA for the NDP.
47. In accordance with the national and District SA objectives, ALL POLICIES in this NDP are written with overarching consideration given to the critically important issues of climate change and carbon reduction. Seen as fundamental to this, is the location

of new development. The emerging Local Plan will be required to have a growth strategy which will be determined by factors including the relative sustainability of settlements, land availability, environmental constraints and access and infrastructure provision. The sustainable objectives and policies of the currently adopted Wealden Core Strategy 2013 identify good accessibility to employment, health, education and other facilities as fundamental. The Core Strategy consequently focusses the bulk of new development on the towns. It proposes only limited expansion of key villages at a level sufficient to maintain their viability as sustainable settlements and this accords with the NPPF.

48. The Development Boundary referred to in the policy below will be updated as part of the new Wealden Local Plan currently in preparation. Consideration has been given as to whether or not it would be appropriate for this NDP to include the preparation of an 'interim' development area for Ninfield, updated to include the new housing sites. However, it has been concluded that this would be inappropriate in the absence of the NDP also considering new housing allocations. The latter cannot be done without an 'indicative housing' figure from the District Council. Given that this is so highly contentious, it is unrealistic to expect such a figure for Ninfield in advance of finalisation of the figures for the other settlements in the District as part of the adoption of a new Local Plan (see 13.2).
49. As regards development in the countryside, the policies of the NPPF and adopted Wealden Local Plan documents are considered to be relatively clear, the major exception being those countryside sites which adjoin built-up areas. This is because the currently-adopted development area and the housing policies and allocations are out-of-date. Therefore, sites adjoining the built-up area of Ninfield village (and also the hamlet of Lunsford Cross) are often the subject of speculative planning applications for new housing. In the period pending the adoption of a new Local Plan, the policy below has been framed to enable judgement to be made in respect of individual sites as to whether or not they meet the requirements of the NPPF taking account of the policies of the currently adopted Local Plan as well as this NDP. The policies of the NPPF (paras 82 and 84) in respect of rural housing that needs a countryside location and 'rural exception sites' are referred to later in this NDP under Housing in the Countryside and Affordable Housing and it is not considered necessary to repeat them in the policy below. The other policies of this NDP and the supporting text identify the landscape, heritage, infrastructure and other constraints that apply to Ninfield. It should therefore assist in the process of finding housing sites as well as the appropriate scale, siting, layout, design and landscaping of development.
50. It is desirable, in principle, to give preference to development of 'brownfield' over 'greenfield' sites and consideration has been given to including this within the policy below. However, apart from the impracticality of implementing such a 'preferential' policy through planning control, there appears to be only one significant 'brownfield' site in Ninfield that could be recognised as potentially ripe for redevelopment. On balance, it is considered that the site concerned is best kept in use for 'business' purposes (see Section on Local Employment).

Policy N1 – Sustainable Location of Development

Development proposals should be located so as to minimise the need to travel by car and to minimise the loss of countryside.

Within the development boundary of Ninfield village as shown in the adopted Wealden Development Plan documents (including any enlarged development boundary forming part of any adopted replacement Wealden Local Plan), development will in principle be supported subject to the other policies of the development plan.

Objective: EC01, EC02

Justification: Loss of countryside was identified as a significant concern with over 90% of respondents stating this was an issue that worried them. The majority wanted to see future growth as infill within the development boundary and the utilisation of brownfield sites (58%) in preference to development on green field sites outside the development boundary. Almost 60% of respondents to the questionnaire specified the need to address the climate emergency by the provision of sustainable and eco-homes in future developments.

NPPF paras 7-13, 82-84, 108, 109, 123-127, 180

WCSLP 2013 objectives SPO1, SPO3, SPO7, SPO8, SPO14 and policies WCS2, WCS6, WCS14

WLP 1998 saved policies GD1, GD2, EN1, EN2, DC17
Background Documents: Landscape Study of Ninfield

Renewable Energy

51. Ninfield Parish Council are aware of the need to adopt low carbon and renewable energy measures at an early stage in any development and, in principle, support proposals for solar PV with battery storage and air (or ground) source heat pumps incorporated into the design. Retro-fit installation of these technologies into existing buildings is also supported wherever possible, as are water harvesting/recycling installations. A balanced approach is necessary to ensure any adverse effects are addressed satisfactorily. This includes visual effects on the landscape and streetscape both individually and cumulatively. Many minor installations on existing properties, subject to certain limitations, are 'permitted development' not needing a planning application. Apart from installations to serve individual properties, the potential benefits of renewable energy installations to serve the wider community could be explored although this would need major investment.
52. The Ninfield Electricity Transforming Station (just over the Parish Boundary in Catsfield) is a major installation on the National Grid. Planning permission has been given by Rother for the construction of Battery Storage Units adjacent to it. There is also a current proposal to extend into Ninfield Parish with a 'greener grid park' comprising energy storage and grid-balancing equipment. The existence of the Transforming Station has provided the opportunity for connection to the Grid by large

solar farms. This has resulted in the construction of 2 such developments; the Pashley Solar Farm (in the south of Ninfield Parish) and the St Francis Solar Farm (over the Catsfield boundary). A third proposal, in Catsfield, was rejected (including at appeal) on grounds of unacceptable harm to a valued landscape and ancient woodland. No other sites appear to have been found suitable or available. Wind farms are difficult to locate owing to their massive scale and impact.

Policy N2 – Renewable Energy

Small-scale renewable energy production schemes such as proposals by householders for renewable energy generation from solar photovoltaic panels (including associated adaptation of existing buildings) and proposals for Community solar and biomass facilities (including use of anaerobic digestion and wood fuel products) will be supported provided they:

- are appropriate in their siting and scale to their setting having regard to its character and sensitivity, particularly if located in the High Weald National Landscape, in an Area of Locally Valued Landscape or affecting a Heritage Asset;
- do not have an unacceptable visual impact;
- do not cause harm to biodiversity; and
- do not have a detrimental effect on neighbouring residents.

Objective: ECO2

Justification: Ninfield Parish Council has declared a climate emergency (as have Wealden District Council and East Sussex County Council). There is a wider awareness of the need to take appropriate actions as soon as possible. Residents support individual/domestic solar harvesting (69%) and renewable heating such as ASHP/GSHP (65%).

Most properties in the Parish are served by overhead electricity supply cables which are vulnerable and power outages are a common occurrence. Most of Ninfield does not have a public gas supply so most properties use oil or LPG for heating and hot water. There is a need to move to renewable energy as soon as practicable.

NPPF paras 157, 161, 163, 164

WCSLP objective SPO9

WLP saved policies EN1

Flood Risk and Drainage

53. With regard to **flood risk**, Ninfield Parish is almost wholly within the Environment Agency's Flood Zone 1 which is the zone of least risk (less than 0.1% chance of flooding in any year). There are only very narrow areas in Zones 2 and 3 which are along Wallers Haven, along the lower parts of the Ninfield Stream and the Moorhall Stream, and along the Catsfield/ Watermill Stream and its tributaries. These narrow strips are extremely unlikely to be subject to development proposals. Development will only be permitted in Flood Zones 2 or 3 where it has been demonstrated that it meets the requirements of the NPPF in relation to the Sequential Test and the Exception Test and a site-specific flood risk assessment has demonstrated that the risk of flooding has been minimised and reduced where possible and that any residual flood risk can be safely managed.
54. Ninfield is one of the parishes in Wealden with fewest recorded incidences of flooding events and those recorded were all surface water. However, areas to the SW of the village (Moorhall Stream valley and Hazards Green) and the central southern part have been identified as areas of groundwater concern in the Wealden Strategic Flood Risk Assessment.
55. The village and most buildings are on high ground. Historically, buildings have avoided the side slopes of the ridge and the lower ground in the Parish as it suffers from surface water drainage problems. Poor permeability, sometimes with springs emerging, arises from the clayey soil structure and underlying geology. The British Geological Society maps show that most of the parish comprises Wadhurst Clay (at surface level in the valleys) which is overlaid by Tunbridge Wells Sand on the higher parts (the main ridge and the low plateau). The dense Wadhurst Clay has very poor permeability, resulting in springs emerging where the junction with the Tunbridge Wells Sand is close to the surface. Even the latter has impeded drainage and, owing to localised variability in its siltstone, mudstone, sandstone and clay structure, shallow flooding can occur even on the higher ground. The water table can be at or near the surface in places and the ground widely saturated. Although groundwater flooding is mainly in the lower parts of the valleys, ground saturation with surface water flooding or 'ponding' can occur even on the higher ground. This is often extremely slow to drain. Climate change seems to be exacerbating the problem owing to more prolonged periods of heavy rain as well as drought and high temperatures.
56. It is a requirement under NPPF (para 175) for any major development (normally 10 dwellings or more but can be defined locally) that surface water drainage is designed as a Sustainable Drainage System (SuDS) preventing excessive run-off directly into existing watercourses or land by copying natural catchment processes within the site where the rain falls. This is especially important within the catchment area of Pevensey Levels (which includes the greater part of Ninfield Parish) which is particularly vulnerable to changes in water volume and quality. SuDS achieve this by allowing water to soak into the ground by infiltration; storing water (for example in swale ponds) and releasing it slowly (attenuation); slowly conveying water on the surface; filtering out pollutants; allowing sediments to settle out; and forming attractive environments that provide pleasant open spaces and valuable wildlife habitats. Detailed advice is contained in the '*Guide to Sustainable Drainage Systems in East Sussex*' published by ESCC. Within this are BGS geology maps identifying areas with probable compatibility for infiltration SuDS (which includes Ninfield village and the higher parts of the Parish) but also subject to consideration of ground stability.

57. Given local problems experienced in Ninfield as mentioned above, it is essential that particularly thorough ground investigations and infiltration tests are carried out several times during the winter season (as part of the design of development and prior to submission of the planning application). The ground infiltration tests, calculations and design of the system must meet the requirements of the Lead Local Flood Authority (ESCC in partnership with Pevensey and Cuckmere Water Level Management Board). For small proposals, ESCC has published the '*SuDS Decision Support Tool for Small-scale Development*'.
58. As regards foul drainage, Ninfield village has a public sewerage system which flows via Russell's Green to the Hooe Wastewater Treatment Works. Lunsford Cross (with Bexhill Road) has a separate sewerage system which flows to the small Lunsford Cross Wastewater Treatment Works. The treated discharge from both is via the East Stream to Pevensey Levels (Ramsar, SAC, SSSI) which, as stated above, is highly vulnerable to changes in quantity and quality of flow and therefore potentially adversely impacted by new developments. A number of properties on the periphery of the village rely on cess pits and septic tanks. The sewerage authority is Southern Water.

Policy N3 – Flood Risk and Drainage

Surface water drainage for development shall be based on sustainable drainage principles allowing for future climate change. The scheme shall be designed to prevent properties both on and off the development site from flooding, including at construction phase, and shall include appropriate ground tests and calculations. Major developments shall demonstrate how maintenance arrangements can ensure an acceptable standard of operation for the lifetime of the development. Where possible, they shall provide multifunctional benefits such as for biodiversity or amenity. Where necessary, these shall be subject to a legal agreement to ensure their implementation. Drainage schemes should take account of the following:

- Wealden Strategic Flood Risk Assessment
- ESCC '*Guide to Sustainable Drainage Systems in East Sussex*'
- ESCC '*SuDS Decision Support Tool for Small-scale Development*'

Objective: ECO2

Justification: Ninfield Parish Council has declared a climate emergency (as have Wealden District Council and East Sussex County Council). There is a wider awareness of the need to take appropriate actions as soon as possible. Southern Water, as the wastewater undertaker for Ninfield, supports the aim of addressing impacts of climate change through sustainable drainage principles. Southern Water strongly encourage well-designed sustainable drainage systems for all development to reduce the volume of surface water entering the foul sewer system and thereby reduce pressure on the sewer network and minimise pollution events.

NPPF paras 157-159, 165-175

WCSLP objective SPO10

WLP saved policies EN1, CS2

Wealden Strategic Flood Risk Assessment

ESCC '*Guide to Sustainable Drainage Systems in East Sussex*'

ESCC '*SuDS Decision Support Tool for Small-scale Development*'

Environment and Countryside

Objective: ECO1- Protect the distinctive landscape setting of the village - which includes the public enjoyment of the countryside with its important public viewpoints, the natural environment, biodiversity and dark skies - and conserve and enhance the High Weald National Landscape and its setting.

Objective: ECO2 - Enable Ninfield to make a contribution to reducing climate change and to build resilience, mitigate effects and maximise beneficial opportunities.

Dark Night Skies

59. Issues relating to Obtrusive Light

- I. Light pollution is the light that is wasted upwards and reflects off the atmosphere, causing the visible blanket cover that hangs over major urban areas at night.
- II. Today starry skies are denied to over 90% of the UK population as a direct result of ill-directed lighting causing light pollution. By contrast, CPRE indicates that darkness at night is one of the key characteristics of rural areas.
- III. There is an increasing demand for artificial lighting for safety (road schemes) and crime prevention (security lighting). This combination of circumstances has raised the profile of intrusive light as an environmental issue
- IV. Obtrusive light is generally a consequence of poorly designed or insensitive lighting schemes. The three main problems associated with lighting are:
 - Sky glow – the glow seen around urban areas caused by scattering of artificial light by dust particles and water droplets in the sky
 - Glare – the uncomfortable brightness of a light source when viewed against a dark background
 - Light trespass – light spilling beyond the boundary of the property on which a light is located.

60. Dark Skies in Ninfield

Ninfield, like many other rural villages in the High Weald, has a tradition of being unlit with no street lighting other than to a very limited extent at two junctions on the A269 in the village. The preservation of the dark night sky is extremely important to residents as an essential part of the rural character, hence the Parish Council's adoption of a policy for dark night skies in 2021 (currently on its website). Figure 3 (Map of Ninfield Parish Dark Night Skies Area), has been produced by the High Weald AONB Partnership using SQM (Sky Quality Meter) dark sky readings collected by local volunteers. It follows standard methodology developed by the Partnership using Dark Sky Association guidance. The majority of the Parish has a dark sky meter reading of 19 or above. The average SQM reading at 20 accessible set locations on 5 different occasions is 20.56. The range is from 21.77 at Standard Hill to 16.69 at the roundabout by the Kings Arms. These figures are indicative and only to be used as a guide.

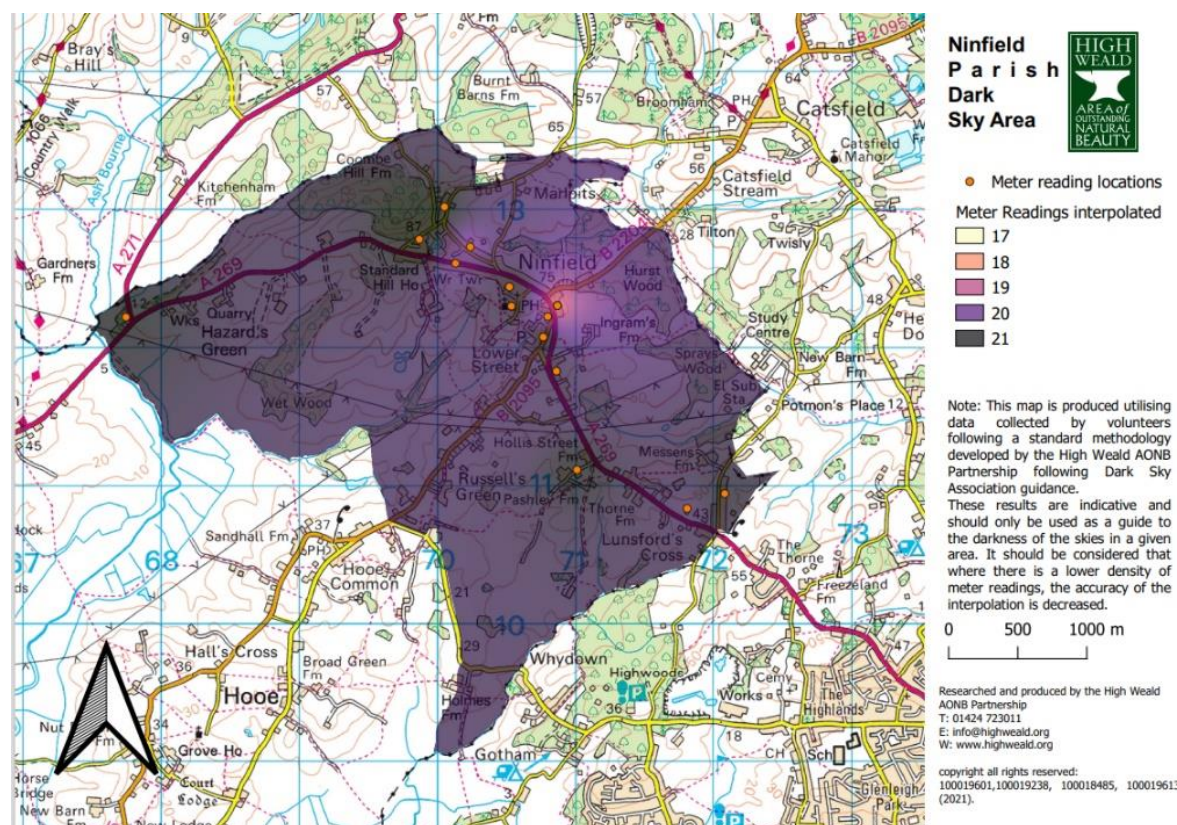
The Institute of Lighting Professionals has defined environmental zones in its guidance of 2021 (GN01/21) from which the relevant part is extracted in the Table below. Much of Ninfield Parish is in Environmental Zone E1 and the remainder in E2.

Zone	Surrounding	Lighting Environment	Examples
E1	Natural	Dark (Sqm 20 to 20.5)	Relatively uninhabited rural areas, National Parks, AONB, IDA buffer zones etc.
E2	Rural	Low district brightness (SQM 15 to 20)	Sparsely inhabited rural areas, village or relatively dark outer suburban locations.

The northern part of the parish, being within the High Weald National Landscape, and the south western edge within Pevensey Levels RAMSAR site are in zone E1. Readings indicate that other extensive areas of the parish including peripheral parts of the village are also in this 'Dark' zone E1. The main part of the village itself is in the 'Low District Brightness' zone E2 owing to the very limited street lighting on the A269. GN01/21 states "Note 1 – Where an area to light lies close to the boundary or 2 zones, the obtrusive light limitation values used should be those applicable to the most rigorous zone" and "Note 2 – Rural zones under protected designations should use a higher standard of policy".

61. Lighting proposals that neighbour or are near enough to significantly affect areas of nature conservation importance e.g. Sites of Special Scientific Interest, Nature Reserves are to be particularly avoided. External artificial lighting can have severe implications for the natural diurnal rhythms in a range of animals and plants. More generally in the parish and village, it is important the new developments respect the dark night skies of Ninfield. They should be designed with care, following the ILP detailed technical guidance in GN01/21, to limit the impact of light pollution from artificial light.

Figure-3 Ninfield Parish Dark Night Sky Area



Policy N4– Protect and Enhance Dark Night 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 GN01/21: The Reduction of Obtrusive Light (and any subsequent revisions).

Objective EC01

Justification: Ninfield Parish Council have declared an intention to protect and enhance our dark night skies. In general, lighting that is well designed, properly maintained and unobtrusive is not problematic. Light pollution has many adverse effects including energy wastage and adverse effect on the natural environment. Obtrusive light, especially in rural locations can affect the natural diurnal rhythms amongst a wide range of animals and plants. Whereas the amenity value of dark night skies and star visibility has a positive effect on human psychology and well-being.

NPPF p191(c)

WCSP 2013 none

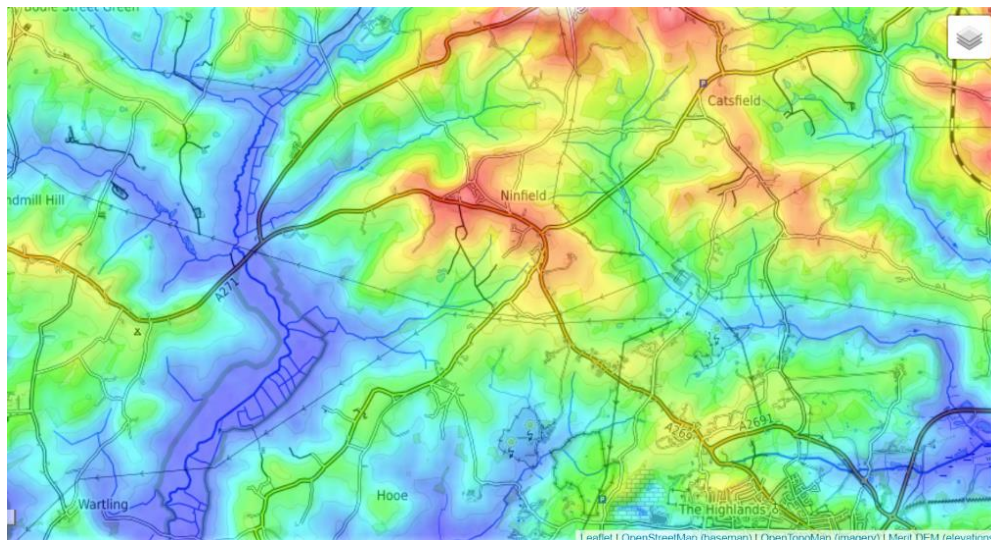
WLP 1998 saved policies EN29, HG6

Landscape and Natural Environment

62. Ninfield Parish has a distinctive topography and landscape. It is almost wholly within the High Weald National Character Area (NCA) apart from a narrow strip on its western edge which is in Pevensey Levels NCA. The **High Weald NCA** encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. It is an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe. It consists of a mixture of fields, small woodlands and farmsteads connected by historic route ways, tracks and paths. Wildflower meadows are now rare but prominent medieval patterns of small pasture fields enclosed by thick hedgerows and shaws (narrow woodlands) remain fundamental to the character of the landscape. The High Weald is a classic patchwork countryside and most but not all of the High Weald NCA is included within the High Weald National Landscape. The **Pevensey Levels NCA** is a wetland of national and international conservation importance and a Site of Special Scientific Interest, Ramsar site and Special Area of Conservation. The Levels are mostly grazed pasture, with extensive drainage networks and flood plain.
63. The East Sussex Landscape Character Assessment 2016 shows Ninfield, apart from a small area in Pevensey Levels, as being in the High Weald, mainly in the 'South Slopes of the High Weald' with the eastern part in the 'Combe Haven Valley'.
64. Consultants LUC, in their Landscape Character Assessment 2022 for Wealden District Council, define the extensive area around the central High Weald (wooded ridges) as having the landscape character type 'Wooded Slopes (High Weald)'. They subdivide this into 5 local character areas (LCAs) based on river catchments. Ninfield lies within 'High Weald – Cuckmere / Pevensey Catchments' (pages 174-186). They describe LCA6E as "a rolling landscape of ridges and valleys containing the River Cuckmere and its tributaries that drain south from the Central High Weald into the Low Weald, and the tributaries of Waller's Haven that drain east into the Pevensey Levels. A wooded landscape with a pattern of small-scale irregular fields, streams and historic ridge-top villages. The LCA is separated into two sections by LCA 1A Pevensey Levels at Waller's Haven (and the District boundary). The north part of the LCA, north of Horam, Windmill Hill and Ninfield, lies within the High Weald AONB".
65. The consultants describe the Landscape Qualities of the LCA 6E as follows: "The following features and characteristics are particularly valued for their contribution to character and for the ecosystem services they provide:
- The landform of ridges and valleys associated with the River Cuckmere and Waller's Haven provide topographical interest to the landscape, creating a sense of place.
 - Hammer ponds and gill streams, support wetland habitats, increasing biodiversity.
 - The woodland, riparian vegetation and wetland habitat of the Cuckmere and Waller's Haven catchments provide nutrient and sediment filtration that enhances water quality, help to regulate water flow and assist in reducing flooding during heavy rainfall.
 - The numerous woodlands (with a high proportion of ancient woodlands), trees and mature hedgerows, provide a sense of place as well as habitat connectivity to support biodiversity, carbon sequestration and the regulation of temperatures.

- Coppicing of woodland offers opportunities for timber provision and a potential source of local fuel and building materials.
 - Semi-natural habitats including deciduous woodland, grassland and wet meadows, some designated as SSSI, support a range of important flora, insects and breeding birds. They allow soil stabilisation/retention, have a higher soil carbon content than cultivated habitats and provide nutrient filtration, enhancing water quality.
 - The small-scale medieval field patterns, with sinuous hedgerow boundaries provide a sense of place and history.
 - Hammer ponds, coppiced woodlands and historic forges provide a link to the Wealden iron industry and a sense of time depth
 - The pattern of historic ridgetop villages (whose value is recognised through designation as Conservation Areas), linked by winding rural lanes, provide a connection to history, cultural identity and aesthetic value.
 - The vernacular of red brick, oak timber, sandstone and flint which reflects the locally available materials, provides a sense of place and accords with a distinctive architectural colour palette. Herstmonceux Castle, Observatory and parkland contribute to the time depth of the landscape and are distinctive landmarks in the landscape.
 - The extensive network of public rights of way contributes to people's physical health and mental well-being.
 - Contrasts between the enclosed character around woodlands and sunken lanes, and open views to the Pevensey Levels and the South Downs provides visual interest and a sense of place.
 - The harmonious small-scale landscape pattern of mixed farms, dense woodland and open views across the Pevensey Levels contribute to the strong scenic quality of the area, reflected in its partial designation as an National Landscape.
 - The low density of settlement provides a sense of rural tranquillity and experience of dark skies."
66. The previous consultants (Chris Blandford and Assocs) described the character type of this part of the High Weald as 'Ridges and Slopes' in their Wealden Landscape and Settlement Character Assessment 2014. Their assessment was that it has "*High Landscape Sensitivity and Very High Landscape Value*". As regards the setting of Ninfield village, they described it as one of Remnant Historic Landscapes with ancient fieldscapes abutting the majority of the settlement edge, with the principal field type being regular piecemeal enclosure but also including cohesive and aggregate assarts and some planned enclosure. Blocks of Ancient Woodland contribute to the historic setting of the settlement, directly bounding the settlement edge on the northwest side.
67. As regards culturally important landmarks, Standard Hill is important as the place where William the Conqueror is reputed to have placed his flag as his troops assembled prior to the Battle of Hastings. Here, long distance views across the levels can be gained. In addition, Ninfield Stocks and whipping Post are a fine example of Wealden iron working which was prevalent until the 18th century.

Figure 4- The Topography of Ninfield – red & orange represent the higher ground and blue & violet represent the low-lying areas.

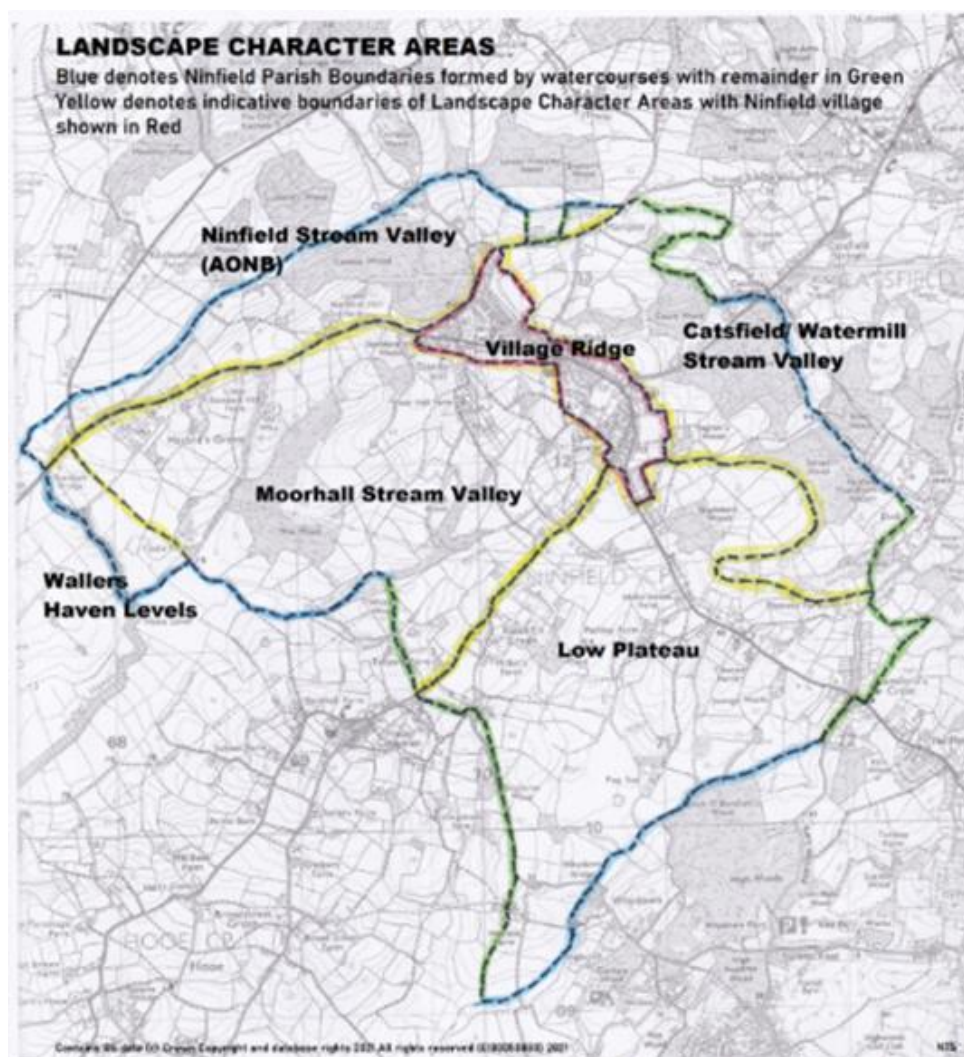


Landscape Character Areas within Ninfield Parish

The following is a summary of the Landscape Study of Ninfield report contained in the Background documents.

68. The ridge on which Ninfield village stands, running eastwards from the high point of Standard Hill (82.7m), slopes downhill into several distinct valleys, except to the south-east and south where it merges much more gradually and broadens out into a 'low plateau'. The ridge forms a watershed between the catchments of two main watercourses, the river called Watters Haven to the west and the stream called Combe Haven to the east. Tributaries of these, although now insignificant in size, sometimes incised as gills, have also formed distinctive valleys each with their own character. The Moorhall Stream and the Ninfield Stream both drain to Watters Haven, the Catsfield/Watermill Stream to Combe Haven. Thus, a number of distinct Ninfield Parish Landscape Character Areas based on these 3 valleys plus the low plateau, village ridge and the Levels can be identified, the key features of which are summarised below:

Figure 5- Map of Ninfield Landscape Character Areas



VILLAGE RIDGE

- Ridge is flat-topped with pronounced side slopes some of which are steep except to southeast where it slopes gradually down and broadens out into the 'Low Plateau'. It narrows in the middle, the small valleys impinging on either side to create a pinch point. Narrow minor ridges project south at Moor Hall Drive and northeast at Marlpits Lane. It is described in more detail under 'Built Environment and its Setting'.

LOW PLATEAU

- Mainly gently rolling, sometimes flat, landscape which splits into low ridges leading to Bexhill and Hooe. There are some more pronounced slopes, notably in the central south part which drains to a watercourse forming the boundary with High Woods (in Bexhill) and then via East Stream to Pevensey Levels.
- Relatively open landscape of agricultural fields, many arable, often enclosed by well-maintained hedges. Significant areas of larger reorganised fields but ancient field pattern survives in some areas.
- Few woodlands remain and generally fewer trees, a notable exception being along B2095 Hooe Road.

- Larger numbers of dwellings than elsewhere, notably at Lunsford Cross and in loose groups of sporadic dwellings along Bexhill-Ninfield Road and along Hooe Road (mostly in the area called Russell's Green).
- Many ancient farmsteads with surviving farmhouses, barns and oasts, mostly listed and converted to residential use.
- Remote and tranquil feel away from main road.
- Several public footpaths, some with long views including towards High Woods and South Downs (see View 19 in Key Views below), but these paths lack connection to village.
- Detracting elements include Skinners Sheds site on Ninfield Road and overhead lines on pylons. Solar farm is on remote low-lying area.

MOORHALL STREAM VALLEY

- Scenic and varied valley topography of pronounced ridges and slopes, the steepest being close to village, with minor watercourses and ponds.
- Network of public paths (including Church Path) on village edge provide panoramic public views from open high ground over valley and western '1066 Country' and beyond to South Downs and sea, as well as more localised views (see Views 1-3, 6-7, 17-18 in Key Views below).
- Community-owned ancient Church Wood (Local Nature Reserve), a recreational and educational as well as wildlife asset, nestles in small valley very close to village.
- Mixture of mainly small irregular open fields on higher slopes with a few larger arable fields to west, and on lower slopes are ancient woods and fields enclosed by wooded hedges. Rough Wood (along Moorhall Gill), Wet Wood and Long Wood (on south and west slopes of Standard Hill) are ancient woods designated as Local Wildlife Sites.
- Remote and tranquil rural character within valley with buildings and roads mainly on periphery.
- No listed buildings but provides setting for important adjacent grade I and II* listed buildings (Church, Standard Hill House and Tanyard House) and grade II cottages at Lower Street.
- Detractors include Tarmac Topblock site, South East Waterworks and overhead lines on pylons but impact is limited owing to woods and trees.

CATSFIELD/WATERMILL STREAM VALLEY

- Mainly heavily-wooded character, dominated by ancient Hurst and Sprays Woods (former partially replanted with conifers), in distinct valley with minor side valleys.
- North part on higher ground adjoining village has mainly a pattern of small irregular ancient pastures with hedges, trees and ponds (including former marlpits), with more gentle slopes except at Moons Hill and eastwards into the Court Wood valley. Marlpits Lane runs along a small ridge on the National Landscape boundary. Lanes are mainly enclosed by banks and tall, dense hedges and trees.
- Prevailing rural and tranquil character with a relatively remote feel except for traffic on B2204 but even here the trees and woods give a very natural appearance.
- Distinctive character of uphill approaches into village at Moons Hill and Catsfield Road hill, with steep wooded banks.
- Few public footpaths and viewpoints for the most part but a long-distance circular route is provided by the public footpath along the wooded valley (including in Catsfield parish), the northernmost section having open views of north side of village ridge (see Views 12 and 13 in Key Views below). Marlpits Lane/ Moons Hill provide a popular short circular route, also for horse riders.

- Ingrams Farmhouse and barn are the only listed buildings within this area (see View 15 in Key Views below) but it provides setting for adjacent grade II listed buildings in village (on north-east side of The Green and Manchester Road).
- Detractors include the Ninfield Transforming Station (over Catsfield boundary) and associated overhead lines and pylons but impact is reduced by the woods and trees.

NINFIELD STREAM VALLEY (part of High Weald National Landscape)

- Distinctively scenic and unspoilt steep-sided valley with some listed former farm houses and cottages including Grade II* Luxford House (former Lower Standard Hill farmhouse).
- Ancient Combe Wood is an extensive and dominant feature, designated as a Local Wildlife Site.
- Irregular ancient fields bounded by hedges and trees.
- Very distinctive steep wooded banks on Combe Hill approach to village which form part of an abrupt drop continuing SW along edge of Coombe Lane and NE alongside Marl pits Lane.
- Public views over valley are mainly from north (from A271 in Ashburnham) and from A269 on west side of Standard Hill. Views are more limited from south side near village (except when hedges cut in Marl pits Lane and Combe Hill) (see Views 10 and 11 in Key Views below).
- Few public footpaths but access appears tolerated to paths in Combe Wood.

WALLERS HAVEN LEVELS (part of Pevensey Levels SSSI, SCA and Ramsar)

- Distinctive flat landscape of meadows and drainage channels, some with embankments.
- Remote rural feel away from A271.
- Views across open landscape generally lacking trees and hedges (see View 9 in Key Views below).
- Important wetland habitat part of designated Ramsar site, Special Area of Conservation and Site of Special Scientific Interest (SSSI).
- Detraction caused by overhead lines on pylons.

Key Views

69. Significant views over the landscape have long been a characteristic of Ninfield because of its topography. As long ago as 1848, the Topographical Dictionary of England gave the following description of Ninfield: “.... *the surface is varied and the scenery beautifully picturesque – the village is situated on the road from Lewes to Battle and Hastings and from its elevated site commands extensive views*”. In 1937, the Victoria County History of Sussex also stated “*The village stands picturesquely on top of a hill and commands wide views*”. Since then, the development of the village has resulted in loss of roadside views from within the village, many views now being from the rear of private properties. This makes it all the more important to protect the significant public views that remain from the surroundings of the village. These comprise mainly views from public footpaths but also from some roads on the village edge.
70. A Key Views Assessment (Appendix E) has been carried out. This defines the selection criteria followed by the identification of the Key Views considered to meet

the criteria. They are representative of the distinctive character of Ninfield and important to its sense of place. Nearly all of these views are from public footpaths on the edge or in the vicinity of the village and important to its setting. As referred to in Appendix E, there are also notable views of Ninfield in the wider landscape from viewpoints in the surrounding parishes but the protection of these is outside the scope of the NNDP. The Key Views² are:-

View 1 – From Church Path looking southwest towards Beachy Head and South Downs National Park.

View 2 – From Church Path looking west over the south end of Church Wood to Moor Hall Drive.

View 3 - Looking west from south end of footpath FP4B (campsite next to the churchyard) over Church Barn Farm towards the South Downs.

View 6 – From footpath FP7A at the east side of Moor Hall Drive looking east over Church Wood.

View 7 – Looking southwest from Moor Hall Drive (footpath FP8B).

View 8 – From Standard Hill looking southwest towards the South Downs National Park.

View 9 – From the riverside path FP13 near Boreham Bridge looking southeast over Waller's Haven Levels and Castle Croft.

View 10 - Looking northwest down Combe Hill over Combe Hill Farm towards Compass Wood.

View 11 – Northwards from Marlpits Lane towards Ashburnham

View 12 - Towards Ninfield Village from FP21 looking south.

View 13 – Towards Ninfield village from FP21 looking southwest.

View 15 – From footpath FP14B looking northwest to Ingrams Farm.

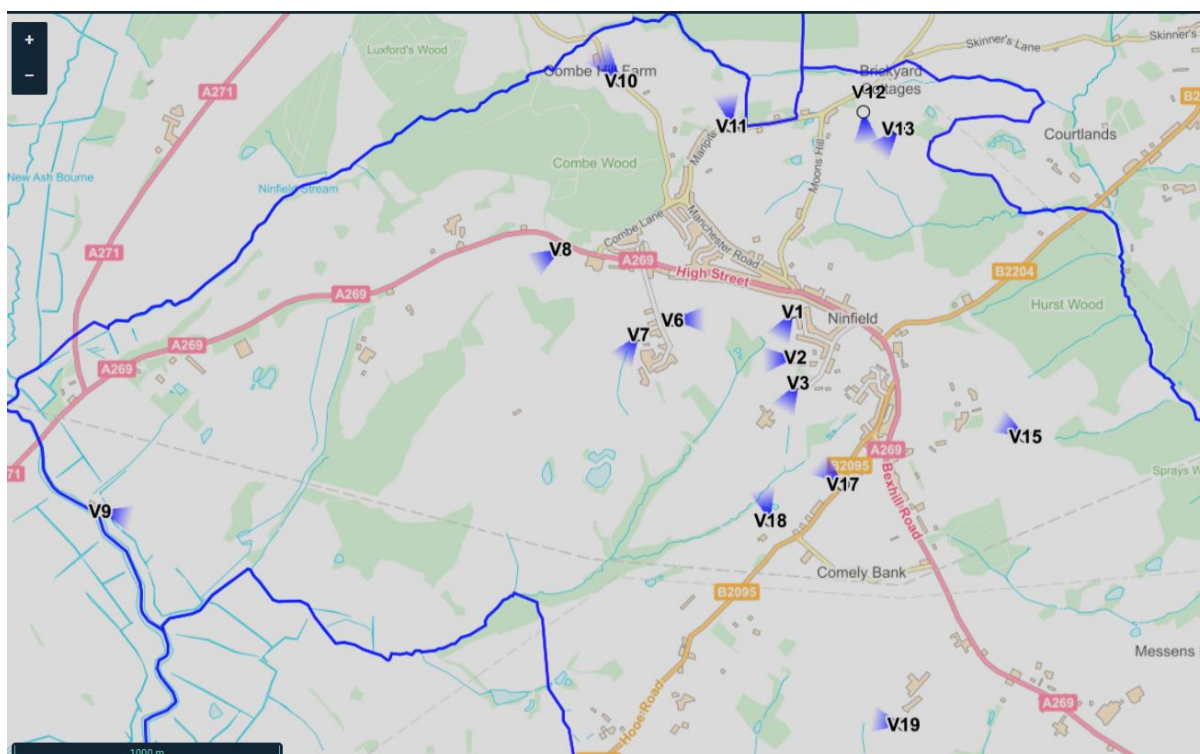
View 17 – From B2095 (Hooe Road) looking northwest towards Church Barn Farm & Church Lane.

View 18 – Looking north from the southern end of FP2 (adjoining Newhouse Barn, Hooe Road) towards village.

View 19 – From footpath FP19 at Pashley Farm looking west over Hooe towards Beachy Head and the Downs.

² Key Views 4, 5, 14 and 16 (see Appendix E) were discounted at the Examination stage, due to not being considered special enough.

Figure 6- Map of Key Views



Policy N5 – Key Views

Key Views are shown on Figure 6 and identified in the Ninfield Key Views Assessment (Appendix E). Where development proposals are acceptable in principle within these Key Views, these should be sited, designed and landscaped to be in harmony with and conserve the characteristic features and visual quality of the landscape. Wherever practicable, the development should enhance or provide greater accessibility to the Views concerned. Development proposals which would result in a significant adverse impact on the landscape character or visual quality of a Key View within the neighbourhood area will not be supported.

Objective: EC01

Justification: Over 69% of respondents in the Parish-wide questionnaire expressed a concern about the impact of development on public views in the Parish.

NPPF para 180

WCSLP objective SP01 and policy WCS13

WLP saved policies EN8, EN11, EN14

Background Document: Landscape Study of Ninfield

Landscape Policy Context

71. The Wealden Core Strategy Local Plan 2013 and the Wealden Local Plan 1998 (saved policies) show Ninfield, except for the part in the High Weald National Landscape, as being in the Low Weald. This is at odds with all the above subsequent landscape studies. The WLP policy EN6 for the High Weald relates solely to the National Landscape. There is no landscape policy for areas of the High Weald that are outside the National Landscape. Those areas are included with the Low Weald which is subject to landscape policy EN8. The Wallers Haven Levels are included with the Coastal Levels which are subject to EN11 which seeks to ensure that development “*conserves its generally open and exposed landscape character*”.
72. Para 180 of the NPPF states: “*Planning policies and decisions should contribute to and enhance the natural and local environment by:*
(a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
(b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;.....*
(d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
73. Para 181 states: “*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*”.
74. The Government’s Planning Practice Guidance ‘Natural Environment’ last revised in February 2024 states that “*The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside. Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary.*” This guidance and the NPPF do not define “value”. It is evident that it is more than simply popularity and must incorporate distinct physical attributes such as scenic beauty or tranquillity for example. Beauty is a largely subjective matter but distinctive topography, woodland, hedgerow and field patterns, especially if historic, are recognised as important contributory factors. The extent to which there are public views over the surroundings also needs to be taken into account. Conversely, substantial environmental detractors can obviously reduce or even negate landscape value.

75. From the Landscape Study of Ninfield, a hierarchy of landscape areas can be deduced within the Parish which, in accordance with Government guidance, warrant different degrees of landscape protection commensurate with their category:
- High Weald National Landscape – a national designation where the beauty of the landscape warrants the very highest level of protection (as provided by the policies of the NPPF quoted below). This comprises of the Valley of the Ninfield Stream;
 - Areas of Locally Valued Landscape (ALVL) – a local designation where the scenic and other qualities of the landscape justify it being given particular weight but not to such a high degree as in the National Landscape. These comprise the Valley of the Moorhall Stream (together with the small area of the Levels within the Parish) and most of the Valley of the Catsfield/ Watermill Stream; and
 - Other countryside – where the normal level of protection is given. This comprises the Low Plateau and the southern end of the Catsfield/Watermill Stream valley.

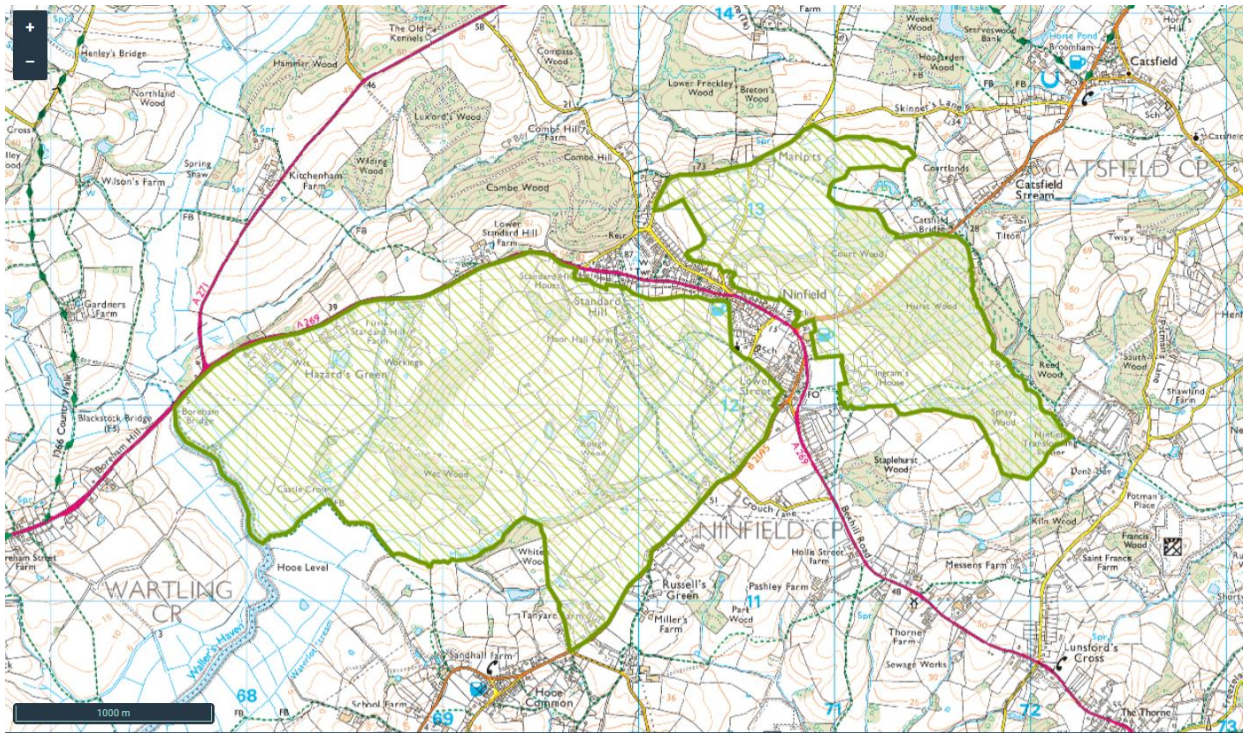
High Weald National Landscape (formerly the AONB)

76. The northern part of Ninfield Parish is in the High Weald National Landscape and comprises the **Valley of the Ninfield Stream**. The Ninfield NDP does not need to include a specific policy for this area because, in addition to WLP policy EN6 above, the NPPF (paras 182 and 183) contains policies giving National Landscapes the very highest level of protection against harmful development as follows: *“Great weight should be given to conserving and enhancing landscape and scenic beauty in.....AONBs which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas..... The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”*
77. Also, *“When considering applications for development within ...AONBs, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*
(a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
(b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

Areas of Locally Valued Landscape (ALVL)

78. The Landscape Study of Ninfield has identified that there are substantial areas outside the High Weald National Landscape boundary which have distinctive topography and special scenic or other landscape quality causing them to be highly valued by the community. These areas share many of the characteristics of the High Weald National Landscape and are a transitional zone. The boundary of ALVL is shown in green in Figure 7 below.

Figure 7- Areas of Locally Valued Landscape



79. It is concluded that there is sound justification for designating the **Valley of the Moorhall Stream and the adjacent part of the Levels** as an Area of Locally Valued Landscape. 125 respondents to the Neighbourhood Development Plan (NDP) Questionnaire stated that they valued Church Wood as local green space, 79 valued the land adjoining Church Path/rear of High Street and 12 valued the fields off Moor Hall Drive. Collectively, these are part of the same landscape and too extensive to be designated as LGS.



View from Church Lane (footpath 3B) looking along Moorhall Stream valley to Wartling and the South Downs.

80. It is an area of particularly attractive and predominantly unspoilt countryside with a very distinctive ridges and slopes topography and an intricate pattern of ancient

irregular fields and woods some of which have nature conservation designations, including gill woodland. Significantly, it has a network of public footpaths (including tarmac Church Path and part of Church Lane) on the village edge. This makes it easily accessible and, with its long-distance panoramic views from the relatively open high ground (see Key Views 1, 3, 7 and 8), as well as more localised scenic views (see Key Views 17 and 18), greatly valued by many residents. There is no other area around the village which is comparable in terms of its combination of numerous viewpoints, distinctive landscape character, accessibility and public usage.



View of Moor Hall site and Church Wood from the south (footpath 3C) with High St in distance

81. In addition to this, it preserves the relationship of significant historic buildings in the village (including the grade I St Mary's Church and II* Standard Hill House and Maltings) to the open countryside. As the public views extend over a very wide area, it is considered that the whole valley including the west side of Standard Hill plus the small area of the adjacent Wallers Haven Levels is a locally valued landscape. The juxtaposition of the contrasting landscapes of the Levels to the higher ground is also a distinctive feature (see Key View 9). It forms a recognisable area that differs from the rest of Pevensey Levels because it occupies a valley between the rising ground either side.



Distant view from A271 to west on north side of Boreham Street. Standard Hill is in centre horizon, its north side (left) being within the High Weald National Landscape and its south side (centre and right) in the Moorhall Valley ALVL

82. There are public views from the A269 on Standard Hill and B2095 Hooe Road and a public footpath, plus a more distant panoramic views across Waller's Haven valley from the A271 on the north side of Boreham Street where the High Weald National Landscape merges imperceptibly with this area as well as from paths on the east side of Wartling. On the village edge, where there is a network of paths at the head of the Moorhall valley, Church Wood and the adjacent fields are proposed to be

designated as Local Green Space to give added protection owing to its greater value to the community.

83. Although lacking the panoramic views and network of public paths of the above area, there is also considered to be justification for another Area of Locally Valued Landscape comprising the **Valley of Catsfield/Watermill Stream** (excluding the southern end which adjoins the major transformer station). Although included by consultants in the 'Ridges and Slopes' character area, the ESCC Landscape Study shows it as part of the Combe Haven Valley area, not the South Slopes of the High Weald. It comprises primarily of a well-defined valley covered in extensive woodland of ancient origin alongside a gill stream. It extends towards the village in a steep side valley occupied mainly by ancient Court Wood but continuing beyond to Moons Hill. South of the trees in the Court Wood valley is an elevated area of fields at ridge height on the village edge behind The Green. The large easternmost grass field (called Cricket Field on the 1841-4 Tithe Map) slopes down to the wood and to a wooded bank in Catsfield Road. It is visible in a long view from the Crowhurst road near Catsfield parish church and is seen as part of the valley landscape, contributing to its scenic value.



View across wooded Catsfield Stream valley from east near Catsfield church to Ninfield ridge (The Green)

84. At the northwestern head of the valley, the higher but less steeply-sloping ground on the village edge behind Manchester Road and adjoining Marlpits Lane differs in that it comprises mainly ancient pastures surrounded by hedges and trees, with numerous ponds, probably former marlpits. There are also a few larger and more open fields. It is an extremely tranquil rural area possessing the character of a remote backwater. It adjoins the boundary of the High Weald National Landscape and is partially seen in views from that area. This proposed ALVL also coincidentally provides the setting for a number of grade II listed and other historic buildings (including Church Farmhouse, Barn and Oast, High Knoll, Cross Farmhouse, Fir Tree Cottages, Ingrams Farm and Barn).



Moons Hill



Moons Hill (top)

85. The narrow country lanes Moons Hill and Marlpits Lane, the latter running along a small ridge giving some views over the High Weald National Landscape (see Key View 11), provide accessibility. These roads combined with public footpath 21 along the valley (partly on the Catsfield side) provide a circular route popular with walkers and, in part, horse riders. Key Views 12 and 13 are from footpath 21 towards the north side of the village ridge. Key View 15 is towards the east side from footpath 14B where it runs from the woods to the village. These routes are especially valued for their tranquil and remote environment so close to and contrasting with the village. 73 respondents to the NDP Questionnaire stated that they particularly valued the area of Moons Hill, Marlpits Lane and Coombe Lane as local green space and 10 particularly valued the fields behind Manchester Road but these areas are too extensive to be LGS. The site at the rear of Sparke Gardens that has been granted planning permission for 80 houses is excluded. Catsfield Road (B2204) is not tranquil, owing to the traffic, but it runs through the area of woods and trees where nature has taken over and provides a distinctive wooded uphill approach to the ridge-top village that is worthy of protection on both sides for its natural scenic value. The Ninfield Transforming Station and associated overhead lines on pylons are a major detractor at the southern end. Although the impact is fairly localised because of enclosure by woods, it nevertheless is so major as to necessitate its exclusion from any ALVL designation. 11 NDP Questionnaire respondents stated that they particularly value the surroundings of the circular public path as green space. It is relevant to note that an appeal regarding a solar farm on the Catsfield side was dismissed because the landscape deserved protection for its intrinsic character and beauty.

86. Therefore, the Ninfield NDP identifies the above as Areas of Locally Valued Landscape (ALVL) with their proposed boundaries shown on the Policies Map. It enables development to be supported provided it is not detrimental to the identified scenic qualities and particular characteristics of these areas. It requires sufficient mitigation where necessary with the details of siting, design and landscaping (including tree planting) minimising any adverse effects. A specific reference is made in the policy to a requirement not to adversely impact on the rural setting of public footpaths or on views from public viewpoints.

Policy N6 – Areas of Locally Valued Landscape

Within the Areas of Locally Valued Landscape as identified on Figure 7, the distinctive character and inherent scenic qualities of the area concerned as identified in this Plan and the Landscape Study of Ninfield will be protected.

Development will be supported if it preserves or enhances the distinctive character and inherent scenic quality of these areas. The setting of public rights of way and public views over the landscape, particularly the defined Key Views, will be safeguarded from detracting by obtrusive or incongruous development. The details of siting, design, materials and landscaping (including tree and hedge planting) shall be harmonious and minimise the effect of development on the landscape.

Objective: EC01

Justification:

The distinctive character and inherent scenic qualities of the Moorhall Stream Valley derive from its topography of ridges and slopes and its ancient pattern of mainly small irregular fields bounded by hedgerows, trees and woodland. There are extensive public views from open high ground including from the network of public rights of way which provide numerous viewpoints over the landscape including to the Downs and sea and towards the village. It includes areas of surviving Ancient Woodland most of which is designated as local wildlife sites or local nature reserve plus ponds and watercourses. The Wallers Haven Levels provide a contrasting flat and open landscape of water meadows and drainage channels, being a protected habitat enclosed by higher ground either side.

The distinctive character and inherent qualities of the Catsfield/Watermill Stream Valley derive from its extensive mostly ancient woodland in pronounced valleys, except close to the village edge where there is an ancient pattern of mainly small pastoral fields enclosed by hedges and trees. There are numerous ponds some in historic marlpits. Lanes and roads are enclosed by hedges and trees with distinctive wooded banks on the uphill approaches to the village. A rural, natural character predominates throughout this area, with tranquillity and a sense of remoteness away from the main roads.

Over 90% of local residents in the parish wide questionnaire stated that they valued the local landscape and natural environment especially features including hedgerows, trees in the landscape, woodlands and footpaths in the countryside. Details of the responses received are contained under the relevant descriptions above.

NPPF paras 180 and 181

WCSLP objective SPO1, policies WCS12, WCS13

WLP saved policies EN8, EN11, EN12, EN14

Background Document: Landscape Study of Ninfield

Other Countryside

87. The remainder of the countryside in Ninfield Parish consists of the extensive area south-east of the village described in the Landscape Study of Ninfield as the Low Plateau, together with the southern end of the Catsfield/Watermill Stream Valley in the vicinity of the Ninfield Transformer station. This is largely an attractive, unspoilt rolling landscape (see Key View 19) with some of the characteristics of the High Weald although in other places it shows more resemblance to the Low Weald. It is not sufficiently distinctive, particularly in respect of its topography, as to justify special protection as an ALVL. The NPPF contains a presumption in favour of sustainable development whilst also recognising the intrinsic character and beauty of the countryside. There has been long-established policy in the UK of protecting the countryside for its own sake with new development in open countryside generally resisted as being unsustainable and environmentally harmful unless it requires a countryside location such as for agriculture, forestry or minerals or to provide essential infrastructure.
88. Development requiring a countryside location needs to pay adequate regard to the intrinsic beauty of the rural landscape and its local characteristics. It should be sited and designed to mitigate its visual and ecological impact with sufficient landscaping (including tree and hedge planting).
89. It is not considered that the 'Other Countryside' of the parish warrants a specific landscape policy in the Ninfield NDP except in so far as it is necessary to protect 2 Key Views shown on the Policies Map (at Ingrams Farm and Pashley Farm). Saved Policy EN8 of the Wealden Local Plan 1998, which currently applies to this area, states that development in the Low Weald "*will only be permitted if it preserves the low rolling agricultural character of the landscape*" and that "*in considering any proposal, particular regard will be had to (1) areas of unspoilt and remote countryside; (2) the setting of settlements; (3) areas on the fringe of statutorily designated landscapes; (4) the retention of woods, boundary trees and hedges; and (5) attractive vernacular buildings and groups of buildings*".

Local Green Spaces

90. The benefits and importance of accessible green spaces are well recognised and contribute significantly to the physical and mental health of the population. The National Planning Policy Framework (paras 105-107) states “*The designation of land as a Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. The Local Green Space designation should only be used where the green space is:*

- *in reasonably close proximity to the community it serves;*
- *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *local in character and is not an extensive tract of land”.*

The National Planning Practice Guidance “Open space, sports and recreational facilities, public rights of way and local green space” provides further guidance including “Designating a green area as LGS would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners.” Normal ‘permitted development’ rights are unaffected.

91. The Wealden Open Space Assessment Report 2022 has comprehensively studied provision throughout the District. Among its conclusions is that Ninfield parish lacks ‘*natural and semi-natural greenspace*’ and ‘*amenity greenspace*’, the nearest being at Hooe Common. Based on the current population, it calculates that there is a shortfall of 10.91ha of the former type and 0.56ha of the latter. As regards other types of open space, it concludes that the existing provisions in Ninfield (the recreation ground including its facilities for children and young people, the allotments and the church cemetery) are sufficient in terms of size for the present population but fall short of being good quality. The report states that there is a basic principle that new housing developments should include provision for the additional recreational needs they would generate, the main mechanisms being through legal agreement with the owners/developers or CIL.

92. Detailed description and assessment of all the potential LGS sites is contained in the Ninfield NDP Local Green Spaces Report. This includes justification for the sites selected as meeting the above criteria. These sites are:-

- **LG01 The Recreation Ground** – (approx. 2.3 hectares). This is the only formal public open space (with sports pitches, pavilion, bowling green and facilities for children and young people) serving the Parish and occupies a central location in the east half of the village. Although only dating back to the 1920s, it appears as if it were the village green, next to the c17th stocks and whipping post, as well as the school. As it is in public ownership, it is reasonably safeguarded but, in view of its recreational importance, it is considered necessary to designate it as LGS rather than simply identify it as public open space.
- **LG02 Stocks/Whipping Post** – this tiny triangle of ground in the centre of the intersection of Church Lane with The Green (A269) is of special historical significance. Visually, the Grade II listed stocks are relatively insignificant but the group of Scots pine trees form an important feature of the streetscene.
- **LG03 Church Wood**– (approx. 1.7 hectares). Church Wood is community-owned ancient woodland to the immediate SW of the village in a deep little valley at the source of the Moorhall Stream. It is a designated Local Nature Reserve and

especially valued for its beauty and tranquillity. It is valued as a natural recreational resource which is very close to the village and school.

- **LG04 The Allotments** – (approx. 0.29 hectare). These are a well-used and valuable resource next to the lower part of Church Path. They also provide a green link between the Recreation Ground and countryside, forming a 'green wedge'. They are owned by the Church and not statutory allotments, so designation as LGS is needed to act as a safeguard.
- **LG05 The Churchyard** – (approx. 0.67 hectare). This surrounds the Grade I listed medieval church of St Mary the Virgin and has a variety of mature trees, including a yew believed to be over 700 years old, as well as historic tombstones. It is appreciated for its historic importance to the Parish community and as a place for reflection, in a tranquil and natural setting.



View looking NW from the north gate of the Churchyard over Upper Church Field, the north edge of Church Wood and fields beyond towards Moor Hall Drive.

- **LG06 Traditional Road Junctions at Standard Hill and Bexhill Road** – These are important features for the rural character and beauty of the village. At Bexhill Road, the designation protects an open junction area that has a traditional wooden finger post road sign. They are under the jurisdiction of ESCC as the local highway authority.

Figure 8- Map of Ninfield Local Green Spaces.



LG1= Recreation Ground, LG2= The Stocks,
 LG3= Church Wood, LG4= The Allotments,
 LG5= The Churchyard,
 LG6= Traditional Road Junctions at Standard Hill and Bexhill Road.

(NB LG5 =The Churchyard of St Mary the Virgin)

Policy N7 - Local Green Spaces

The Neighbourhood Plan designates Local Green Spaces, as shown on Figure 8. The designated Local Green Spaces are:

- LG01 The Recreation Ground
- LG02 Stocks/whipping post
- LG03 Church Wood
- LG04 The Allotments
- LG05 The Churchyard of St Mary the Virgin
- LG06 Traditional Road Junctions at Standard Hill and Bexhill Road.

Any development adjacent to these spaces should be sited, designed and landscaped to take account of their importance to the character of the area and as places valued for their intrinsic beauty, tranquillity, historic significance, wildlife or recreational use and should maintain or enhance access to our Green Spaces.

Objective: EC01

Justification: Local Green Spaces were cited by residents responding to the questionnaire as specific areas of land that are valued for their intrinsic beauty, tranquillity, views, historic significance, wildlife or recreational use.

The Ninfield NDP Survey 2021 has enabled residents to identify the sites that they consider are special to the local community and hold particular local significance. The recreational use of such spaces has increased markedly during the Covid-19 pandemic when restrictions on travel and opportunities for social contact were reduced. Many local residents have spoken of how valuable these spaces have been to them. A report on Local Green Spaces was prepared as part of the NDP process and forms part of the supporting documentation to this Neighbourhood Plan. It contains the full list of sites that were put forward for consideration as LGS and the reasons for rejection or selection.

East Sussex County Council emphasise the physical health and mental wellbeing benefits of LGS, increasing physical activity through enabling more walking within the area and access to play and recreational areas. It is important to maintain and improve the accessibility of LGS for all ages and abilities. The safeguarding of the allotments is welcomed as they provide benefits not only of healthy food but bring people together improving physical and mental wellbeing. Additional community food growing spaces should be considered.

NPPF paragraphs 105-107

WCSLP objective SPO11, policies WCS12, WCS13

WLP saved policies EN12, EN18, LR1

Wealden Open Space Assessment Report 2022

Background Document: Landscape Study of Ninfield

Biodiversity (including Green and Blue Infrastructure or GBI)

93. 'Green infrastructure' includes trees and woodlands, hedgerows, fields, recreational open space, etc being areas of importance or potential for biodiversity and, in particular, their linkages to form an effective network. 'Blue infrastructure' comprises rivers, streams, other watercourses, ponds, etc and has a close relationship to green infrastructure, providing important linkages. The NPPF states that: *"180. Planning policies and decisions should contribute to and enhance the natural and local environment by:---(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and at para 186. When determining planning applications, local planning authorities should apply the following principles: (a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused..... (c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and (d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to*

improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate". Para 186 (a) above is known as the 'avoid, mitigate, compensate hierarchy'.

Figure 9- Woodland Areas in Ninfield Parish

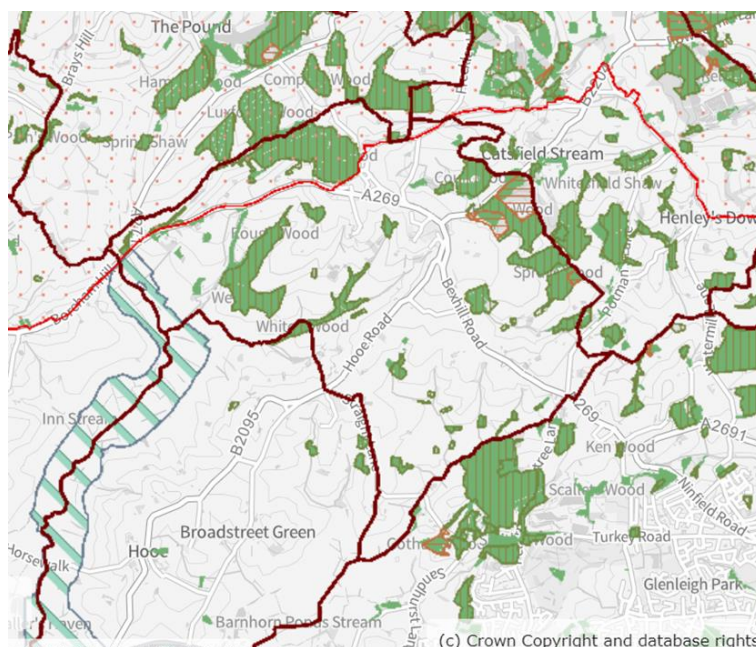


Figure 9 is an extract from Defra MAGIC showing Ninfield Parish (dark red boundary) in context with **Deciduous Woodland priority habitat in green** with Ancient Woodland in vertical lines and ancient replanted woodland in horizontal lines; **Pevensey Levels RAMSAR site** in blue lines and **High Weald National Landscape** in red dots with red boundary line. See Appendix F.

94. The Environment Act 2021 (amending the Town & Country Planning Act 1990) and its associated regulations came into force in February 2024 and contain provisions requiring, subject to some exceptions, 10% biodiversity net gain on new development (with a requirement to impose planning conditions accordingly). The main aim is to leave the natural environment in a measurably better state than it was before development took place.
95. Biodiversity net gain will be measured using Natural England's 'Biodiversity Metric', which assesses the biodiversity on a site using the quality, extent and type of habitats (for example woodland, grassland) present. The metric then calculates a value in 'biodiversity units' for each site. To achieve a net gain, developers will be able to avoid or reduce biodiversity impacts through:
 - Site selection and layout, e.g. enhancing biodiversity onsite;
 - Creating or enhancing offsite habitats, either on their own land or by purchasing biodiversity units not on the development site ('offsite') through the private market;
 - As a last resort, where market supply does not meet demand, they will be able to buy statutory biodiversity credits sold by government.
96. The government has set up a National Biodiversity Gain Sites Register to avoid double counting (so that one biodiversity unit cannot be sold and allocated to two different developments). Offsite biodiversity units must be on this register to be relied upon by a development.

97. The method of measurement is currently provided by a calculation tool contained in Natural England's 'Biodiversity Metric 4' and 'Small Sites Metric' (for developments of 1-9 dwellings on a site of under 1ha or less than 0.5ha for other developments).
98. The Wealden Green Infrastructure Study 2017 (by Chris Blandford Assocs for Wealden DC) provides a high-level strategic audit of existing GBI assets in the District and makes various recommendations for their enhancement. Its description of the High Weald Fringes (including Ninfield Parish and Wallers Haven) is in section 3.7 pages 127-134. It identifies 'priority landscape-scale corridors' which have key opportunities for strategic GBI enhancement, linkage and creation. One of these corridors is Pevensey Levels and Wallers Haven Valley (section 5.2 pages 178-185) a wetland area designated at international level as a Ramsar Site and also as a SCA and SSSI. This is shown extending northwards into Rother District. Ninfield Parish, although only having a small part of Pevensey Levels, has a largely surviving High Weald landscape pattern of ancient fields and woods. It clearly has a role to play in the protection and enhancement of this strategic corridor as it has a number of valleys and minor streams within its catchment.
99. The GBI infrastructure in the countryside of Ninfield Parish is closely aligned with the topography of ridges and valleys created by the minor watercourses, springs and ponds that provide blue infrastructure and the geology as described under the Landscape section above. Apart from the small part of Pevensey Levels referred to above, its main biodiversity assets can be summarised as:
 - a. Valley of Ninfield Stream – Combe Wood designated Local Wildlife Site (LWS). This large area of ancient woodland on steep slopes is the dominant feature and is linked to scattered smaller areas of woodland, mainly ancient, by trees alongside the stream, as well as to numerous important roadside and field-side hedges. There are also some small patches of wildflower meadow habitat and marsh near the stream and wooded shaws on steep banks.
 - b. Valley of Moorhall Stream – Church Wood designated Local Nature Reserve and community wood at the head of the valley is linked downstream to Rough Wood designated LWS by numerous trees along the course of the stream. Rough Wood/Whites Wood stretches three-quarters of a mile along the Moorhall Gill downstream towards Pevensey Levels and also extends along an upstream tributary towards Lower Street. These are all linked to important field and roadside hedges with trees. Also, to extensive ancient woodland Wet Wood and Long Wood (both LWS) which clothe much of the west side of Standard Hill and ancient Kiln Wood. There are also a number of ponds surrounded by trees and some recently-created lakes.
 - c. Low Plateau – A generally more open landscape of larger fields, some arable, and maintained hedges. However, it also includes two ancient woods (Staplehurst Wood and Park Wood) and some ancient field pattern with trees, ponds and important hedges linking to High Woods SSSI (in Bexhill). It mostly drains to Pevensey Levels via a tributary of the East Stream except for its eastern edge which drains to Combe Haven.
 - d. Valley of Catsfield/Watermill Stream – Lies within the Combe Haven catchment (mainly in Rother District). It includes very extensive areas of ancient woodland (Hurst Wood, Sprays Wood) undesignated and in some parts replanted with conifers. Upstream tributary has ancient Court Wood (subject to TPO) which continues as a wooded valley to Moons Hill and links to numerous important hedges on ancient field

boundaries and lanes, with many sunken ponds (often former marlpits) surrounded by trees.

100. The Parish landscape, apart from the woodland, consists primarily of pastoral grassland most of which has been 'improved' or 'semi-improved' thereby causing it to be species poor. By contrast, the surrounding hedges, many of which are species rich, and the field margins, including of arable land, provide more valuable habitat. Agricultural practices over recent decades have severely reduced biodiversity. Various countryside stewardship and woodland grant schemes have been in operation for many years but, with the cessation of EU subsidies, the Government now proposes more fundamental changes for farming as set out in its 'Path to Sustainable Farming: An Agricultural Transition Plan 2021-2024'.
101. The verges of the highways (some designated as wildflower verges) are also biodiversity assets. Some are within the village. The churchyard, allotments and domestic gardens of all types and sizes, with numerous hedges and trees, may also be biodiversity assets although their value is often lessened by the presence of non-native species which can be a threat to biodiversity if they are invasive.

Policy N8 - Biodiversity (including Green and Blue Infrastructure or GBI)

Development should protect and enhance the biodiversity of the Parish. 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. Development sites should be landscaped sufficiently as an integral part of their layout and design to provide green corridors that connect with the open countryside and existing wildlife habitats. Existing trees and hedges (with their associated undergrowth habitats), including those that are not covered by relevant protection, should be retained and enhanced by new planting with native British species preferably of local provenance.

Developments should not disrupt or harm biodiversity and, where alternative siting is not possible, mitigation measures shall be put in place to off-set any negative impacts, and if this is not possible compensatory measures shall be implemented.

Developments of 1-9 dwellings on sites of less than 1ha (and other development types on sites of less than 0.5ha) shall provide biodiversity enhancement in accordance with Natural England's Small Sites Metric (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 provision have been exhausted.

Objective EC01

Justification: Over 90% of local residents in the parish wide questionnaire stated that they valued the local landscape and natural environment especially features including

hedgerows, trees in the landscape, woodlands. Conservation of existing green infrastructure, the creation of new nature reserves and increasing overall biodiversity were specifically mentioned.

NPPF paras 180, 181, 185-188

WCSLP objectives SPO1, SPO11 policies WCS12, WCS13

WLP saved policies EN1, EN12-15 inclusive

Development and Design

Built Environment and its Setting

Objectives DDO1- Conserve and enhance the unique rural heritage and character of Ninfield including its historic buildings and their settings, through sensitive design of new development which reflects the needs of the Parish, maintains the ridge-top setting and avoids spread onto the side slopes.

DDO2 - Encourage sustainable design in the construction of new development and alterations to existing buildings and their facilities.

DDO3 - Support the provision of a mix of dwelling types including in particular, affordable housing, smaller dwellings and starter homes for young families or those downsizing.

Setting of Ninfield Village

102. As previously stated under 'Key Views', the Topographical Dictionary of England 1848 and the Victoria County History of Sussex 1937 refer to the village standing picturesquely on top of a hill, commanding wide views. The saved Wealden Local Plan 1998 (para 19.28.3) states that Ninfield is in an elevated position along the crest of a ridge and the surrounding countryside is of high scenic quality. Hence, its 'development boundary' is drawn tightly around the village. As referred to earlier under Landscape Character Areas of Ninfield Parish, public views have been assessed as part of this NDP and 'Key Views' identified (see Policies Map and Appendix E) Nearly all of these relate to the setting of the village.

103. The Landscape Study of Ninfield contains a detailed description of the distinctive landscape setting of the ridge-top village of Ninfield. It identifies the following features:-

- Built-up area confined to flat-topped ridge with side slopes undeveloped (except to small extent at Lower Street and now by new development taking place behind Sparke Gardens).
- Ridge has relatively well-defined edges with pronounced slopes often steep except to southeast where it slopes gradually down and broadens out into the 'Low Plateau'. It

narrows in the middle, dividing the built-up area in two, with most facilities in the east half (except the doctors' surgery and Blacksmith's Inn). The recreation ground extends as a 'green wedge' into the centre of the east half.

- Village is surrounded by surviving ancient pattern of small irregular fields with hedges, trees and ancient woods. Fields west of Church Path (south of High Street/Standard Hill and northwest of Hooe Road) are mainly on open high ground with exposed slopes, as are fields to north of The Green. Otherwise, trees reduce the visual impact of village on wider landscape from many directions, creating a 'soft' edge.
- Panoramic public views from high ground over scenic landscape to South Downs and sea ('1066 Country') from Church Path and from network of other public paths also providing varied localised views.
- Public views in other directions much more limited but include northwards across open Lower Street valley from B2095. Views northeast over open high ground on village edge towards the High Weald National Landscape are mainly from private properties.
- Distinctive uphill unspoilt rural approaches ('gateways') with wooded banks into village from minor roads Combe Hill and Moons Hill and also main roads (Catsfield Road hill and Standard Hill).
- Church Path is an historic and significant route linking Lower Street, Ninfield Green, the church and school. It preserves the historic relationship of the village to the countryside, largely acting as a demarcating line between village and countryside.

Figure 10- Map of the Setting of Ninfield Village



Figure 10 shows public rights of way (dark green lines) with public views (red arrows); areas of open high ground and/or exposed slopes (yellow); ancient woods (solid green); and distinctive uphill road approaches to village with wooded banks (broken brown lines).

Built Character Areas

104. The historic buildings in Ninfield are relatively scattered and, in the village, interspersed with more recent buildings. Nevertheless, there are recognisable groupings of historic buildings mainly in Lower Street, in the vicinity of the Blacksmiths Inn (Ninfield Green/Cross including along part of Manchester Road and High Street) and in Church Lane. There is a prevailing character of rurality and informality owing to the relatively low density of buildings, with many trees and hedges, and the individuality and domestic scale of the houses, cottages and bungalows. There are no large buildings to act as a focus. The recreation ground is a feature of the east half, virtually acting as a village green next to the historic stocks.
105. The housing has developed over several centuries demonstrating an evolution of style and construction. However, there is a general theme of the traditional, with pitched roofs (many are barn hipped) and the use of local materials, the area having a history of brick and tile production thanks to the extensive deposits of clay in the vicinity. Clay tile-hanging and weatherboarding are also prominent in the Wealden style and many older houses are constructed with timber frames. The majority of dwellings are detached, many are bungalows, and the few traditional terraces comprise no more than 3 cottages. In the main, plots are generous and off-street parking is the norm. Other than the main road (A269), roads and lanes mostly have grass verges without kerbstones or have granite setts in keeping with the rural

setting. However, exceptions are the recent highway ‘improvements’ in Manchester Road and its junction with the A269 (required by ESCC) which have concrete kerbstones damaging the rural and historic character.

106. Except for the recent approvals (two large sites now under construction), housing estates are quite small and generally behind frontage development so that, although their design is typical of their period rather than any local character, they have little effect on the main street scenes of the village.
107. The Ninfield Village Character and Heritage Assessment has studied the built environment of the village in detail (see background document). This has enabled the following character area types to be identified:-
 - **Lower Street and Ninfield Green/Cross (with part of High Street and Manchester Road)** – Comprises the 2 main historic parts of the village with many of the historic buildings (some grade II listed) dating from the 17th, 18th and early 19th centuries. These are interspersed to varying degrees with buildings of all subsequent periods from Victorian to late c20th. Most buildings are detached and of individual design but there are some terraces of 3 cottages and some semi-detached houses. Generally, the area has an informal layout of medium density but Lower Street has a greater density owing to a row of closely positioned Victorian cottages on its western side, north of the more historic listed cottages. In High Street, a short distance west of the group of listed and other historic buildings at the Blacksmiths Inn junction, a line of Edwardian cottages and villas and some of Arts & Crafts influence are features of the streetscene. The trees notably include Scots pines which are mainly in the vicinity of the historic buildings including at the junction with Church Lane where the listed stocks/whipping post is located. There is an historic line of pollarded limes in front of listed Church Farmhouse in Manchester Road and several large oaks nearby. Hedges are also a characteristic of the streetscene but also brick walls. Building materials in these areas vary but are predominantly brick (either red-brown multi-stock, some with grey headers) often with tile hanging above (traditionally clay peg tiles but also modern concrete imitations). Roof tiles are predominantly plain clay or concrete tiles. White-painted weatherboarded cottages are found in Lower Street. These 2 areas contain community facilities comprising the Blacksmiths Inn, which acts as a focal point, Doctors surgery and small Village Store/ PO. These 2 areas have heritage value-and it is desirable to conserve and enhance the fabric and setting of the historic buildings (both listed and unlisted) and to reinforce this historic character by encouraging new development to be in the traditional Wealden vernacular as well as in keeping in scale and form.
 - **Church Lane** – Comprises the small medieval Church (listed grade I) with its graveyard, the large original Rectory, the original school house, the greatly extended C of E Primary School, allotments, Recreation Ground with its replacement Sports Pavilion, Reading Room, extended Methodist Church and a number of houses dating from late Victorian to modern. Characterised by the large grassed open space and by wooded grounds with numerous hedges and trees including Scots pine and churchyard yew trees (one believed to be over 700 years old). Building materials are mainly red-brown multi-stock brick and plain clay roof tiles. The row of 1928 semi-detached houses overlooking the Recreation Ground has traditional clay tile-hanging and contributes to the

character. This is another area of heritage value to be conserved and enhanced. It is an area that forms a 'green wedge' which, in the saved Wealden Local Plan 1998, is excluded from the village development area because of its loose-knit character and linkage to the countryside. The main aim here is to protect this existing character and, consequently, extensions need to be in keeping and new housing development, including intensification or redevelopment of houses on large plots, is likely to be inappropriate.

- **Manchester Road (northwest), Coombe Shaw, Millfield, Downs View, Stocks Meadow and Smith Close** – These areas (in different parts of the village) include 4 small estates and are characterised by repetition of standard or similar house types typical of the style of their period, mainly 1960s-70s. Their design and layout lack any local character, with concrete roof and tile hanging except for Stocks Meadow which has clay tile-hanging. Boarding is tongued and grooved, not traditional shiplap weatherboarding. Densities are medium but with some higher densities owing to the inclusion of terraced houses and flats. Downs View and Coombe Shaw have open-plan layouts and include parking/garages within individual curtilages. The others have front gardens often enclosed by hedges, and in the case of Millfield a communal parking/garage compound which is under-used. There are no special aims for these areas other than for extensions and new buildings to be sympathetic to the existing buildings on the particular site or vicinity. Improvements to parking provision would need to be landscaped.
- **Standard Hill, High Street (south side) and Marlpits Lane (west side)** – Comprise low density areas of a semi-rural character, with mostly detached houses and bungalows of individual design and periods but mainly 1930s-1960s. Some are distinctive architect-designed, most are more typical of their period. They are predominantly set well back on large plots with numerous trees, shrubs and hedges, screening the buildings to varying degrees. They generally have large rear gardens which create an attractive 'soft' edge to the village. Grade II* Standard Hill House, the largest listed dwellinghouse in Ninfield, is an important feature standing at the western end of this area, next to a copse. These low-density areas are characterised by trees, shrubs and hedges, in many cases largely concealing the buildings. It is desirable to protect the existing semi-rural quality and, most particularly, to safeguard the 'soft' transition to the adjacent countryside which is either High Weald National Landscape or locally-valued landscape. Retaining the existing character, dominated by trees and hedges, would be facilitated by avoiding development at higher than prevailing densities.
- **Area at the mini-roundabout junction of A269 Bexhill Road/The Green with B2204 Catsfield Road** – this area has several commercial/business premises with parking areas, including the Kings Arms public house (with its historic rear wing) which forms a visual feature at the approach to the village from Catsfield Road, and the Ninfield Service Station with convenience store and tyre-fitting depot. There is also another garage site now called 5 Oak Business Park on A269 Bexhill Road towards the village edge with a carwash and some small businesses in generally poor-quality buildings. Contextual "*environmental improvement*" could enhance the street scene in these locations.

Figure 11- Built environment of Ninfield village



Figure 11 shows historic buildings (Listed buildings in solid red circle, other pre-1850 buildings in red outline circle and 1850-1914 buildings in orange outline circle). Yellow shading represents the areas of local heritage value. The green line denotes the 'soft' edge of low-density parts of the built-up area where it adjoins the High Weald National Landscape or ALVL.

Heritage Assets

108. Ninfield, as stated in section 4, is an ancient settlement and parish mentioned in the Domesday survey of 1086. Much earlier remains have been found in excavations and ESCC have defined 'archaeological notification areas' which include much of the village, being more extensive than the proposed Local Heritage Areas listed below. Lunsford Cross is first recorded in the c16th but the name relates to the crossroads as no recognisable settlement developed until the 1930s. The area of mainly c19th dispersed dwellings called Russell's Green appears to derive from a large medieval farmstead called *Russelleslond*.

Figure 12- Ninfield village in 1897



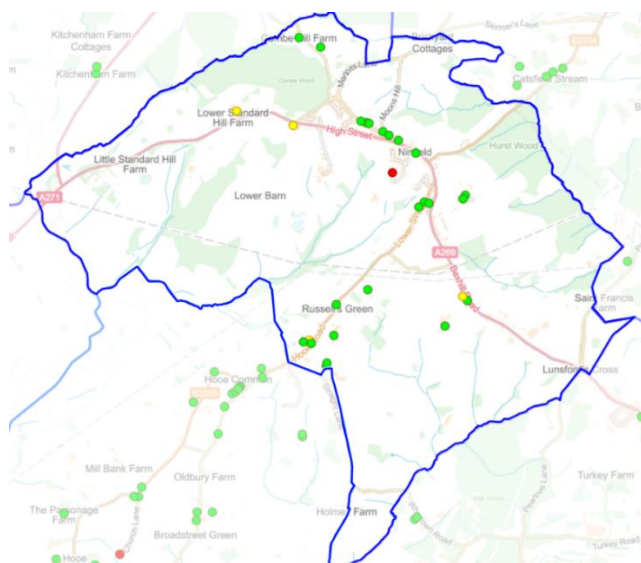
Ninfield village in 1897 as shown on Ordnance Survey (from maps,nls.uk)

109. Despite the small size of the historic settlement, a significant number of historic buildings survive of which 28 are statutorily-listed as being of special architectural or historic interest. 12 of these are within the village. These 12 listings, in fact, include 15 dwellings as some are semi-detached, terraced or curtilage buildings, plus the famous c17th iron Stocks /whipping post. The medieval church of St Mary the Virgin is listed Grade I and Grade II* buildings comprise c17th Standard Hill House in the village and outside it c18th Luxford House (former Lower Standard Hill Farmhouse), Tanyard House and Hollis Street Farmhouse. The list of Buildings of Special Architectural or Historic Interest in Ninfield is contained in Appendix C. These Designated Heritage Assets including their settings receive the highest level of protection from inappropriate development under the Planning (Listed Buildings and Conservation Areas) Act 1990 which imposes a statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Under this Act, in Conservation Areas other buildings are also protected albeit to a lesser degree, plus trees. However, Ninfield has no designated Conservation Area and was not considered to justify such designation when last assessed by WDC in 2015.



Listed Grade II* buildings - Tanyard House (left) and Standard Hill House (right)

Figure 13- Map Showing Statutorily-Listed Buildings in the Parish of Ninfield



(Historic England: Red=Grade I, yellow=Grade II*, green =Grade II).

110. NPPF (para 195) states “*Heritage assets range from sites and buildings of local historic value to those of the highest significance..... These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*” The Government’s Planning Practice Guidance ‘Historic Environment’ states that ‘non-designated heritage assets’ are “*buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets*”. It states that the neighbourhood plan-making process is one of the methods of identifying such assets, having the advantage of participation by the local community, and that it needs to be based on sound evidence. Clear and up-to-date information on them should be made publicly available including the criteria for selection and they should be added to the local historic environment record by the planning authority. Historic England have published detailed good practice guidance including ‘Local Heritage Listing: Identifying and Conserving Local Heritage’.

111. Ninfield has a sizeable number of unlisted historic buildings that, together with the listed buildings, are an irreplaceable resource and give the village and Parish its sense of place. They are integral to its character but, in the absence of a Conservation Area or other form of designation, there is currently insufficient means of safeguarding Ninfield’s heritage. There are also very few TPOs to protect trees that are significant features of the village, often in combination with historic buildings. Little or no account has been taken of a number of unlisted historic buildings in the past resulting in harm to their setting or even their destruction. The losses include a number of c19th or earlier small cottages and shops (one a PO), a blacksmith’s forge and most notably Moor Hall, a mainly c19th building that had become a hotel but had originated as a manor house first recorded in the c13th. The landmark feature of the windmill was lost much earlier in 1937 as was the turnpike tollhouse (Paygate Cottage). As previously stated, the historic settlement was scattered, lacking a defined centre, but small clusters of mainly domestic historic buildings are clearly recognisable today mainly at Lower Street and in the vicinity of the Blacksmiths Inn (at the junction of several roads and path with The Green, referred to as Ninfield

Cross). The listed medieval Church with adjacent 1880 rectory, 1853 school and schoolhouse, 1910 Reading Room and nearby 1871 Methodist chapel form another group that served the community historically and mostly remain so today. These buildings and areas are a significant historic asset as are the dispersed historic buildings in the rest of the village and parish. In many cases they relate to Ninfield's agricultural past, comprising former farmhouses and cottages and various farming and allied activities such as cornmilling, oasthouses, granaries, blacksmiths forges, plus brickfields, etc (described under the section on 'Local Economy'). In order to help protect them from intrusive or harmful development, there is a clear need for the identification of 'non-designated heritage assets'. This will complement the national designations helping to safeguard the sense of place, identity and history of Ninfield.

112. Being defined as a non-designated heritage asset does not affect 'permitted development' rights (unless a Conservation Area is designated). However, it should help to ensure due consideration is given to local heritage when applications for planning permissions are made. NPPF (para 209) states "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*"

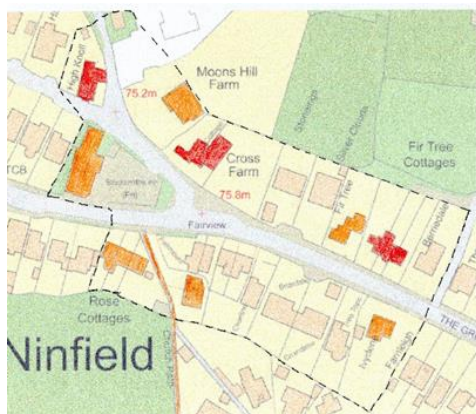
Non-designated Heritage Assets in Ninfield Parish

113. Taking account of the guidance of Historic England (on page 11 of their Advice Note 7 2021), in the context of Ninfield's heritage, 'Local Criteria' have been defined for the inclusion of buildings and constructed features as 'non-designated heritage assets'. Using these criteria, a comprehensive assessment has been carried out by a sub-group of the Steering Committee, of the buildings and structures in both the village and wider parish. This has enabled the identification of non-designated Heritage Assets (NDHA) contained in Appendix C. Appendix C also includes the list of Designated Heritage Assets that comprise the statutory list of buildings of Special Architectural or Historic Interest. Owners of the identified NDHAs were consulted during December 2022.
114. The non-designated Heritage Assets also include Local Heritage Areas. The reason for this is that there are several historic areas comprising recognisable groupings of buildings meeting the selection criteria for local listing as well as having statutorily listed buildings. They each have a distinctive character and appearance which is considered to warrant conservation.

Ninfield Local Heritage Areas (with non-designated heritage assets):

NB. On the following maps, Local Heritage Areas are shown by a broken black line, statutorily-listed buildings are shown in red, and non-designated heritage assets in orange.

Ninfield Green/Cross Local Heritage Area



Based on the various mainly historic buildings and features (3 statutorily listed) in a loose group around the Blacksmiths Inn forecourt/ road junction extending a short distance east along The Green. Often regarded as the 'centre' of the village, it lies at the meeting of Church Path with The Green, High Street, Moons Hill and the back lane named Manchester Road. The following have been identified as non-designated heritage assets:

<i>Fir Tree House, The Green</i>
<i>1, 2 & 3 Rose Cottages, The Green</i>
<i>1 & 2 Church Path, The Green</i>
<i>Church Path (historic route across village)</i>
<i>Moons Hill Farmhouse, The Green</i>
<i>Ivydene, The Green</i>
<i>Strawberry Cottage, Manchester Road</i>
<i>Blacksmiths Inn (formerly New Inn/United Friends)</i>
<i>Finger post at junction</i>

High Street/Manchester Road (East) Local Heritage Area



This is separated from the above Area by too many modern buildings to form a combined heritage area. High Street is characterised by a few traditional cottages but mainly by larger dwellings including Edwardian villas representing the first phase of residential development of the village. A twayn links it to the back lane referred to as Ninfield Street in the c19th (named Manchester Road in the early 1900s) where the agricultural past survives in the statutorily-listed former farm buildings (farmhouse, barn and oast/granary) and some old cottages in the part formerly called Mill Corner. Grass verges (without kerbs) and mature trees (including a line of pollarded limes) retain rurality and lend cohesion. The following have been identified as non-designated heritage assets:

<i>Jubilee Cottage, High Street</i>
<i>Green Cottage, High Street</i>
<i>Mill Meadow, The Briars, Capelhurst/Walden Lodge and The Old Bakery/ Low Moor, High Street</i>
<i>1, 2, 3 & 4 South View, High Street</i>

*Rose Tree House and Cottage,
Manchester Road*

*Lemon Cottage and Lynwood,
Manchester Road*

London House, Manchester Road

Myrtle Cottage, Manchester Road

Lower Street Local Heritage Area



This is a more cohesive traditional village street with the oldest buildings around the junction at the southern end (3 statutorily listed) and late Victorian dwellings extending northwards in a distinct line but also a few dispersed down the steep twitten (Church Path). The roads have mainly granite sets or grass verges without kerbs. The following have been identified as non-designated heritage assets:

Hollybank House and Cottage, Lower Street

Hollybank Barn, Lower Street

1, 2 & 3 West Central Cottages, Nara, Somerdale, Stepping Stones, 1, 2 & 3 Beacon Cottages, Rose Cottage and Oakdown, Lower Street, plus Springfields and 1 & 2 Church Path, Lower Street

Sadlers Cottage, Lower Street

Church Path (historic route across village)

White Cottage and Glasshouse

Finger post at junction in Lower Street

Granite setts (as highway kerbs)

Church Lane Local Heritage Area



Based on the Grade I listed church and other community-related buildings in a low-density wooded setting. The Methodist Church and adjacent cottage are separated from the main area but Scots pine trees provide a visual link and give coherence. The following have been identified as non-designated heritage assets:

*Sunnyside House (former Rectory),
Church Lane*

School House, Church Lane

Methodist Church, Church Lane

Sea View Cottages, Church Lane

Reading Room, Church Lane



Church Path (historic route across village)

Granite setts (as highway kerbs)

Non-designated Heritage Assets in the remainder of the village and Parish:

<i>Kings Arms, The Green</i>
<i>Prospect House and Cottage (with former Nazarene Chapel), The Green</i>
<i>Ivy Cottage and Maycroft, Standard Hill</i>
<i>Lower Barn, off Standard Hill</i>
<i>Glendale Cottage, Catsfield Road</i>
<i>Yew Tree Cottage, Moons Hill</i>
<i>Moons Hill Cottage and Normandy Cottage, Moons Hill</i>
<i>Brickyard Cottage, Pinecroft, Little Orchard and Threeways (former 1, 2 .3 & 4 Brickyard Cottages), Marlpits Lane</i>
<i>Burtonswood, Marlpits Lane</i>
<i>1 & 2 Moorhall Cottages (former Lodge), Moor Hall Drive</i>
<i>Moorhall Farmhouse, barn and converted courtyard farmbuildings, Moor Hall Drive</i>
<i>Newhouse Farm and Forge, Hooe Road</i>
<i>Whitehaven (former Parish Workhouse), Hooe Road</i>
<i>The Old Sunday School, Russells Green</i>
<i>The Laurels, Russells Green</i>
<i>Drayton Lodge, Russells Green</i>
<i>Clock House, Russells Green</i>
<i>Little Park Lodge, Russells Green</i>
<i>1 & 2 Lunsford Cross Cottages, Ninfield Road</i>
<i>Lunsford Cross Farmhouse and barn, Ninfield Road</i>
<i>Thorne Oast, Ninfield Road</i>
<i>Thorne Mill, Ninfield Road</i>
<i>Blackthorne, Ninfield Road</i>
<i>Messens Farmhouse, Potmans Lane</i>
<i>Memorial Hall (originally Cinque Ports Volunteer Artillery Drill Hall), Bexhill Road</i>
<i>Finger posts at junctions of Marlpits Lane/ Manchester Road, Coombe Lane/Combe Hill, The Green/Church Lane, Hooe Road/Crouch Lane, Hooe Road/Straight Lane, Bexhill Road/Lower Street and Bexhill Road/Crouch Lane</i>
<i>Castle Croft ancient earthwork, Boreham Bridge</i>

Policy – N9 Built Heritage

New development should sustain and enhance the local distinctiveness of the historic built environment which is an irreplaceable resource giving Ninfield its sense of place. Proposals involving the non-designated heritage assets and Local Heritage Areas identified in Appendix C and this Neighbourhood Plan shall be assessed having regard to the scale of any harm or loss when balanced against the significance of the heritage asset concerned whether it be an area, building or feature. Development proposals affecting these non-designated heritage assets will be supported if they sustain or enhance their fabric, appearance, character and setting and better reveal their significance.

Note: Where a designated heritage asset is involved, (i.e. a statutorily listed building), this policy does not affect the statutory duty of having special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

Objective: DD01

Justification: The questionnaire responses show clearly that residents value their heritage and want to ensure that any development is sympathetic to its surrounding buildings in terms of scale, character, materials and design (over 70% of respondents said these factors were very important to them).

NPPF para 195-214

WCSLP 2013 objective SPO2

WLP 1998 saved policies: None

Design of New Development

115. The National Planning Policy Framework (para 131) states *“The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”* Para 132 states *“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers”.*
116. The Design Guide for Ninfield is intended to provide clarity as to the type of housing development that will be supported locally. It utilises the Ninfield Character and Heritage Assessment and Landscape Study which describe in detail and illustrate the key physical attributes and characteristics that combine to give Ninfield its local village identity and sense of place.

117. The Landscape Assessment by LUC (2022) for Wealden Council describes the built environment of the High Weald – Cuckmere/ Pevensey Catchments' local character area, which is half in and half outside the High Weald National Landscape, as follows: *"The vernacular of red brick, oak timber, sandstone and flint which reflects the locally available materials, provides a sense of place and accords with a distinctive architectural colour palette"*. The assessment states within its guidelines *"Ensure new building reinforces and responds to local character in its scale, layout and design, reflecting the local vernacular in use of materials. Developments should draw on the principles contained within the High Weald AONB design guidance, High Weald AONB 'Guidance on the selection and use of colour in development' and objectives of the High Weald AONB Management Plan"*.
118. The High Weald Housing Design Guide 2019 states that **'*Towns and villages outside but adjacent to the AONB often share many of the origins and landscape components described above and development adjacent to them would also benefit from the landscape-led approach*'**. Consequently, it has provided much of the basis for the Ninfield Design Guide.
119. The biggest threat to Ninfield retaining its sense of place is urbanisation through extensive and incongruous new housing development, including associated highway "improvements" (with standard concrete kerbs instead of traditional granite setts or grass verges). There are serious concerns in Ninfield about not only the size but also the design of two housing estates that have been granted detailed planning permission (for 144 dwellings in total) and are now under construction. These relatively large peripheral 'add-ons' estates intrude into the countryside whereas the existing small estates were mainly infilling within the linear form. They are self-contained entities with very little physical integration with the existing village in their design, layout and siting. One, in particular, has relatively stark 'contemporary' architecture, which is the current fashion, deriving more from urban office or industrial buildings than from the rural farmsteads and cottages typical of the local area. It is 'anywhere' development with no local character. Moreover, the use of standard or similar house forms repetitively on anything more than a small scale is also out of keeping and can create an inappropriate formality of streetscene. Unsympathetic type and colour of bricks and cladding materials add to the harm. When completed, they are in danger of cause the village to reach a 'tipping point' and further similar proposals could result the substantial erosion of Ninfield's identity as a small rural High Weald village. It would become characterised by suburban-type housing, with loss of sense of place.
120. In order to avoid this happening, it is particularly important that any further housing developments are of an appropriate siting, size, design and materials. Above all, they need to reflect and be in keeping with the character and architectural vernacular of the High Weald landscape character area. They need to have a 'sense of place' with an informal, unpretentiously robust, rustic quality that is appropriate to this very rural location, not the formality of an urban or suburban location. This does not rule out some contemporary designs on such a theme. They need to preserve the landscape setting of the village and create a 'green' environment. They need to avoid excessive repetition of standard or very similar designs. By this approach, it is hoped to reinforce the traditional High Weald character.

121. The following NNDP Policy N10 and the Design Guide for Ninfield are aimed primarily at the design of new houses and other residential buildings but are also applicable to other new buildings of a similar scale and construction type. The Wealden Design Guide 2008 is an adopted WDC Supplementary Planning Document that aids the interpretation of saved policies EN1 and EN27 of the WLP 1998 and should also be taken into account with new development. It is comprehensive (287 pages) and deals with all types of development, not just new dwellings and extensions. It gives design advice on agricultural, commercial and industrial buildings, shopfronts, signage, conversions, alterations to listed buildings and telecommunications equipment. So far as extensions and alterations to existing dwellings are concerned, saved policy HG10 of the WLP 1998 requires that their scale, style, design and materials are appropriate and sympathetic in relation to the existing buildings and there is no significant adverse effect on the amenities of the occupiers of neighbouring properties, so this is not repeated in N10 below.

Policy N10 - Design

In terms of its design, new development that is otherwise acceptable in principle will be supported provided:-

- (a) **It safeguards the distinctive character of the High Weald landscape and Ninfield's landscape features including topography, woods, trees, hedges, banks, ponds and watercourses. Where possible, opportunities should be taken to provide new public viewpoints over the landscape.**
- (b) **It respects the character of the High Weald vernacular and reinforces local distinctiveness as identified in the 'Design Guide for Ninfield' and 'The Ninfield Village Character Assessment and Heritage' appended to this Neighbourhood Plan, with its scale, density, layout, form, design, materials and landscaping being appropriate to its setting and observing the Design Guide for Ninfield. If it is located in the low-density semi-rural residential areas of the village which adjoin the National Landscape or the Moorhall Valley Area of Locally Valued Landscape (as on the south side of Standard Hill/ High Street and the west side of Marlpits Lane), it does not detract from their existing low-density character, visually dominated by trees and hedges as well as preserving their 'soft' edge to the countryside.**
- (c) **It does not adversely affect the residential amenities of any neighbouring dwellings including by reason of excessive overlooking, loss of light or overbearing impact;**
- (d) **It is designed to be sustainable with consideration given to energy efficiency, passive heating and cooling, recycled and sustainable materials, wastewater reuse and smart lighting.**

Objective: ECO1, ECO2, DDO1, DDO2

Justification: The Ninfield Neighbourhood Development Plan Survey 2021 shows the overwhelming extent of the community's current opposition to new housing developments on greenfield sites as well as on anything greater than a small scale. There were 342 responses (not mutually exclusive) of which a substantial proportion oppose any additional dwellings (27%). A negligible 1% consider large estates (over 30 dwellings) to be appropriate. 55%

favour housing developments of less than 10 dwellings and 50% individual houses; with only 15% medium estates (10-30 dwellings). As to the siting of any new development in Ninfield during the next 15 years, the 336 responses (not mutually exclusive) state 58% on brownfield sites; 54% only within the development boundary; 21% by conversion of farm buildings; 13% by increasing the density of existing built areas; and a negligible 1.5% on greenfield sites. As to concerns about further development in Ninfield Parish, of the 349 responses, 90% cite loss of countryside; 89% increased traffic; 84% loss of village identity; 82% impact on GP surgery; 72% loss of farmland; 69% impact on views; 69% parking problems; 68% pedestrian safety; 66% lack of school places; and 61% clash with existing character. Only 2% are not concerned.

Similarly, responses to the Survey indicate a marked preference for traditionally styled housing, together with a high level of satisfaction with the existing traditional rural character of Ninfield. 70% would prefer traditional design, with 60% stating a preference for sustainable (eco) homes.

NPPF para 123, 128-140

WCSLP 2013 objective SPO2, SPO3, SPO11, SPO13, SPO14, WCS12, WCS13, WCS14
WLP 1998 saved policies EN1, EN27, HG6, HG7, HG10

Wealden Design Guide 2008

High Weald Housing Design Guide 2019

Design Guide for Ninfield

Landscape Study of Ninfield

Housing

Housing Growth Context

122. The context relating to housing growth in Ninfield is as follows:-

- The adopted Development Plan is the starting point for decision making (NPPF (para 12). This is the Wealden Core Strategy Local Plan 2013, the saved policies of the Wealden Local Plan 1998, and the Wealden Affordable Housing Delivery Local Plan 2016. The Core Strategy contains a strategic requirement for 50 new houses in Ninfield (2013-2027) and this has already been vastly exceeded. The tightly-drawn 1998 development boundary based on the constraints of the landscape setting has been very substantially breached on the basis that these Plans are deemed out-of-date owing to the footnote to para 11 d of the NPPF requiring a 5-year supply of housebuilding land in the District.
- 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. The Parish has only 1% of the District population, so its pro-rata share of the 1,200 dpa figure below is 12 dpa. Existing uncompleted permissions in 2023 totalled 228 dwellings which equates to 18.7 years.
- There is currently a hiatus in respect of strategic housing policies. The new Wealden Local Plan for the period until 2040 to replace the Core Strategy, etc has been published for consultation in March 2024, whereas the NNDP had already been drafted and published for consultation in 2023. As set out in Wealden's draft Local Plan (March 2024), under the Government's 'standard methodology', the minimum estimate of District housing need is calculated as 19,800 dwellings for the period

2023-2040 or 1,200 per year. The emerging new Local Plan will, as a strategic matter, determine the overall level of growth and the distribution of new housing development between the towns, villages and other settlements (possibly requiring a new actively planned settlement, rather than reactive or piecemeal allocation).

123. As previously stated, the Wealden Core Strategy Local Plan 2013 identifies Ninfield as a 'Local Service Centre'. The saved policies of the Wealden Local Plan 1998 include a 'development boundary' for Ninfield which the Core Strategy retains, subject to the allocation of the 50 dwellings referred to above. The surplus part of the covered reservoir site is the only significant undeveloped site within the 'development boundary' (estimated as potentially suitable for about 20 houses).
124. In 2015, the Core Strategy requirement for 50 houses was met by the grant of planning permission for 55 dwellings (now under construction) on a flat site enclosed by trees at Ingrams Farm, Bexhill Road and another 9 houses were subsequently permitted. In 2019, on a sloping field to the rear of Sparke Gardens, Manchester Road, an application for 80 (78 net) houses was permitted. These have recently been completed. 13 houses were recently allowed at Lunsford Cross an earlier permission having lapsed. A further 65 were granted outline permission on Crouch Field, Bexhill Road, in December 2022. As of 2023, 16 (net) other dwellings have been built since 2013 and another 16 (net) had been permitted.
125. As mentioned earlier, there is also an undeveloped site within the Development Boundary suitable for about another 20 dwellings (for which no application has yet been submitted).
126. Overall, this would mean a potential-total of 263 new dwellings since 2013 of which 245 are in or directly adjoining the village. This represents a massive 52% increase in the number of dwellings in the village built-up area with a resultant population increase from approximately 1,150 to about 1,730 (based on the 2011 occupancy rate of 2.35).
127. There has never been any housing allocation or development boundary for the hamlet of Lunsford Cross. However, as mentioned above, 13 new houses have been allowed. It will increase the number of houses in Lunsford Cross by 26% and its population from approximately 120 to about 150. Overall, the total population of the Parish would potentially be increased from 1,562 (2011 census) by +40% to about 2,180.
128. There was considerable residential development in Ninfield in the period 1965-1985 but much less since that time, probably because of the restrictive development boundary in the 1998 Local Plan combined with low demand. This has enabled the village to reach a state of relative equilibrium between its population and its community facilities which large-scale new housing will seriously upset. The NPPF (para 83) states "*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby*". The NPPF is silent as to the appropriate scale of development and certainly does not suggest that villages should be expanded disproportionately particularly to the extent of taking more than their fair share of District housebuilding. The amount of housebuilding already approved goes well beyond what is necessary to "enhance or

maintain the vitality” of Ninfield. Locationally, for villages such as Ninfield, the overwhelming local view of the community as expressed through the NDP consultation process, is that small-scale expansion is appropriate for the future ‘sustainability’ of the village, aimed primarily at meeting local rather than District-wide or sub-regional housing needs. A small rural village such as Ninfield, which currently has about 0.7% of the Wealden District population, is incapable of providing the level of services, facilities and choice of sustainable forms of transport needed for housing development on anything greater than a small scale. Its contribution to meeting District-wide housing targets can never be more than a tiny percentage.

129. Ninfield is within the Hastings/Rother Housing Market Area, not the Eastbourne/ Wealden HMA, the nearest main town being Bexhill-on-Sea. The Rother Housing Land Supply Position Statement April 2021 contains a housing trajectory for Bexhill which contains in its Appendix 5 a projected figure of 3,603 house completions for the period 2011-2031 of which only 946 have been built and 2,657 (74%) remain to be built. Most of this housing land is within the NE Bexhill urban extension which partially adjoins the A269 Ninfield Road. This is clearly a much more sustainable location than Ninfield given its relative proximity to facilities of all types and wide choice of means of travel.

Housing in the Countryside

130. Most of Ninfield Parish consists of countryside. 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. Whilst the NPPF does not reaffirm these words and contains a presumption in favour of ‘sustainable development’, para 180 of the NPPF reiterates that the intrinsic character and beauty of the countryside should be recognised in planning decisions. New housing in the countryside is normally regarded as unsustainable development and only permitted in exceptional circumstances (as referred to in the NPPF below). Para 84 of the NPPF specifically states that isolated new houses in the countryside should be resisted unless they:-
- (a) meet an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
 - (b) represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
 - (c) re-use redundant or disused buildings and enhance the immediate setting;
 - (d) subdivide an existing residential building; or
 - (e) are of a design of exceptional quality, in that:
 - it is truly outstanding, reflecting the highest standards in architecture, helping to raise standards of design more generally in rural areas; and
 - would significantly enhancing its immediate setting, with sensitivity to the defining characteristics of the local area.
131. There is planning case law as to interpretation of the word ‘isolated’ in para 84 of the NPPF. The Courts have ruled that in this context it means outside a settlement and that ‘isolated’ does not have to mean ‘remote’ or that there are no other dwellings in the vicinity. However, judgement as to what constitutes a ‘settlement’ is a matter for the relevant planning decision-maker.
132. In Ninfield, there are areas of scattered dwellings, often historic and mostly built before planning control or to meet agricultural needs. Some are in loose groups along the roads leading from Ninfield to Lunsford Cross and to Hooe such as Russell’s Green, and are considered too small and dispersed to be settlements. An

appeal in respect of 3 dwellings in 2019 was dismissed on the basis that Russell's Green is not a recognisable settlement and the development would harm the rural landscape. Within closer proximity to the village, but only affecting its setting to a very limited degree, are some other roads or areas containing sporadic dwellings. These are at Ingrams Farm, Moor Hall Drive, Standard Hill (west slope), Church Lane (southwest part), Lower Street (south edge), Combe Hill (southeast edge), Moons Hill and Marlpits Lane (except south-west part). These do not form part of the village built-up area and are not considered to be settlements in their own right. They are dispersed in character and separated from the village by small gaps of countryside of varying size. Many of these dwellings are set in secluded positions, some in relatively large grounds, and mostly in areas of local landscape value. With few exceptions, they are predominantly concealed by numerous trees and tall hedges thereby making their character essentially rural and part of the countryside rather than the village.

133. In respect of proposed new houses that in principle meet the requirements of para 84 of the NPPF, it is important that in their details of siting, design and landscaping they also accord with the policies of this Neighbourhood Plan.

134. The Ninfield NDP Survey 2021 referred to earlier shows the high degree to which the Ninfield community values its rural character. 'The countryside' is cited by 89% of the 347 respondents as what they like most about Ninfield and 79% state that in 20 years' time they would like Ninfield still described as 'rural'.

Affordable Housing

135. The lack of sufficient affordable housing, especially of reasonable quality, is clearly a major problem particularly in the South East. Consultants have produced the Wealden Local Housing Needs Assessment 2021 in order to enable relevant policies to be included in the new Local Plan for the period until 2039. It identifies that in 2019 median house prices in Wealden District were 11.5 times median annual earnings, making it the worst of any comparator areas and demonstrating the difficulty faced by first-time buyers. It concludes that there is a need to provide as many affordable homes as possible within new developments but recognises the limitations on viability and need for flexibility as to type. Their Assessment calculates that the part of the District in the Rother-Hastings HMA (i.e. Ninfield and Hooe) has a gross need of 9 affordable dwellings per annum as compared to the whole District's gross need of 519 dpa (42% of the overall 1,225 dpa including market housing).

136. The Wealden Affordable Housing Delivery Local Plan 2016 requires housing developments of 5 (net) dwelling units or more to provide at least 35% of the total number of dwellings as affordable housing. The affordable housing component is normally delivered via a Housing Association or other Provider registered with Homes England and split between 40% Social rented (under National rent regime), 40% Affordable rented (at no more than 80% of market rent) and 20% shared ownership. This necessitates a section 106 planning obligation which also limits occupation of those houses to 'qualifying persons' (nominated by the Council from its housing needs register, priority needs homeless and by the registered provider). The Wealden Housing Allocations Policy 2020 includes a Parish Lettings Policy for rural parishes such as Ninfield whereby the proportion let to local people meeting the criteria is determined on a site-by-site basis having regard to local housing need. The above Local Plan policy has been applied to the two recently commenced new housing estates in Ninfield and the associated legal agreement requires a total of 47

of the 135 dwellings to be affordable (including 19 for social rent). The additional estate of 65 houses permitted in 2022, increases the number of affordable dwellings required to 69 (including 27 for social rent). Notwithstanding this, the two developments totalling 135 dwellings currently being constructed are in partnership with a housing association and are stated to be 100% affordable. As at September 2021, the number of Ninfield residents on the housing register stood at only 7. Consequently, the provision far exceeds that required for local need in Ninfield or the neighbouring rural parishes. It will clearly cater for persons on the Housing Register from across the much wider area. Subsequent to the above, a new requirement from the Government is that a minimum of 25% of all affordable housing units secured through developer contributions should be First Homes (low-cost affordable homes sold by the developer at a capped price for the initial sale and discounted by a minimum of 30% of the open market value for future sales). The remaining units should then be delivered in accordance with the proportions set out in the local policy.

137. At the time of the 2011 census, there were 56 social rented housing units in Ninfield Parish, half the original 114 Council houses/flats built before the right-to-buy legislation in 1985. This is only 8.7% of Ninfield households, half the national average of 17.7% but slightly higher than the Wealden District average (7.7%).
138. Regarding unmet local housing need in Ninfield, the NDP Survey 2021 asked residents if, within the past 5 years, anyone in their household had to move away (or stay living with them). 93% replied 'no' and 7% 'yes'. 29 responses gave the reason that the available housing was too expensive and 9 that it was too large; 6 cited transport issues; 2 needed sheltered/supported housing and 7 were for other reasons. Although this indicates that lack of affordable or suitable housing in Ninfield has only affected the members of a small number of households, affordability is clearly a serious problem for those concerned. The other reasons cited relating to house size and transport may also stem from affordability. A Ninfield Housing Needs Survey has not been carried out but the indications are that the provision of the above 47 affordable houses would appear to be in excess of any parish-driven need. For those 'qualifying persons' who do not have a Ninfield connection, the village's location may well be inconvenient and unsustainable as a location for affordable housing provision. It is likely to cause them unnecessary expense and other problems regarding travel to work, to facilities and socially as these are most likely to be in the towns.
139. Where there are particular challenges of housing affordability in rural communities, the NPPF (para 82) allows for the provision of affordable housing through 'rural exception sites'. These are additional housing sites that are used to meet defined affordable housing needs in rural areas where up-to-date survey evidence shows that unmet local need exists. This enables small sites to be used specifically for affordable housing in small rural communities that would not normally be considered acceptable because, for example, they fall outside Local Plan development boundaries.

Housing Mix

140. The 2011 census shows that Ninfield has a very high percentage (57%) of detached homes as compared to the Wealden average (44%) and the national average (23%). This gives the village its low-density informal character. The proportion of semi-detached homes (30%) is similar to the Wealden and national average but the percentage of terraced houses (5.7%) is greatly below the Wealden average (13%) and national average (25%) as are flats (5.5% compared with 11% and 22%).
141. In respect of bedrooms, the percentage distribution of households with two bedrooms (28%) and three bedrooms (41%) is almost identical to the national average but higher for three-bedroom than Wealden (35%). However, one-bedroom households (6%) are slightly lower than Wealden (8%) and much lower than nationally (12%). Households with four or more bedrooms in Ninfield are 25% as compared to Wealden 29% and 19% nationally. The Wealden Local Housing Needs Assessment 2021 identifies a need to encourage 'downsizing' in order to make more effective use of the large number of under-occupied detached houses in Wealden and this is also relevant to Ninfield. These percentage figures from 2011 will be changed by the 135 dwellings currently nearing completion on 2 new estates in Ninfield, increasing the proportion with one bedroom to 7%; two-bedrooms to 30%; maintaining three bedrooms at 41% and reducing four or more bedrooms to 22%.
142. The Wealden Local Housing Needs Assessment Aug 2021 provides an up-to-date basis for the proposed new Wealden Local Plan to include a housing mix policy for the District. Its suggestions as to percentage split according the number of bedrooms are:
- *Private market housing: 5% one-bedroom, 30% 2-bed, 40% 3-bed and 25% 4-bed.*
 - *Affordable home ownership: 20% one-bed, 40% 2-bed, 30% 3-bed and 10% 4-bed.*
 - *Affordable rented housing: 40% one-bed, 30% 2-bed, 25% 3-bed and 5% 4-bed.*
- However, as Ninfield lies within the very small part of Wealden District in the Hastings/Rother HMA, the housing needs assessment carried out for Hastings and Rother Councils (Housing and Economic Development Needs Assessment Aug 2020 by GL Hearn) is also relevant. This suggests a housing mix split for Rother District as:
- *Private market housing: 10-15% one-bedroom, 35-45% 2-bed, 30-35% 3-bed and 10-20% 4-bed.*
 - *Affordable home ownership: 20-30% one-bed, 35-45% 2-bed, 20-30% 3-bed and 5-15% 4-bed.*
 - *Affordable rented housing: 30-40% one-bed, 25-35% 2-bed, 20-30% 3-bed and 5-15% 4-bed.*
- The above assessment states that, whilst there are some differences between different areas of Wealden District, it does not consider "they are substantial enough to suggest a notably different mix of housing as being needed in different areas. That said, the mix on any specific site could be influenced by site characteristics, and also any localised evidence of need".
143. The above Assessments relates largely to housing need generated by towns and urban areas within the Eastbourne-Wealden HMA. Notwithstanding its conclusions about sub-areas not justifying a different mix, there are concerns as to whether the suggested District-wide mix is suitable for direct application in detail to a relatively small rural parish such as Ninfield which accounts for only 1% of the District's population and lies within the Hastings-Rother HMA. There has been no local housing needs assessment carried out for Ninfield and its adjoining rural

parishes. The only local consultation regarding housing mix is the Ninfield NDP Survey 2021. This shows support for starter homes (44% of the 333 respondents) and smaller homes of 1-2 bedrooms (40%) but not for flats (5%). Family homes (38%) and elderly adapted homes (31%) are also supported as, to a lesser extent, are disability-adapted homes (19%), homes for rent (18%), residential care (12%) and shared ownership (11%). As stated under Affordable Housing, regarding household members being unable to find a dwelling in Ninfield, the large size of available housing was cited as a reason. The 2011 census statistics related to size and type of dwellings in Ninfield showed an imbalance compared to the national average in respect of the low proportion of one-bedroom dwellings and the high proportion of 4-bedroom dwellings. This is typical of many rural areas but the 2 new estates nearing completion will reduce the imbalance. Saved policy HG5 in the WLP 1998 supports a housing mix but does not elaborate. In the absence of an up-to-date Local Plan policy, there is some justification for a housing mix policy in the NNDP which helps to redress the imbalance. However, it is considered that this should not be any more detailed than favouring a higher proportion of small affordable dwellings and a lower proportion of large market dwellings. It is particularly important that it is applied in a flexible way paying sufficient regard to the character of the particular locality. The position is ambivalent in that the need to protect the landscape setting and low-density character of Ninfield weighs against providing large numbers of small dwelling units, especially flats, as they inevitably mean high densities.

144. Account also needs to be taken of the high percentage of people over 65 years old in Ninfield. In 2011, at 26.6% it is very similar to Wealden District (26.2%) but significantly higher than the South East region (19.7%) and England (18.5%). Owing to forecasts of disproportionately large increases in older and/or disabled people in Wealden, the above housing need Assessment states there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as specific provision of older persons housing. It recommends all new dwellings be required to meet the M4(2) standard (similar to Lifetime Homes Standards), plus at least 10% of homes (a higher percentage for affordable homes) being wheelchair-user homes meeting the M4(3) standard.

Policy N11 – Housing Mix and Space Standards

On all developments of 10 dwellings or more, there shall be a mix of dwelling sizes and support will generally be given to the following proportions:-

Affordable rented dwellings - 70% with 1 or 2 bedrooms.

Affordable home ownership dwellings - 60% with 1 or 2 bedrooms.

Private market housing - a maximum of 25% with 4 or more bedrooms.

In applying the above mix to individual development sites, particular regard shall be had to the character of the site and its surroundings and to the evidence of need current at the time of the proposal taking account of the local mix and turnover of properties.

The inclusion of elderly and disability-adapted bungalows is encouraged.

All new residential development should as a minimum meet the Government's Statutory Guidance 'Technical housing standards - nationally described space standard' (unless different space standards are contained in any adopted replacement Wealden Local Plan).

Objective: DDO3

Justification: The Ninfield NDP questionnaire responses, which are not mutually exclusive, show support for starter homes (44% of the 333 respondents); smaller homes of 1-2 bedrooms (40%) but not for flats (5%); family homes (38%); elderly adapted homes (31%); disability-adapted homes (19%), homes for rent (18%), residential care (12%) and shared ownership (11%).

In respect of housing types, 34% of 336 respondents supported bungalows, 32% detached houses (only 4% large executive) and 31% semi-detached but only 10% supported terraced.

NPPF para 61, 63, 64

WCSLP 2013 objective none

WLP 1998 saved policy HG5

Wealden Local Housing Needs Assessment 2021

Housing and Economic Development Needs Assessment 2020 by GL Hearn for Hastings Borough and Rother District Councils

Economy, Infrastructure and Facilities

Objective: EIFO1- Support proposals that provide local employment and are sustainable, environmentally-appropriate and consistent with the rural location;

Objective: EIFO2- Retain, upgrade and expand facilities, infrastructure and communication networks to meet the social, leisure and health needs and interests of residents.

Communications

145. The NPPF (paras 118 and 119) highlight that advanced, high-quality communications are essential for economic growth as well as social wellbeing. *“Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution). The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate”.*
146. Reliable, fast broadband is likely to be most needed by residents working from home as well as local businesses. The village is served by a superfast fibre network from the Openreach (BT) exchange building in Manchester Road. Most broadband problems appear to be caused by the inadequacy of old copper wire connections to the network dependent on their length and number of properties they serve. The whole network in the UK is proposed to be upgraded to ultrafast broadband by 2025 but upgrading of connections seems less clear.
147. Mobile phone coverage in Ninfield varies widely according to which of the 4 main operator’s services is being used. Antennae are located on the water tower on the reservoir site, with EE having large antennae and Three a smaller antenna. The Ofcom map shows good coverage of the village for 4G but it declines with distance eastwards to Lower Street/Bexhill Road as well as down the slopes to lower ground. Lunsford Cross has good coverage for 4G by Vodafone and O2 (from Bexhill) but most of the rest of the parish has poor or very poor coverage.
148. Most upgrading works, including possibly to 5G, are likely to be ‘permitted development’ subject to only limited planning control. In April 2022, the Government relaxed planning rules to enable larger masts providing better coverage.
149. The recent pandemic has shown that efficient communications systems are essential to many aspects of our lives. In rural areas this is particularly important to facilitate remote working, education, maintaining social contact and retail opportunities.

Policy N12 – Communications

Proposals for the development of broadband and mobile communications infrastructure will be supported provided their design and placement pays sufficient regard to their surroundings in respect of environmental and landscape sensitivity, scale, form and colour, that their placement minimises disturbance to road surfaces and that any remedial work complies with approved standards. Wherever possible, existing masts, buildings and other structures should be used and equipment should be sympathetically designed and camouflaged where appropriate.

Objective: EIF02

Justification: The Ninfield NDP Survey 2021 shows that 89% of respondents said the reliable and fast broadband was important to them. 40% of respondents said they experienced problems with mobile phone signal.

NPPF 118, 119

WCSLP 2013 objective none

WLP 1998 saved policies none

Local Economy

150. The Eastbourne and Wealden Employment and Economic Study 2022 states that the parishes of Ninfield, Hooe and Wartling fall within the Hastings/Rother 'Functional Economic Market Area' (FEMA) and 'Housing Market Area' (HMA), being within the Hastings Travel to Work Area (as defined by ONS) rather than the Eastbourne TTWA.
151. Despite designation as a 'Local Service Centre' in the WLP Core Strategy 2013, facilities and employment opportunities in Ninfield are very limited. Unlike Sidley and Herstmonceux, it has no central core and sites are scattered. There appear to be no current proposals for any increase. No statistics are available as to job numbers in the Parish. The above Study (page 61) shows that there was a total of 1,750 jobs in 2020 in the 5 parishes comprised in the Herstmonceux and Ninfield statistical area (MSOA) as compared to a population of 6,473 (2021). For the size of the area, this represents the lowest job density in the whole District. There is clearly a very large imbalance between population and employment. The 2011 census shows that of the 743 economically active people in Ninfield parish, only 125 (17%) either worked from home or travelled less than 2km to work.
152. The local economy has changed greatly over the years as in most rural parishes. It was a settlement of agricultural origin and, even as late as 1901, 50% of the working population in Ninfield were engaged in agriculture (including market gardening) mainly in numerous small tenant farms. There was more cultivated or arable land and hop-growing on poles was very important with a number of farms having oast houses. Many other people were employed in allied trades at the 2 windmills and forges, plus in several small shops (including the emporium called Manchester House which gave its name to the back road in the early 1900s). Most were demolished in the mid-c20th. Two very small brickfields (one close to Lower Street, the other in Marlpits Lane) also provided employment in the c19th. Teaching at the small C of E school was the main source of the minimal amount of professional employment. Most properties were owned by the vast estates of Ashburnham Place and Normanhurst Court (Catsfield) and, to a very much lesser extent, Moor Hall. These employed many domestic servants as well as farm labourers. These estates were split up and sold off in the 1920s. With increasing car travel, the village had 2 garages and it ceased to have such a self-contained economy, becoming much more dependent on the nearest towns. Some tourism-related employment was provided by the Moor Hall Hotel and Country Club and the Moons Hill Guesthouse as well as tearooms but these had all gone by the late c20th.
153. Agriculture is still highly important to the character of the Parish, especially its biodiversity as well as appearance, but with mechanisation and less intensive farming, it employed only 3.6% of the working population of Ninfield in 2011. This is

slightly more than double the Wealden and national averages. Farms have been amalgamated into larger holdings and redundant buildings converted to holiday cottages and dwellings, often sold off with a few fields for keeping horses, etc. Some farm diversification has taken place by renting out converted farm buildings for business or residential use and constructing lakes for recreational fishing. It is important to support diversification to keep farming sustainable and 'permitted development rights' have been extended to enable this in principle but with some control over details by the local planning authority. The NPPF para 180 recognises the economic and wider benefits of 'the best and most versatile agricultural land' (grade 3A and above). However, despite the pressure for speculative housing development, no information is available as to which of the grade 3 land around Ninfield is 3A. It has not been required by WDC to be assessed for planning applications. Little or no account seems to be taken of the need to safeguard the best and most versatile agricultural land or the Natural England Technical Information Note TIN049 on the subject.

154. In the village, the main employment sites are:-

- the Ninfield petrol station/convenience store and adjacent tyre-fitting depot (in former garage/showroom) adjacent to the A269/B2204 junction;
- the 5 Oak Business site (a former garage site on the A269 on the village edge) comprising a hand carwash, equine centre and various car related and storage premises;
- the Kings Arms carvery/pizzeria with bar and large car park, opposite the junction of the B2204 with the A269;

155. Additional sources of employment in the village are some of the sites identified as community facilities, namely the primary school and doctor's surgery (providing a small amount of professional and administrative employment); the Blacksmiths Inn and the village shop/PO. In addition to Ninfield, the surgery (which is a satellite of Collington and Pebsham surgeries in Bexhill) also serves the neighbouring rural parishes whereas the primary school is only intended to additionally serve Hooe and Ashburnham.

156. The 5 Oak business site is of relatively poor quality and could be seen as a 'brownfield' site ripe for redevelopment. It provides a service to the local community, as well as to passing motorists, and provides low-cost premises for some small businesses. The local environment would be improved if was refurbished or possibly redeveloped. The Ninfield petrol station and tyre-fitting depot occupy a relatively modern building on a site that is partially under-used. Their retention as business sites is desirable otherwise Ninfield risks becoming little more than a residential dormitory. Outside these sites, within the village, there appears to be extremely limited scope or demand for new business development beyond the scale of home working (which does not require planning permission unless it materially changes the residential use).

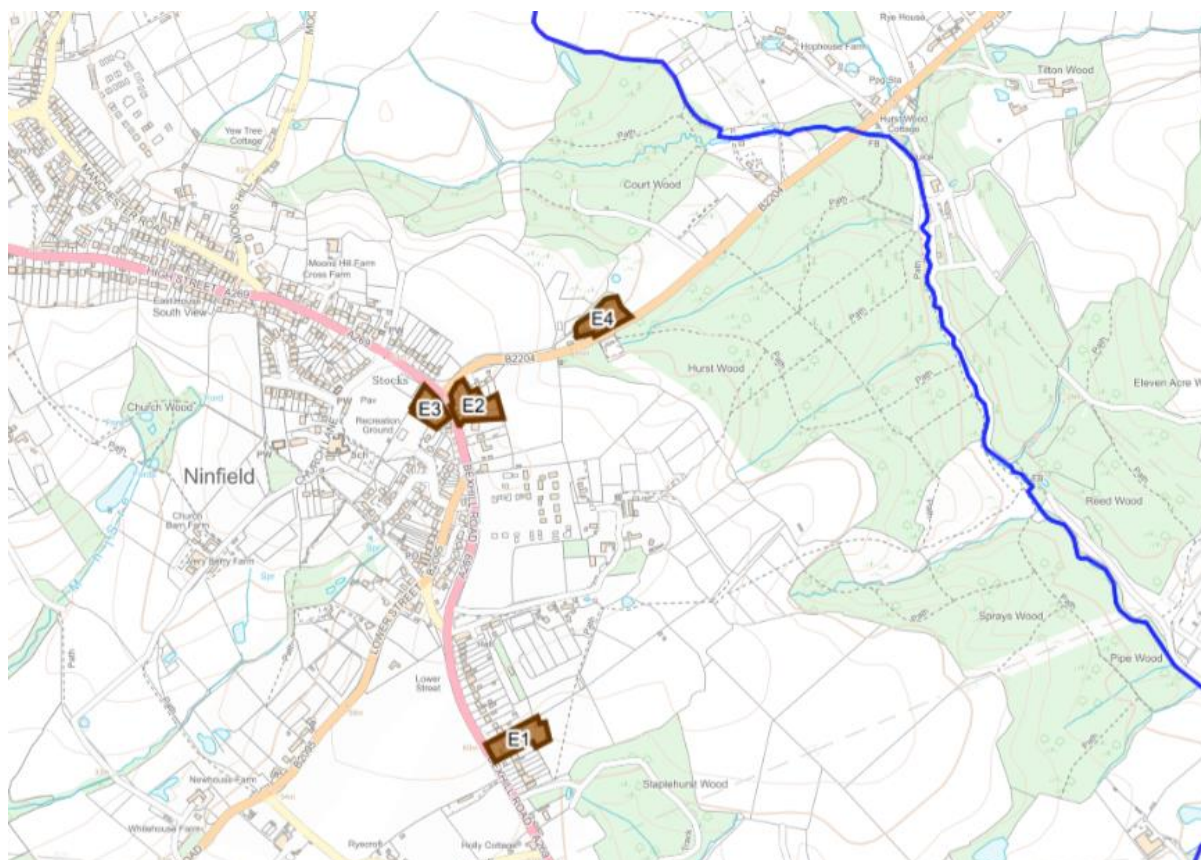
157. Outside the village, in the countryside, the main employment sites are:-

- Tarmac Blockworks on the former 1930s brickfield of the Ninfield Brick & Tileworks off the A269 at Hazards Green/Standard Hill;
- Skinners Sheds and adjacent Rusty's Reclamation both on a former poultry farm on the A269 Ninfield-Bexhill Road;
- the former ESCC Highways depot in Catsfield Road (now occupied by GJ Wholesale Flooring and a car-related business);

158. Also in the countryside are some other smaller sites that provide limited employment. In the Russell's Green area on the B2095 are Hope Cottage

farmshop/café with some adjacent very small businesses and adjacent Athela's Plants Garden Centre. Hope Cottage is listed subsequently in the NNDP as a community facility as it is the only local shop serving the Russell's Green area and Hooe. Also, on the B2095 is Woodlands View/Martins Farm, comprising some modern small units for light industrial and storage use on a former nursery/smallholding. The Headstart special school lies off the B2095 in Crouch Lane. Off the A269 Bexhill Road, there are a few small businesses in some of the farm buildings at Pashley Farm.

Figure 14- Map of Ninfield Employment Sites



Key: E1= Five Oaks Business site including car wash, E2= Petrol Station with convenience store and tyre depot, E3= Kings Arms restaurant, E4= GK Flooring.

159. As regards planning considerations, although the Tarmac Blockworks is one of the more significant employment sites in the Parish and in an area of locally-valued landscape, it is inappropriate and unnecessary to identify it as such because it is a safeguarded facility for concrete products and in part for waste recycling under the provisions of the East Sussex Waste and Minerals Local Plan. Rusty's Reclamation is also a safeguarded waste recycling site and the adjacent Skinners Sheds is within its consultation zone so these are not identified as local employment sites subject to policy N13. The GJ Flooring site on the B2204 is within an otherwise unspoilt mainly wooded valley landscape but is not widely visible owing to the trees. The Hope Cottage site is in an area of relatively flat, open countryside, and therefore more visible. Adjacent Athelas Plants to the rear now has its own separate access with a gap opened up from Straight Lane. The Woodlands View/ Martins Farm units are set well back from the road with a backdrop of trees so as not to harm the landscape on the edge of the valley. None of these countryside sites is sustainably

located, the roads lacking footways and being too narrow for safe cycling, especially the winding B2095. The A269 and B2204 are bus routes but lack bus stops near these sites.

160. The South East Water Hazards Green Waterworks is a very large site providing essential infrastructure. It would not be appropriate to include it as an employment site within the following policy N13.
161. In Ninfield, in the 2011 census, 10.1% (74 people) of the working population worked from home which is almost double the proportion nationally although similar to Wealden. The Ninfield NDP Survey shows that 19% of 204 respondents worked from home although this may be distorted because of the pandemic. Provided the type of activity involved does not cause detriment to neighbours by causing disturbance, parking or other problems, home working is unlikely to require planning permission and, in general, is to be supported as the reduced need to travel is clearly in the interests of sustainability.
162. Also significant is the very high proportion (19.5%) of economically-active residents who were self-employed in 2011 which is also double the national average and, for those who were employees, the high proportion that worked part-time. Ninfield has a significant number of tradesmen such as those engaged in building activities, domestic repairs and servicing, landscaping and tree works who are based at home but work over a wide area.
163. With regard to type of employment, in 2011, the most notable aspects compared to the national average are the very high proportion in skilled trades. Otherwise, it is similar to the national average but, compared to Wealden District, there is a lower proportion of managerial/professional or in financial/insurance services, perhaps reflecting more limited types of employment opportunities in the Hastings/Bexhill area and lack of rail transport for commuting. Qualification levels are similar to nationally but lower than the Wealden average. The Ninfield unemployment rate (2.5%) was the same as Wealden in 2011, significantly lower than regionally (3.6%) and nationally (4.4%).
164. The Hastings/Rother FEMA is one of the coastal areas in the South East identified as in priority need of economic regeneration in order to help redress the imbalance between employment and population and also to raise the level of qualifications and skills. The East Sussex Growth Strategy 2014 comprehensively proposes a wide range of measures to foster new businesses and improve employment opportunities. It identifies two growth corridors based on the A22/A26/A27 (Eastbourne-Hailsham-Uckfield) and the A21/A259 (Hastings-Bexhill). Much public investment through the South East Local Enterprise Partnership (SELEP) has taken place in order to 'kick-start' private investment in the local economy. This has involved constructing controversial new roads comprising the Hastings-Bexhill Link Road and the North Bexhill Access Road (by-passing Sidley to link to Ninfield Road). These serve the long-standing NE Bexhill urban extension, a very large allocation of employment and housing land, with its north end close to the A269 Ninfield Road. Despite the investment of Sea Change Sussex in the Bexhill Enterprise Park, in an attractive landscape and laid out for development, this has not so far had much success and indicates that the area is not attracting new businesses, especially high-tech/ICT/digital media to provide higher quality jobs and training. The Rother Employment Land Supply position statement April 2021 shows that 64,000sqm of employment land commitments in Bexhill, slightly more than the Rother Core Strategy target of 60,000sqm. However, between 2011 and 2021, the net completions in Bexhill totalled minus 755sqm.

165. On account of the above, the attraction of new businesses to Ninfield to improve the quantity and quality of local employment, even if suitable sites were made available, would be an unrealistic aim. Policy WCS3 of the WCSLP 2013 does not make any allocations for new employment-related development outside the towns. The existing Ninfield sites may be under-occupied but they are not disused and fulfil a need from local businesses for relatively low-cost premises. Therefore, any policy in this NDP should be aimed at supporting them whilst also encouraging environmental improvement. The start-up of small new businesses can often commence, depending on their type, through home working. This is supported and can often not need planning permission.
166. The existing employment sites (excluding a few very minor ones and those protected as community facilities under policy N16) are identified on Figure 14 and included on Figure 2 the Policies Map. These mostly fall into various Use Classes B2 (general industrial), B8 (storage or distribution) and E(g) (iii) (industrial processes that can be carried on in a residential area without detriment to its amenity). However, two sites fall outside any Use Classes termed 'sui generis' namely the petrol station and the Kings Arms public/drinking house with expanded food provision. The established use is determined in relation to definition of the 'planning unit' and its primary use. This may be complicated as some of these sites appear to contain more than one such unit and several different uses which may or may not be incidental to the primary use. Hence policy N13 includes not only the above Use Classes but also the above two 'sui generis' uses, protecting them as local sources of employment.

Policy N13 – Local Employment

The retention of the existing premises in employment-related use will be supported. Subject to compliance with the other policies of this Neighbourhood Plan, support will be given to proposed extensions, alterations or redevelopment for employment-related purposes falling in Use Classes B2, B8 and E(g) (or within the existing sites of the fuel station and the public house/drinking establishment with expanded food provision, for purposes connected with the existing 'sui generis' use) if there would be no detrimental effects on:

- (1) landscape and biodiversity (including trees, hedges, banks, ponds and watercourses);**
- (2) the residential amenities of any nearby dwellings;**
- (3) the built environment including heritage assets, trees, hedges and landscaping; and**
- (4) highway safety or the environment by reason of the quantity or type of traffic generated.**

The loss of existing premises in employment-related use, in instances where planning permission is required, will not be supported unless evidence exists to show that there is no market demand for the current use or an alternative employment-related use.

Acceptable evidence would be a marketing campaign for a minimum of 18 months, clearly identifying a lack of demand for business/ commercial activity based on marketing via relevant trade organisations offering the property for sale or rental at a realistic valuation with no reasonable offers rejected. If the submitted evidence is considered by the LPA to require review by an independent consultant, the applicant will be required to cover the cost as part of the planning application process.

Objectives: EIF01, EIF02

Justification: The results of the Ninfield NDP survey show that over 54% of residents work within a 5-mile radius (36% do not travel to work). 17% are travelling over 20 miles to get to work. Most people travelling to work used their car (67%).

The Ninfield NDP Survey sought views on business/employment related topics but the responses are fairly mixed. 13% of the 339 respondents run a business whereas 87% did not. In response to whether new businesses should be encouraged in Ninfield Parish 42% replied 'yes', 20% 'no' and 38% did not mind.

In response to the question are there any non-residential sites in the Parish that you want to see protected from development, 86% responded the GP surgery, 78% the Pub, 57% the Working Men's Club, 48% the Garage, 26% the Car wash and 17% other. However, as stated earlier, 58% supported new residential development being located on brownfield sites which would most likely be existing business sites. We asked how the NP could help the operation of local businesses and the results show that there was a need for business premises, better broadband and phone signal as well as business promotion and support.

NPPF para 88, 89

WCSLP 2013 objective SPO1, SPO6 and policies WCS3, WCS14

WLP 1998 saved policies DC6, DC7, BS7, BS8, BS9, BS14, BS15

Landscape Study of Ninfield

Farm Diversification and Sustainable Rural Business

167. The use of redundant farm buildings should be supported in principle including by any appropriate new businesses that might wish to set up in Ninfield, particularly if the business is related to agricultural or other countryside activities as identified in the NPPF below. The first paragraph quoted below relates to rural areas as a whole including villages whereas the second paragraph relates to the countryside outside existing settlements. NPPF: (paras 88 & 89) under 'Supporting a Prosperous Rural Economy' state: "*Planning policies and decisions should enable: (a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed beautiful new buildings; (b) the development and diversification of agricultural and other land-based rural businesses; (c) sustainable rural tourism and leisure developments which respect the character of the countryside; and (d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship*" and, "*Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist*".

168. The following policy, taking account of the NPPF as quoted above, is intended to relate to proposals outside the identified employment sites and outside the village. It applies the provisions of the NPPF in a manner that is considered to be appropriate to Ninfield Parish.

Policy N14 Sustainable Rural Business

Sustainable rural business development outside of the settlement boundary which creates local employment opportunities and economic, social and environmental benefits for the local community will be supported provided it:-

- a) contributes to diverse and sustainable farming enterprises or, in the case of other countryside-based business, contributes to the wider rural economy or promotes recreation in the countryside;**
- b) utilises existing redundant buildings which are appropriate for conversion both in terms of location and construction. New small-scale buildings may be acceptable if well related to existing buildings or settlements and in keeping with the rural character;**
- c) Does not prejudice the agricultural use of a unit;**
- d) Includes adequate provision of vehicle parking;**
- e) Does not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal or necessitate improvements to these roads which would detract from rural character; and**
- f) Otherwise complies with the policies of this Neighbourhood Plan.**

Objective: EIFO1

Justification:

The Ninfield NDP Survey sought views on business/employment related topics but the responses are fairly mixed. 13% of the 339 respondents run a business whereas 87% did not. In response to whether new businesses should be encouraged in Ninfield Parish 42% replied 'yes', 20% 'no' and 38% did not mind.

In response to the question "do you wish there to be policies that control development of agricultural land?", around 74% were in favour of the conversion of agricultural buildings for residential use. However, 59% were in favour of more diversification (e.g. stables, livery, tourism and leisure). 53% were in favour of farm buildings being used for small businesses, while 50% said they would like to see diversification to include specialised agricultural uses e.g. market gardening.

NPPF para 88, 89

WCSLP 2013 objective SPO1, SPO6 and policy WCS14

WLP 1998 saved policies DC6, DC7, BS7, BS9, BS14

Background document: Landscape Study of Ninfield

Infrastructure and Facilities

169. Infrastructure can be of many different types, some involving more fundamental services than others:
- Utilities such as water supply, electricity supply, gas supply (Lunsford Cross only), sewerage, surface water drainage, mobile phone and landline/broadband;
 - Transport such as roads, cycle lanes and footpaths including signage, bus routes and shelters, public car parks and public electric vehicle charging points etc;
 - Health and Education facilities such as medical centres, surgeries and schools;
 - Emergency service provisions such as fire hydrants;
 - Community facilities such as public halls, churches, sports and recreation grounds and pavilions, allotments and burial grounds;
 - 'Green and Blue infrastructure' such as country parks and woods, rivers, streams and other watercourses.
170. Many of these insofar as they are relevant to the development and use of land are covered by policies under their own separate headings elsewhere in this Neighbourhood Plan. Their provision can be by public or private bodies.
171. The fairly basic level of existing infrastructure in Ninfield is a significant issue but more in relation to anticipated pressure put on it from new housing in the village rather than current problems. There will be a large influx of additional residents in the two large estate developments where construction has recently started. The 135 dwellings are likely to result in about 300 extra residents (on the basis of the 2011 occupancy rate). Notwithstanding CIL contributions, existing residents are not convinced that existing services will cope, particularly in respect of the small satellite doctor's surgery and the small primary school. Public transport is poor, roads and footways narrow, cycle lanes absent, broadband not entirely reliable and mobile phone signals can be patchy.
172. New development requires the necessary infrastructure to support it. If this does not already exist or does not have sufficient capacity, then it is important that the necessary provision or upgrading is secured as part of the development. Policy WCS7 of the Wealden Core Strategy Local Plan 2013 requires this. Depending upon the type of infrastructure, this can be achieved through a section 106 legal obligation under the T&CP Act 1990 and/or through the Community Infrastructure Levy (CIL) or by other legislation such as the Highways Acts. Some of the above types of infrastructure cannot be secured by such means but the above policy supports their upgrading and improvement for the benefit of the Ninfield community.
173. A major utility installation in Ninfield parish is the Hazards Green Waterworks operated by South East Water and serving a wide area. Its installations are on a large site in an area of locally valued landscape adjacent to the High Weald National Landscape but their visual impact is generally mitigated by numerous trees. It relies on boreholes (augmented by river water and a pipeline from Darwell Reservoir) and there is a groundwater protection zone covering much of the parish. The major Ninfield Electricity Transforming Station over the Catsfield boundary is mentioned under Renewables.

Policy N15 – Infrastructure

The provision of new and improved infrastructure to serve Ninfield is supported in principle provided that it accords with the other policies of this Neighbourhood Plan and is sited and designed in a manner sensitive to its surroundings.

Where appropriate, new development should demonstrate that there is sufficient capacity in the local infrastructure and community facilities to meet the need generated by the proposed development. If there is insufficient capacity to serve it, the development shall be required to include the appropriate provision or upgrading of the infrastructure to serve it (or the necessary financial contribution secured by a section 106 obligation).

Infrastructure projects identified are as follows:

- Modernisation of the children's play area on the Recreation Ground
- Publicly accessible electric vehicle charging points
- Enhanced Broadband provision
- Community Hub
- Traffic management/speed reduction

See Appendix D.

Objective: EIF02

Justification: With regard to the Ninfield NDP survey, there were 341 responses in respect of utilities. 99% had mains electricity with 4% experiencing a problem. 98% had mains water supply with 3% reporting a problem. 87% had main sewer connection with 4% reporting a problem. Only 6% had mains gas (19% problems) whereas 55% had oil-fired boilers (1% problems) and 21% used bottled/tanked gas (19% problems).

Our water supply is also vulnerable, we are reliant on 2 relatively small reservoirs that are filled by pumping water up the hill from Hazards Green by means of diesel fuelled pumps. Developments should also maximise rain water harvesting measures and consider grey water recycling to avoid the waste of potable water. 78% of residents supported better rainwater harvesting in a domestic setting.

NPPF para 128c

WCSLP 2013 objective none

WLP 1998 saved policies CS1

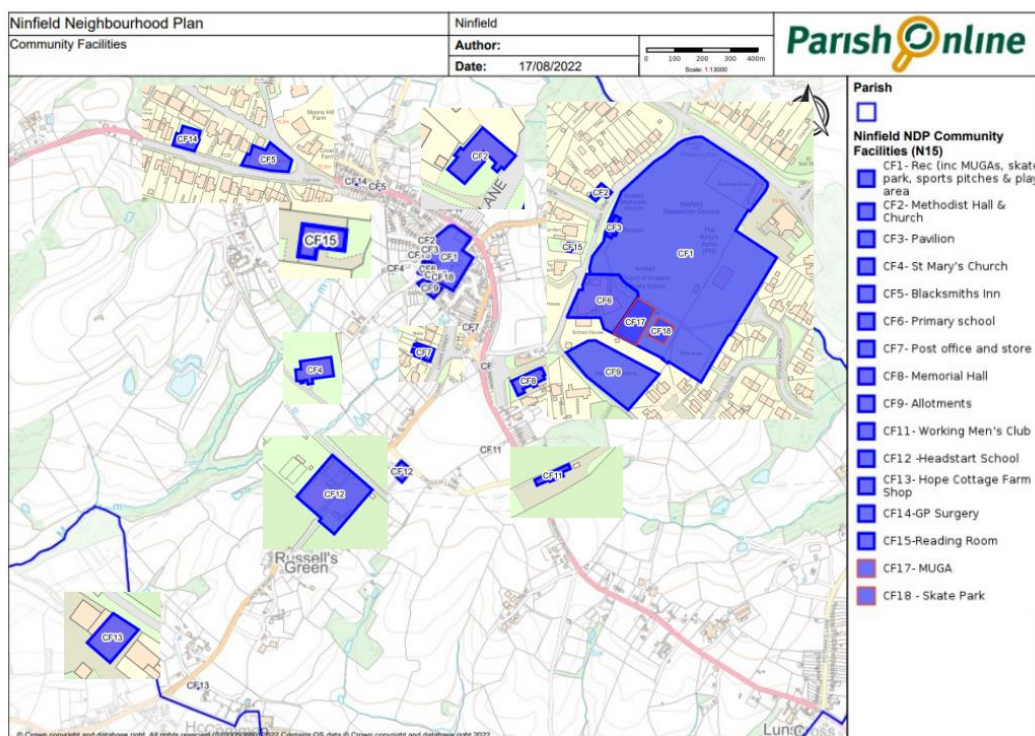
Community Facilities

174. The community facilities of Ninfield are in relative equilibrium with the size of the present population. There is a thriving community spirit and the existing facilities are highly valued. However, there is serious concern as to whether some of the facilities, notably the doctor's surgery and the primary school, will cope with the additional demand arising from the large housing developments currently under construction and another recently permitted.

175. The NNDP survey showed that residents valued the existing infrastructure and would like to see additional community facilities. In particular, a community

hub/café space suitable for all age groups but especially young people and additional green infrastructure, open spaces for leisure and recreation, allotments, footpaths and play areas.

Figure 15- Map of Existing Community Facilities in Ninfield



176. The existing community facilities fall into a number of types:-

- **Sports facilities and public open space:** The Recreation Ground with Pavilion including Skate Park and Multi-user Games Areas, sports pitches, Bowls Club and play area.
- **Community meeting facilities:** Memorial Hall, Methodist Church Hall, Reading Room, and Working Men's Clubroom
- **Places of Worship:** St Mary's Church and the Methodist Church
- **Education:** C of E Primary School and the Headstart Special School
- **Health:** GP Surgery (with pharmacy service)
- **Retail:** the Village Shop with Post Office; the Blacksmiths Inn; and the Hope Cottage Farmshop (serving the Russell's Green area). NB. the Kings Arms carvery/pizzeria and the Ninfield Petrol Station with convenience store were judged to be more aimed at the wider travelling public than community facilities.
- **The Allotments**

177. It is considered very important to protect the above facilities from loss by change of use (insofar as planning control exists) or by redevelopment unless suitable alternative provision is made. The loss would have greatest impact on those without a car. Hence the need for the following policy:-

Policy N16- Community Facilities

The change of use to other purposes (insofar as subject to planning control) of the following community facilities including their curtilage (as identified on the Policies Maps) will not be supported because they fulfil the essential needs of the community of Ninfield:-

- **The Recreation Ground including Skate Park and Multi-user Games Areas, sports pitches, Bowls Club and play area.**
- **Pavilion**
- **Methodist Church & Hall**
- **Reading Room**
- **St Mary's Church**
- **Primary School**
- **The Allotments**
- **Village Shop/Post Office**
- **Blacksmiths Inn**
- **GP Surgery**
- **Memorial Hall**
- **Working Men's Club**
- **Headstart School**
- **Hope Cottage Farm Shop**

Development proposals which would result in the loss of any of these existing community facilities and land will only be supported if:

- a) Evidence exists to show that the existing use has become unviable. In the case of the Village Shop and Blacksmiths Inn evidence would need to show that there is no market demand for the current use and acceptable evidence would be a marketing campaign for a minimum of 18 months, clearly identifying a lack of demand for the use based on marketing via relevant trade organisations offering the property for sale or rental at a realistic valuation with no reasonable offers rejected. If the submitted evidence is considered by the LPA to require review by an independent consultant, the applicant will be required to cover the cost as part of the planning application process; or**
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable and accessible location; or**
- c) The development is for alternative community provision, the need for which can be clearly demonstrated to outweigh the loss.**

Proposals for the enhancement or extension of the above facilities will be supported provided they comply with other relevant policies of the Ninfield Neighbourhood Development Plan, particularly if they are able to contribute directly to one or more of the following community priorities:

- **providing multi-purpose rooms to support a range of community users such as groups and organisations, young people (including teenagers) and the older population;**
- **Encouraging the enjoyment of health, education, recreation, sport and hospitality and expanding the range of retail provision to meet local needs;**

- **providing the community with a hub/meeting place within easy reach for all residents (including young people, older residents, clubs and societies) for informal socialising and refreshment and for indoor recreational activities;**
- **providing the community with outdoor recreational space and nature/biodiversity opportunities.**

Objective: EIF02

Justification: The parish wide survey showed that residents wanted to see additional community facilities including a community hub/café space to be used by a wide range of age groups (in particular young people). Specialist shops and a wide range of other interests and activities were also mentioned.

The survey showed that residents wanted to see additional green infrastructure including nature reserves/wildlife habitats, more land made available for farming and grazing, open spaces for leisure and recreation, allotments, footpaths and play areas. Other ideas put forward included a business hub.

East Sussex County Council state that they support infrastructure projects which increase physical activities, improve play and recreation and provide meeting places. There would be significant physical health and mental wellbeing benefits of providing additional community facilities and connected accessible meeting places for all ages, reducing social isolation and improving social cohesion. Proposals could usefully include community food growing opportunities in addition to allotments.

NPPF para 89d, 96, 97, 103

WCSLP 2013 objective SPO1 and policies WCS12, WCS13
WLP 1998 saved policies LR2, LR8

Transport & Access

Objective: TAO1- Enable safer and sustainable access for residents to key facilities and services by bus, cycle and on foot and other future modes of mobility and ensure an adequate level of car parking is provided within new developments, supported by electric vehicle charging infrastructure and cycle parking.

Safer and More Sustainable Travel

178. Ninfield is located on a rural road network which is historic and barely improved since the 1930s when a short section of by-pass to Lower Street was constructed and Boreham Bridge was widened. Although there are some wider stretches, most of the A269 is not wide enough to pass cyclists safely (in accordance with the recently amended Highway Code) if there is oncoming traffic which is most often the case.

179. The other main roads are B roads which are for the most part, narrower and poorly-surfaced. There are a few short stretches subject to a 40mph limit but otherwise the roads are only subject to the national 60mph speed limit.

180. Traffic speeds are often much too high for the road conditions and cycling is widely considered to be unduly dangerous. Consequently, single cyclists are rarely seen but groups of recreational cyclists do use occasionally use these roads at weekends and public holidays.
181. Road casualty figures (2018) show that 2 persons were killed or seriously injured which is double the Wealden average. Outside the 30mph village, the roads are mostly bounded by roadside hedges with narrow or intermittent grass verges. Forward visibility on bends is often poor, especially on the B2095 Hooe Road which has narrow blind bends without any verges.
182. Perhaps owing to congestion on the coastal A259/A27, the completion of the NE Bexhill link road appears to have resulted in a marked increase in traffic on the A269 with the result that the mini-roundabout junction with the A2204 Catsfield Road is congested at busy times of day, creating some tailbacks. The same applies where the A271 joins the A269 at Boreham Bridge. Otherwise, congestion is not a problem in the village or Parish and concerns are mainly in respect of highway safety and, increased traffic noise and pollution.
183. The location of Ninfield is not conducive to sustainable travel whether by bus or by cycling. There is little realistic scope for providing cycleways (or footways) linking Ninfield to Lunsford Cross and the nearest main town, Bexhill. Apart from the uneconomic cost, it would destroy numerous hedgerows with resultant unacceptable damage to biodiversity and the essential character of the countryside. Although the distance and gradients are suitable for cycling, the A269 carriageway is not wide enough to have cycle lane road markings. ESCC suggests that future updates to the NNDP should also reference the recently commenced review of the East Sussex Local Transport Plan. The revised strategy is intended to have policies to support transport in both urban and more rural areas of the County, focussing on decarbonisation of transport and greater emphasis on active travel and public transport. ESCC also draw attention to the Government's Local Transport Note 1/20 'Cycle infrastructure design' which is expected to be updated shortly to provide guidance for cycle infrastructure in more rural locations.
184. Public investment in cycling in this part of East Sussex is being concentrated on the Hastings and Bexhill Movement and Access Programme. This includes improving cycle routes, footpaths and bus infrastructure in the urban area, in order to support sustainable economic growth and 'smart mobility', reducing car journeys in the two towns. Enabling efficient connections to neighbouring settlements and supporting sustainable access has been mentioned but nothing seems to have emerged.
185. There is a higher proportion of multi-car households in Ninfield than the Wealden and national averages. Most people, particularly families, are reliant on using cars in their everyday lives owing to the limited facilities within the village.
186. The bus services are only well-used by students and others without a car. Most of the daytime, the buses through Ninfield have very few passengers. Buses provide an essential lifeline for a small minority and, with a mainly hourly service during the daytime, are perhaps better than for many villages. However, their timing is unsuitable for most travel to/from work and they are too time-consuming owing to the lack of direct routes to Hastings and Eastbourne town centres (both about one hour away) and also Bexhill town centre with its railway station. They are inconvenient and unattractive to the car-owning majority (even those with free bus passes). It is difficult to see that, without some fundamental change, improving the

existing bus routes, if it were economic for the operator Stagecoach, would still have minimal effect on car usage. The rural character of the area means that it would be totally unrealistic to aspire to have the well-used bus services with a 10min/20min frequency that run along the heavily-populated A259 coastal route.

187. ESCC provides some bus service funding primarily for school services (routes 320 and 356 to Claverham Community College, Battle) and also subsidising the two-hourly route 95 (Bexhill-Ninfield-Battle-Conquest Hospital Hastings). Some funding to provide evening and Sunday services on the hourly route 98 (Eastbourne-Hailsham-Ninfield-Bexhill-Hastings) was agreed but not implemented.
188. ESCC has recently produced a 'Bus Services Improvement Plan' to bid for funds in response to the Government's 'Bus Back Better' strategy. It includes a package of measures to restore bus usage back to pre-pandemic levels and further increase its attractiveness. One of the proposals is a new mobility hub in North Hailsham linking improved bus services in various directions including route 98 to Hastings. There is an innovative proposal for Digital Demand Responsive Transport schemes where fixed services are replaced by routes that change daily in response to passengers booking pick-ups and drop-offs but this appears to be aimed at areas with a less than hourly bus service.
189. The greatest scope for realistically encouraging sustainable travel appears to be within Ninfield village itself and its immediate vicinity, by improving walking and cycling routes in the village and their linkages to surrounding countryside. Not only would this be of functional benefit in enabling residents to access village facilities but would also be of health and recreational benefit. There is potential to align with the ESCC Local Cycling and Walking Infrastructure Plan 2021 which does not currently contain any proposals for Ninfield.
190. There is plenty of scope for improvement of footpath routes, in the surfacing, width, accessibility by the less able (such as replacing stiles with gates) as well as negotiating more linkages by means of permissive paths between existing public rights of way. It would also be desirable to open up access to areas largely devoid of paths such as to the northeast and south of the village but it would be difficult to link to Russells Green or Lunsford Cross.
191. At present, as shown on the ESCC Definitive Map of Public Rights of Way, only the area to the immediate southwest of the village, in the valley of the Moorhall Stream with community-owned Church Wood, has a reasonable network of public footpaths. There are currently no cycleways and no bridleways. Horse riders currently use some of the narrow back roads. Other than potentially negotiating the widening of tarmac Church Path to a combined footpath and cycleway, scope appears fairly limited.
192. The NDP Survey 2021 asked whether traffic issues affected local people directly and, of the 347 respondents, 73% stated traffic speed; 58% traffic volumes; and 44% traffic noise as major problems.
193. As regards a question as to which measures might improve road safety, of the 330 respondents, 67% stated traffic calming; 55% speed indicators; 52% more pavements; 32% cycle ways; and 30% more signage.
194. Traffic-calming measures to reduce speeding and the effects of the increasing amount of traffic on the A269 through the village need to be evaluated. There is little obstruction caused by on-street parking and the 30mph limit is often exceeded by

HGVs as well as cars despite the fairly narrow carriageway and footways. Live speed signage might have some effect but the benefit of traffic calming such as by narrowing or raised platforms would probably be outweighed by the negative effects of more noise and pollution.

195. The proposed large housing development off the back lane (called Manchester Road) has included urbanising “improvements” in the vicinity of the site access and in other locations through the village, deemed to be routes for new residents to access facilities. However, for most of its length Manchester Road remains a road without footways or kerbs which is part of its essential rural character. A 20mph limit could be considered for this and other back lanes under the Quiet Lanes and Home Zones Regulations but the width of the road as well as on-street parking already tends to limit traffic speeds and more signage would add to street clutter.
196. The dominance of car travel is shown by the 2011 Census. It shows that Ninfield Parish had a significantly higher percentage of households with 3 cars/vans than the District average (14.9% compared to 9.7%) and a significantly lower percentage of households with 1 car/van (33.4% compared to 39.3%).
197. It had a similar proportion of households with no cars/vans (11.3% compared to the District average of 12.4%); households with 2 cars/vans (35.1% compared to 34.2%); and households with 4 or more cars/vans (5.3% compared to 4.4%). The total number of cars/vans in the Parish was 1,101 and the average number of vehicles per household was 1.7, similar to 1.6 for Wealden but much higher than 1.2 nationally.
198. In 2011, 78.5% of the working population used a car/van to travel to work, 5.5% used public transport and 5.1% walked/cycled.

Policy N17 - Safer and More Sustainable Travel

Development proposals should aim to promote sustainable travel (including for recreational purposes) by increasing the attractiveness of walking, cycling and use of public transport. Proposals should consider guidance in LTN 1/20 – Cycle Infrastructure design (gov.uk), and as appropriate to the scale and type of development proposed:-

- 1. It should provide safe public footpath/footway (and, where appropriate, cycle) connections to existing public routes linking to bus stops, community facilities, local green spaces and surrounding countryside;**
- 2. where no such public routes exist or are deficient, the proposals should include the provision or necessary improvement of such routes as part of the development proposals;**
- 3. in addition to being safe, routes should be accessible for people with disabilities (including those using wheelchairs or mobility scooters) and for parents with children in pushchairs;**
- 4. 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.**

Public footpaths should be of appropriate width and use surfaces suitable for the local environment: a tarmac surface in well-used routes; a well-drained surface overlaid with bark for more rural settings and no surfacing for paths across grassy spaces, subject to necessary consultation with the ESCC as the local highway authority.

Objective: TA01

Justification: The NDP Survey 2021 asked what changes would make it easier to get to work, of the 254 respondents, 28% state improved pavements/footpaths; 23% more frequent buses; 19% dedicated cycle paths; 16% better network of paths; 9% more bus destinations; and 6% Express buses.

The Ninfield NDP Survey 2021 shows the present, extremely high degree of car dependence in the daily lives of Ninfield residents. For shopping and entertainment 99% of respondents use a car; 92% for sport and leisure; 70% for college; 67% for work (another 19% work from home); 51% for secondary school and 46% for primary school.

Buses are mainly used by students to travel to secondary school (49% of respondents) and college (30%) whereas for most other purposes only 6% of respondents use buses except for travel to work when it is only 2%. Walking is significant for primary school (50%), for leisure and sport (29%) and local shop (15%). Cycling is negligible except for sport and leisure purposes (5%).

In terms of distance travelled for Work, of the 204 responses, 36% under 1 mile; 18% 1-5 miles; 31% 6-20 miles; and 17% over 20 miles.

For Shopping, of 310 responses, 5% under 1 mile; 58% 1-5 miles; 50% 6-20 miles; and 5% over 20 miles.

For Leisure, of 258 responses, 14% under 1 mile; 42% 1-5 miles; 53% 6-20 miles; 14% over 20 miles.

For Sport, of 186 responses, 31% under 1 mile; 42% 1-5 miles; 30% 6-20 miles; and 9% over 20 miles.

For Entertainment, of 223 responses, 14% less than 1 mile; 30% 1-5 miles; 60% 6-20 miles; 22% over 20 miles.

Aside from traffic calming measures, 52% of respondents in the survey said that more pavements or improved pathways would improve road safety. People also mentioned the need for cycle paths (32%) as there are none in the parish at present.

NPPF Para 104, 108, 114-117

WCSP 2013 objective SPO7

WLP 1998 saved policies TR3, TR13

Parking

199. It is evident that, in most of the village, which is characterised by detached dwellings with on-site provision, parking is not a problem. The same applies to the rest of the Parish. The main A269 through the village has remarkably little on-street parking, other than by occasional delivery vans or lorries or occasional overflow from the doctor's surgery.
200. There is more on-street parking on the B2095 Lower Street where houses do not all have on-site parking and also casual parking generated by the village shop/PO. Although this may cause a degree of detriment to highway safety on a short stretch of road which is also a bus route, it is not considered a significant problem.
201. Most congestion of parked cars occurs on a daily basis in Church Lane as a result of the large quantity of traffic generated by the primary school at opening and closing times. The congestion and obstruction caused is a significant problem for residents of the dwellings in Church Lane and also in Downsview. It occurs because the road is a cul-de-sac and mostly single lane because of the on-street parking. A few houses have no on-site provision. Less frequently and at other times, the sports pitches on the recreation ground also cause significant on-street parking. There is no obvious solution to the problem other than by encouraging more walking/cycling to the school and recreation ground.
202. Some of the estates, notably Millfield and Stocks Meadow, do not have parking provision within individual plots so there is a large amount of on-street parking, including in the bays which have been provided on parts of formerly grassed amenity space. Millfield was constructed with a sizeable communal garage

and parking compound but the garages appear unused for parking and the outside spaces appear under-used.

203. It is important that new developments make sufficient provision for access and parking to avoid creating or aggravating highway problems. East Sussex County Council, as the local highway authority, has published relevant Guidance for parking based on detailed background evidence. It is normally used by the District planning authorities when deciding planning applications. It includes a calculation tool, which takes account of the level of car ownership in the local Ward, and follows the NPPF as now set out in para 111 which states: *“If setting local parking standards for residential and non-residential development, local planning authorities should take into account: (a) the accessibility of the development; (b) the type, mix and use of development; (c) the availability of and opportunities for public transport; (d) local car ownership levels; and (e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles”*.
204. The ESCC Guidance encourages the provision of charging points as a way of facilitating the transition to electric vehicles and thereby contributing to the reduction of greenhouse gases. The NPPF, in addition to (e) above, states in para 116(e) developments should *“be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations”*. The Government has amended the Building Regulations to make charging points a legal requirement from June 2022 for all new dwellings and offices with parking provision.

Policy N18 - Parking

New development should provide adequate parking for vehicles, motorcycles and cycles to meet the standards adopted by East Sussex County Council as contained in the following guidance (or replacements thereof):

**ESCC ‘Guidance for Parking at New Residential Developments’ 2017
ESCC ‘Guidance for Parking at Non-residential Development’**

Development that includes a reliance on parking on existing streets will not be supported if it results in a material adverse impact on the safety of road users including cyclists and pedestrians.

Objective: TA01

Justification: In the Ninfield NDP Survey 2021, 16% of the 342 respondents replied that car parking was a problem for them whereas 84% said that it was not. There appears to be scope to increase walking or cycling to destinations within the village as, for example, 46% of the 52 respondents in the NDP Survey said they currently used a car to take their children to primary school.

NPPF para 111 and 112

WCSLP 2013 objective none

WLP 1998 saved policy TR16

Delivery Plan

Introduction

205. The Ninfield Neighbourhood Development Plan will be implemented through a combination of Wealden District Council's consideration and determination of planning applications for development in the parish and through public and private investment into a series of infrastructure projects contained in the plan. The community aspirations set out in Chapter 7 will inform an Action Plan which will be implemented by Ninfield Parish Council in the lead working in partnership with other relevant bodies.

Development Management

206. Most of the policies contained in the Neighbourhood Development Plan will be delivered by landowners and developers responding to its proposals for encouraging and managing development. In preparing the Plan, care has been taken to ensure, as far as possible, that these proposals are achievable.
207. Whilst Wealden District Council will be responsible for determining planning applications for development within Ninfield Parish having regard to the development plan including the Ninfield Neighbourhood Development Plan, the Parish Council will use the Ninfield Neighbourhood Development Plan to frame its representations on submitted planning applications. It will also work with the authorities to monitor the progress of sites coming forward for development.

Infrastructure Projects

208. 25% of the levy collected by Wealden District Council from development in the Parish of Ninfield will be transferred to the Parish Council once it has made a Neighbourhood Development Plan. The Action Plan referred to in Chapter 7 above and the List of Infrastructure Projects in policy N15 and Appendix D will be used to inform the Infrastructure Delivery Plans of Wealden District Council and to guide Ninfield Parish Council's own expenditure of its proportion of the Community Infrastructure Levy.

Monitoring and Review of the Neighbourhood Plan

209. Changes in the local planning context, such as the adoption of a new Wealden Local Plan, could result in the Neighbourhood Development Plan needing to be reviewed. This will be monitored by Ninfield Parish Council in consultation with Wealden District Council. Monitoring will include all elements covered by the NNDP including the Local List of non-designated Heritage Assets and the list of protected community facilities.

The End

Annex 1

Non-Statutory Community Aspirations

Introduction

210. This section sets out Non-Statutory Community Aspirations. These aspirations do not form part of the development and land use policies in the Neighbourhood Development Plan. Rather they will inform an Action Plan to be prepared and implemented alongside the Plan. This will include projects identified during the process that residents consider should be addressed. The actions in this Action Plan, together with the policies set out in the previous section of the Neighbourhood Development Plan, will guide residents and other stakeholders on how the community seeks to plan for and deliver upon its issues and objectives. This Section summarises recommendations for the Action Plan.

Community Aspirations

Community Aspiration 1

211. *In deciding how to spend the Parish Council's share of the Community Infrastructure Levy that will accrue from development, priority should be given to support initiatives that meet the changing needs of the parish and encourage community links between all age groups and needs. Provision of improved facilities and initiatives for sports, social and recreational uses that meet the changing needs of the parish encouraging links between all age groups. Include provision and improvement of play facilities for the very young and recreational facilities for the youth to help mitigate anti-social behaviour, support existing community groups, organisations and events to encourage the continued feel of community.*

Community Aspiration 2

212. *To work with relevant authorities on speed reduction and traffic calming measures including for example consideration of possible 20mph speed limits for Marlpipts Lane/Moons Hill and Lower Street (under Quiet Lanes and Home Zones Regs). Also, to work with relevant authorities and Highways to address the need for traffic calming across the Parish and to give serious consideration to vehicle parking provision and road safety measures including lower speed limits where appropriate. The community will support the provision and improvement of footpaths and cycleways within the parish and connecting to facilities and the countryside.*

Community Aspiration 3

213. *To work with relevant authorities for better road and pavement maintenance, including fixing pot holes, road resurfacing and hedge cutting to keep pathways clear.*

Community Aspiration 4

214. *Support the provision of a village hub to include a community café, youth club and space for the Men's Shed.*

Community Aspiration 5

215. *Work with landowners and relevant authorities to create new footpaths in the countryside.*

Community Aspiration 6

216. *Support the provision of a community orchard and a community garden/allotment.*

Community Aspiration 7

217. *Work with relevant authorities to improve bus services by extending timetables, integration with train times and the introduction of express buses. Where existing routes do not already serve a proposed development area, the new development may be expected to fund additional services which do not replace existing services. Developers will provide, through a planning obligation or otherwise, such subsidy as is necessary to ensure that the service runs for a time period commencing and ending at points during the development to be agreed with the planning and highway authorities.*

Community Aspiration 8

218. *Address anti-social behaviour with measures including provision of youth facilities and working with police to raise their profile in the village/parish.*

Community Aspiration 9

219. *Maintenance and updating of Street Furniture.*

Community Aspiration 10

220. *In recognition of the village's heritage, press for the designation of a Ninfield Conservation Area (or Areas). The Local List of 'non-designated heritage assets' (both buildings/structures and areas) contained in this NDP has no statutory force and does not provide sufficient safeguards without statutory conservation area designation (unless the setting of a listed building is involved). Local planning authorities are obliged to designate as conservation areas any parts of their own area that are of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. They also have a statutory duty to review past designations from time to time to determine if any further parts of their area should be conservation areas. Wealden's last review was in 2015.*

Community Aspiration 11

221. *Community Led Housing: To facilitate a Community Land Trust or similar organisation to take forward a proposal for affordable housing to meet local needs.*

