

## SUSTAINABILITY APPRAISAL OF NINFIELD NEIGHBOURHOOD DEVELOPMENT PLAN

### 1.0 Introduction

1.1 In May 2022, Wealden District Council (WDC) informed the Parish Council that neither a Strategic Environmental Assessment (SEA) nor a Habitats Regulation Assessment (HRA) is required for the Ninfield Neighbourhood Development Plan (NNDP) as drafted. This followed consultation with the statutory consultees and the production of detailed Screening Assessment Reports for both. This is subject to the policies in the Plan not being changed materially.

1.2 This Sustainability Appraisal of the NNDP has been carried out on the recommendation of WDC. This is on the basis that it is good practice and shows how the NNDP will meet sustainability objectives as well as meeting the Basic Conditions, in particular, condition (d) below. 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.”*

1.3 The NNDP sets out a vision, objectives and policies covering a plan period to 2039. It has been prepared having regard to national policies and advice (including the National Planning Policy Framework) and the need to conform with the strategic policies of Wealden District's Development Plan. The NNDP does not seek to allocate sites for development. It instead provides policies to help guide development by providing certain criteria in relation to the environment, sustainability, design, economy and transport. As stated in the WDC Screening Report, in general terms the framework of policies seeks to guide projects which are local in nature. It may have a limited degree of influence over the formation of other documents and policies. However, this is unlikely to be significant given the Plan's position within the policy hierarchy and the limited extent of the parish. Its criteria-based policies and local designations are intended to promote sustainable development in line with the requirement that all neighbourhood plans contribute to the achievement of sustainable development.

### 2.0 Ninfield Neighbourhood Development Plan Vision

**‘By 2039, Ninfield will have retained its character as a safe, vibrant, rural parish, protecting the character of its position between the High Weald AONB 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.**

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

### 3.0 NNDP 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 AONB and its setting.

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

#### 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-** Promote safer and better access for residents to key facilities and locations by bus, cycle and on foot and ensure an adequate level of car parking is provided with new developments.

### 4.0 List of NNDP Policies

Policy N1	Sustainable Location of Development
Policy N2	Renewable Energy
Policy N3	Flood Risk and Drainage
Policy N4	Dark Skies
Policy N5	Key Views
Policy N6	Areas of Locally Valued Landscape
Policy N7	Local Green Spaces
Policy N8	Biodiversity
Policy N9	Built Heritage
Policy N10	Design
Policy N11	Housing Mix and Space Standards
Policy N12	Communications
Policy N13	Existing Business Sites

Policy N14	Sustainable Rural Enterprise
Policy N15	Infrastructure
Policy N16	Community Facilities
Policy N17	Safer and More Sustainable Travel
Policy N18	Parking

## 5.0 National Planning Policy Framework

5.1 The NPPF contains the Government’s definition of sustainable development building upon the high-level definition of ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’. The NPPF para 8 states that sustainable development has 3 overarching objectives:

**an economic objective** – “to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”

- The NNDP seeks to protect existing business sites and foster sustainable rural enterprise appropriate to the rural landscape (policies N13 and N14). Provision of improved infrastructure and communications is also supported (N12 and N15) and parking provision (N18).

**a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”

- The NNDP includes a policy on design (N10) and housing mix (N11), protects and encourages improvement of a variety of community facilities (N16). N7 protects Local Green Spaces. N17 encourages walking and cycling and together with other policies recognising the role of countryside in supporting health and wellbeing of parish residents and visitors.

**an environmental objective** – “to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

- The NNDP sets out policies that protect and encourage enhancement of valued landscape (N6), local green spaces (N7), key views (N5), biodiversity (N8), non-designated heritage assets (N9) and dark skies (N4). The Plan seeks to promote more sustainable transport patterns by supporting improvements in walking, cycling and use of public transport (N17) and encourage renewable energy (N2) and safeguarding against flooding (N3).

## 6.0 The Wealden ‘Sustainability Appraisal Scoping Report’ Feb 2021

6.1 This sets out 18 Sustainability Appraisal (SA) Objectives to form the basis against which the new Wealden Local Plan will be tested. Although the scope of neighbourhood plans is clearly less than that of a Local Plan, it is considered that these same SA objectives should be used to test the sustainability of the policies of the Ninfield NDP. These SA objectives are:-

- “1. To tackle the climate emergency by reducing greenhouse gas emissions, protecting existing carbon sinks and increasing their potential to store carbon, promoting zero carbon technologies and renewable energy technologies.*
- 2. To adapt to the effects of a changing climate by protecting and managing water resources.*
- 3. To adapt to and mitigate the risk of flooding from all sources taking account of the impact of climate change.*
- 4. To reduce pollution (air, noise, light, water and soil), improve air and water quality and minimise impacts associated with development.*
- 5. To protect and enhance existing habitats, species and biodiversity and deliver measurable biodiversity net gain.*
- 6. To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.*
- 7. To protect and enhance the quality and range of natural green spaces and to improve the wider green infrastructure network.*
- 8. To ensure development protects existing open spaces and creates open space in areas of deficiency, in regard to quantity and quality standards.*
- 9. To conserve and enhance the district’s countryside, landscape, historic environment and cultural assets.*
- 10. To ensure development makes efficient use of land, buildings and infrastructure, including previously developed land.*
- 11. To improve the quality of the built environment and promote high quality and sustainable design, including preserving and, where possible, enhancing the district’s heritage assets and their settings.*
- 12. To provide a range of high-quality homes, including affordable housing, to meet local needs.*
- 13. To promote healthy, safe and inclusive communities, and promote equal opportunities including allowing people to remain independent.*
- 14. To ensure access to local services and facilities, including local shopping, leisure facilities, open space, the countryside and sport and recreation opportunities.*
- 15. To reduce reliance on private transport modes, enable alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.*
- 16. To increase the vitality, viability and uniqueness of the district’s existing town centres, local centres and village centres.*
- 17. To promote sustainable economic growth and employment opportunities, including access to high quality jobs.*
- 18. To improve the level of skills, education and training of the population.”*

## **7.0 Compatibility of Ninfield Neighbourhood Plan objectives with Wealden SA objectives**

7.1 The following table sets out which of the above Neighbourhood Plan objectives are in conformity with the above Wealden SA objectives as contained in the Wealden ‘Sustainability Appraisal Scoping Report’ Feb 2021. These are derived from the more detailed comparison contained in the following section on the Wealden Assessment Framework and Guidance on policy making. All the SA objectives are met, albeit to

varying degrees, through the NDP objectives apart from objective 18 (To improve the level of skills, education and training of the population). There are no NDP objectives which have a negative effect on SA objectives.

	ECO1	ECO2	DDO1	DDO2	DDO3	EIFO1	EIFO2	TAO1
SAO1		√		√				
SAO2		√		√				
SAO3		√		√				
SAO4	√			√			√	√
SAO5	√							
SAO6		√						
SAO7	√							
SAO8			√					
SAO9	√		√					
SAO10				√				
SAO11			√	√				
SAO12					√			
SAO13					√		√	√
SAO14								√
SAO15								√
SAO16							√	
SAO17						√		
SAO18								

## 8.0 Compatibility of Ninfield Neighbourhood Plan policies with Wealden SA objectives

8.1 The following table sets out which of the above Neighbourhood Plan policies conform with the above Wealden SA objectives as contained in the Wealden 'Sustainability Appraisal Scoping Report' Feb 2021. All the SA objectives are met, albeit to varying degrees, through the Neighbourhood Plan policies apart from SA objectives 6 (To prevent and reduce the amount of waste) and 18 (To improve the level of skills, education and training of the population). Ninfield Policy N18 (parking provision) fits with an SA objective if it is regarded as infrastructure. None of the NDP policies would have a negative effect on SA objectives.

	N1	N2	N3	N4	N5	N6	N7	N8	N9	10	11	12	13	14	15	16	17	18
SAO1	√	√					√										√	
SAO2			√															
SAO3			√															
SAO4	√	√	√	√														√
SAO5							√	√										√
SAO6																		
SAO7	√				√	√		√										
SAO8							√											
SAO9	√				√	√	√		√	√							√	√
SA10	√									√				√	√			
SA11					√		√		√	√				√				
SA12											√							

SA13															√	√	√	
SA14	√						√				√				√	√	√	
SA15	√																√	
SA16	√											√	√			√		
SA17											√	√	√	√	√			√
SA18																		

## 9.0 Assessment of Ninfield NDP policies against the Wealden SA Assessment Framework and Decision Making Guidance

The Wealden Sustainability Appraisal Objectives 1-18 and the associated Questions forming the Wealden guidance for Policy/Plan decision-making are in black type. **The responses for the Ninfield NDP are in red type and relate solely to its relevant policies as it does not seek to allocate new sites for development.**

### 1. To tackle the climate emergency by reducing greenhouse gas emissions, protecting existing carbon sinks and increasing their potential to store carbon, promoting zero carbon technologies and renewable energy technologies.

- Does it include measures to maximise energy efficiency? **N2 has this aim**
- Does it reduce greenhouse gas and particularly carbon dioxide emissions by reducing energy consumption? **N2 has this aim**
- Does it incorporate zero or low carbon technologies? **N2 has this aim**
- Does it incorporate renewable energy technologies? **N2 has this aim**
- Will it include energy recovery? **Not specifically.**
- Will it minimise the need to travel, particularly by private car by efficient land use patterns? **N1 has this aim**
- Will it lead to more sustainable travel including walking, cycling and public transport? **N17 has this aim**
- Will it enable the take up of low or ultra-low emission vehicles? **Not specifically.**
- Does it result in the loss of a carbon storage function provided by a natural habitat? **N6 aims to protect habitat**
- Will it increase the carbon storage potential of a site/habitat? **N6 indirectly has this aim**
- Will it result in significant soil disturbance? **No such proposals in NNDP.**

### 2. To adapt to the effects of a changing climate by protecting and managing water resources.

- Will it include measures to reduce water consumption? **Not specifically.**
- Does it increase water abstraction? **Not specifically.**
- Will it lead to an increase in impermeable surfaces? **Not specifically.**
- Does it include a drainage strategy that incorporates SuDS and follows the 'treatment train'? **N3 requires this.**
- Are any proposed SuDS suitable for the site conditions? **Normally SuDS can be designed to be suitable in this area.**
- Does it take account of the South East Water Management Plan? **Not applicable.**
- Will it have an impact on the Pevensey Levels Ramsar site and SAC? **N3 aims to prevent this.**

### 3. To adapt to and mitigate the risk of flooding from all sources taking account of the impact of climate change.

- Will the proposal be affected by flooding, i.e. is it within Flood Zone 2, 3a or 3b? **No proposals to develop within these zones.**
- Does it take account of the ESCC Flood Risk Management Plan requirements? **N3 follows ESCC guidance.**
- Will it lead to increased surface water flooding? **N3 aims to prevent this.**
- Will it lead to sewer flooding? **N3 aims to prevent this.**
- Will it impact or increase the risk of flooding to other people and property? **N3 aims to prevent this.**
- Will it include flood mitigation measures where necessary? **N3 has this aim.**
- Will it promote and include climate change adaptation measures? **N3 has this aim.**
- Does it include a drainage strategy that incorporates SuDS? **N3 requires this.**
- Are any proposed SuDS suitable for the site conditions? **Normally SuDS can be designed to be suitable in this area.**
- Does the proposal include opportunities to reduce flood risk to surrounding communities? **Not applicable.**
- Does the proposal identify/safeguard areas around the floodplain to accommodate changes in water levels? **Not applicable.**

#### **4. To reduce pollution (such as air, noise, light, water and soil), improve air and water quality and minimise impacts associated with development.**

- Will it impact on natural resources, soil, air and water quality? **N1, N2, N17 aim to limit this.**
- Will it reduce emissions of pollutants? **N2, N17 have this aim.**
- Will it impact on locations that are sensitive to air pollution? **N2, N17 aim to.**
- Will it impact on noise levels? **N17 indirectly aims to.**
- Will it lead to more light pollution? **N4 aims to prevent this.**
- Does it improve water quality? **Not specifically.**
- Does it include a drainage strategy that incorporates SuDS and follows the 'treatment train'? **N3 requires this.**
- Are any proposed SuDS suitable for the site conditions? **N3 requires this.**
- Will it safeguard soil quality and quantity? **Not specifically.**

#### **5. To protect and enhance existing habitats, species and biodiversity, deliver measurable biodiversity net gain and create resilient habitats to provide for nature recovery.**

- Will it impact on national, regional or local habitats and/or species? **N8 aims to prevent or mitigate against this.**
- Does it affect a site designated for nature conservation purposes? **N7, N8 aim to prevent this.**
- Will it impact on access to nature? **N7, N17 aim to improve access.**
- Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non-designated sites? **N8 has this aim.**
- Will it lead to a biodiversity net gain? **N8 requires this for major schemes.**
- Will it impact on the connectivity and/or function of habitat sites, biodiversity and species? **N8 indirectly aims to improve this.**
- Will it identify/deliver opportunities for the restoration of natural process and natural interventions to enable climate resilient landscape for people and wildlife? **N8 has this aim.**
- Will it contribute towards the Local Nature Recovery Strategy? **N8 indirectly has this aim.**
- Will it utilise Natural Capital? **Not specifically.**

- Will it create new green spaces? **N7 enables this.**
- Will it lead to a degradation or fragmentation of habitats? **N8 aims to prevent this.**
- Will it ensure continuity of ecological frameworks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species? **N8 has this aim.**

**6. To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.**

- Will it prevent waste wherever it occurs? **Not within the scope of this NDP.**
- Will it promote sustainable waste management, following the waste hierarchy, and reduce consumption of materials and resources? **As above**
- Will it increase waste recycling? **As above**
- Will it promote the use of energy recovered from waste? **As above**

**7. To protect and enhance the quality and range of natural green spaces and to improve the wider green infrastructure network.**

- Will it encourage the enhancement of the wider green infrastructure network? **N8 has this aim.**
- Does it create green links/corridors between green spaces? **Not specifically.**
- Will it lead to the loss of, or degradation to, assets that comprise the green infrastructure network i.e. hedgerows, trees, woodlands, watercourses, green spaces etc.? **N1, N8 aim to prevent this.**
- Will the wider green infrastructure network be protected i.e. hedgerows, trees, woodlands, watercourses, green spaces etc.? **N1, N5, N6, N8 have this aim.**

**8. To ensure development protects existing open spaces and creates open space in areas of deficiency, having regard to quantity and quality standards.**

- Will it increase or decrease public open space deficiency? **N7 aims to decrease the deficiency.**
- Does it meet the quality and quantity standards for the provision of open space? **N7 aims to.**
- Will it increase or decrease formal and informal recreational open space? **N7 aims to increase informal space.**

**9. To conserve and enhance the district's countryside, landscape, historic environment and cultural assets and improve accessibility as relevant.**

- Will it lead to the loss or degradation of designated spaces such as Local Green Space, the High Weald AONB or the South Downs National Park? **N1, N6, N7 aim to prevent this.**
- Will local landscape quality, distinctiveness and character be protected? **N5, N6 aim to achieve this.**
- Will the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings be protected? **No such sites.**
- Is access for residents and visitors relatively easy? **N7, N17, N18 have this aim.**
- Is 'access for all' incorporated into the proposal where appropriate? **N17 has this aim.**

**10. To ensure development makes efficient use of land, buildings and infrastructure, including previously developed land.**

- Will it optimise the use of previously developed land, buildings and existing infrastructure? **N1, N14, N15 have this aim.**
- Will it lead to an unacceptable loss of greenfield sites or back garden land? **N1, N10 aim to prevent this.**



- Does it incorporate sustainable design and construction practices? **N10 has this aim.**
- Is there remediation of contaminated land? **Not specifically.**

**11. To improve the quality of the built environment and promote high quality and sustainable urban design, including preserving and, where possible, enhancing the district's heritage assets and their settings.**

- Will it affect the significance of heritage assets through direct impacts or impacts on their setting i.e. listed buildings, scheduled ancient monuments, historic parks and gardens, Conservation Areas? **N5, N7, N9, N10 aim to safeguard such assets and improve their settings.**
- Will the design enhance local character? **N10 requires this.**
- Have opportunities that make a positive contribution to the local character and area been identified? **N10 has this aim.**
- Will it impact on any potential archaeological remains? **No**
- Will it promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation? **N10, N14 have this aim.**
- Does it have regard to the Conservation Area Appraisal, where one is relevant? **No Cons Area.**

**12. To provide a range of high quality homes, including affordable housing, to meet local needs.**

- Will it increase the number of homes? **Not significantly as no housing allocations beyond existing development area.**
- Will it increase the number of affordable homes? **As above.**
- Will it reduce the number of unsuitable/unfit homes? **Not applicable.**
- Does it increase accessibility for wheelchair users? **N11 has this aim.**
- Does it ensure homes are suitable for older residents i.e. designed specifically as such or include adaptability? **N11 has this aim.**
- Does it ensure an appropriate tenure mix of housing is provided to meet local needs? **N11 has this aim.**
- Does it provide for the needs of the gypsy and traveller community? **Not applicable.**
- Does it ensure homes are built to Lifetime Homes Standards or equivalent? **Not applicable.**

**13. To promote healthy, safe and inclusive communities, and promote equal opportunities including allowing people to remain independent.**

- Will it impact on access and/or provision of health facilities? **N15, N16 aim to improve.**
- Will it encourage healthy life styles? **N17 indirectly has this aim.**
- Does it follow secure by design principles? **Not specifically.**
- Will it contribute to a reduction in the actual crime level? **As above**
- Will it contribute to a reduction in the fear of crime? **As above**
- Will it be likely to increase public well-being? **N16, N17 indirectly have this aim.**
- Does it plan for the potential impacts of climate change on health? **No**

**14. To ensure access to local services and facilities, including local shopping, leisure facilities, sport and recreation opportunities.**

- Is the proposal/land use located close to existing local services and facilities? **N1 has this aim.**
- Will services and facilities be created? **N15, N16 have this aim.**
- Is public transport available and accessible to all? **N17 has this aim.**

- Does it address the deficit in leisure, sport and recreation facilities where appropriate? **N7, N15, N16 have this aim.**
- Will it result in the loss of local services and facilities i.e. local shops, community facilities etc.? **N16 aims to prevent this.**
- Will it improve accessibility to key local services? **N16, N17 aim to achieve this.**
- Will it enable people to stay independent? **N11, N16, N17 indirectly have this aim.**
- Does it improve access for all, such as for those with limited mobility, wheelchairs? **N17 has this aim.**

**15. To reduce reliance on private transport modes, enable alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.**

- Will it impact on traffic congestion? **N1, N17 aim to avoid this.**
- Will it enable the use of public transport? **N1, N17 aim to.**
- Will it enable walking and cycling? **N1, N17 require this.**
- Is the proposal/land use in a location with public transport provision? **N1 aims for this.**
- Will it make use of existing transport infrastructure? **N1 aims for this.**
- Will it enable alternatives to the car? **N1, N17 aim for this.**
- Does it promote the inclusion of sustainable transport links within the district? **N1, N17 aim to.**
- Is it located within good access to local services, facilities, open space etc.? **N1, N17 seek this.**
- Will it minimise the need to travel by car through the location and design of new development and places which provide more opportunities for active travel and for the provision and link to public transport infrastructure **N1, N17 aim to achieve this.**
- Are walking and cycling provision and links included? **N17 requires this.**
- Does it promote safe walking and cycling? **N17 does so.**

**16. To increase the vitality, viability and uniqueness of the district's existing town centres, local centres and village centres.**

- Will it promote and add to the vitality and viability of town centres, local centres and village centres? **N1, N16 have this aim.**
- If the site is located in a town centre, will it include retail and/or town centre uses? **No town ctr.**
- Does it result in the loss of town centre uses i.e. shops (A1 use) to residential (C3 use)? **n/a**
- Does it reinforce a centres' retail role? **N16 aims to protect and improve the existing very limited role.**
- Will it stimulate the use of local companies, local products and services and provide other forms of community benefit? **N13, N14, N16 aim for this.**
- Does it promote and add to the tourism economy of the District? **N14 allows for this.**
- Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas? **N14 has this aim.**

**17. To promote sustainable economic growth and employment opportunities including access to high quality jobs.**

- Will it help create the right conditions and infrastructure provision to encourage private sector investment? **N12, N13, N14, N15, N16, N18 aim to do so.**
- Will it help improve the competitiveness and productivity of the local economy? **Not directly.**
- Will it help in achieving local economic growth? **N13, N14 may do so.**

- Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas? **N14 aims for this.**
- Does it promote and add to the tourism economy of the district? **N14 includes this.**
- Does it provide the commercial floorspace the district needs to encourage/support new and existing business development? **N13, N14 do in a limited way appropriate to a rural area.**
- Is the commercial floorspace/business units provided of a suitable size, type and in the right location? **N13, N14 allow for this.**
- Does it provide/create jobs? **N13, N14, N16 allow for this.**
- Will it meet local business and employment needs? **N13, N14, N16 allow for this.**
- Will it increase employment opportunities? **N13, N14, N16 allow for this.**
- Will it increase training and skilled employment? **Not specifically.**

**18. To improve the level of skills, education and training of the population.**

- Will it deliver education and training opportunities? **No, as outside the scope of the NNDP**
- Does it include education provision where necessary i.e. a new school? **As above**
- Does it deliver opportunities for apprenticeships and vocational training? **As above.**