

East Dean and Friston Neighbourhood Plan 2024-2042

Submission Version

A Report to the South Downs National Park Authority on the Examination
of the East Dean and Friston Neighbourhood Plan

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John Slater Planning Ltd

3rd October 2025

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Executive Summary

My examination has concluded that the East Dean and Friston Neighbourhood Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the Plan meets the basic conditions. The more noteworthy include –

- Refer to essential local workers rather than key workers and encourage applicants, rather than requiring them, to have to demonstrate how schemes reflect HAPPI principles and RTPI guidance on Dementia for Town Planning.
- Remove policy requiring improvements to main highway approaches to the settlements.
- Only requiring consideration of archaeological matters for development within Archaeological Notification Areas.
- Removing provisions related to net biodiversity gain which are covered by the statutory provisions and include recognition of the importance of chalk grassland to the parish's natural environment.
- Removing protection of views that cover land outside the parish.
- Removing the requirement for new community facilities to have to contribute to the character of the area and replace by an obligation not to detract from it and also to balance any impact on heritage assets with the public benefits arising from that community development.

The referendum area does not need to be extended beyond the Plan area.

Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which offers local communities the opportunity to create the policies that will shape the places where they live and work. A neighbourhood plan does provide the community with the ability to allocate land for specific purposes and to prepare the policies that will be used in the determination of planning applications in its area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the policies in the South Downs Local Plan. Decision makers are required to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been undertaken under the supervision of East Dean and Friston Parish Council. A Neighbourhood Plan Steering Group was appointed to undertake the Plan's preparations made up of parish councillors and local residents.
3. This report is the outcome of my examination of the Submission Version of the East Dean and Friston Neighbourhood Plan. My report will make recommendations, based on my findings, on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by the South Downs National Park Authority.

The Examiner's Role

5. I was appointed by the South Downs National Park Authority in July 2025, with the agreement of East Dean and Friston Parish Council, to conduct this examination.
6. For me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 47 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of my neighbourhood planning consultancy, John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of the South Downs National Park Authority and East Dean and Friston Parish Council, and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.
7. Under the terms of the neighbourhood planning legislation, I am required to make one of three possible recommendations:

- That the Plan should proceed to referendum on the basis that it meets all the legal requirements.
 - That the Plan should proceed to referendum, if modified.
 - That the Plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
8. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the East Dean and Friston Neighbourhood Plan area.
9. In examining the Plan, the Independent Examiner is expected to address the following questions:
- Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
 - Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and that it must not cover more than one Neighbourhood Plan area.
 - Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Town and Country Planning Act 1990 and been developed and submitted by a qualifying body?
10. I can confirm that the Plan only relates to the development and use of land, if modified in line with my recommendations, covering the area designated by the South Downs National Park Authority, for the East Dean and Friston Neighbourhood Plan, on 10th April 2019.
11. The cover page of the submission version of the plan states that the plan will cover the period from 2024 to 2042.
12. I can confirm that the Plan does not contain policies dealing with any “excluded development”.
13. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
14. I am satisfied that East Dean and Friston Parish Council as a parish council can act as a qualifying body under the terms of the legislation.

The Examination Process

15. Once I had reviewed the submitted documents, my first task was to conduct a site visit to the parish. That was carried out on Monday 11th August 2025.
16. I approached the parish from the west, along the East Dean Road/ Seaford Road and immediately turned into the Downlands Estate,

where I was able to appreciate the special character of the estate, the importance of the Greensward as an open space and the views, especially from the elevated parts. I saw the local shops; I travelled up the hill to The Ridgeway and rejoined the main road opposite St Mary's Church. I then visited the National Trust car park at Crowlink. I drove along Old Willingdon Road, appreciating its magnificent properties and their stunning views. I ventured into the heart of East Dean village and parked beside the Village Hall and saw the Tiger Inn and the Village Green.

17. I next drove down to the Birling Gap. It was late afternoon on a hot summer day, the place was crowded including surprisingly, a lot of people waiting for the bus! I saw for myself the issues around the on-street parking. I carried on to Beachy Head. I then returned to East Dean village, this time venturing up Lower Street, gaining a different perspective of the centre of the village.
18. In total, I spent just over 2 hours in the parish and in that time, I visited many of the viewpoints, saw the 2 proposed local green spaces and a large number of the proposed non-designated heritage assets.
19. Upon my return from East Sussex, I have prepared a document entitled Initial Comments of the Independent Examiner dated 14th August 2025. In that document, I advised the parties that I would be able to deal with the examination without the need to call for a public hearing. I asked a series of questions which were mainly directed at the Parish Council but also the South Downs National Park Authority. I received responses from both the Parish Council and the South Downs National Park Authority on 4th September 2025. I subsequently sent an email asking views on the definition of key workers and clarifying the expectations regarding archaeological matters.

The Consultation Process

20. In 2019, a Steering Group was formed and its early work involved scoping meetings with various local groups and four working groups were established and a community questionnaire produced. A pamphlet was distributed at the village fete.
21. However, work on the neighbourhood plan seemed to stall in 2020 and work only re-commenced in November 2022, when a new Steering Group was appointed. A new questionnaire was devised and distributed in September 2023, alongside an online survey and a drop in event was held on 12th September 2023 in the Village Hall, attended by 35 residents. A total of 50 questionnaires were returned.
22. Five topic groups were then set up, covering housing, design and heritage, environment and green space, transport movement and community facilities. Each managed the topics within the context of an overarching Communication Strategy.

23. An open evening was held on 29th January 2024 in the Village Hall. In addition, a presentation was given on the neighbourhood plan at the annual village meeting.
24. All this work culminated in the preparation of the Pre-Submission version of the plan, which was the subject of a six-week consultation, known as the Regulation 14 consultation, which ran from 2nd September to 27th October 2024. Within that period, 2 consultation events were held. 22 responses were received to a survey from residents and various consultees, which are fully set out in Appendix B of the Consultation Statement and the Steering Group's responses are set out in Table 2.
25. I am satisfied that the Parish Council actively sought the views of the local community whilst preparing this plan.

Regulation 16 Consultation

26. There was a period of final consultation, which took place over a six-week period, between 19th May 2025 and 30th June 2025. This consultation was organised by the South Downs National Park Authority, prior to the Plan being passed to me for its examination. That stage is known as the Regulation 16 consultation.
27. In total there were 16 responses received: from Historic England, South Downs National Park Authority, Environment Agency, UK Health Security Agency, Horsham District Council, Health and Safety Executive, Open Reach, Gatwick Airports Ltd, British Horse Society, National Highways, Wealden District Council, East Sussex County Council, Friends of the South Downs, Southern Water, Natural England and from a local resident.
28. I have read all the representations and will refer to them, where relevant, when I come to consider my recommendations.

The Basic Conditions

29. The neighbourhood planning examination process is different to a local plan examination, in that the test is not one of "soundness". The Neighbourhood Plan is tested against what are known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.
30. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -
 - Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State?

- Will the making of the Plan contribute to the achievement of sustainable development?
 - Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
 - Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
 - Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (as amended)?
31. This plan was submitted after 24th March 2025 and so it will be examined against the Secretary of State's policies set out in the December 2024 version of the National Planning Policy Framework.

Conformity with the Development Plan

32. To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the South Downs Local Plan 2014 – 33, adopted on 2nd July 2019.
33. Policy SD25 sets out the development strategy for the National Park. The villages of East Dean and Friston are collectively identified as one of the settlements that lies on the Dip Slope of the Downs which has the ability to accommodate growth of a scale and nature appropriate to its character and function, with the emphasis on making best use of suitable and available previously developed land and on making efficient and appropriate use of the land. It is one of the villages where there is a settlement boundary, where development is allowed outside of it, in exceptional circumstances.
34. Policy SD26 makes provision for the building of 4,750 new homes across the National Park as a whole, for the period 2014 to 2033. The policy establishes that the parish's contribution to that figure is 11 new homes although there is a footnote to the associated table which states that that figure has been met through the allocations made as part of the Pre-Submission version of the plan and which had been built. Therefore, the Local Plan did not need to make any site allocations in the parish.
35. Policy SD47 allocates The Horsefield and Went Way Allotments as local green space.
36. In addition, the Plan includes a number of strategic overarching policies that are relevant to some degree, to the neighbourhood plan. In particular Policy SD5 covers design matters, Policy SD6 deals with Safeguarding Views, what are described as landmark views from publicly accessible areas. Policies SD9, and 12 covers biodiversity and geodiversity and the Historic Environment respectfully. Policy SD18 addresses The Open Coast, setting criteria for development which is appropriate to a coastal location and which is expected to conserve and enhance the character

of the Heritage Coast or is needed for operational needs and which is consistent with the Shoreline Management Plan, and which conserve and enhance coastal access and has no impact on the Marine Conservation Zone. Finally, Policies SD19 and 20 address Transport and Accessibility and Walking, Cycling and Equestrian Routes. The mix of housing is addressed in Policy SD27 and Policy SD29 is a policy covering rural exception sites. Policy SD48 addresses issues around Climate Change and the Sustainable Use of Resources.

37. The South Downs National Park Authority has embarked on the preparation of a Local Plan Review which will roll forward the local plan until 2042. The Regulation 18 consultation closed in March 2025 and the results of that consultation and the next version of the plan. The Regulation 19 version, is expected to be published in May 2026.
38. My overall conclusion is that the Neighbourhood Plan is in general conformity with these strategic policies in the adopted South Downs Local Plan.

Compliance with European and Human Rights Legislation

39. The South Downs National Park Authority, in a screening letter dated 3rd September 2024, considered whether a full Strategic Environmental Assessment (SEA), as required by EU Directive 2001/ 42/ EC, which is enshrined in law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would be required. That concluded that the plan would not be likely to have significant environmental effects which were not appraised through other development plan processes, and accordingly a full SEA would not be required.
40. In the same letter the South Downs National Park Authority, as the “competent authority”, screened the plan under the Habitats Regulations and concluded that, as the plan was not allocating sites, there was not “expected to be any effects on any internationally designated nature sites”. Accordingly, an Appropriate Assessment was not required to be carried out.
41. I am satisfied that the basic conditions regarding compliance with European legislation, including the 2017 introduced basic condition specifically requiring compliance with the Habitat Regulations, are met. I am also content that the plan has no conflict with the Human Rights Act.

The Neighbourhood Plan: An Overview

42. East Dean and Friston Parish Council is to be congratulated for grasping the opportunities of producing a locally distinct neighbourhood plan,

allowing the community to prepare the planning policies which will cover the neighbourhood area, despite an early hiatus.

43. The plan seeks to generate planning policies which will extend beyond the current timeframe of the South Downs Local Plan, of 2033, and takes the plan through to 2042, which is the time horizon of the South Downs Local Plan Review. By extending beyond the end date of the current strategic policies, I needed to be satisfied that the plan will be meeting the basic condition of contributing to the delivery of sustainable development. I had at the forefront of my mind whether it will deliver “a sufficient number and range of homes...to meet the needs of the present and future generations”. The plan does not need to make site allocations as the parish has already delivered the required number of homes to meet its obligations from the Local Plan for the period up to 2033. However, the plan makes no provision for housing growth beyond that date. This was a matter that I needed to explore with both the National Park Authority and the Parish Council.
44. I set these issues out in my Initial Comments document, and I referenced the paragraphs in the NPPF which provides for the circumstances where neighbourhood plans proceed in advance of a Local Plan. I asked whether the Parish Council had sought an indicative number from the National Park Authority, as envisaged by paragraphs 69 and 70 of the Framework. The response was that it had not asked for an indicative number and the National Park Authority confirmed that it had urged neighbourhood plan groups not to allocate sites as that was a task for the Local Plan, which would take account of constraints across the whole of the National Park. The Parish Council was content to leave it to the Local Plan Review and noted that in the Reg 18 version (of the emerging South Downs Local Plan), no site allocations had been proposed for the parish, but it accepted that may change in subsequent versions. It did indicate a willingness to conduct a high-level review of the neighbourhood plan in the light of the adopting of the Local Plan Review. I would support that review.
45. My conclusion on this issue is that the policies in the neighbourhood plan are not seeking to control housing supply beyond the strategic policies set in the current Local Plan. The scope of any neighbourhood plan is entirely up to the Qualifying Body to determine and it is following the lead of the strategic planning body by not looking at site allocations or quantifying housing requirements beyond the current end date of 2033, although it does, based on evidence of the housing needs assessment, seek to ensure that any housing development coming forward, does address local housing need. I am satisfied that the end date of the neighbourhood plan can extend to 2042, in line with the Local Plan Review, whose policies would in any event supersede the neighbourhood plan, as it would be adopted after this plan.

46. The East Dean and Friston Neighbourhood Plan includes a policy that ensures that any new housing meets the needs of residents, particularly where their needs cannot be met through market housing. It seeks to protect the special character of the area, which is of the highest landscape quality and sets high design standards through the East Dean and Friston Parish Design Guidance and Codes, it encourages energy efficiency and the sustainable design of new development, protects important views and heritage assets and the area's biodiversity and encouraging non-car-based travel. It encourages community facilities, especially those aimed at children and teenagers. I am satisfied that the neighbourhood plan when taken as a whole, will deliver sustainable development.
47. My examination has concentrated on the wording of the policies, rather than the contents of the supporting text and the interpretation sections.
48. As a result of some of my recommendations there will need to be some consequential changes to the supporting text. It is important that the supporting text reflects the policy changes so that the plan still reads as a coherent statement of policy. It is beyond my scope as examiner to offer changes to the supporting text, as my remit is restricted to matters of the basic conditions and the other legal requirements.
49. I will leave it to the Steering Group, to work with the planners at the South Downs National Park Authority to agree the changes to the supporting text, when it is preparing the Referendum Version of the plan, which will have to be published alongside the Decision Statement.

The Neighbourhood Plan Policies

Policy EDF1: Meeting Local Housing Needs

50. Government advice is that where a neighbourhood plan wishes to introduce policies on the size and type of housing, it must do so on the basis of evidence. In this case that evidence is provided within the East Dean and Friston Housing Needs Assessment prepared by AECOM. I am satisfied that the evidence justifies the mix of dwelling houses put forward, as evidenced in Table 5-10 of the HNA.
51. The third element of Section 8 of the policy, encourages "greater affordability uplifts" and prioritises local residents and those with a connection to the parish. It also refers to key workers which is not defined within the plan or within the South Downs Local Plan. I initially raised this issue with the Parish Council who suggested that the definition of key workers encompassed "workers who are essential to their communities but might struggle with housing costs, with eligibility and specific benefits, including public sector workers like teachers, nurses and police officers." I proposed a slight rewording.

52. I also sought the views of the South Downs National Park Authority who suggested that a more appropriate term should be “essential local workers” as that is a sector that is included within the heading of affordable housing in the Glossary to the NPPF and I believe that it would still meet the aspirations of the plan in terms of providing housing for those with an essential role within the community whose housing needs are not met by market housing.
53. The second element to the policy refers to applicants for new housing developments having to demonstrate how their scheme reflects the HAPPI principles (Housing our Aging Population Panel for Innovation) and the guidance published by the RTPI on Dementia for Town Planning. The Parish Council pointed to the need for homes to be suitable for those wishing to downsize and therefore could cover all forms of housing that an older person might choose to occupy.
54. I believe that it will be an over onerous and unnecessary imposition to be imposed on all forms of housing development, for example, the policy encourages developments to be meeting the needs of single people, young couples and smaller families as well as those wishing to downsize. I believe that the aspiration can be met through encouragement rather than imposing an obligation on all applicants for new housing in the parish.

Recommendations

In A iii) replace “key” with “essential local”

In B replace “should” with “is encouraged to “

Policy EDF2: Character and Design of Development

55. I am satisfied that the first part of the policy properly sets out the expectations of how design should be approached and references appropriate design guidance. There will be some schemes where all the four requirements would not be appropriate. For example, “meeting the needs of residents” and “respecting the local street scene” may not be appropriate, for example, in the case of the erection of a new agricultural building. That can be covered by a suitably worded caveat.
56. The second part of the policy places an obligation, subject to the test of appropriateness, for an applicant to show how their development proposal will be making a positive contribution to the main highway approaches into the settlement, through interventions such as “additional tree planting, better management of roadside green spaces, reductions / consolidation of road signs and other street furniture.” These matters relate to highway land and are likely to be the responsibility of the County Council as the highway authority. I do not believe that it would be within the control of an applicant to be able to take on these responsibilities and I furthermore consider that imposing them via a planning obligation would not meet the test set out in Regulation 122 of the Community Infrastructure Levy

Regulations 2010. Such matters do not generally come within the definition of development which is subject to planning control.

57. The Parish Council has acknowledged this but has pointed to the fact that there are many roads, for example in the Downlands Estate, where residents are responsible for their roadside areas. It has been suggested that the remit of the policy should be aimed at “development proposals on private (or unadopted) roads”, rather than the main highway approaches, as drafted. From my site visit, I was not struck by the poor management of the roadside green spaces or saw a proliferation of road signs and street furniture, within the private roads within Friston.
58. I appreciate the aspirations of the Parish Council in respect to the main highway approaches, but these are not planning issues which can be included within the development plan, but they can be included as non-policy actions within Chapter 12. I do not disagree with a desire for the imposition of requirements relating to the desire to “incorporate soft landscaping and characteristic boundary treatment” within the private roads of Friston, as they do not fall within the responsibility of the highway authority and therefore can be subject to a degree of planning control, although some works are still covered by permitted development rights.
59. In terms of the remainder of the policy, there is a typo in the final paragraph which should be “designed” not “design”.

Recommendations

Delete paragraph B i.

In Bii) insert at the end “especially on private (or unadopted) roads”

In the final paragraph replace “design” with “designed”

Renumber b sub-paragraphs from i) to iv).

Policy EDF3: Energy Efficiency and Design

60. It is important that this policy only offers support to schemes that meet high environmental standards and mitigate the impact of predicted climate change. As such it is not imposing specific requirements, which need to be complied with, merely schemes that incorporate these standards, will be supported. A scheme that does not meet them would not be capable of being refused planning permission under the terms of this policy.

Policy EDF4: Conserving Heritage Assets

61. Whilst the policy dealing with designated heritage assets repeats some aspects in national policy, the policy does go further and as such I do not have any concerns in terms of duplication.
62. The reference to “above and below ground archaeological deposits” does not specify whether this relates to all developed proposals or just those

- that affect designated heritage assets. I raised this matter with the Parish Council, and it has confirmed that it wishes the section of policy to refer to all developments. If that were the case it would raise the question as to whether the policy should sit within the policy dealing with heritage assets.
63. However, there are some schemes where they will not be a relevant consideration such as changes of use or perhaps upper floor extensions which affect heritage assets. Furthermore, there will be parts of the parish where the Historical Environment Register has no record of any evidence of archaeological interest. To apply a requirement to impose this obligation on all applicants in this parish, would in my opinion, be over onerous. It also goes beyond the requirements set in Policy SD16 of the Local Plan which states that a Heritage Statement will be required for “all planning applications that affect or have the potential to affect heritage assets and their setting, including sites with archaeological potential”. Paragraph 205 imposes a requirement for the local planning authority to maintain or have access to a historic environment record which can be used to “predict the likelihood that currently unidentified heritage assets, particularly sites of historic or archaeological interest, will be discovered in the future.” However, that is a paid for service. I will therefore be recommending that this policy only applies within the Archaeological Notification Areas, which are published by East Sussex County Council.
64. The plan is proposing the designation of 37 non-designated heritage assets. I did question the benefits of the inclusion of the village green allotment as I had incorrectly believed that it was already designated local green space in the South Downs Local Plan. I now understand that this designation relates to the other allotment within the parish and I am content that the village green allotments can be treated as a non-designated heritage asset.
65. The air raid shelter at Little Gales Cottage (No12) needs to be added to the map.
66. The section of the policy relating to the conservation area includes in (ii) a requirement for development to preserve and enhance the character of the conservation area and its setting. That then renders unnecessary the requirement in (v) which states “where appropriate, makes provision for the enhancement measures”.

Recommendations

In the second paragraph of A. after “proposals” insert “which fall within the Archaeological Notification Areas published by East Sussex County Council”

Add the location of “12. Air Raid Shelter “to Map 4 or 5

In C. delete (v)

Policy EDF5: Conserving and Enhancing the Natural Environment

67. Now that the national scheme for delivering biodiversity net gain is established, which requires post decision, applicants to submit a biodiversity net gain plan to demonstrate how they will follow the biodiversity green hierarchy, that changes the position with regard to this policy. If on site provision is not possible, the statutory provisions allow off site provision, but not necessarily in the parish and as a last resort applicants can purchase biodiversity credits. The scheme also provides a mechanism for ensuring the ongoing management for these sites through a legal agreement. I therefore believe that it would not be appropriate for a neighbourhood plan policy to continue to seek to impose its own requirements.
68. The next section of policy states that the proposals should seek to deliver a net gain of “20%, where possible, but as a minimum a net gain of at least 10%.” Whilst I understand the desire to aim for a high percentage, the wording “should seek” goes beyond “encouragement”. Government advice set out in Planning Practice Guidance is that neighbourhood plans should not be seeking a higher figure beyond the 10% unless it is supported by evidence.
69. I understand that the National Park Authority is itself considering a higher figure but that is not part of the current local plan and any policy advanced by the NPA will have to be itself tested against the evidence and it needs to be the subject of viability testing. In the absence of any specific evidence to justify the 20% expectation within the parish, even with the caveat “where possible”, I do not believe that this part of the policy meets the basic condition of having regard to Secretary of State policy.
70. In its response to the Regulation 16 representations the Parish Council indicated its support for the comments by Wealden District Council and the Friends of the South Downs Society recognising the importance of chalk grassland. I am content to accept the proposed inclusion of a subset of the policy covering that particular habitat, but the needs to implement “appropriate and adequate grazing,” and support for shrub clearance is not in my view a matter that can be addressed through planning policy as they are not related to development proposals but relates to farming practice, and land management. Reference to these matters could be added to the supporting text.

Recommendations

Delete B.

Delete the last sentence of C

Insert after section on Hedgerows and renumber

Amend the letters to A to C

“Chalk grassland

vi. The importance of chalk grassland habitats, which are regarded as nationally significant, should be recognized, with no loss or degradation occurring”

Policy EDF6: Local Green Space

71. I have no comments to make on this policy.

Policy EDF7: Protection of Locally Significant Views

72. It is a basic principle of the neighbourhood planning system that a policy can only apply to land that falls within the neighbourhood area. The Figure 10 map shows the number of shaded arcs of view extending across the parish boundary. This is particularly in the case of viewpoint 2 which is a view towards the sea and also to a marginal extent in terms of viewpoints 1, 3 and 10. I believe that a marginal reduction in the breadth of the arcs so that the shaded area only relates to land inside the parish, is possible but Viewpoint 2 - Summer Down to the Sea is fundamentally protecting views across land beyond the parish and the wording of the policy could possibly be construed as relating to the design of proposals that lie in a different parish. I will also make it clear that the requirements of the policy only relate to policy proposals that fall within the neighbourhood area. Other views can be covered by the Local Plan Policy SD6.

Recommendations

Delete Viewpoint 2 (and renumber) and amend the shaded arcs of viewpoint 1, 3 and 10 so that the arcs fall entirely within the neighbourhood area boundary.

In B. after “proposals” insert “within the neighbourhood area”

Policy EDF8: Walking, Wheeling, Cycling and Equestrian Opportunities

73. I believe that the caveats attached to the policy, namely that this requirement should be interpreted as regards to whether it is “appropriate to their scale, nature and location”. Beyond that I am satisfied that the policy meets basic conditions.

Policy EDF9: Improving Opportunities for Community and Cultural facilities, Sport and Recreation

74. I note that generally this is a policy which is supportive of new community, cultural, sports and recreation facilities, especially those geared to children and teenagers. I do not necessarily consider that all such development

needs to contribute to the overall character and landscape setting of the area, rather I would suggest that such development should not detract from the character of the area, in the same way that the policy expresses impact on residential amenity, highway impact or heritage impacts.

75. On the heritage criteria, it should be that the impact on heritage assets should be weighed against the public benefits, particularly for the category of land use, which is the approach advocated in the section of the NPPF dealing with considering potential impacts on heritage assets set out in paragraphs 214, 215 and 216.
76. Beyond those drafting changes, I believe the policy meets the basic conditions

Recommendations

In A. i. replace “contributes to” with “does not detract from”

In A. iv. Add to the end “unless the public benefits arising from the development outweigh that harmful impact.”

The Referendum Area

77. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the East Dean and Friston Neighbourhood Plan as designated by the South Downs National Park Authority on 10th April 2019 is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

Summary

78. I congratulate East Dean and Friston Parish Council on reaching a successful outcome to the examination of its neighbourhood plan.
79. This is a locally distinctive plan which clearly deals with the issues that are important to the community.
80. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test, and that it is appropriate, if successful at referendum, that the Plan be made.
81. **I am therefore delighted to recommend to the South Downs National Park Authority that the East Dean and Friston Neighbourhood Plan, as modified by my recommendations, should proceed, in due course, to referendum.**

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John Slater Planning Ltd

3rd October 2025

