

# EAST DEAN & FRISTON NEIGHBOURHOOD DEVELOPMENT PLAN SUBMISSION FULL REPRESENTATIONS

Respondent Reference:	RI
Organisation or Individual:	UK Health Security Agency (UKHSA)

**From:** [REDACTED]  
**Sent:** 18 May 2025 23:10  
**To:** PlanningPolicy  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation -- East Dean & Friston Neighbourhood Plan

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Neighbourhood Planning,

Thank you for sending us the planning consultation. As the UK Health Security Agency (UKHSA) are not a statutory consultee, we would not normally comment on this type of planning consultation unless there are specific chemical & environmental hazard concerns which have the potential to impact on the health of local communities. Impacts on public health from local air quality, noise and contaminated land fall under the remit of the local authority and it is their responsibility to decide whether or not to comment on these aspects of the planning application.

The planning authority may wish to contact the local authority public health team for matters relating to wider determinants of health associated with this development/proposal.

If the local authority has any specific queries relating to potential impacts on public health from chemical & environmental hazard exposures, then they are welcome to contact us for advice.

Yours sincerely,

**From:** PlanningPolicy <PlanningPolicy@southdowns.gov.uk>  
**Sent:** 16 May 2025 09:44  
**Subject:** Consultation -- East Dean & Friston Neighbourhood Plan

**EXTERNAL:** This email originated outside of UKHSA. Do not click links or attachments unless you recognise the sender.

## **THE SOUTH DOWNS NATIONAL PARK AUTHORITY PUBLIC NOTICE OF PUBLICATION OF THE EAST DEAN & FRISTON NEIGHBOURHOOD DEVELOPMENT PLAN**

### **Opportunity to comment on the East Dean & Friston Neighbourhood Plan**

The East Dean & Friston Neighbourhood Plan has been submitted to the South Downs National Park Authority (SDNPA) for examination, by an Independent Examiner.

Please see the attached documents for further details and how to comment on the plan.  
The consultation runs from **Monday 19 May 2025 to Monday 30 June 2025 (until 23:59).**

Comments can be made by email to: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk) or in writing to: Neighbourhood Planning, South Downs National Park Authority, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH. All representations received from this consultation will be forwarded to an Independent Examiner, appointed to consider the Neighbourhood Development Plan.

Respondent Reference:	R2
Organisation or Individual:	Horsham District Council, Neighbourhood Planning

**From:** [REDACTED]  
**Sent:** 19 May 2025 12:43  
**To:** Neighbourhood  
**Cc:** neighbourhood.planning  
**Subject:** FW: Consultation -- East Dean & Friston Neighbourhood Plan

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

To whom it may concern,

Thank you for the opportunity to comment on the East Dean and Friston Neighbourhood Plan. Horsham District Council has no further comment to make on this neighbourhood plan.

Kind Regards,

[REDACTED]  
Senior Neighbourhood Planning Officer

Telephone: [REDACTED]

Email: [REDACTED]



---

Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB  
Telephone: 01403 215100 (calls may be recorded) [www.horsham.gov.uk](http://www.horsham.gov.uk) Chief Executive: Jane Eaton

---

**From:** PlanningPolicy <PlanningPolicy@southdowns.gov.uk>  
**Sent:** 16 May 2025 09:55  
**Subject:** Consultation -- East Dean & Friston Neighbourhood Plan

## **THE SOUTH DOWNS NATIONAL PARK AUTHORITY PUBLIC NOTICE OF PUBLICATION OF THE EAST DEAN & FRISTON NEIGHBOURHOOD DEVELOPMENT PLAN**

### **Opportunity to comment on the East Dean & Friston Neighbourhood Plan**

The East Dean & Friston Neighbourhood Plan has been submitted to the South Downs National Park Authority (SDNPA) for examination, by an Independent Examiner.

Please see the attached documents for further details and how to comment on the plan.  
The consultation runs from **Monday 19 May 2025 to Monday 30 June 2025 (until 23:59).**

Comments can be made by email to: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk) or in writing to: Neighbourhood Planning, South Downs National Park Authority, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH. All representations received from this consultation will be forwarded to an Independent Examiner, appointed to consider the Neighbourhood Development Plan.

The East Dean & Friston Neighbourhood Plan and supporting documents can be viewed online on the SDNPA website and the East Dean & Friston Parish Council website. These documents will go live on the SDNPA website on Monday 19 May 2025 and may be unavailable before that time.

Respondent Reference:	R3
Organisation or Individual:	Health & Safety Executive, Land Use Planning Support Team

**From:** [REDACTED]  
**Sent:** 21 May 2025 10:43  
**To:** PlanningPolicy  
**Subject:** Re: Consultation -- East Dean & Friston Neighbourhood Plan

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Sir or Madam

HSE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area we recommend you contact the Office of Nuclear Regulation.

HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App <https://pa.hsl.gov.uk/> and downloadable GIS consultation zones. These tools alongside HSE's published methodology (<https://www.hse.gov.uk/landuseplanning/methodology.htm>) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations.

Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales.

For England: <https://www.gov.uk/guidance/hazardous-substances> in particular paragraphs 65 to 69 which explain an LPAs responsibilities when taking public safety into account in planning decisions and formulating local plans.

For Scotland: <https://www.gov.scot/publications/circular-3-2015-planning-controls-hazardous-substances/pages/2/> Annex F

For Wales: <https://www.legislation.gov.uk/wsi/2015/1597/contents/made>

Regards

[REDACTED]

HSE's Land Use Planning Support Team  
Health and Safety Executive | Chemicals, Explosives and Microbiological Division 5  
[lupenquiries@hse.gov.uk](mailto:lupenquiries@hse.gov.uk)



For HSE's Land Use Planning Advice Terms and Conditions, please click on the following link [HSE's Planning Advice Web App - Login \(hsl.gov.uk\)](#) and then click on 'terms and conditions'.

---

**From:** PlanningPolicy <PlanningPolicy@southdowns.gov.uk>  
**Sent:** 16 May 2025 09:43  
**Subject:** Consultation -- East Dean & Friston Neighbourhood Plan - Agata

Respondent Reference:	R4
Organisation or Individual:	Openreach



**From:** [REDACTED]  
**Sent:** 27 May 2025 09:29  
**To:** PlanningPolicy  
**Subject:** FW: Consultation - East Dean & Friston Neighbourhood Plan  
**Attachments:** ED&F\_Reg 16\_Public\_Notice.pdf; ED&F Rep Guidance Note.pdf

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Hello team,

Thanks for your email.

We require some further information to progress with your enquiry, can you please provide the following details

- A detailed plan of the intended works (1:500 plan at least)

Please email all correspondence to: [REDACTED]

Thanks and Regards,

[REDACTED]  
Associate Engineer FND  
**Openreach**

We build and maintain the digital network that enables more than 600 providers to deliver broadband to homes, hospitals, schools and businesses large and small. Our engineers work in every community, every day, because we believe everyone deserves decent and reliable broadband.

This email contains Openreach information, which may be privileged or confidential. It's meant only for the individual(s) or entity named above. If you're not the intended recipient, note that disclosing, copying, distributing or using this information is prohibited. If you've received this email in error, please let me know immediately on the email address above. We monitor our email system and may record your emails.

**Openreach Limited**

Registered Office: 6 Gracechurch Street, London EC3V 0AT  
Registered in England and Wales no. 10690039

---

**From:** PlanningPolicy <PlanningPolicy@southdowns.gov.uk>  
**Sent:** 23 May 2025 20:37  
**Subject:** Consultation - East Dean & Friston Neighbourhood Plan

You don't often get email from [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk). [Learn why this is important](#)

**THE SOUTH DOWNS NATIONAL PARK AUTHORITY PUBLIC NOTICE OF  
PUBLICATION OF THE EAST DEAN & FRISTON NEIGHBOURHOOD DEVELOPMENT  
PLAN**

**Please note the consultation started on Monday 19 May 2025. You may respond to the consultation up to the end of Friday 4 July as you are receiving this notification later.**

Respondent Reference:	R5
Organisation or Individual:	Gatwick Airport Limited

Neighbourhood Planning  
South Downs National Park Authority  
South Downs Centre  
North Street  
Midhurst  
West Sussex GU29 9DH

27 May 2025

**Re: Consultation on East Dean & Friston Neighbourhood Plan**

**Our Ref: LGW5855**

Thank you for your email dated 16 May 2025, regarding the above-mentioned consultation.

We have no aerodrome safeguarding concerns with regard to the Neighbourhood Plan.

However, it is vital that the safe operation of the airport is not impacted upon by buildings, structures or works. Therefore, we would be grateful if we could be consulted on any proposed buildings or structures that will exceed 150m AGL, within the plan area. This is to ensure that Instrument Flight Procedures (IFPs) that are utilised by Gatwick air traffic will not be impacted.

Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which London Gatwick is one. Aerodrome safeguarding is the process used to ensure the safety of aircraft while taking off and landing or flying in the vicinity of aerodromes.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

 Aerodrome Safeguarding Officer

For and on behalf of London Gatwick

Email: 

Respondent Reference:	R6
Organisation or Individual:	Historic England, London and South-East Region



Historic England

By e-mail to: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

Our ref:  
PL00796823

Date: 03/06/2025

Dear Neighbourhood Planning

### **Draft Neighbourhood Plan for East Dean and Friston**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

We would be grateful if you would notify us on [REDACTED] if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[REDACTED]



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



Respondent Reference:	R7
Organisation or Individual:	The British Horse Society

East Dean & Friston Parish Council

Via email: [REDACTED]

Neighbourhood Planning

South Downs National Park Authority

Via email: [PlanningPolicy@southdowns.gov.uk](mailto:PlanningPolicy@southdowns.gov.uk)

4<sup>th</sup> June 2025

Dear East Dean & Friston Parish Council and Neighbourhood Planning Team

### RE: East Dean & Friston Neighbourhood Plan

I am responding to this consultation on behalf of the British Horse Society, the UK's largest equestrian charity with over 125,000 members and representing the country's 3.2 million horse riders. Comments on the plan are below.

#### Policy EDF8: Walking, cycling and equestrian pursuit opportunities

8.9. Engagement for the EDNP highlighted a number of areas where improvements would be helpful in relation to transport and movement. Specific opportunities to progress these improvements (shown on Figure 8) should be sought:

1. [...] Bridleway 13b would provide the most direct route to and from the village. A circular route taking in the South Downs Way and Bridleway 9c could be signed. The use of the informal paths and tracks could also be explored.
2. [...] Bridleway 13b could be improved for this purpose, as could Bridleway 9c.

We welcome the inclusion of equestrian interests in this policy but we do have some concerns about the reference to "improvement" of bridleways for the promotion of cycling. The "improvement" of bridleways must not be to the detriment of the primary intended user, namely walkers and horse riders. Anything which enables cyclists to travel at speed on off road routes is likely to render the paths less safe and amenable for those on foot and horseback.

Countryside Act 1968, section 30 (Riding of Pedal Cycles on bridleways) states:

- (1) *Any member of the public shall have, as a right of way, the right to ride a bicycle, [F]not being a mechanically propelled vehicle], on any bridleway, **but in exercising that right cyclists shall give way to pedestrians and persons on horseback.***

[...]

- (2) *The rights conferred by this section shall not affect the obligations of the highway authority, or of any other person, as respects the maintenance of the bridleway, **and this section shall not create any obligation to do anything to facilitate the use of the bridleway by cyclists.***

Clearly any change to the surface of the bridleway must only be completed with consent from East Sussex County Council.

We welcome the suggestion that "The use of the informal paths and tracks could also be explored" but trust that this would include equestrian use too.

8.10. Additional improvements, which are not location specific include:[...]

- *Controlling the use of footpaths at certain seasons (e.g. nesting season) to limit impacts on wildlife.*
- More signage of the rights of way network including sites of interest along the routes – directions, history, environment, walks, flora and fauna etc.
- Better control of traffic and parking and speeding including along Gilberts Drive and the coast road.
- Maintenance of footpaths, including from erosion. The footpath over the Seven Sisters has been particularly mentioned as has the Forest Mountain Bike Trail. [...]
- Introducing slower traffic speeds / traffic calming off the main A259.

Any restriction of access to public rights of way should be avoided. Better education of users to, for example, keep to the path or keep dogs under close control during nesting season would be a better idea. The process of restricting access requires due legal process to be followed which is likely to meet with strong resistance from user groups.

Improved maintenance of public rights of way, improvement to waymarking and the reduction of speed limits is always to be welcomed in areas where vulnerable road users are, or would like to be, present.

#### POLICY EDF8: WALKING, CYCLING AND EQUESTRIAN PURSUIT OPPORTUNITIES

A. To ensure that residents can access social, community, public transport, local shops and other important facilities in the parish and in neighbouring settlements in a sustainable and safe way, all new residential developments should ensure safe pedestrian, and where possible cycle, access to link up with the existing footpath and cycleway network, and public transport network, as defined in Figure 8.

B. The provision of new, or the enhancement of existing, cycle and pedestrian routes that are, where feasible, physically separated from vehicular traffic and from one another will be strongly supported. Such routes should be of permeable material and ensure that access by disabled users and users of mobility scooters is secured.

C. The design and layout of works related to the widening of footpaths or the provision of traffic-calming measures should enhance the rural, village character, for example retaining and/or providing hedgerows, trees and soft verges where possible. Materials and layout must be sympathetic to local character.

D. Proposals for new bridleways will be supported wherever possible; in all new developments existing bridleways must be retained where they exist or, alternatively, new or amended bridleway links provided together with safe road crossing points that enable connectivity between the village and the wider countryside.

We would ask that equestrians are added equestrian to Points A & B. Exclusion of equestrians, in particular from road side improvements, renders them less safe than before. We welcome point D.

2. New signage could be installed in the area to direct visitors along safe routes to the KCIII ECP and South Downs Way. Further, surfacing improvements could be delivered along the PRow that would support an accessible off-road route throughout the year. Promoting (a circular) East Dean to Birling Gap cycle path – a cycle path, distinct from the road would be supported. Bridleway 13b could be improved for this purpose, as could Bridleway 9c. Note that although both are bridleways and can be used by cyclists, the path linking them along the cliffs is footpath only. It would need new designation as Bridleway to form a loop. On Figure 11, note that this opportunity is relevant to Bridleway 13b and 9c.

We welcome this proposal. The upgrading of footpaths of suitable width to allow bridleway traffic allows more of the community to enjoy them. It is possible that there might be some small funding available from the Charity where new provision which includes equestrians is proposed.

#### 12. Non policy Actions

- Longer period between grass cutting on village greens and verges to leave some areas 'wild'.

Whilst we acknowledge the need for improving and encouraging biodiversity, verges alongside roads are part of the highway and provide valuable refuge for those walking or riding or leading horses. Leaving them unmown means it is not possible to check for hazards in the long grass which can lead to accidents or people avoiding using them walking/riding instead on the road.



## 7. Sustainable tourism

- Address parking issues at Birling Gap, where parking on verges is a problem. Work with landowners to explore alternative parking provision, link to the foot/cycle network.

Equestrian tourism appears to be a growing industry so the inclusion of equestrian parking (horseboxes and trailers) in discussion with landowners, together with B & B arrangements where horses can stay too would be useful inclusions on an and would ensure that equestrians are included as well as cyclists and walkers in leisure provision.

The British Horse Society would be very willing to work with the parish in respect of any potential provision or improvement which would benefit equestrians and hope to do so in the future.

Yours faithfully

[REDACTED]  
Access Field Officer – London & South East  
Email: [REDACTED]  
Tel: [REDACTED]

Respondent Reference:	R8
Organisation or Individual:	National Highways, South-East Region

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 10 June 2025 08:28  
**To:** Neighbourhood  
**Cc:** Planning SE  
**Subject:** NH/25/11221 - East Dean & Friston Neighbourhood Plan – Regulation 16 consultation - NH response 10/06/25

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

**FAO:** Neighbourhood Planning, South Downs National Park Authority  
**Your ref:** East Dean & Friston Neighbourhood Plan – Regulation 16 consultation  
**Our ref:** NH/25/11221

Dear Sir/Madam,

Thank you for your email of 16 May 2025, consulting National Highways on the above referenced Neighbourhood Plan.

We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN). In the case of East Dean & Friston, no section of the SRN runs through the parish.

We have read the consultation document and noted that the Plan does not allocate sites for housing development.

We are satisfied that this Neighbourhood Plan, if adopted and implemented, would not have an unacceptable impact on the safety, reliability, and/or operational efficiency of the SRN. Our formal response is **no objection**.

Should you or any others have any queries regarding our response, please contact us via [REDACTED]

Kind regards,

[REDACTED] Spatial Planner  
South East Region, Operations Directorate  
National Highways

**Office:** [REDACTED]  
**Mobile:** [REDACTED]  
**Web:** [www.nationalhighways.co.uk](https://www.nationalhighways.co.uk)

For information about our engagement with the planning system please visit  
<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

Respondent Reference:	R9
Organisation or Individual:	Environment Agency

**From:** [REDACTED]  
**Sent:** 18 June 2025 10:43  
**To:** Neighbourhood  
**Cc:** [REDACTED]  
**Subject:** RE: Consultation -- East Dean & Friston Neighbourhood Plan

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Good morning,

Thank you for consulting the Environment Agency on your Draft Neighbourhood Plan (NP) for East Dean & Friston. We are a statutory consultee in the planning process providing advice to Local Planning Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

You have confirmed that there will be no development coming forward as part of this plan. Therefore, based on the information currently available, the proposed NP raises no environmental concerns for us.

We trust that the above information is of assistance.

*Please note: this response is based on the information you have made available at this time. It is based on current national planning policy, associated legislation and environmental data / information. If any of these elements change in the future, then we may need to reconsider our position.*

Kind regards,

Sustainable Places Team | Environmental Planning and Engagement | Solent and South Downs  
**Environment Agency** | Chichester Office, Oving Road, Chichester, West Sussex, PO20 2AG

*Please accept our thanks for your email in advance - each person sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year.*

Creating a better place  
for people and wildlife



Certified Carbon Literate



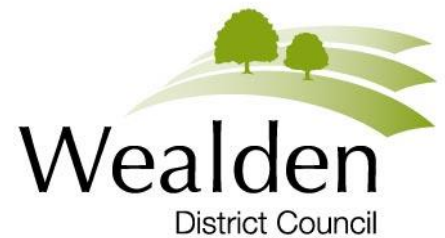
Respondent Reference:	R10
Organisation or Individual:	Wealden District Council

OUR REF:

**ASK FOR:**

DATE: 19 June 2025

YOUR REF:



Head of Planning Policy, Economy &  
Climate Change

South Downs National Park Authority

By email

Dear Colleagues,

**Wealden District Council response to the East Dean and Friston Neighbourhood Plan (Regulation 16) Consultation.**

Thank you for your invitation to make a representation on the East Dean with Friston Neighbourhood Plan (Regulation 16) that has been open to consultation between 19 May 2025 and 30 June 2025.

**Overview**

As stated at the Regulation 14 stage, we congratulate the Steering Group on the production of a detailed and well considered Neighbourhood Plan (NP) for the East Dean and Friston Parish at the Regulation 16 stage. The East Dean with Friston NP is concise, well-organised and structured. It is clear how the Plan has evolved from identifying the issues and opportunities to developing a vision and objectives and subsequently the policies. For each policy, the purpose is clearly described, and this is followed by a justification after the policy. In addition, weblinks are provided to the background documents. It is therefore easy to ascertain why, how and on what evidence base a policy has been formulated. There is good use of maps throughout the Plan to clarify and enhance the policies and show the relevant designations. Photos are also used to good effect, particularly in the appendices.

The East Dean and Friston NP tackles large scale issues such as climate change and conserving the natural environment but still manages to keep a local perspective. Apart from one action included in the main text (see comment under the tourism heading below), non-policy actions have been kept separate to specific planning policies and these are listed in section 12. The remainder of this letter will concern individual policies and our representations on these policies.



## **Policy EDF4: Conserving Heritage Assets and Appendix B: Designated and Non-Designated Heritage Assets.**

In the Regulation 14 version of the neighbourhood plan, there were 22 non-designated heritage assets identified in this policy. However, in the Submission version (Regulation 16), 37 non-designated heritage assets have now been identified. In Wealden District Council's (WDCs) Regulation 14 comments, we noted that in Appendix B (Designated and Non-Designated Heritage Assets), only the 22 buildings selected as non-designated heritage assets, which are in public ownership, had been included in the table. The text in Appendix B then stated that other non-designated heritage assets would be added before the final draft of the neighbourhood plan is published. WDC stated at the Regulation 14 stage that there should be minimal changes between the Regulation 14 and Regulation 16 versions of the neighbourhood plan. We suggested that the South Downs National Park Authority (SDPNA) would be able to advise on whether they consider this to be possible.

The reason for our comments at that stage would be that residents will not have had the opportunity to comment on these additions before now, and that after the Regulation 16 stage, there is no opportunity for the qualifying body to address any concerns or issues raised during the Regulation 16 stage. We note that it is now for the Examiner to determine if the changes to this policy between Regulation 14 and 16 are appropriate.

Turning to the policy wording itself, it is considered that the reference to Listed Buildings under Part B (Non-Designated Heritage Assets) is not required.

The first line of paragraph 5.24 now refers to part of the parish being designated as a heritage coast; however, no explanation has been added here as to what this means or its purpose. We assume this relates to the definition of Heritage Coast in the National Planning Policy Framework (NPPF) under paragraph 191 and within the Glossary (Annex 2), but this should be made clearer in the NP. The sentence does not seem to relate to the remainder of the paragraph.

Figures 4 and 5 of the East Dean and Friston NP have been added to the Regulation 16 version and the location of flint walls have been shown. However, the significance of these flint walls has not been explained in the policy or in the supporting text. If these are not considered to be non-designated heritage assets, this should be explained, given that they are shown on maps titled 'non-designated heritage assets'. If they are considered to be non-designated heritage assets, this would need to be made clearer on the maps and within the policy.

## **Tourism**

Page 33 of the East Dean and Friston Submission NP lists an 'Action' related to sustainable tourism. The rest of the 'Actions' are listed at the back of the East Dean and Friston NP in section 12. It is unclear why this 'Action' is in the main Submission NP.

## **Policy EDF5: Conserving and Enhancing the Natural Environment:**

At Regulation 14, WDC stated that 'Figure 5 shows a number of Biodiversity Opportunity Areas (BOAs) and Areas of Biodiversity Value, yet there is no explanation within the supporting text as to how these areas have been selected. The BOAs do not relate to the larger BOAs defined by



the Sussex Local Nature Partnership (SLNP)<sup>1</sup> and presumably have been locally defined, but this is not explained, even within Appendix C. Would a different name help to distinguish them from those BOAs identified by the SLNP? These have now been renamed in the East Dean and Friston Submission NP as Areas of Biodiversity Significance, as shown in Figure 7, and Areas for Possible Biodiversity Improvement, as shown in Figure 8.

Policy EDF5 (Conserving and Enhancing the Natural Environment) under Part B has been amended from the Regulation 14 version. Part B of the policy now states that 'where biodiversity net gain units cannot be delivered on site, they should be prioritised for use within the parish, focusing on maintaining and improving the identified biodiversity opportunity areas'. As the wording has been changed, rather than biodiversity opportunity areas, should these now be referred to as Areas for Possible Improvement as shown in Figure 8?

However, more significantly, the first sentence of Part B of Policy EDF5 now states that where Biodiversity Net Gain (BNG) units cannot be delivered on site, they should be prioritised for use within the parish. The regulations (which stipulate the use of the Statutory Biodiversity Metric) do not consider the parish level and instead refer to the districts/boroughs and National Character Areas. If provided offsite, then there is no requirement in the regulations to restrict this to parishes where the planning application was determined. We would suggest the wording is amended to more closely align with government guidance and allow more flexibility, for example by adding 'where possible' after 'they should be prioritised for use within the parish'.

Alternatively, the Areas for Possible Biodiversity Improvement could be highlighted as being areas where the Parish would support applications that seek to improve these areas.

The last sentence of Part C of Policy EDF5 (Conserving and Enhancing the Natural Environment) has been added since the Regulation 14 stage. It is questioned whether this line is required given that the national requirements of BNG is 10%. In addition, although there is an aspiration to achieve 20% BNG within the policy, this does not appear to be supported by a localised evidence base on this issue.

At paragraph 7.7, it states 'within the parish, 12 additional Areas for Possible Biodiversity Improvement have been identified in the Biodiversity Profile. These are areas in yellow in Figure 7'. We presume this is an error as it is the 12 areas of biodiversity significance that are shown in Figure 7. The 13 Areas for Possible Biodiversity Improvement are shown in Figure 8. At Figure 7, it states that we should see appendix B for detail; however, Appendix B relates to those sites shown on Figure 8, not 7.

Some of the proposed Areas for Possible Biodiversity Improvement are outside of the designated area. Therefore, these potential designations should be reduced to only be included within the neighbourhood plan area.

## **Policy EDF6: Local Green Spaces**

### Land outside Fridays houses

Our Estates Management Team have confirmed that WDC does not have any objection as landowners to the designation of Land outside Fridays Houses as a Local Green Space.

---

<sup>1</sup> [Biodiversity Opportunity Areas in Sussex](#)

## Other Comments

At the Regulation 14 stage, there were four proposed Local Green Spaces (LGS). Two of these have now been removed (East Dean Allotments and the Bowling Green) from the East Dean and Friston Submission NP. In Appendix C, we would expect to see an explanation as to why the two sites have been removed, rather than just stating they were not acceptable as an LGS in Table 5. As the two LGS were removed between Regulation 14 and Regulation 16 stages, this should be as a result of comments received at the Regulation 14 stage and this should ideally be explained in the appendix to the East Dean and Friston NP, as well as in the accompanying Consultation Statement.

The Recreation Ground has now been added to the map at Figure 9. As it has been added under the heading Local Green Space designation and the colouring is very similar to the designations, at first glance it appears as though it is a designation. However, there is no assessment at Appendix C, and it is not referred to in the policy, so it is assumed this is not an LGS. However, this could be made clearer on the mapping itself.

### **Policy EDF7: Protection of Locally Significant Views**

As WDC stated at Regulation 14 stage, some of the view arcs as shown on Figure 10 extend outside of the neighbourhood plan area into adjoining parishes. It is not possible to apply the policies of this neighbourhood plan outside of the designated neighbourhood area. As such the views and their associated arcs need to be reduced to within the confines of the neighbourhood area on Figure 10. This will particularly be an issue for View 2, but may also be a consideration for View 1, 3 and 10.

As context, within Wealden District, the Horam Neighbourhood Plan has recently undergone the examination process and has been adopted. The Examiner requested under paragraph 7.74 of the Examiner's Report<sup>2</sup> that the views referenced in the NP were restricted on the relevant diagram to those only within the neighbourhood area. The Examiner also suggested at paragraph 7.74 that within the supporting text, it should be made clear that the policy only applies to those parts of wider views which are within the parish.

### **Design Guide and Design Code Document**

It is noted that WDC comments on the Design Guide and Design Code Document may not form part of the wider examination process of the East Dean and Friston NP. Nonetheless, the document is referred to interchangeably as both a Design Code and a Design Guide. Design Codes will usually contain a set of clear, measurable rules and enable binary decision making (i.e. either a code has been followed, or it has not). If it were a Design Code, we would expect it to be limited to simple, precise, measurable and enforceable rules with illustrated design requirements. If you consider the National Model Design Code (NMDC)<sup>3</sup>, it is far more about physical form rather than design specifics/aesthetics of individual houses. Design Guides are generally more qualitative and harder to measure.

From section 3 of the document onwards, it is quite unclear to the reader what is the design guidance and what is the design code. There have been minimal attempts at coding within the East Dean and Friston Design Guidelines and Codes Document and in general the document is more akin to a Design Guide rather than a Design Code in our view.

---

<sup>2</sup> [A Report to Wealden District Council on the Horam Neighbourhood Development Plan \(July 2024\)](#)

<sup>3</sup> [The National Model Design Code \(2021\)](#)

There may be a way of combining both a design guide and design code, for example using coding for streets, building lines, heights, car-parking, materials etc., and having separate guidance for the basics of good design but they would need to be clearly distinguishable. The Peacehaven and Telscombe Design Code<sup>4</sup> for example has coding for each area type/character area but also General Design Principles which will apply across the whole plan area.

I trust that the above representation is helpful at this stage.

Yours faithfully

A large black rectangular box redacting the signature of the Head of Planning Policy.A small black rectangular box redacting the name of the Head of Planning Policy.

Head of Planning Policy, Economy and Climate Change

---

<sup>4</sup> [Peacehaven and Telscombe Neighbourhood Plan](#)

<b>Respondent Reference:</b>	<b>R11</b>
<b>Organisation or Individual:</b>	<b>East Sussex County Council, Planning &amp; Environment</b>

<p style="text-align: center;"><b>East Dean and Friston Neighbourhood Plan</b></p> <p style="text-align: center;"><b>Regulation 16 Consultation</b></p>
---

**EAST SUSSEX COUNTY COUNCIL RESPONSE, JUNE 2025**

Thank you for the opportunity to comment on the submission version of the East Dean and Friston Neighbourhood Development Plan (NDP). The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference.

Our response considers whether the NDP meets the basic conditions and also references the recommended amendments raised by County Council Officers at the previous consultation stages (Pre-submission version, Regulation 14) as well as any further updates and considerations that should be considered. Where appropriate the specific section, policy or document within the consultation documents has been referred to.

If you have any queries on the County Council's comments, please contact:  
Infrastructure Planning & Place Team ,  
Communities, Economy & Transport ,  
East Sussex County Council .

[strategicplanning@eastsussex.gov.uk](mailto:strategicplanning@eastsussex.gov.uk)

**1. Highways Authority**

- 1.1 ESCC welcome the changes made in the updated NDP in response to comments we made on the Regulation 14 consultation, particularly the references to “wheeling” throughout the document, and to relevant ESCC strategies.
- 1.2 Transport And Movement, para 8.15, Page 54; ESCC welcome the addition of the East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) within the NDP.
- 1.3 Transport And Movement, Public Transport in East Dean and Friston, para 8.17, page 54; Whilst it is helpful to indicate that ‘Aspirations’ [for bus service improvements] could be reflected in the East Sussex Bus Service Improvement Plan (BSIP)’, it should be made clear that this would be part of a future iteration of the BSIP when it has been reviewed and updated. In addition, more detail on the specific bus services (including numbers) that need improving along with the existing and proposed frequency, would be beneficial.
- 1.4 Transport And Movement, para 8.15, Page 54; ESCC welcomes the addition of the BSIP within the NDP. The BSIP has recently been updated and is referred to as [BSIP2](#).

- 1.5 Transport And Movement, para 8.5, page 51; The Exceat Bridge project has progressed since paragraph 8.5 was drafted. Therefore, consideration could be made to updating the text. The current timeline for the project is available on the East Sussex Highways website; [Timeline of activities to date | The Exceat Bridge | live.eastsussexhighways.com](https://live.eastsussexhighways.com)
- 1.6 Transport And Movement, para 8.7, page 51; It should be made clear that the responsibility for rail lies with Network Rail. It should also be noted that Great British Railways (GBR) is intended to replace Network Rail as the operator of rail infrastructure in Great Britain. GBR will take on the functions of Network Rail, including ownership and management of most railway infrastructure, along with other rail-related functions currently held by the Department for Transport (DfT) and various rail operators. A Railways Bill providing for the establishment of GBR will be brought forward later in 2025, with the new body anticipated to be fully operational by late 2026.
- 1.7 Transport And Movement, para 8.15, Page 54; The fourth East Sussex Local Transport Plan 2024 – 2050 (also known as LTP4) has now been adopted at the County Council’s Full Council meeting on 8 October 2024. Therefore, the paragraph should be updated to reflect the current status of LTP4.
- 1.8 The new wording in Policy EDF2, Character and Design of Development (page 18), in relation to removal of street clutter (including signage) is noted, as well as the promotion of additional signage to promote non-motorised routes throughout the document. Reduction or increase in signage may be supported by the Highway Authority in certain circumstances, but will be subject to road safety requirements. This is also the case with the many of the criteria in subsection B of EDF2, in particular those found in B (i), (ii), (iii) and (vi). The interventions suggested may be appropriate, but it should be understood that any interventions would need to take account of advice from the Highway Authority in relation to individual development proposals or specific projects.
- 2 King Charles III England Coast Path (KCIIIIECP) National Trail Southeast Section**
- 2.1 ESCC welcome the references to the KCIIIIECP and that previous comments have been taken into consideration.
- 2.2 Figure 11: Movement map of the parish, page 56, and Figure 12: Policies Map - whole parish, page 67; With reference to the legends on these maps the current text is missing the word ‘England’. The full title of the trail should be used; **‘King Charles III England Coast Path’**.

### **3 Rights of Way**

- 3.1 Transport And Movement, Para 8.13 Page 54; Point 3, of paragraph 8.13, states 'Controlling the use of footpaths at certain seasons (e.g. nesting season) to limit impacts on wildlife.' There are very few formal controls where public rights of way can be 'controlled' in relation to wildlife. Additionally, those controls only apply to a very limited number of scenarios. Therefore, 'Controlling' should be amended to 'managing.'



Head of Planning & Environment

Respondent Reference:	R12
Organisation or Individual:	Friends of the South Downs





These are the comments of the **Friends of the South Downs** (FSD). We were founded in 1923 and are the only membership organisation dedicated to the protection and enhancement of the South Downs. We today have approximately 1,400 members and campaign for the conservation and enhancement of the special qualities of the South Downs National Park and its quiet enjoyment.

The FSD has a long association with the parish of East Dean and Friston. In 1926 475 acres of land at Crowlink, extending as far as the Seven Sisters, was purchased by a property speculator who intended to develop the site for housing. At this time the coast and countryside between Brighton and Newhaven were being destroyed by development and the threat of the Seven Sisters being similarly despoiled caused a national outcry. The Friends (then called the Society of Sussex Downsmen) led a campaign to raise funds by public subscription to buy the land from the developer. The necessary £7000 (equivalent to nearly £1 million at today's prices) was secured entirely from the generosity of our members and the public, thereby saving the land. In 1931 we gifted Crowlink to the National Trust to ensure its preservation in perpetuity. We are therefore grateful for the opportunity to make the following comments.

We consider that the Neighbourhood Plan is a very comprehensive and professional document and we are broadly supportive of its policies and proposals. However, there are a number of areas where we would like to offer constructive suggestions for its improvement and to strengthen its effectiveness.

We have also recently commented to the National Park Authority on the South Downs Local Plan Review and are currently drafting comments on the Partnership Management Plan (PMP) Review. We are seeking changes to the Local Plan and PMP Reviews which are also relevant to the Neighbourhood Plan, and we refer to these below.

### **Character, Heritage and Design**

We support Policy EDF2 "Character and Design of Development". We have made a comment in response to the South Downs Local Plan Review expressing disquiet about the development boundary for East Dean and Friston, which includes Old Willingdon Road. This road is on a high ridge that is visible from a wide area, and we are pleased that Policy EDF7 recognises the value of these views. Local Plan Policy SD25 contains a presumption in favour of development within the development boundary. Our worry is that this will lead to infilling and densification of the skyline. The previous Wealden Local Plan contained guidance on this issue (appended to this comment – see paras 19.7.11 et seq), and we are disappointed that this was not carried forward into the current Local Plan. Our preferred option would be to remove Old Willingdon Road from the development boundary.

We support the Neighbourhood Plan and consider it has gone as far as possible to address this issue, given that the Neighbourhood Plan cannot override the strategic policies of the Local Plan. We would ask if the Parish Council would wish to support our concerns about the Local Plan.

We support Policy EDF4 “Conserving Heritage Assets”. We consider the list of non-designated heritage assets very useful. We would, however, question the inclusion of the terrace of Coastguard Cottages at Birling Gap in the list (37). Several of these dwellings have already been demolished due to cliff erosion, and the rest will inevitably follow. In 2000 planning applications were made for sea defences to protect these cottages. The applications were refused following a public inquiry and the planning inspector concluded that “the cottages cannot be considered attractive by any stretch of the imagination.”

We would also question the inclusion of the Friston water tower. While doubtless a prominent and familiar feature on the skyline, it could not be considered to make a positive contribution to the landscape.

However, we are pleased to note the inclusion of the Sarsen Stone at Flagstaff Point (16) in the list as this celebrates the Friends’ role in saving the Crowlink estate we referred to above.

We are also pleased to note the recognition of the many “Napoleonic” flint field walls as these make a distinctive contribution to the landscape. These are referred to in paragraph 5.27 and shown on Figures 4 and 5. For clarity, they should be referred to in Policy EDF4 and Appendix A too.

### **Environment and Green Space**

In principle, we support Policy EDF5 “Conserving and Enhancing the Natural Environment”. However, we are concerned that the policy and its supporting text equate biodiversity exclusively with “trees and thicket/woodland”.

However, wildflower-rich chalk grassland is widely regarded as the most important habitat in the downland. It has a very high level of biodiversity due to its exceptionally varied flora, as well as the fauna that it supports, particularly invertebrates and birds. It is chalk grassland that predominantly creates the Downs’ characteristic open landscape. It is nationally and internationally a very rare and threatened habitat. It is estimated that 97% of chalk grassland has been destroyed since the 1940s and its restoration should be a high priority.

Most of the loss of grassland has been caused by agricultural intensification and afforestation, but much has also been due to neglect, since grassland is rapidly taken over by scrub and woodland if not actively managed through grazing. Indeed, much existing scrub and woodland has grown up on former chalk grassland and represents the loss of a much rarer and more valuable habitat.

We therefore recommend that the policy and its text be amended to recognise chalk grassland as the first priority for habitat protection and restoration. Indeed, it may be desirable in some cases to restore grassland by clearing woodland and scrub, and this should also be acknowledged.

We note that Figure 8, “Areas for Biodiversity Improvement” only shows areas of scrub and woodland. The map should additionally indicate areas for chalk grassland restoration when funds become available for habitat recovery through biodiversity net gain and other sources. For example,

much of the land owned by the National Trust was ploughed for several years during the 1940s. It was subsequently seeded with grass, but commercial ryegrass was used and it has never recovered its biodiversity. This land should be a high priority for restoration of chalk grassland and should be shown as such on Fig. 8. Appendix B “Localities for biodiversity offsets and interventions” should also identify sites for chalk grassland restoration.

The downland around East Dean and Friston has recently been declared part of the Seven Sisters King’s series “super” national nature reserve, one of only seven such reserves in England. This exciting development will lead to funds and projects being put forward for habitat creation and restoration and should also be acknowledged in the Plan.

More information here: <https://www.southdowns.gov.uk/wp-content/uploads/2024/03/Agenda-Item-10-sNNR.pdf>

### **Sustainable Tourism**

We fully agree with the Neighbourhood Plan’s view that pressures of visitor numbers are creating significant problems for East Dean and Friston. We concur with the very comprehensive description of the issues which the Plan provides.

We accept that many of these problems are beyond the scope of the Neighbourhood Plan to address. We also agree with the Plan’s statements that the issues need to be dealt with across a wider area than the parish. We consider that these are exactly the kind of matters which the National Park Authority (NPA) was established in order to tackle.

These visitor pressures are felt across the whole of the Sussex Heritage Coast, which is estimated to receive a million visitors per year. The NPA has a duty to prepare a management plan for the Heritage Coast. However, the last management plan expired in 2020 and has not been replaced. We consider that a new management plan is urgently needed. We have made comments to this effect on the Local Plan Review and will do so in relation to the Partnership Management Plan Review. We think this would be preferable to the production of a parish visitor strategy suggested in paragraph 6.4.

The Neighbourhood Plan identifies key issues for tourism following paragraph 6.3. This includes the statement (ii) that “it is considered that there are not enough parking spaces at Birling Gap to handle the volume of cars.” (There is a similar statement in paragraph 2.11, 7<sup>th</sup> bullet point). While true, we would not want this to be interpreted as implying the need for more off-road parking, as this could only be provided on undeveloped downland. We would suggest a more neutral wording, such as “The number of visitors’ cars exceeds the capacity of the Birling Gap car parks”.

Another problem the Plan identifies is the large numbers of pedestrians on Birling Gap Road. These visitors arrive by bus and alight at East Dean. The Neighbourhood Plan should advocate that visitors be encouraged through information and signposting to alight instead at Friston Pond and walk to Birling Gap along footpaths through National Trust land. We therefore support the Plan’s statement of this in paragraph 8.12(1).

## Transport and Movement

We consider that Policy EDF8 addresses transport issues in the parish and support it, and would like to make some suggestions to strengthen this section of the Plan.

The text and Figure 11 identify public rights of way. It would also be helpful to describe the considerable amounts of access land in the parish. Under the Countryside and Rights of Way Act 2000 access land and coastal margin have been designated, where the public have a right to roam everywhere, without being constrained to specific footpaths. All the extensive National Trust land in the parish is so designated. (These areas are shown on Ordnance Survey maps). Forestry England also permits free access for the public in Friston Forest. These access lands are a great asset to the parish and should be recognised in the Plan.

The Plan also refers to the adverse impact of traffic on the A259 and advocates highway design in keeping with the character of the village. We fully agree and are concerned at the highway layout of the A259 in East Dean, which encourages high traffic speeds, is hostile to pedestrians and unsightly for a downland village location. In this regard we would draw your attention to the document “Roads in the South Downs”. This was jointly written in 2015 by the National Park Authority and the Highways Authorities to set out standards of road design appropriate to the National Park. We commend this document and suggest that it be referred to in the Plan.

“Roads in the South Downs” is available here:

[Roads-in-the-South-Downs.pdf](#)

██████████

Chairman, Planning and Conservation Committee  
Friends of the South Downs

Respondent Reference:	R13
Organisation or Individual:	Southern Water

**From:** [REDACTED]  
**Sent:** 26 June 2025 12:27  
**To:** PlanningPolicy  
**Subject:** RE: Consultation -- East Dean & Friston Neighbourhood Plan

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Sir/Madam - thank you for your email below, inviting Southern Water to comment on the Submission version of the East Dean and Friston Neighbourhood Plan. I can confirm we have reviewed the document, and the content of the Consultation Statement also provided, and we have no comments to make further to those provided on the Pre-Submission version of the Plan. We look forward to being kept informed of the Plan's progress.

Should it be of interest to you, please also note the new National Standards for Sustainable Drainage Systems - <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

Yours faithfully,

[REDACTED]  
Strategic Planning Lead  
Kent & East Sussex

M. [REDACTED]  
[southernwater.co.uk](https://southernwater.co.uk)



---

**From:** PlanningPolicy <PlanningPolicy@southdowns.gov.uk>  
**Sent:** 16 May 2025 09:55  
**Subject:** Consultation -- East Dean & Friston Neighbourhood Plan

## **THE SOUTH DOWNS NATIONAL PARK AUTHORITY PUBLIC NOTICE OF PUBLICATION OF THE EAST DEAN & FRISTON NEIGHBOURHOOD DEVELOPMENT PLAN**

### **Opportunity to comment on the East Dean & Friston Neighbourhood Plan**

The East Dean & Friston Neighbourhood Plan has been submitted to the South Downs National Park Authority (SDNPA) for examination, by an Independent Examiner.

Please see the attached documents for further details and how to comment on the plan.  
The consultation runs from **Monday 19 May 2025 to Monday 30 June 2025 (until 23:59).**

Comments can be made by email to: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk) or in writing to: Neighbourhood Planning, South Downs National Park Authority, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH. All representations received from this consultation will be forwarded to an Independent Examiner, appointed to consider the Neighbourhood Development Plan.

The East Dean & Friston Neighbourhood Plan and supporting documents can be viewed online on the SDNPA website and the East Dean & Friston Parish Council website. These documents will go live on the SDNPA website on Monday 19 May 2025 and may be unavailable before that time.

[East Dean & Friston Neighbourhood Plan - SDNPA](#)  
[East Dean & Friston Parish Council - Neighbourhood Plan](#)

Respondent Reference:	R14
Organisation or Individual:	Natural England

Date: 27 June 2025  
Our ref: 512999  
Your ref: East Dean & Friston Neighbourhood Plan



Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ  
T 0300 060 3900

South Downs National Park Authority

**BY EMAIL ONLY**

[neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

Dear Sir/Madam

**East Dean and Friston Neighbourhood Plan - Regulation 16 Consultation**

Thank you for your consultation on the above dated 16 May 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [REDACTED]

Yours faithfully

[REDACTED]

Consultations Team



## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

---

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

---

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Respondent Reference:	R15
Organisation or Individual:	Private Individual

# Letter of Objection to the Regulation 16 East Dean and Friston Neighbourhood Plan Consultation



[neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

FAO: East Dean and Friston Neighbourhood Plan Committee

Dear Members of the Neighbourhood Plan Committee,

I am writing to formally express my gratitude for the opportunity to contribute to the East Dean and Friston Neighbourhood Plan formal consultation. It is commendable the work that has gone into this and that the committee is formally engaging the community in this vital planning and consultation process. However, I also wish to express my objections to the current plan, primarily on the grounds of insufficient protection of the landscape, nature, biodiversity, and long distance views from the eastern boundary of the village plan as currently drafted.

The preservation of our natural environment is of national importance as a designated national park and landscape in the South Downs National Park. As well as being a treasured landscape for its views, The South Downs that surround East Dean to the east are also home to fragile and unique ecosystems that contribute significantly to our local biodiversity. The current plan as drafted does not adequately reflect the necessary and statutory safeguards to protect these national ecological treasures to the east of the village boundary which are both an integral part of village character and regional enjoyment. Enhanced measures must be incorporated in the plan to ensure the conservation of our national landscape flora and fauna, which are irreplaceable assets to our community and future generations are consistent with the national designations and national planning policies.

Moreover, the scenic views and landscapes in East Dean and Friston are integral to the character and heritage of our area. They not only provide aesthetic pleasure but also support our local tourism industry and identity of the village as enjoyed along the footpaths the connect, Willingdon, Eastbourne, Beachy Head and Birling Gap. The current draft of the east dean and Friston neighbourhood plan appears to overlook the importance of preserving these long range views along the eastern edge of the village, which if not strengthened could unwittingly lead to detrimental changes in our natural vistas and the overall integral appeal of our South Downs region.

In light of these concerns, I urge the committee to reconsider and revise the Neighbourhood Plan by incorporating stronger protections for nature, biodiversity, and our cherished views in particular along the eastern village boundary we can ensure that the plan not only meets current needs but also preserves the beauty and ecological integrity of the setting of East Dean and Friston in the South Downs National Park for the future. Some suggested alterations are provided in Appendix A of this letter.

Thank you for considering my objections. I trust that the committee and the appointed Examiner by the SDNPA will take these points into serious consideration and work towards a revised plan that reflects our collective commitment to environmental stewardship and community values. If there is an opportunity to do I would welcome a chance to present more information to the Examiner at any Hearings.

Thank you

Yours sincerely,

██████████

#### Appendix A.

Alterations Required. Figures 6, 7 8 9 and 10 all need to be amended.

1. Why have the nature and landscape designations only to the south and west of the village boundaries been included? The land to the east of the village up to Eastbourne is entirely included in the South Downs National Park which is the highest form of beauty and landscape protection. This was support in the latest SHLAA review.
2. Priority Habitats adjacent to the built up edge and boundary should also be shown. For instance the Priority Habitats lowland calcareous grassland are designated on the field immediately behind the houses on Summerdown Lane which is a sensitive meadow, which is only ever grazed and has been omitted from figure 8 . Other protected species habitats have been entirely omitted from figure 8 which are situated further east of Summerdown Lane.
3. Land to the east of Summerdown Lane, is also in the Seaford to Eastbourne Biodiversity Opportunity Area –which should be clearly identified as being adjacent to the built up area boundary to the east of the village, as they closely integrate with the character and setting of the downland estate a substantial part of village.
4. Designated footpaths that connect with the wider networks used for recreation and leisure activities to the east of the village (behind Elven and Summerdown Lanes) have also been omitted or downplayed.
5. Archaeological notification areas (ANAs) immediately to the east of the village also should be shown, as they may interrelate with developments in the gardens that back on to the South Downs priority habitats and open fields.
6. ALL of the Long reaching views from the properties and footpaths accessible from Summerdown Lane also need to be included. The locally significant views currently shown in Policy EDF 7 don't go far enough and as a result those included in Figure 10 are inconsistent and appear ad hoc as they don't take in the full range of sensitive views

eastwards towards Eastbourne from footpaths and gardens. This should be updated to include all of the long range views to the east of Summerdown Lane.

7. Figure 9 and 10 also shows the local green spaces, and should include the land behind Summerdown and Elven Lanes which is used as informal open and recreational space by residents and visitors to the national park via the network of public rights of way.

## Summary

The landscape protections for land outside the village neighbourhood boundary to the south and west are included but entirely omitted for land to the east. National Character Area 125 - South Downs National Park area, chalk downland – which is mostly open access land predominantly farmland with a network of public footpaths and rights of way has been unwittingly been omitted from this draft plan. Its current statutory protections within the SDNPA should be clearly shown on the next version of this neighbourhood plan and the village context within the network of public rights of way added, protected nature designations, long range views and the BOA added.

Respondent Reference:	R16
Organisation or Individual:	South Downs National Park Authority (SDNPA)



## SDNPA response to the East Dean & Friston Submission (Regulation 16) Neighbourhood Development Plan

All text to be added is underlined, all deleted text is ~~struck through~~.

NDP Reference	SDNPA Comment / Recommendation	SDNPA Explanation/Reasoning
	General Comments	
	<p>The Parish Council is congratulated on having prepared a robust and locally distinctive plan for their community. The preparation of the Neighbourhood Plan to this stage reflects the commitment and determination of those involved. SDNPA appreciates the changes made to the Neighbourhood Plan following comments at the pre-submission stage.</p> <p>The following are suggested corrections and clarifications to the document rather than substantive changes.</p>	
Paragraph 1.5, p6	Rearrange to read, “relevant policies in the <u>adopted</u> South Downs <del>adopted</del> Local Plan...”	Reads better. Clarification
Paragraph 1.7, p8	Update NPPF paragraph numbers to 30 and 31 as per December 2024 version	Correction.
Paragraph 1.11, p9	Second sentence. “...with the <u>Local Plan Review</u> Regulation 18 version gone out to consultation...”	Clarification.
Paragraph 1.13, p9	Fourth sentence. “These <del>will be</del> <u>are</u> set out fully in the Consultation Statement, <del>which will be prepared later in the process, at the Submission Version Plan stage.</del> ”	Clarification. Consultation Statement now prepared.
Paragraph 2.4, p11	East Dean village (Character Area (CA) 1 in Figure 2, p.232)	Correction. Amended to p.22 or appropriate page number after formatting.
Paragraph 2.6, p11	First sentence. “...with approximately 200 homes (see Figure 2, p.232)...”	Correction. Amended to p.22 or appropriate page number after formatting.
Policy EDF1, Criterion A.iii. p15	First sentence. “...when it comes to allocating housing ( <del>such as the use of First Homes</del> ).”	Clarification. NPPF footnote 31, no longer requirement to deliver percentage of affordable housing as First Homes. As per Reg 14 SDNPA comment, discount in the region of 40-50%, depending on the size of the dwelling, would be needed in the

NDP Reference	SDNPA Comment / Recommendation	SDNPA Explanation/Reasoning
		National Park to make First Homes “affordable”.
Paragraph 5.1, p18	First sentence. “Good quality, landscape-led housing design can...”	Clarification. Remove the word housing as policy covers all types of development. Left in by error. The other changes to the paragraph recommended by SDNPA at Reg 14 have been made.
Policy EDF2, p19	Add “C” in front of last sentence of policy, “C. Where development abuts open countryside...”	Correction. Labelling as criterion “C” appears to have been missed off after making the changes to the policy wording.
Paragraph 5.18, p24/25	Second sentence. “Policies SD48 and SD51 of the SDLP supports development...”	Correction.
Paragraph 5.23, p27	First sentence. “...conservation area approved by South Downs National Park Authority...”	Clarification
Paragraph 5.26, p28	First sentence. Update reference. ( <del>Paragraph 018-039</del> ) (Paragraph: 005 Reference ID:18a-005-20190723 Revision date 23 07 2019)	Update reference.
Paragraph 5.27, p28	Second sentence. “They are also described in Appendix A, <u>paragraph A.5</u> and mapped in Figure 3”.	For reference and ease of reading.
Paragraph 6.1, p31	Third sentence. “...coastline offering access to <u>the</u> beach/sea.”	Correction.
Paragraph 6.3, p31	Second sentence. “...the scope of planning, <del>which</del> <u>whilst</u> others are addressed in either <del>via</del> the SDLP or EDFNP policies.	Correction.
Paragraph 7.2, p34	“...will also bring positive benefit to <u>the</u> physical and mental health...”	Correction.
Policy EDF5, p34	Criterion A. End of sentence. “...in the South Downs Landscape Character Area (LCA) A1}.	Correction.
Table 3, p38	Designated road verge. Provide full description for the acronym “RVEI”	Clarification.
Table 3, p38	Tree Preservation Orders (TPO) right hand column. Delete second and third sentences. SDNPA as local planning authority have responsibility.	For ease and clarity remove as no need to provide this level of detail.

NDP Reference	SDNPA Comment / Recommendation	SDNPA Explanation/Reasoning
Paragraph 7.12, p41	Last sentence. "...reflected in the emerging policy aspirations for the South Downs Local Plan <u>Review</u> (Regulation 18); January 2025)." <del>Review</del>	Correction.
Paragraph 7.13, p41	Third sentence. "An SDNPA-funded project ( <u>Nature Recovery and Climate: Action in the Parish of East Dean and Friston</u> , see Evidence List)	Correction and for reference.
Paragraph 7.16, p41	Last sentence. "It should be noted too that a Super Nature Reserve <del>is soon to be defined</del> <u>has been proposed by Natural England</u> stretching from..."	Clarification.
Policy EDF6, p45, paragraph 7.24, p45, Figure 9, p46, Appendix C p125-126.	Please ensure use of one name for the proposed Local Green Space at "Fridays houses" as the site appears with three different names in the Policy EDF6, in paragraph 7.24 of the supporting text, in the key for Figure 9, and in Appendix C Local Green Spaces.	Clarity and consistency.
Policy EDF7, p47	Criterion B "...within the shaded arcs of the various views as shown in Figure <del>9</del> <u>10</u> should be designed..."	Correction.
Paragraph 8.5, p51	Third sentence. "...and more free-flowing traffic could be an increase <u>to</u> the traffic speed and density..."	Correction.
Paragraph 8.12, p52 to paragraph 8.15, p54	Move the identified 8 improvements and the additional bullet points to Section 12 Non-Policy Actions.	Clarification.
Figure 11, p56	Amend the key for Figure 11 to reflect changes to paragraphs 8.12 to 8.15 and that the improvements are in Section 12 Non-Policy Actions.	Clarification.
Section 14 – Glossary, Major Development	Second sentence. "...on what constitutes "major development" for the purposes of Paragraph <del>183</del> <u>90</u> of the NPPF (2023 <del>5</del> <u>5</u> )." Third sentence. "These opinions are that the definition as per Paragraph <del>183</del> <u>90</u> is based..."	Correction. To reflect latest NPPF.
Section 15 – List of Evidence Documents	First column. National Planning Policy Framework ( <del>amended December</del> <u>updated February 2023</u> <del>25</del> <u>25</u> ) Last column. As <del>amended</del> <u>updated Dec-Feb 2023</u> <del>25</del> <u>25</u>	Correction. To reflect latest NPPF.

NDP Reference	SDNPA Comment / Recommendation	SDNPA Explanation/Reasoning
Appendix A Designated and Non-Designated Heritage Assets, p75-76	Add paragraph numbers to Appendix A, i.e. A.1, A.2, A.3...	For reference and ease of reading.
Appendix A Designated and Non-Designated Heritage Assets, p75	Fifth paragraph. Second sentence. "This neighbourhood plan used criteria outlined by the South Downs National Park <u>Authority</u> "	Clarification
Appendix B – Localities for Biodiversity Offsets and Interventions, p119-122	Add paragraph numbers to Appendix B, i.e. B.1, B.2, B.3...	For reference and ease of reading.
Appendix B – Localities for Biodiversity Offsets and Interventions, p119	First paragraph, last sentence. "These are shown in Figure <u>58</u> ".	Correction.
Appendix B – Localities for Biodiversity Offsets and Interventions, p119	1.Old Willingdon Road hedgerow. Fourth sentence. "Ownership of the trackway is thought to be with East Sussex <u>County</u> Council."	Correction.
Appendix B – Localities for Biodiversity Offsets and Interventions, p119	3.A259 hedgerow. Second sentence. "A number of hedgerow trees were planted in the 1990's by East Sussex <u>County</u> Council, but have suffered..."	Correction.
Appendix C – Local Green Spaces, p123-126	Add paragraph numbers to Appendix C, i.e. C.1, C.2, C.3...	For reference and ease of reading.
Appendix C – Local Green Spaces, p123	First paragraph. Second sentence. "...in the National Planning Policy Framework (NPPF) at paragraphs 105 <u>6</u> to 107 <u>8</u> ."	Correction.
Appendix D – Locally Significant Views, p130	Add paragraph numbers to Appendix D, i.e. D.1, D.2, D.3...	For reference and ease of reading.