

22 October 2024

East Dean & Friston Neighbourhood Plan Steering Group
Village Hall, Village Green Lane
East Dean, East Sussex
BN20 0DR

SENT BY EMAIL

Dear Clerk,

South Downs National Park Authority response to the East Dean & Friston Pre-Submission (Reg 14) Neighbourhood Development Plan (NDP) [2024 to 2040].

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Regulation 14, pre-submission version, of the East Dean & Friston NDP. The SDNPA would like to congratulate the parish council on reaching this stage of the neighbourhood planning process. The comments, overleaf, have been identified as opportunities to improve or amend the NDP to: avoid ambiguity; ensure conformity with the Adopted South Downs Local Plan (SDLP); and ensure sufficient implementation of the NDP once it has been “made”. Notwithstanding the comments overleaf, we have two overarching comments:

- A number of policies take inspiration from **Reg 16 Bramshott & Liphook NDP** which has now been subject to modification following a successful Examination. We recommend that you review the Referendum version of this NDP and modify the East Dean & Friston NDP accordingly to ensure an efficient Reg 16 and Examination process next year. That said, please bear in mind our additional comments overleaf which are more specific to a parish wholly within the National Park.
- There is overlap / confusion amongst **Policies EDF2 and EDF5** in relation to landscape character, design, and natural environment. In terms of EDF2, it is fine to capture both landscape character and design subject to our comments overleaf. As for EDF5, it is important to remember that the National Park is a landscape (not natural environment) designation – the term “landscape” covers both the natural and built environments. We recommend that you proof-read these policies to avoid any potential overlaps and future confusion.

Thank you very much for the opportunity to comment, and please do not hesitate to contact us if there is anything that you would like to discuss or seek clarification on.

Yours sincerely

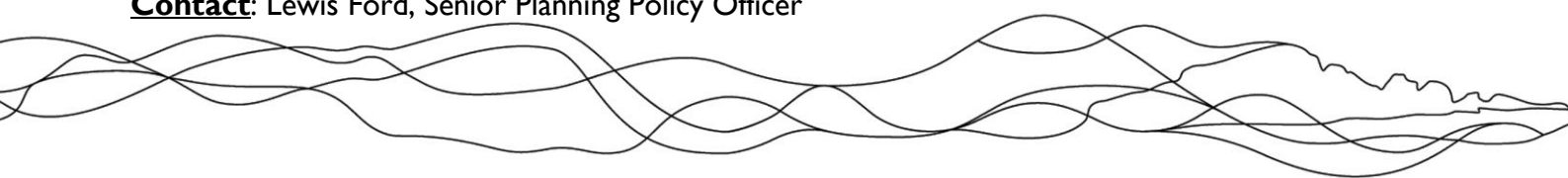


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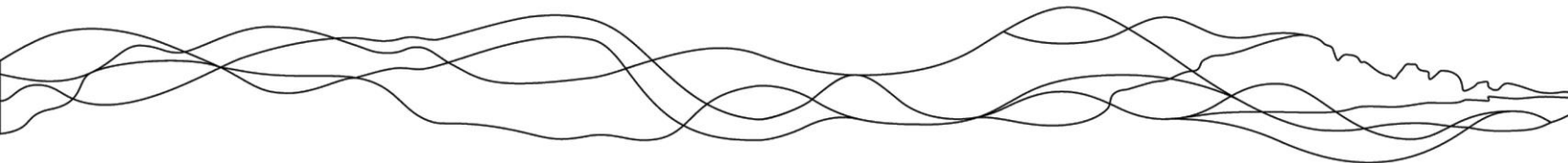
Interim Chief Executive: Tim Slaney



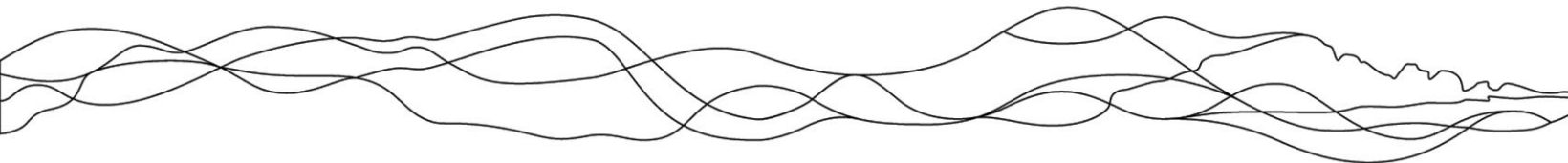
SDNPA response to the East Dean & Friston Pre-Submission (Reg 14) Neighbourhood Development Plan (NDP)

The comments set out below are the views of individual officers under the Delegated Powers of the South Downs National Park Authority.

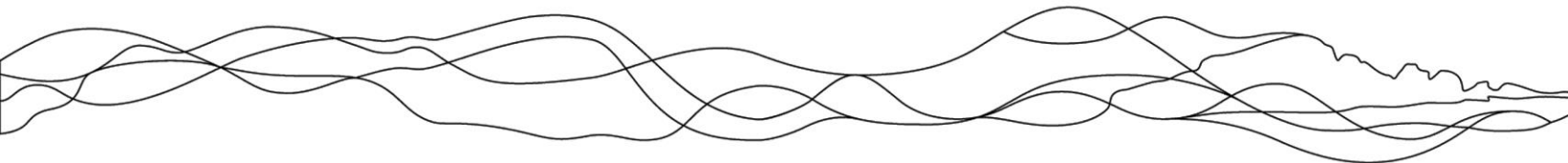
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
General	You sometimes refer to the SDNP when you mean SDLP .	Correction.
General	You sometimes refer to EDNP when you mean EDFNP .	Correction.
General	All photographs should include a number and caption explaining what and (as appropriate) where they are showing.	Ease of reading and understanding.
General	It is lower case for conservation area unless you are referring to the East Dean Conservation Area, in which case it is capitals.	Consistency and grammar.
Foreword – Para 2, p1	Typically, these plans have a long-term outlook and for our parish, this plan will run from 2025 2024 to 2040.	Correction.
Foreward – Para 2, p1	The Planning Practice Guidance explains that there is no requirement to review or update a “made” neighbourhood development plan. With this in mind, we recommend that you soften the language here.	Clarification.
General – Potential Areas for Biodiversity Improvements	The Potential Areas for Biodiversity Improvement seem sensible, based on the Areas of Particular Biodiversity Value set out in the Biodiversity Profile, and cover a good and appropriate range of habitats.	n/a



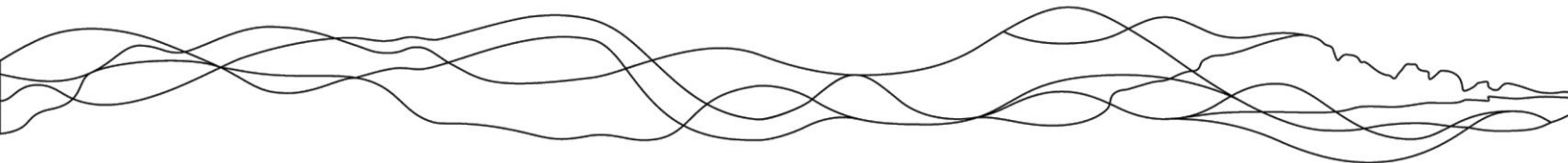
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Section I – Introduction		
General	<p>The introduction section needs to explain the designation of the South Downs National Park, along with the purposes and duty of the National Park. We suggest the following text:</p> <p>The National Parks & Access to the Countryside Act 1949 (“the 1949 Act”) enabled the creation of National Parks to ensure that the nation’s most beautiful and unique landscapes would continue to be protected for the future. The parish is wholly within the South Downs National Park which was designated on 31 March 2010. The 1949 Act, as amended by Section 245 of the Levelling Up & Regeneration Act 2023, requires all relevant bodies (incl. the parish council) to seek to further the following purposes of the National Park:</p> <ul style="list-style-type: none"> • Purpose 1 – To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and • Purpose 2 – To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. <p>In pursuit of the Purposes, the Government also places a corresponding duty upon the South Downs National Park Authority (SDNPA) [Est. 01 April 2011] to seek to foster the social and economic wellbeing of the local communities within the National Park.</p>	Requested for all community-led plans to ensure clarity, reading and understanding.
Introduction – Para 1.2, p4	Neighbourhood Development Planning (General) Regulations 2012 (as amended).	Correction.



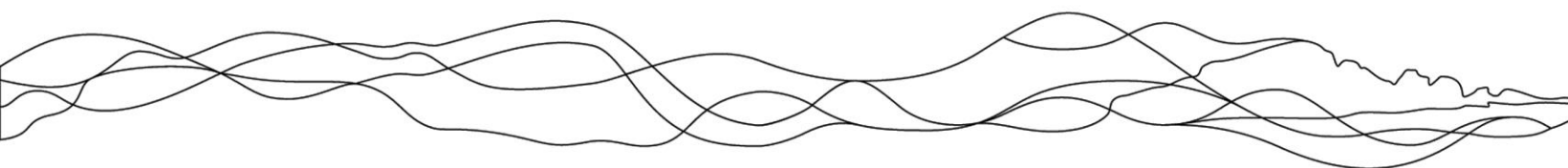
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Introduction – Para 1.3, p4	The EDFNP policies form part of the development plan for the South Downs National Park and must be considered by any interested parties wishing to submit planning applications for development within East Dean and Friston parish. The policies also set out how land-use is a material planning consideration in the determination of applications, alongside the policies of the local development plan.	The last sentence does not read well and, regardless, is unnecessary.
Planning Policy Context – Para 1.7, p6	A revised National Planning Policy Framework (NPPF) is currently out to consultation and is anticipated for publication in Winter 2024/25. You will need to update paragraph numbers, conformity references, and direct quotes accordingly once the revised NPPF has been published.	Update.
Local Planning Policy – Para 1.10, p7	The ninth edition of the South Downs Local Development Scheme (March 2024) was subject to public consultation over Summer 2024 and will be considered by the South Downs Planning Committee on 14 November 2024. Please amend the link and information accordingly before submitting the NDP under Regulation 15.	Update.
Community Engagement – Table 1, p7-8	The following need to be moved into 2025: “Regulation 16 Plan published”; “Examination”; “Plan amended appropriate into Submission Version and submitted, with supporting documents to SDNPA”; “Regulation 16 consultation run by SDNPA”; and “Plan independently examined”.	Update.
Neighbourhood Plan Objectives – No.6, p12.	To support opportunities for walking / wheeling , cycling and equestrian pursuits in the parish.	To be inclusive of those using mobility aids (i.e., wheelchairs, mobility scooters etc.)



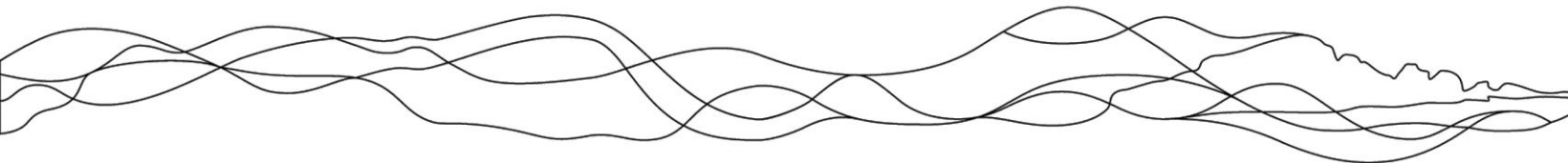
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDFI: Meeting Local Housing Needs		
Para 4.7, p13	In terms of addressing affordable housing need, the adopted policy of the SDNPA on this subject (Policy SD28) of the SDLP requires 50% of all new housing new developments for 11 net homes or more to be affordable housing. Of these, the Local Plan SDLP guideline mix of requires 75% to be affordable social rented to and 25% to be intermediate housing (i.e., shared ownership). for the National Park This appears to offer a suitable benchmark for the tenure mix within affordable housing for the parish as well as the wider District , and also complies with the various minimum requirements mandated nationally.	Amendments to capture corrections and ensure ease of reading and understanding.
Para 4.9, p14; and Policy EDFI, Criterion A(iii)	<p>I think you need to start with the last sentence - i.e., 75:25 split between affordable social rent and intermediate housing – and then explain any further breakdown within these affordable housing tenures for ease of reading and understanding.</p> <p>In terms of First Homes, the level of discount needed to make them “affordable” in the National Park would need to be in the region of 40-50% depending on the size of the dwelling. The South Downs First Homes Advice Note explains that the SDNPA will implement First Homes flexibly, ensuring local needs are met and focusing on affordable rent tenure. Notwithstanding the above, the new Government’s position on First Homes is currently unclear. It is understood that the Government’s position on affordable home policy and products will be clarified in the anticipated new National Planning Policy Framework (NPPF), which is due to be published in Winter 2024/25.</p>	We are currently unsure about the Draft NDP’s approach to First Homes. We will advise soon when the new Government’s position has been clarified.
Para 4.10, p14	The paragraph states that 3-bedroom properties form a much smaller proportion of the suggested mix, but that’s not what Table 2 shows.	Clarification.



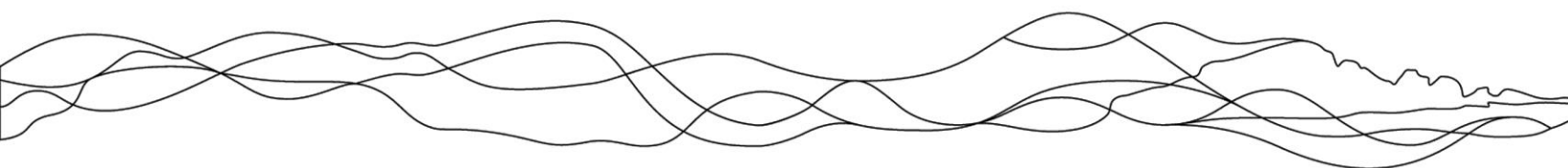
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF1	<p>The policy takes inspiration from Policy BL2 in the Bramshott & Liphook NDP (Reg16 Submission Version) which has since been subject to Examination and modification. Please amend relevant sections of Policy EDF1 as per Policy BL2 in the Bramshott & Liphook NDP (Referendum Version) as appropriate: https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/bramshott-liphook-neighbourhood-plan/ (Please refer to referendum version and the Examiner’s final report). Otherwise, our additional comments are as follows:</p> <ul style="list-style-type: none"> • It needs to be made clear that the default is for 50% affordable homes on all developments of 11 gross homes or more as set out in Policy SD28; • It is fine to ask for a local size mix-based on the latest housing need evidence; and • It is good to refer to HAPPY and RTP1 guidance, but this should be in the supporting text rather than the policy wording. 	<p>A form of the draft wording has already been subject to, and modified following, Examination. To ensure efficient Examination, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before then submitting the NDP to the SDNPA. In addition, we have provided additional comments on the left for your review and action.</p>
Criterion A(iii), p15	Do you mean 25% of the intermediate housing proportion?	Clarification.
Policy EDF2: Character & Design of Development		
Policy Name	The contents says “character and design of development” whilst the policy itself just says “character of development”. Please clarify and correct throughout.	Clarification.



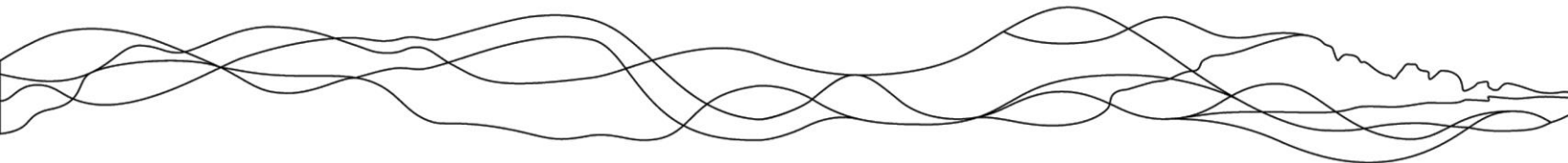
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
New paragraphs (Above Para 6.1)	<p>Landscape is defined as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors” (European Landscape Convention), whilst landscape character includes distinct, recognizable and consistent patterns and features within a landscape which help to differentiate one landscape from another.</p> <p>The parish is wholly within the South Downs National Park and is identified in the South Downs National Character Area (NCA 125) and the Ouse-to-Eastbourne Open Downs Landscape Character Area (LCA A1) as set out in the South Downs Landscape Character Assessment 2020.</p>	If the policy is about character and design, then supporting text about landscape and landscape character is required.
Para 6.1, p16	<p>Good quality, landscape-led housing design can conserve or enhance the landscape and its character whilst also improving social public health and wellbeing and the quality of life by improving the built environment, reducing crime, improving public health, easing transport problems and providing supportive neighbourhoods. The policy seeks to encourage development proposals within the parish to comply with the highest design standards which are informed by landscape character and adhere to the locally specific Design Guidance and Codes (Appendix A) prepared for the Parish. The policy and its supporting text add greater detail to the Local Plan policies, in particular Policies SD4 and SD5. These which requires development to conserve and enhance landscape character, and ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural, and built environment, respectively reflect local distinctiveness but which is not specific.</p>	Amendments to better align with suggested additional paragraphs above. It is important to remember that the policy will be used to consider all types of development, not just housing.
Paras 6.2 and 6.6, p16	The paragraphs appear to just be referring to the main village, but the introduction section, and later paragraphs, explain that there are a number of settlements in the parish.	Clarification.



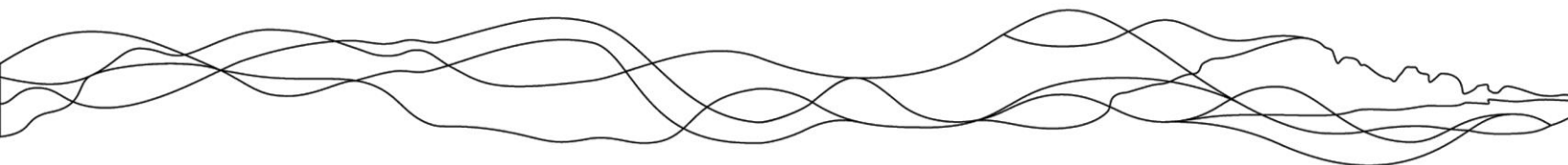
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Para 6.3, p16	Delete the first sentence (The importance of good design has received renewed attention over recent years) and change “physical character” to “landscape character”.	The use of “renewed attention” is unhelpful. It dates the document and weakens the importance of good design.
Para 6.5, p16	Development should needs to be contextually designed using from a landscape-led approach perspective and . As part of this, the South Downs Design Guide SPD provides a comprehensive set of advice, to promote well-designed places and conservation and enhancement guidance on a range of design issues relevant to new development and the implementation of South Downs Local Plan Strategic Policy SD5 (Design).	Amendments to better align with landscape-led approach to development and the relationship between Policy SD5 and the South Downs Design Guide.
Para 6.6, p16	The Neighbourhood Plan Steering Group commissioned AECOM to develop a more localised set of design guidance and codes guiding to inform future development in the parish village — note the SDNPA will no longer recognise Village Design Statements as Supplementary Planning Documents upon adoption of the new Local Plan.	It is understood that the new Government will continue to allow for the preparation and adoption of SPDs. Regardless, we recommend that design guidance is included in NDPs to ensure it has sufficient weight.
Para 6.7, p17	Remove “including the strategic site allocations”.	There are no strategic site allocations for the parish. Regardless, this would already be captured by “all development proposals”.
Policy EDF2, General	The policy takes inspiration from Policy BL3 in the Bramshott & Liphook NDP (Reg16 Submission Version) which has since been subject to Examination and modification. Please amend relevant sections of Policy EDF2 as per Policy BL3 in the Bramshott & Liphook NDP (Referendum Version) as appropriate: https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/bramshott-liphook-neighbourhood-plan/ (Please refer to referendum version and the Examiner’s final report). As part of the above, we have proposed additional amendments below.	A form of the draft wording has already been subject to, and modified following, Examination of the Bramshott & Liphook NDP. To ensure an efficient and quick Examination process, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before then submitting the NDP to the SDNPA.



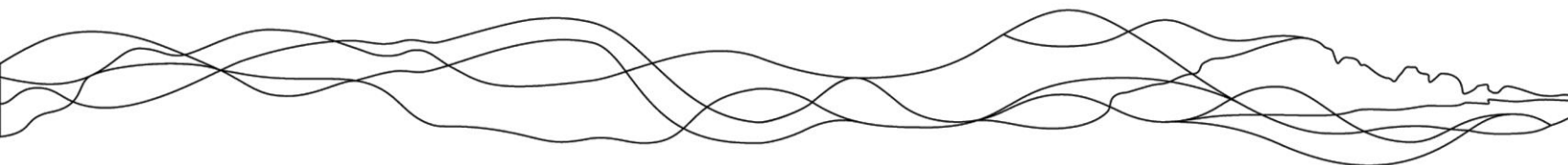
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Policy EDF2, Criterion A	<p>Please split the criterion into two criteria as follows:</p> <p>(A) Development Proposals should have a landscape-led approach to development and demonstrate a high-quality of design, which is informed by the South Downs Landscape Character Assessment (LCA A1), the South Downs Design Guide, the East Dean and Friston Design Guidance and Codes (see Appendix A and the four character areas identified in Figure 2). As part of the above, proposals should:</p> <ol style="list-style-type: none"> a. Respond Conserve or enhance landscape character; b. Integrate well within its their context and surroundings; c. Meet the changing needs of its residents; and d. Respect the local streetscape. <p>(B) Proposals it should reflect the variety-of architectural variety styles found locally, using materials that are in keeping with those used in existing buildings in the immediate locality. Innovation in design will be supported where this demonstrably enhances the-quality-of the built form of development and the way in which it functions in-a-local-character-area.</p>	<p>The proposed amendments reflect the modifications made to Policy BL3 of the Bramshott & Liphook NDP following Examination, along with further proposed amendments specific to the East Dean and Friston NDP.</p> <p>As part of the proposed amendments, you do not need to include heritage assets or valued views as these are already covered in Policies EDF4 and EDF7, respectively. In terms of the reference to avoiding or minimising adverse impacts on the National Park, this is repetition of national policy and only relates to development within the National Park's setting. It is relevant for split parishes preparing NDPs, but for parishes wholly within the National Park (such as East Dean and Friston), it is not necessary to include.</p>
Policy EDF2, Criterion B	<p>Where-relevant, As appropriate to their scale, nature and location, development proposals should demonstrate how they have sought to address the following matters as they are appropriate to their scale, nature and location:</p>	<p>As per Examiner modifications to Policy BL3 of the Bramshott & Liphook NDP.</p>
Policy EDF2, Criterion B (i)	<p>If you are minded to accept the proposed amendments to Criterion A, then existing Criterion B(i) can be deleted.</p>	<p>Criterion subsumed into proposed amendments to Criterion A.</p>



NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF2, Criterion B(ii)	Make a positive contribution to the visual appearance of the main highway approaches into the settlements (the A259, Birling Gap Road and Jevington Road) through characteristic interventions. Improvements and enhancements Interventions should may include, where appropriate, additional tree planting, the better management enhancement of roadside green spaces (for instance through planting), the reduction / consolidation of road signs and other street furniture, and wider green infrastructure improvements as appropriate to landscape character that are identified as being necessary.	Criterion B(ii) currently alludes to what might be “aesthetically pleasing” rather than characteristic of the landscape. The proposed text changes are proposed to tighten the criterion.
Policy EDF2, Criterion B(iii)	Incorporate soft landscaping and other characteristic boundary treatments including the retention and enhancement of established trees and hedgerows.	The criterion is loose as currently worded.
Policy EDF2, Criterion B(iv)	Provide adequate and characteristic vehicular access - and space for cycle parking and vehicular off-road parking - for residents, visitors and service vehicles, in accordance with the following adopted minimum parking requirements.	There is no minimum parking requirements included, so assume the latter part has been included in error. As for the rest of the criterion, it does not acknowledge the conflict between providing adequate access which is also characteristic of its landscape.
Policy EDF2, Criterion B(v)	Respect and protect Preserve or enhance the buildings and setting environment of the conservation area , listed buildings and other heritage assets (including non-designated assets) of the parish.	Legally it is “preserve or enhance” and it would be better to reference “setting” rather than “environment”.
Policy EDF2, Criterion B(vi)	There is no unacceptable loss of amenity for neighbouring uses through the loss of privacy, loss of light or visual intrusion on the views and surroundings that create the backdrop to an area.	This criterion, as written, conflates two points which is confusing. The latter part needs to be deleted as you already have a views policy (EDF7).

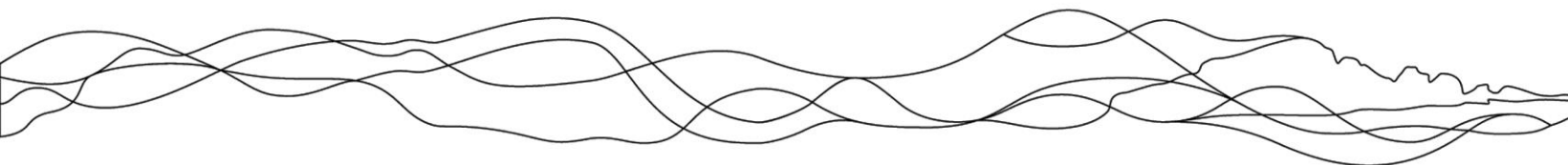


NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF2, Criterion C	Where development abuts open countryside, development on the rural boundary edge should be designed and laid out to mitigate any detrimental visual impacts on the landscape countryside. This should be achieved through the siting of lower density development at the rural boundary of the site in order to provide a gradual transition from the built form to open countryside, or by other means such as through a layout that clearly minimises the visual impact of any larger buildings on both the open countryside and existing village scape.	The transition from Downs to settlement is quite abrupt in this area, so unsure if a “petering out” of buildings is characteristic of the landscape in this location of the National Park. Either amend as shown on the left or carry out further character work. Notwithstanding the above, please do not introduce new terms like “village-scape” into policy wording – I believe you are referring to built or wider landscape character here.
Policy EDF3: Energy Efficiency & Design		
Para 6.13, p20	... introducing a new target for at least a 100% reduction ...	Correction.
Para 6.17, p20-21	Please refer to both Policies SD48 and SD51 and delete “by 2030”.	Correction.
Policy EDF3	The policy takes inspiration from Policy BL4 in the Bramshott & Liphook NDP (Reg16 Submission Version) which has since been subject to Examination and modification. Please amend relevant sections of Policy EDF3 as per Policy BL4 in the Bramshott & Liphook NDP (Referendum Version) as appropriate: https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/bramshott-liphook-neighbourhood-plan/ (Please refer to referendum version and the Examiner’s final report).	A form of the draft wording has already been subject to, and modified following, Examination of the Bramshott & Liphook NDP. To ensure an efficient and quick Examination process, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before then submitting the NDP to the SDNPA.
Conformity Reference	Please add SD48 to the conformity reference.	Correction.

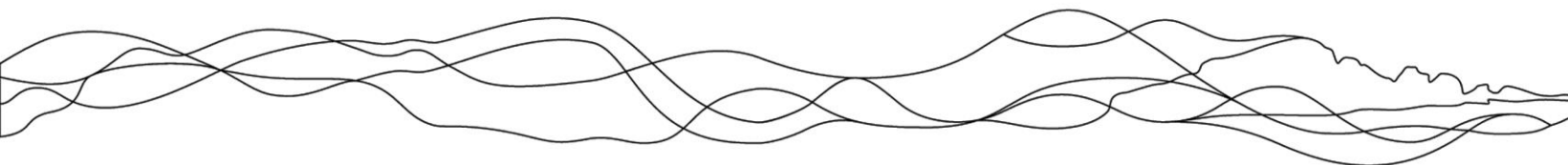


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Policy EDF4: Conserving Heritage Assets		
Paras 6.22 to 6.29, P23-24	Please provide sub-headings as appropriate – i.e., Scheduled Monuments, East Dean Conservation Area (incl. link to conservation area appraisal), listed buildings, non-designated heritage assets, archaeology, Sussex Historic Landscape Characterization, and local heritage at risk.	Ease of reading and understanding.
Para 6.23, p23	Please delete the last sentence.	This refers to non-designated heritage assets which are covered in the following paragraph.
Para 6.24, p23	Please define non-designated heritage assets (NDHAs) or refer to Appendix B.	Clarification and ease of understanding.
Para 6.25, p23	Please delete this paragraph.	The Authority is not preparing an NDHA list of local listings. The Authority continues to advise parishes to identify NDHAs through their NDPs or Design Statements.
Paras 6.28 and 6.29, p23-24	Please merge these paragraphs.	There is no need for two paragraphs.
Policy EDF4	<p>The policy takes inspiration from Policy BL13 in the Bramshott & Liphook NDP (Regl 6 Submission Version) which has since been subject to Examination and modification. Please amend relevant sections of Policy EDF4 as per Policy BL13 in the Bramshott & Liphook NDP (Referendum Version) as appropriate: https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/bramshott-liphook-neighbourhood-plan/ (Please refer to referendum version and the Examiner’s final report).</p> <p>Criterion C - Please make the conservation area reference singular and include a link to the conservation area appraisal.</p>	<p>A form of the draft wording has already been subject to, and modified following, Examination of the Bramshott & Liphook NDP. To ensure an efficient and quick Examination process, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before then submitting the NDP to the SDNPA.</p> <p>There is only one conservation area.</p>

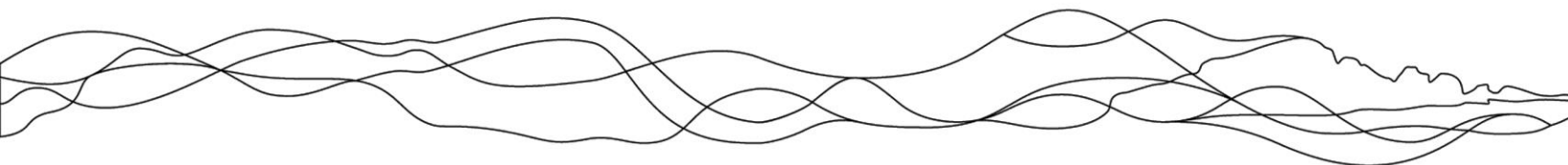
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Conformity Reference	Please change conformity reference to SD12-16.	Correction.
Section 6: Sustainable Tourism		
Para 6.2, p27	Policy SD23 (Sustainable Tourism) of the SDNP SDLP provides a comprehensive overarching strategic approach to managing tourism sensitively across the National Park.	Correction.
Para 6.3, p27	... whilst others are addressed in either the SDLP or EDFNP ...	Ease of reading and understanding.
Key Issues & Potential Solutions, p27-28	<p>This section needs to be refined to make it more succinct and easier to read. In addition, it makes statements which need to be supported by sources. E.g.</p> <ul style="list-style-type: none"> • Issue I – Can you quantify “sheer volume of visitors”? • Issue II – What is the data source for insufficient car parking? • Issue III – This is only advice / current aspirations of the National Trust and still needs to be considered by relevant authorities, including ESCC as the Highway Authority. For the meantime, it may be more pragmatic to list the issues (using sources as much as possible) and explain that a car parking solution for Birling Gap and a multi-partner sustainable transport solution is required. • Issue V – How many visitors are there from outside the area/overseas? • Issue VI – What is the data source for “high number of second / holiday homes” and what is the exact number? • Issue VIII – Where has the 100,000 visits per year figure been cited? 	Key issues and associated statements need to be backed up by sources – either as hyperlinks or footnotes.



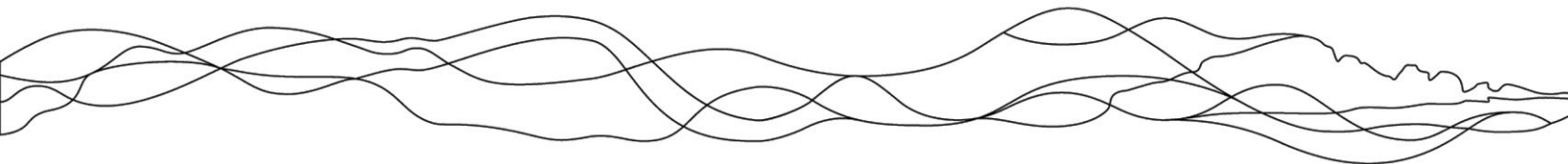
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Para 6.4, p28	<p>Please amend as follows:</p> <ul style="list-style-type: none"> • Please delete the second and third sentences as the two strategies are out of date. As an alternative, you may want to consider reviewing and referencing the Regenerative Tourism in UK National Parks (2024) and any guidance from the Sussex Local Visitor Economy Partnership (LVEP). The latter is a pan-Sussex approach to tourism which is also aligned with Visit England. • We agree that it is important to bring key partners together to consider how visitors can be effectively managed. However, we do not want to frame visitors as a problem / entirely negatively. Business voices should also be represented as tourism contributes to a thriving rural economy. • Please add the South Downs National Park Authority (SDNPA) and Experience Sussex to the list of key partners. 	<p>The South Downs Tourism Strategy (2015-2020) and the Sussex Heritage Coast Strategy and Action Plan (2016-2020) are out of date.</p> <p>We do not want to frame visitors as a problem or in an entirely negative way.</p> <p>It is important that the SDNPA and Experience Sussex are consulted on any future tourism or visitor strategy for the parish.</p>
Para 6.5, p28	However, in conjunction with adopted SDLP policies, many of the policies in this EDFNP provide the start for a local visitor strategy.	Clarification.
Para 6.5, p28	Please add “/ walking and cycling ” after walking and delete “(walking and cycling)”.	To be inclusive of those using mobility aids (i.e., wheelchairs, mobility scooters etc.)
Action, p29	The Parish Council will work proactively with partners across the parish and beyond to develop a Sustainable Tourism Strategy for the Parish, This can drawing from strategic tourism strategies. and should explore how economic benefits to be gained from the tourism sector can be optimized, while minimising the impacts on the sensitive historical and natural environment and on the local community. This strategy will identify ways to ensure the advantages of tourism to the parish’s communities, economy, and natural environment outweigh any disadvantages.	As set out in the Regenerative Tourism in UK National Parks (2024) , the UK National Parks vision on tourism is moving on from “minimising harm” to an aspiration of “net positive impacts”.



NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF5: Conserving & Enhancing the Natural Environment		
Para 7.1, p30	... to conserve and, where possible, provide a net gain in biodiversity ...	Biodiversity net gain is mandatory by virtue of the Environment Act 2021.
Paras 7.1 and 7.2, p30	Can these paragraphs be merged?	Ease of reading and understanding.
Para 7.3, p30	The parish is situated in the South Downs National Park and such areas are afforded the highest level of protection in national planning policy in terms of their landscape and scenic beauty.	Conformity with NPPF Paragraph 182.
Para 7.4, p30	A local green space is not necessarily “managed” for conservation, so please remove this reference.	Correction.
Figure 4, p34	The designated road verges are either not shown or very hard to find. We would recommend setting these out in a zoomed-in figure / map.	Ease of reading and understanding.
Para 7.11, p35	The paragraph specifies onsite BNG or offsite BNG within the parish. Whilst this cannot be an absolute requirement in terms of policy - with distance from impact only addressed at the LPA/NCA level via risk multipliers built into the Metric tool (essentially further away = more expensive) - it does fit with the BNG hierarchy of on-site preference, off-site, and statutory credits. The SDNPA asks for BNG to be delivered in the National Park in its current TAN.	It is not yet known how this approach (i.e., requesting offsite BNG within a parish) will hold up to delivery scrutiny and at Examination.
Para 7.11, p35	Please can you explain what the SDNP-funded project is called and provide a weblink to it?	Clarification.

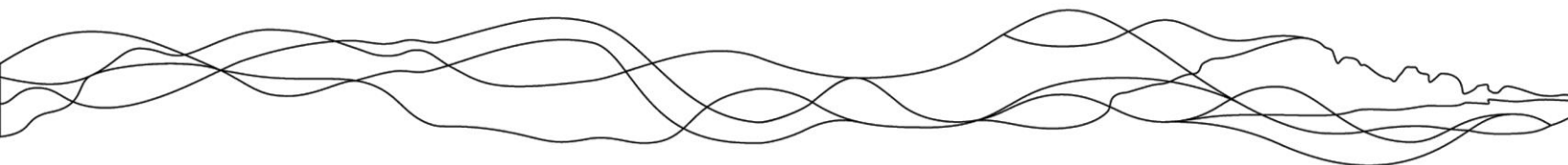


NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Para 7.13, p35	There is no harm in mentioning the Seaford to Eastbourne Nature Recovery Project. However, it should be highlighted that it is not yet known whether it will be pulled through into the Local Nature Recovery Strategy (LNRS) Framework which maps deliverable projects.	Update.
Para 7.14, p35	New plantings should be mixed, native species to increase resilience.	Consistency with other SDNPA NDP advice.
Para 7.16, p35	<u>Light pollution:</u> The parish lies within the South Downs International Dark Sky Reserve (IDSR) and the purpose of Policy SD8 of the SDLP is to ensure that development does not harm the quality of the intrinsic dark night skies.	Correction.
Figure 5, p36	The “Biodiversity Opportunity Area (hedgerow)” is quite difficult to see against the pink boundary of the parish. We recommend a better colour contrast.	Ease of reading and understanding.

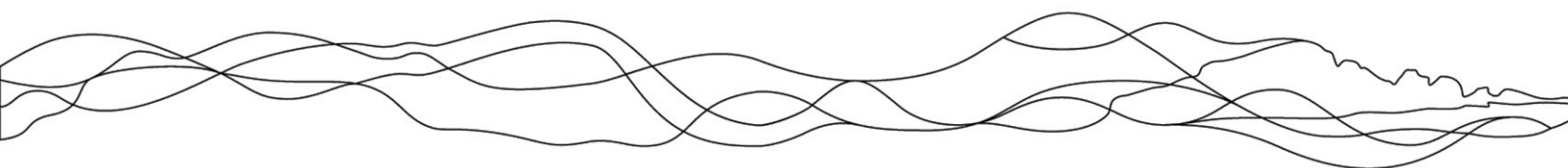


NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF5	<p>The policy takes inspiration from Policies BL5 and BL6 in the Bramshott & Liphook NDP (Reg16 Submission Version) which has since been subject to Examination and modification. Please amend relevant sections of Policy EDF5 as per Policies BL5 and BL6 in Bramshott & Liphook NDP (Referendum Version): https://www.southdowns.gov.uk/planning/planning-policy/neighbourhood-planning/neighbourhood-development-plans/bramshott-liphook-neighbourhood-plan/ (Please refer to referendum version and the Examiner's final report). As part of the above:</p> <ul style="list-style-type: none"> • Criterion A – Amend to: Development proposals should conserve or enhance the natural environment, landscape character, and rural setting of the neighbourhood area, and should seek to incorporate natural features typical of the parish as identified in South Downs Landscape Character Area (LCA) A1. • Criterion B – Remove reference to 10% BNG as this is already required in legislation. Replace this criterion with Criteria A and B of Policy BL5 in the Bramshott & Liphook NDP (Referendum Version). • Criterion D(i) – Remove reference to ancient woodland as we do not want to promote exceptional circumstances (even if there are some); consider the wording of Criterion B(iii) of Policy BL6 in the Bramshott & Liphook NDP (Referendum Version). • Criterion D(iii) – As worded it implies that vehicular access is a given exception; consider Criteria B(ix) of Policy BL6 in the Bramshott & Liphook NDP (Referendum Version). • Criterion D(iv) – Restoration of, and additions of new, hedgerows need to be characteristic and comprise a mix of native species. • Criteria D (ix to xiii) – Reword to that of Policy BL6 in the Bramshott & Liphook NDP (Referendum Version). 	<p>A form of the draft wording has already been subject to, and modified following, Examination of the Bramshott & Liphook NDP. To ensure an efficient and quick Examination process, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before submitting the NDP to the SDNPA.</p>

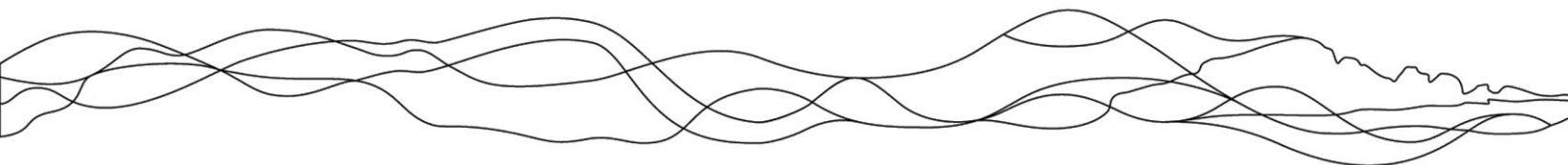
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF6 – Local Green Spaces		
Policy EDF6	Please amend as follows: <ul style="list-style-type: none"> • It is Figure 6, not Figure 4; • Delete last sentence about being consistent with national green belt policy as this is NPPF repetition and unnecessary; and • Remove SDLP policies SD4, SD11 and SD12 from the consistency reference, and replace with SDLP policy SD47. 	Corrections.
Figure 6, p40	It is difficult to differentiate between the different shades of green, especially given the map scale. Please either zoom in and divide into two maps or select three contrasting colours.	Ease of reading and understanding.
Policy EDF7 – Locally Significant Views		
Para 7.23, p41	This policy sets out a series of views in and across the parish which have been identified by the community as being important to safeguard. The policy seeks to safeguard the views from inappropriate development ensure that development does not harm the identified views, but instead development is designed and informed by the identified views. This is to ensure that any potential impacts on the integrity and scenic quality of the identified views are mitigated. The policy adds local details to Policy SD6 (Safeguarding Views) of the SDLP.	Correction and to ensure that the policy is consistent and in conformity with Policy SD6. The amendments capture the Examiner's modifications to the Bramshott & Liphook NDP which had previously proposed similar wording.
Para 7.29, p42	Where identified views stretch into neighbouring parishes, it is the intention of the parish council to discuss with those views with the relevant parishes the impact on views in their area , especially in relation to any future if development is planned for those areas.	Ease of reading and understanding.



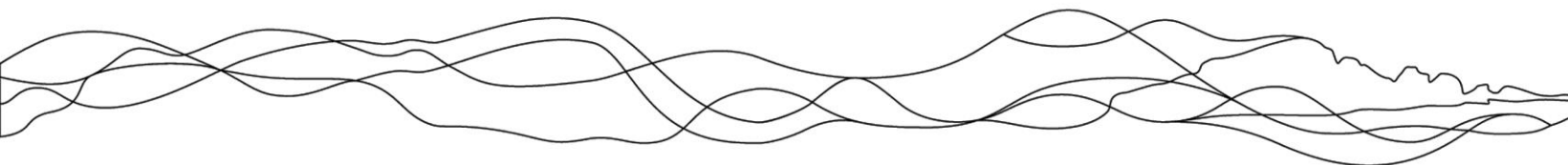
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF7	<p>POLICY EDF7: PROTECTION OF LOCALLY SIGNIFICANT VIEWS</p> <p>A. Development proposals are required to ensure that they have been informed by, and do not have a significantly detrimental impact on, the views set out below and mapped in Figure 7.</p> <ul style="list-style-type: none"> • View 1: The Gallops, Friston Hill • View 2: Summer Down to Sea • View 3: Top of the Link • View 4: The Greensward • View 5: Hobbs Eares • View 6: Crowlink Valley • View 7: Crowlink Corner • View 8: Went Hill (a) • View 9: Went Hill (b) • View 10: A259 looking west <p>B. As appropriate to their scale and nature, development proposals within the shaded arcs of the various views as shown in Figure 7 should be designed in a way that demonstrates how it has taken into consideration the importance of the locally significant view or views, in the layout, design or Masterplanning of the site(s) the potential impacts that such a development may have, and how these impacts will be mitigated any adverse impact on those views.</p>	<p>A form of the draft wording has already been subject to, and modified following, Examination of the Bramshott & Liphook NDP. To ensure an efficient and quick Examination process, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before submitting the NDP to the SDNPA. Suggested amendments are highlighted in red text.</p>
Figure 7, p43	Replace “Significant local views (1-10)” with “Locally Significant Views (1-10)” to be consistent with the section and policy titles.	Consistency.



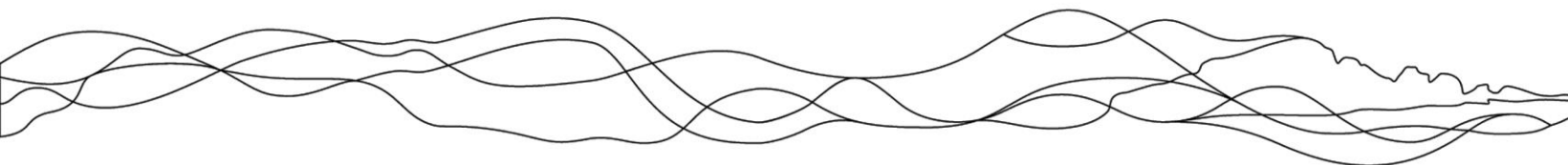
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF8 – Walking / Wheeling, Cycling and Equestrian Pursuit Opportunities		
Para 8.1, p44	This policy seeks to enhance walking/wheeling, cycling and, where feasible, horse-riding opportunities along routes which are most likely to encourage a shift away from the private car for short journeys in and around the parish. This will support the ambitions of the East Sussex Local Transport Plan and support the physical and mental health and wellbeing of local residents and visitor.	To be inclusive of those using mobility aids (i.e., wheelchairs, mobility scooters etc.); for conformity with policies in the development plan; and for ease of reading / understanding.
Para 8.4, p44	Exceat Bridge has planning permission (but works have not yet commenced) and it is understood that speed reductions in the Exceat / Seven Sisters area are included as part of this project. You could add some background to this – i.e., a weblink. Otherwise, the paragraph does not read well, especially the first and last sentence. Please review and amend accordingly.	Clarification and ease of reading and understanding.
Para 8.6, p44	The paragraph does not read well and may appear confusing to the reader. Please review and amend accordingly.	Clarification and ease of reading and understanding.
Para 8.7, p44	The EDFNP can encourage more active travel to be undertaken by foot or by bike walking/wheeling, cycling or horse-riding.	To be inclusive of those using mobility aids (i.e., wheelchairs, mobility scooters etc.).
Para 8.8, p45	Improving the walking/wheeling and cycling network will benefit visitors by keeping them away from the roads and onto the safer network of paths.	To be inclusive of those using mobility aids (i.e., wheelchairs, mobility scooters etc.).
Paras 8.9-8.10, p45-46	The 8 improvements and 8 additional improvements are aspirational. It would be clearer to include these in Section 12 (Non-Policy Actions) and update the key in Figure 8 accordingly.	Clarification.
Page 46	The last two paragraphs should be 8.11 and 8.12.	Correction.



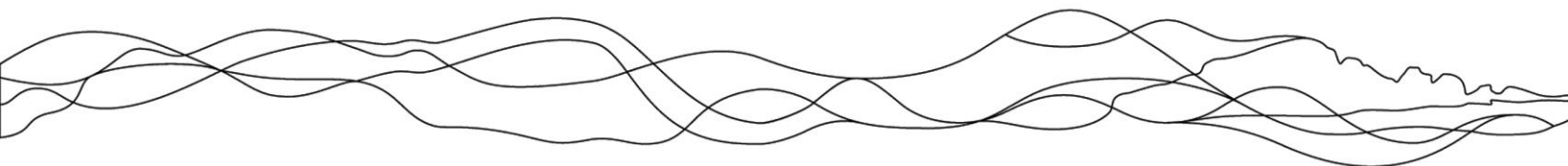
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF8	<p>POLICY EDF8: WALKING/WHEELING, CYCLING AND EQUESTRIAN PURSUIT OPPORTUNITIES</p> <ul style="list-style-type: none"> • Criterion A – As appropriate to their scale, nature and location, development, proposals should To ensure 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. To do this, all-new residential developments proposals should ensure safe pedestrian walking/wheeling, and where possible cycle and equestrian, access to link up with the existing footpath and cycleway network, and public transport network, as defined in Figure 8. • Criterion B – No comments. • Criterion C – Insofar as planning permission is required, 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 of the area, for example by retaining and/or providing characteristic hedgerows, trees and soft verges where possible practicable. The materials and layout must used should be sympathetic to local character. • Criterion D – Please amend to Criterion D in Policy BL10 of the Bramshott & Liphook NDP (Referendum Version). 	A form of the draft wording has already been subject to, and modified following, Examination of the Bramshott & Liphook NDP – see Policy BL10 . To ensure an efficient Examination process, please amend as per the Bramshott & Liphook NDP (Referendum Version) as appropriate before submitting the NDP to the SDNPA.
Conformity Reference	The policy wording does not mention parking, tourism, or equestrian development, so please amend conformity reference to Policies SD19-20 only.	Correction.
Policy EDF9 – Improving Opportunities for Community and Cultural Facilities, Sport and Recreation		
Figure 9	Paragraph 9.2 references Figure 9 but this has been omitted.	Omission correction.



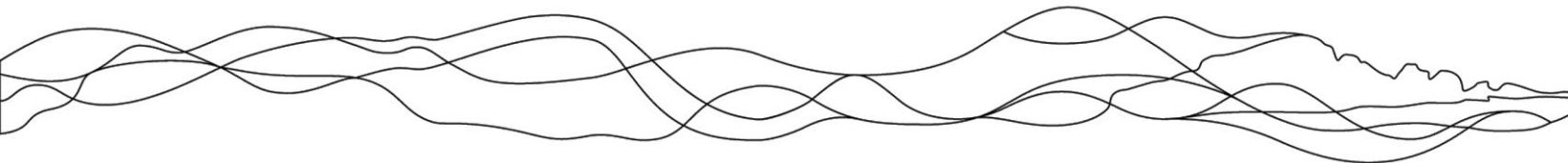
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Policy EDF9	<p>The supporting text alludes to existing community facilities, but these have not been mapped or referenced in the policy wording. The policy is about providing new facilities, but it would be good if it also sets out and protects the existing facilities. Recently examined and made NDP policy wording can be found in the Rowlands Castle NDP – see NDP Policy 10. Otherwise:</p> <ul style="list-style-type: none"> • Criterion A - Please be consistent between the policy title and the first line of the criteria. • Criterion B - Your broad location to the north of the A259 has been identified so should be encouraged rather than supported. 	Clarifications.
Conformity Reference	Please remove SD37 and SD42; and replace with SD43 and SD46.	Correction.
Section 10 – Implementation and Plan Review		
Para 10.2, p51	Once the Plan has been developed ('made'), there will be ...	Correction.
Para 10.3, 2 nd bullet, p51	Please remove the last two sentences. Although we have no issue with the suggestion of a meeting, it is unnecessary to include in the NDP itself.	Clarification.
Section 14 – Glossary		
East Sussex County Council	<p>Please amend to: The county-wide authority has responsibility for strategic matters including waste and minerals planning, maintaining the public rights of way network, education, libraries and roads.</p>	Correction. The SDNPA is the minerals and waste planning authority for the National Park.



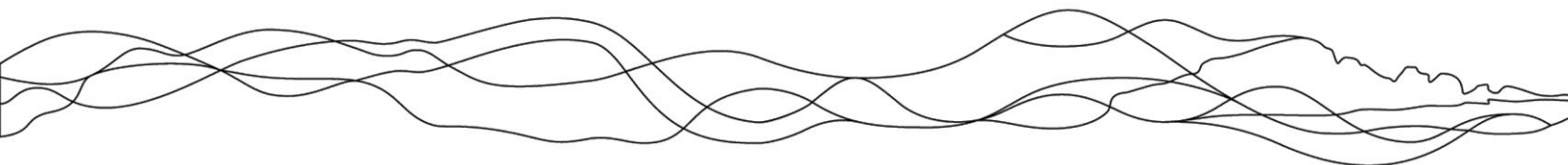
NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Major Development	<p>Please amend to:</p> <p>The National Planning Policy Framework defines major development as: 10 or more homes, or a site area of 0.5ha or more (for residential); additional floorspace of 1000sqm or a site area of 1ha or more (for non-residential); or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015. In addition to the above, the SDNPA has sought legal opinions on what constitutes “major development” for the purposes of Paragraph 183 of the NPPF (2023). These opinions are that the definition as per Paragraph 183 is based on whether, prima facie, the development might potentially have adverse impacts on a National Park, rather than whether, after a careful and close assessment, it will have such adverse impacts.</p>	Correction.
South Downs National Park & Authority	<p>Please add:</p> <p>South Downs National Park (SDNP): The South Downs was designated as a National Park on 31 March 2010 for its natural scenic beauty, wildlife and cultural heritage. The SDNP covers an area of 1,627 square kilometres.</p> <p>South Downs National Park Authority (SDNPA): The Local, Minerals and Waste Planning Authority for the whole of the South Downs National Park (SDNP).</p>	Clarification.
Section 15 – List of Evidence Documents		
CIL and S106 Charging Schedule	As per the Adoption Statement on our website, the charging schedule was adopted on 31 January 2017 and came into effective on 01 April 2017.	Correction.



NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
East Dean Conservation Area Appraisal	The current link takes us to the parish council's NDP webpage. Please correct to either the actual document or our conservation area webpage: https://www.southdowns.gov.uk/planning-news/latest/historic-environment/conservation-areas/	Correction.
National Planning Policy Framework	This was last amended in December (not September) 2023. Notwithstanding the above, a new NPPF is anticipated for the new year. Please cross check your conformity references with the latest NPPF at the time of submission.	Correction.
Neighbourhood Development Planning Regulation 2012 (as amended)	Please amend to: Neighbourhood Planning (General) Regulations 2012 (as amended).	Correction.
South Downs National Park Supplementary Planning Documents and Technical Advice Notes	The correct link is: https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/	Correction.
Appendix A – East Dean and Friston Design Guidance and Codes		
Favorable Design Outcomes, p28	Permeable layout of development, particularly on foot and cycle. Promote connectivity through the use of twittens (alleyways), where sufficient natural surveillance would be possible , to link streets together	Promotion of connectivity is welcomed but needs to be balanced with security and crime prevention (SDNP Design Guide C.1.2) as twittens / alleyways can be poorly overlooked.
Active Travel and Walkable Routes, p34	It could be beneficial to refer to the “Roads in the South Downs” guidance document: https://www.southdowns.gov.uk/landscape-design-conservation/design-in-the-south-downs/guidance/roads-in-the-south-downs/	Reference to, and connection with, existing guidance.



NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Active Travel and Walkable Routes, p34	This requires a footway, grass verge or pavement that is wide enough to ensure pedestrians do not conflict with vehicles, except where this conflicts with rural road character . Primary through routes ...	Text to reflect that, sometimes, a traditional lane approach without footpaths may be the most appropriate for area context.
Materiality and Details, p41 (Point ii)	Point ii (Features / Details) - The preference in traditional or traditionally inspired buildings is flush fitting, painted timber casements rather than aluminum or plastic.	Alignment with SDNP Design Guide (C.13.3).
Materiality and Details, p42 (Point x)	Point x (Materials) – <ul style="list-style-type: none"> • Flint appears to be a very characteristic material in the outlying settlements area but is not currently within the list of façade treatments. • It would be beneficial to expand on the type of weatherboarding as this could currently be considered to include artificial cladding weatherboards. 	Clarification.
Materiality and Details, p42 (Point xi)	Development proposals should make reference to details seen in neighbouring properties, where these contribute positively to the local character .	Amendment suggested in case there is any existing inappropriate 20 th century development in the area.
Cycle Parking, Figure 47, p49	The example image given is not appropriate within the SDNP. The image should be revised to that of a timber store building, with an opportunity to promote the use of green roofs on store buildings. Photo examples can be discussed.	Inappropriate photo example.
Appendix B – Designated and Non-Designated Heritage Assets		
General	It is good how you have presented each non-designated heritage asset (NDHA) in table format (with key information) in Appendix B. Please make sure you have clearly explained why each asset has been identified as an NDHA.	Clear explanation will greatly assist in the considerations and determination of planning applications and appeals.



NDP Ref	SDNPA Comment / Recommendation	SDNPA Explanation / Reasoning
Scheduled Monuments, p66	Paragraph 6.23 states there are 4 scheduled monuments, whilst the second paragraph of Appendix B states that there are 3.	Clarification.
Reasons for listing NDHAs, p66	Please correct to: “Reasons for identifying NDHAs”	NDHAs are identified, not designated.
Appendix C – Localities for Biodiversity Offsets and Interventions		
Page 90	Delete: “using the statutory 10% biodiversity net-gain funds or other similar funding”.	Correction.
Page 90-91	It would be good if the five hedgerows, four woodlands, three ponds, and one village green were shown on a map.	Ease of reading and understanding.
Appendix D – Local Green Spaces		
Page 94	Please delete the third paragraph as the first part is not strictly correct, and the latter part is repetition of the NPPF which is not necessary.	Correction.
Pages 95-97	Please be clear about which table is Table 5, and which is Table 6.	Clarification.
Appendix E – Locally Significant Views		
Pages 104 to 107	It is good that you have included details about the locally significant views. However, as written, only the location of the views is described, and text about what is significant about them has been omitted. Further evidence is required to explain why the views are “special” and/or “valued” by the local community. We note that the Examiner for the Send NDP (in Guildford Borough) wanted to know how locally significant views had been identified, and why they were valued / special. We recommend that the parish council review the examination and evidence for the Send NDP to ensure that their identification of locally significant views is justified and robust.	Clarification.

