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| Table of contents   |                    |   |
| Map 1   | Page 2             | <ul style="list-style-type: none"> <li>Title of map needs amending as it does not show “LGS designation” or “Wildlife corridor”.</li> </ul>   |
|   | Page 2             | <ul style="list-style-type: none"> <li>Map needs to be clearer and show designations relevant to West Saltdean – suggest removing non-relevant designations from Map Key</li> </ul>   |
| Foreword  | Page 4             | <ul style="list-style-type: none"> <li>Text that says “However. We are increasingly seeing family homes being divided into flats or converted into nursing homes and assisted living homes” seems to be out of context and not relevant to policies in the plan. Suggest amending.</li> </ul>   |
| Section 1<br>Introduction to<br>Neighbourhood<br>Planning | 1.3                | <ul style="list-style-type: none"> <li>Amend as follows:<br/>           “The Neighbourhood Forum managed the development of the <del>Local Plan</del> <u>Neighbourhood Plan</u>.”</li> </ul>  |
| Section 2   |                    | <p>Check and amend references in Section 2 (and throughout Plan) to SDNPA where South Downs National Park is being referred to not the South Downs National Park Authority as follow by way of example:</p> <p><i>We will have preserved and enhanced the unique local character of West Saltdean's built environment and open spaces including the seafront and <del>SDNPA</del> <u>South Downs National Park (SDNP)</u>.</i></p>                                  |
| Aims of this plan   |                    | <ul style="list-style-type: none"> <li>In this section reference – NPPF?</li> </ul> <p>Para 8. <b>Achieving sustainable development</b> means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): <b>a) an economic objective</b> – to help build a strong, responsive and</p> |

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|  |                    | <p>competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; <b>b) a social objective</b> – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and <b>c) an environmental objective</b> – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p> |
|  | Para 2.7           | <ul style="list-style-type: none"> <li>• CIL projects technically are part of the ‘planning process’ as funded via planning, so perhaps re-word to say “outside of the direct planning application process” or similar for clarity?</li> </ul>   |
| <b>Objectives of this plan</b>         | p7/para 2.3        | <ul style="list-style-type: none"> <li>• Second bullet - change walking to ‘<i>walking/wheeling</i>’</li> </ul>  |
| <b>Policies vs Projects</b>            |                    |  |
| <b>Section 3 – West Saltdean today</b> | 3.6<br>3.7         | <ul style="list-style-type: none"> <li>• Amend as follows: “Future development of new homes is constrained by West Saltdean’s boundaries of the sea, the SDNPA...”<br/> <i>“West Saltdean is a gateway to the SDNPA with its protected <u>landscape, flora and fauna and range of nature</u>. The area also benefits from proximity to coast and cliff tops <u>and the entire area is situated within</u> <del>(part of</del> the protected UNESCO’s <u>Living Coast Biosphere Reserve</u>).”</i></li> <li>• Suggest amending first few words<br/> <i>“In <del>Q3</del>-2022 the residents of the area too part in a survey conducted by the West Saltdean Neighbourhood Forum about the <del>NA</del>-<u>Neighbourhood Area</u>”</i></li> </ul>   |

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|  | Page 10 para 3.10  |  |
| <b>Section 4 – West Saltdean Tomorrow</b>        |                    |  |
| <b>Section 5 – Local Area Policies</b>           |                    |  |
| <b>1. Achieving Good Design</b>                  |                    | <ul style="list-style-type: none"> <li>• cite (2020) Building for a Healthy Life as well as NDG / NMDC</li> <li>• NB*Future Homes and Building Standards (FHBS) due to come into effect 2025 (may be subject to delay due to consultation process issues (The FHBS technical matters were being consulted on - may now be extended until March 2025 (with legislation Q2/3/4?))</li> </ul> |
|  | Page 12 para 5.1.1 | <ul style="list-style-type: none"> <li>• Update reference to NPPF to say (December 2024)</li> </ul>  |
|  | 5.1.1              | <ul style="list-style-type: none"> <li>• Update reference to National Planning Policy Framework 2024 and relevant paragraph numbers</li> </ul>   |
|  | 5.1.4              | <ul style="list-style-type: none"> <li>• Amend as follows:<br/> <i>Although West Saltdean contains no conservation areas, but does include listed buildings such as the Lido and the former Ocean Hotel, whose special setting and character should be preserved. All new development should respond accordingly to the landscape in which the proposal is being set.</i></li> </ul>       |
| <b>Policy WS1- Achieving High Quality Design</b> | WS1 point 2.       | <ul style="list-style-type: none"> <li>• As well as reducing waste, sustainable design considerations could also include embodied and operational carbon emissions, climate change adaptation and biodiversity. Other standards that could be referenced include: minimum Energy</li> </ul>  |

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|  |                    | <p>Performance Certificate rating (EPC), Net Zero Carbon Buildings Standard (currently at pilot stage), BREEAM rating, performance above Part L building regulation requirements.</p> <ul style="list-style-type: none"> <li>Amend to clarify whether seeking high standard of design or sustainability. If related to sustainability, this part of the policy would need to refer to /accord with CPP1 Policy CP8 and CPP2 Policy DM44, RM10 of Waste and Minerals Plan polices WMP3d and RM 10:</li> </ul> <p><i>Amend as follows: All proposals for development should be designed to a high <u>standard of design, minimise construction and demolition waste and use using</u> sustainable materials suitable for the location which have low embodied carbon. Developers are encouraged to consider circular economy principles* and <del>setting out how materials have considered</del> “Zero Avoidable Waste”* <u>in construction.</u></i></p> <p><i>*Circular economy principles encourage material and resources to be kept in use for as long as possible by re-using, recycling, remanufacturing and sharing resources.</i></p> |
|  | WS1 part 4         | <ul style="list-style-type: none"> <li>Amend as follows: <i>Proposals for development should be sympathetic to West Saltdean’s local character and history, which includes the spaces around buildings, landscape <u>and heritage</u> settings and filtered views.</i></li> </ul>  |
| <p><b>2. The South Downs National Park</b></p> |                    |  |
| <p>POLICY WS2 – South Downs National Park</p>  |                    | <ul style="list-style-type: none"> <li>Amend as follows: <i>“Development within, or impacting upon, the SDNPA should have a landscape-led approach to design, having regard to the setting of the National Park in terms of its landscape and visual amenity.</i></li> </ul> <p><i>Development within or impacting upon the SDNPA must respect the landscape setting of West Saltdean, including meeting the purposes of the SDNPA.”</i></p>   |

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|  |  | <ul style="list-style-type: none"> <li>Comment: there is no supporting text for this policy. For example, this could expand upon what would be considered to be a landscape-led approach. The purposes of the SDNP could be set out within the supporting text for clarity, which are “to conserve and enhance the natural beauty, wildlife and cultural heritage of the park”. (See comments under Section 8).</li> </ul>   |
| <p><b>3. Creating future housing stock for the area</b></p>        |  |  |
| <p>POLICY WS3 - Affordable Housing</p>                             | <p>Second Paragraph of policy</p>                          | <ul style="list-style-type: none"> <li>For clarity as viability assessments may not be required in all cases, to amend:<br/> <i>If a case is made that inclusion of affordable housing would be unviable where it is required as part of a relevant application, r</i><del>R</del><i>obust “open-book” viability assessments should be undertaken...</i></li> </ul>  |
| <p>POLICY WS4 – Other types of low-cost and specialist housing</p> |  |  |
| <p>POLICY WS5 – Adaptable housing</p>                              | <p>Page 17<br/>         Policy WS5 – Adaptable Housing</p> | <p>Comments as per Reg 14 stage:</p> <ul style="list-style-type: none"> <li>Policy largely duplicates or overlaps with CPP2 policies DM1, DM4 and DM5. CPP2 Policy DM1 already sets a requirement for <u>all</u> new housing to meet M4(2) as a minimum.</li> <li>No justification for 400m restriction referenced in point 5 of the policy. The likely impacts of development on local roads such as congestion and overspill parking would be assessed against policy in each case and are dependent on size and on site parking provision. Suggest addressing transport / parking concerns in transport/parking policies rather than here.</li> </ul> |


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|   |                                | <ul style="list-style-type: none"> <li>Point 6 of the policy allows for the expansion of existing facilities/accommodation which contradicts the 400m restriction cited above.</li> <li>Under point 2.) second and third paras label as a) and b) to provide clarity to the reader and decision maker</li> </ul>   |
| <b>4. Conserving Local Heritage</b>   |                                |  |
| POLICY WS6 – Conserving Local Heritage  | Page 18<br>Para 5.4.1          | <ul style="list-style-type: none"> <li>Change “<del>the NA</del>” to read “<i>the Neighbourhood Area</i>”</li> <li>Point 1 should be numbered 1.</li> </ul> <p>As per regulation 14 comments</p> <ul style="list-style-type: none"> <li>Not sure you can say ‘rejected outright’ as this may not be the case – more that ‘<i>development proposals should seek to retain green tiles and their removal will be resisted</i>’. Can do a lot through permitted development so only relates to development that needs planning permission. Also is ‘green tiled roofs’ precise enough? Do you mean original green tiles or green pantiles? - helpful if you could define this better e.g. material, design etc (or include a photo)</li> <li>Point 2 should be numbered 2.</li> <li>Comment: Not sure you can restrict a house from extending?</li> </ul> |
| <b>5.Achieving water efficiencies</b>   |                                |  |
| POLICY WS7 – Incorporating Sustainable Drainage and Water Efficiency Measures | Page 20<br>Policy text for WS7 | Suggest removing bullet points and replacing with a) and b) to provide clarity in referring to the policy for officers and public  |
|   | Page 20<br>Policy text for WS7 | Add in reference to SPD 16 “and <i>SPD 16 Sustainable Drainage will also apply</i> ”   |

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| <b>6. Achieving more sustainable buildings</b>                                       | 5.6.1 to 5.6.6      | Comment: There is some additional data to add to this context, in the Decarbonisation Pathways report, available on the BHCC website. It is recommended that this report be reviewed and also feeds into the Brighton & Hove Energy Co-Op decarbonisation feasibility study.   |
| POLICY WS8 – Small scale renewable energy projects including community energy scheme | WS8 Point 1 page 22 | <p>Acknowledging that this section is expected to be revised. The definition of small scale could include individual heat pumps, and heat networks.</p> <p>Need to clarify that whilst small scale renewable projects etc are acceptable in principle the size and scale will still need to be fully assessed, along with visual, noise and heritage impact – and therefore will need to accord with relevant policies such as amenity (DM20) and also WS8.4</p> <p>As per Regulation 14 comments:<br/>         Small scale is in most cases, subject to limitations and conditions covered by permitted development rights.<br/>         Amend: ...that are not <del>submitted under covered by permitted development rights</del> ...will be acceptable <u>in principle</u>.</p> |
|  | WS8 point 1         | Cannot say categorically that applications will be 'acceptable' i.e. approved. Could change to say 'encouraged' or 'acceptable where there is no conflict with other policies of the Plan'?  |
|  | WS8 Point 3 page 22 | <p>As per Regulation 14 comments:<br/>         What type of project? Wording needs amending to be clear. If this relates to retrofit of existing homes/buildings, what type and scale of renewable projects will require a current carbon footprint assessment? Who would undertake this assessment? Further guidance would be required on an established methodology of assessment, the reduction that is sought. Who will</p>  |

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|                |                                | <p>assess whether the reduction requirement has been met or not? This would go beyond the requirement of CP8 and DM44</p>   |
|                | <p>WS8 Point 6<br/>Page 22</p> | <p>As per Regulation 14 comments:<br/><br/>           These types of features are unlikely to be part of a planning application, won't be shown on most drawings although sometimes seen in householder applications. Difficult to control this, to install one is permitted development, even after permission usually. Note CPP2 Policy DM40 does consider the impacts of emissions from transport, flues, fixed plant, and heat and power systems with respect to air quality. The council have previously objected to wood burning stoves in a nearby new development on the grounds of air quality. The policy could instead encourage new builds to use low carbon or renewable heating sources and resist the use of gas or solid fuels?</p> |
|                |                                | <p>As per Reg 14 comments:<br/><br/>           The South Downs Local Plan Development management Policy SD51: Renewable Energy would apply to land in the national park and should be referenced.</p>   |
|                | <p>WS8 Point 6:</p>            | <p>As per Regulation 14 comments:<br/><br/>           These types of features are unlikely to be part of a planning application, won't be shown on most drawings although sometimes seen in householder applications. Difficult to control this, to install one is permitted Development, even after permission usually. Note CPP2 Policy DM40 does consider the impacts of emissions from transport, flues, fixed plant and heat and power systems with respect to air quality, the council have previously objected to wood burning stoves in a nearby new development on the grounds of air quality. The policy could instead encourage new build to use low carbon or renewable heating sources and resist the use of gas or solid fuels?</p>   |
|                |                                | <p>Acknowledging that this section is expected to be revised. Whole life carbon could be considered ie both operational carbon differences and also the embodied carbon associated with making the proposed changes and any difference in maintenance / equipment replacement regimes.</p>  |

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|  | WS8 point 6        | Cannot state categorically such proposals will definitely be 'rejected' suggest change to 'strongly resisted' or 'will not be supported' or similar.  |
| <b>7. Travel, Transport and Active Movement</b>              | 5.7.2              | 5.7.2 The northern part of the Neighbourhood Plan area is set within the SDNPA and provides public rights of way connections to other nearby areas such as Rottingdean, Woodingdean and Telscombe.  |
| POLICY WS9 – Encouraging and enabling better travel planning | p28/Point 2        | Change walking to 'walking/wheeling' x 2  |
|  | Point 2            | <p>Point 2 – as per Regulation 14 comments:<br/>         Amend text to read “ transport statements/ assessments should positively encourage <u>'reducing the need to travel and enable'</u> high levels of...”</p> <p>Pont 3 as per regulation 14 comments amend to say:<br/>         “a long term-management strategy for their maintenance <u>and funding, where appropriate,</u> should be submitted.’</p> |
| POLICY WS 10 – Parking                                       | WS10 item 1        | <p>Recommended change:<br/>         Planning applications that would result in a net gain of dwellings should include dedicated off-street vehicle parking spaces <u>with electric vehicle (EV) charging available</u> unless they are specified as car-free.</p>   |
|  | WS10 point 1       | <p>Some supporting text about what 'car-free' means would be helpful<br/>         Note that car free cannot really happen here in the wider sense as no CPZ so no permits to be removed.<br/>         Suggest removing text altogether and state should aim to include off-street where possible?</p>   |
|  | WS10 point 2       | <p>Perhaps a typo and should say 'street scene' not 'street scheme'. Cannot categorically state new parking spaces must definitely have greenery – Suggest amending to say 'should aim to incorporate an element of soft landscaping wherever possible'.</p>  |

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|  | WS10 point 3        | Cannot say it is 'prohibited'. Especially as verges/trees might actually be within public highway and not actually controlled by planning directly. Also, some creation of hardstanding and new access onto an unclassified road is Permitted Development (and note there are a few private roads in Saltdean). Again suggest 'strongly resisted' or 'will not be supported' or similar instead.   |
| <b>8. Enhancing our Open Spaces, encouraging Biodiversity &amp; Wildlife</b> | Para 5.8.1          | Change reference to NPPF to say "December 2023 <del>34</del> , paragraph <del>182-189</del> "  |
|  | Para 5.8.1          | Amend as follows:<br><i>"West Saltdean lies in a valley bordered by the sea to the south, the SDNPA to the north and the neighbouring settlements of Rottingdean to the west and East Saltdean to the east. Large parts of West Saltdean Neighbourhood Plan area lie within the SDNPA."</i>  |
|  | 5.8.1-5.8.2         | These paragraphs relate more to policy WS2. Suggest moving to that policy which currently has no supporting text.  |
| POLICY WS11 – Protecting Local Green Spaces                                  | Site 1<br>Site 13   | Site 1 Saltdean United Football Ground and North Saltdean Recreation Group designation as LGS contradicts extant planning permission BH2021/04508 amended by BH2023/02164 to provide 3G pitch, replacement spectator stand, external seating area and new clubhouse. Suggest boundary of Site 1 needs to be amended to remove the part of the site which this planning permission relates to.<br><br>Site 13 Saltdean Vale (3 separate sites adjacent to the road). Question whether these meet the criteria of LGS. |
|  | Site 3<br>Sites 5/6 | Site 3 designated as Local Wildlife Site – BH72<br><br>Maps for Sites 5 and 6 are wrong way round  |
|  | Site 16             | As mentioned, Site 16 is a designated SSSI (Brighton to Newhaven Cliffs). As such unsure why require the LGS designation. Would be better served as a specific entry as SSSI with reference to designation features and link to <a href="#">SSSI entry</a>   |

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| POLICY WS12 –<br>Enhancing local<br>green spaces,<br>biodiversity &<br>wildlife | WS12.1             | Amend as follows for clarity:<br><br>“1. Proposals for new development which would cause any potential harm to the <u>Local Wildlife Sites</u> or...”   |
|   | Text of policy     | Remove bullet points and replace with a) - g) to provide clarity to the reader and decision maker.  |
|   | WS12.3             | 2 <sup>nd</sup> bullet point – suggest amending as follows: “conserve and enhance wildlife and biodiversity <u>and provide Biodiversity Net Gains when required</u> ”<br><br>3 <sup>rd</sup> bullet point refers to a “wildlife corridor”. There is no map to identify where this wildlife corridor is located and no mention of a wildlife corridor in the supporting text. Suggest deleting text.   |
|   | WS 12              | As per comment above, wildlife corridor is mentioned on first map and in this policy but no detail on what this means. Is it reference to the ecological corridor identified in the <u>Green Infrastructure Study</u> ?<br><br><br><br>Suggested add in # with specific reference to ‘proposals that negatively impact the Brighton to Newhaven SSSI will be refused’ or words to that effect |

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|   | WS12 point 2                         | Cannot state categorically they will definitely be refused, suggest rewording to say 'strongly resisted' or 'not supported' or similar.  |
| <b>9.Promoting and Safeguarding the Local Economy</b>   |                                      |  |
| POLICY WS13 – Saltdean Lido   | 5.9.9                                | Remove text that says <del>“while the heritage and recreational aspects of the Lido buildings and pool are addressed elsewhere in the plan”</del> as it isn't.   |
| POLICY WS14 – Supporting local businesses and providing a mix of employment opportunities   | WS14                                 | <p>As per Regulation 14 comments:</p> <p>Not clear if one or all criteria (laid out as bullets) are needed to be met in all cases. Suggest changing bullets to letters to aid decision making process.</p> <p>Point 3) It would be onerous for change of use applications needing planning permission to improve the public realm. This land is also unlikely to be within their jurisdiction</p> <p>Point 4) Increasing/ expanding retail offer may be difficult to implement if a unit is E use class as they may not be a shop and may be an office use, so wouldn't be able to expand the retail offering in the area for residents and visitors. Wording is at odds with CPP2 DM12.</p> |
| <b>10. Encouraging day visitors, improving facilities on the beach and undercliff and safeguarding the beach/clifftop flora and fauna</b> |                                      |  |
| POLICY WS15 – Improving facilities. Safeguarding the  | Policy text for WS15 – after point 1 | For paras starting “seek to” and support and” add in a) and b) at start to provide clarity to the reader and decision maker  |

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| beach/cliff top flora and fauna   | WS15 point 1       | Suggested change to:<br>Support will be given to planning applications on the undercliff promenade and beach that comply with <u>policies</u> SA1 The Seafront <del>CPP2 Policy</del> and DM39 <u>Development on the Seafront development of CPP2</u>   |
|   | WS15 point 2       | The beach, cliff and cliff top fall within a designated Site of Special Scientific Interest and a Local Geological Site and so the impacts of built development on these will need to be taken fully into account in accordance with Policy DM37 Green Infrastructure and Nature Conservation. A cross reference to this policy is recommended. |
| POLICY WS16 - Retaining Whitecliffs Café/Bar as a café/bar/restaurant and an employment site. |                    | As per Regulation 14 comments:<br><br>The facility is likely to be classed as E use class which covers a wide variety of potential occupiers without the need for planning permission.  |
| <b>Section 6<br/>Community<br/>Infrastructure Levy</b>  |                    |   |
| <b>Section 7 Potential projects that could be funded by CIL Receipts</b>                      | p50/section ii)    | Change walking to 'walking/wheeling' x 6  |