

Date:	6 th March 2025
Title:	Report Item 13 – SDNPA Local Plan Consultation
By:	Fiona Chalk (Parish Clerk)
Purpose:	To agree a response to the SDNPA
Recommendations:	To note the proposed response and agree a final version.

SDNPA LOCAL PLAN SUMMARY

The South Downs National Park Authority (SDNPA) is reviewing its Local Plan, which will guide development in the National Park until 2042. This consultation (Regulation 18 stage) seeks input from communities, local councils, and stakeholders on proposed policies and site allocations. The key themes include nature recovery, climate action, housing, economic development, and community well-being.

Key Areas Covered in the Local Plan Review:

1. **Core Policies** – Ensuring sustainable development, major development guidelines, and strategic planning.
2. **Landscape & Heritage** – Protecting views, tranquillity, dark skies, and historical sites.
3. **Nature Recovery** – Biodiversity, tree protection, and international conservation sites.
4. **Climate Action** – Policies on renewable energy, climate change mitigation, and flood risk management.
5. **Water & Pollution** – Managing water resources, drainage, and air quality.
6. **Housing** – Provision of affordable housing, mix of homes, and rural exception sites.
7. **Economy** – Supporting local businesses, employment land, sustainable tourism, and agriculture.
8. **Community Infrastructure** – Open space, local green spaces, walking and cycling routes, and public transport.
9. **Site Allocations** – Identifying areas for new housing, employment, and mixed-use developments.

The consultation document emphasises the **landscape-led approach**, **ecosystem services**, and a **medium dispersed growth** strategy.

A copy of the draft response was circulated via email. Comments received from Councillors and members of the NPSG since then have been added in – see highlighted areas.

DRAFT RESPONSE TO SDNPA LOCAL PLAN CONSULTATION

Planning Policy Team

South Downs National Park Authority
South Downs Centre
North Street
Midhurst
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GU29 9DH

Subject: Response to the South Downs Local Plan Review Consultation (Regulation 18)

Dear Planning Policy Team,

East Dean & Friston Parish Council welcomes the opportunity to comment on the South Downs National Park Authority's (SDNPA) Local Plan Review. We appreciate the effort to ensure the Local Plan reflects the evolving needs of communities while maintaining the special qualities of the National Park.

This response is informed by the **East Dean & Friston Neighbourhood Plan (EDFNP)**, which is nearing finalisation. We wish to ensure that the SDNPA Local Plan aligns with the **specific needs and priorities of our Parish**, particularly in relation to **housing, visitor management, transport, biodiversity, and community infrastructure**.

1. Housing & Development

We recognise the need for appropriate housing within the National Park but have concerns regarding the scale, affordability, and **impact of new development on infrastructure and local character**.

- **Housing Mix & Affordability:** The EDFNP (Policy EDF1) prioritises **smaller homes (1-2 bedrooms)** to support downsizing for older residents and to attract younger families. Larger detached homes do not meet local needs. **We urge SDNPA to ensure any future housing allocations prioritise this mix.**
- **Second Homes & Short-Term Lets:** A high proportion of **holiday homes and second homes** is weakening community sustainability. We **request that SDNPA considers stronger policies to limit second-home purchases and regulate short-term lets.**
- **Infrastructure Capacity:** Any new housing should be accompanied by **investments in local infrastructure**, including **healthcare, transport, and utilities**, to prevent additional strain on existing services.
- **Design & Character:** We support policies ensuring new developments reflect the **local vernacular** and comply with all Parish Council's Design Guides, including the **East Dean & Friston Design Guidance and Codes. Assets of Community Value** should be recognised as having suitable status.

Recommendation:

- Strengthen policies prioritising **1- and 2-bedroom homes** for local people.
- Introduce **controls on second homes and short-term lets** to preserve community sustainability.
- Ensure that all new developments align with the **EDFNP Design Guidance and Codes**.
- **Policy SD5 should make a reference to Parish Council's Village Design Statements somewhere where they have been adopted as Supplementary Planning Documents by the Planning Authority.**
- **Policy SD23 should retain mention of Assets of Community Value**

2. Sustainable Tourism & Visitor Management

Our Parish experiences **significant visitor pressures**, particularly at **Birling Gap**, with **600,000 visitors annually**. The planned removal of **coach parking at Birling Gap in 2025** will **increase congestion and safety risks**. The **Black Robin Farm development in Eastbourne** could add **up to 100,000 additional visitors** per year, further straining local infrastructure.

- **Traffic & Parking Management:** We urge SDNPA to develop a **coordinated visitor transport strategy** to manage vehicle flows, including **park-and-ride solutions** and alternative transport options.
- **Safer Walking Routes to Birling Gap:** Many visitors walk along **Birling Gap Road**, which has **no footways and presents serious safety risks**. SDNPA should **prioritise safer pedestrian and cycle routes**.
- **Coastal Erosion & Visitor Safety:** Increased tourism **exacerbates cliff erosion risks**, and better **visitor education on safety and conservation** is needed.

Recommendation:

- Implement a **Sustainable Tourism Strategy** to balance visitor numbers with environmental protection.
- Work with the **National Trust, Gilbert Estate**, and **Eastbourne Borough Council** to **mitigate impacts from the Black Robin Farm development**.
- Develop **safer pedestrian and cycling routes to Birling Gap** to **reduce road safety risks**.

3. Transport & Infrastructure

The EDFNP (Policy EDF8) highlights **critical transport challenges**, including:

- **Dangerous pedestrian conditions** on **Birling Gap Road** due to lack of footpaths.
- **Lack of cycle lanes** between **East Dean and Birling Gap**.
- **Increased traffic pressures** from developments and changes at **Exceat Bridge**.

Recommendation:

- Introduce **segregated cycle and pedestrian paths** to **Birling Gap and Friston Hill**.
- Implement **traffic calming measures and safer crossing points** on the A259.
- **Improve public transport links from Eastbourne to Birling Gap** to prevent tourists walking in the road along Gilberts Drive, between Birling Gap and East Dean.

4. Environment & Biodiversity

The EDFNP (Policy EDF5) sets a **higher biodiversity net gain target (20%)** than the national minimum (10%). Additionally, key **local biodiversity opportunity areas** have been identified.

Recommendation:

- Support a **20% biodiversity net gain requirement** in SDNPA policy.
- Ensure **biodiversity offsetting is prioritised within the Parish** rather than external areas.
- Strengthen protections for **local wildlife corridors and green spaces**.

5. Community & Public Spaces

The EDFNP highlights the **lack of community facilities**, particularly for **young people and visitors**.

- **Public Toilets:** Essential for managing visitor numbers at **Birling Gap and East Dean village**.
- **Play Areas & Recreation:** Need for **additional play spaces for children and teenagers**, particularly **north of the A259**.
- **Village Infrastructure Improvements:** Enhancements needed to the **Downlands Way shopping area** and community facilities.

Recommendation:

- Support the development of **public toilet facilities** at key visitor locations.
- Ensure **investment in play areas and recreational spaces** to support local well-being.
- Encourage **developer contributions towards community infrastructure** through SDNPA policies.

Conclusion

We appreciate the opportunity to contribute to the Local Plan Review and commend SDNPA for its proactive approach to balancing conservation with community needs. However, we urge SDNPA to give **greater consideration to the specific challenges facing East Dean & Friston**, particularly:

✓ **Prioritising smaller, affordable homes for local people and curbing second-home purchases.**

- ✓ **Implementing a Sustainable Tourism Strategy** to manage visitor numbers and reduce environmental impact.
- ✓ **Improving transport safety** with safer pedestrian routes, cycle lanes, and public transport improvements.
- ✓ **Strengthening biodiversity protections** with a **20% net gain target** and local offsetting measures.
- ✓ **Investing in community infrastructure**, including **public toilets, play spaces, and local facilities**.

If further clarification is required on any of the points raised, please do not hesitate to contact us.

Yours sincerely