

## **Brighton & Hove City Council**

### **West Saltdean Neighbourhood Plan 2024-2030**

#### **DECISION STATEMENT**

##### **1. Introduction**

- 1.1 Under the Town and Country Planning Act 1990 (as amended), the City Council has a statutory duty to assist communities in the preparation of Neighbourhood Plans and Orders and to take plans through a process of examination, referendum and adoption. The Localism Act 2011 (Part 6 Chapter 3) sets out the local planning authority's responsibilities under Neighbourhood Planning.
- 1.2 This report confirms that the modifications proposed by the examiner's report have been accepted, the draft West Saltdean Neighbourhood Plan has been altered as a result of it, and that this plan may now proceed to referendum.

##### **2. Background**

- 2.1 The West Saltdean Neighbourhood Plan relates to the West Saltdean area and the associated Neighbourhood Forum, which were officially designated as a Neighbourhood Area and Forum by Brighton & Hove City Council on 23 August 2022 and by the South Downs National Park Authority (SDNPA) on 30 August 2022. This designated area is within the ward of Rottingdean & West Saltdean and includes part of the South Downs National Park. Brighton & Hove City Council is the lead authority on behalf of the SDNPA. The Neighbourhood Plan has been prepared by West Saltdean Neighbourhood Forum.
- 2.2 Following the submission of the West Saltdean Neighbourhood Plan to the Council, the plan was publicised, and representations were invited over a 6-week period from 27 January to 10 March 2025 in accordance with Regulation 16 of the Neighbourhood Plan regulations.
- 2.3 Mr Derek Stebbing BA (Hons) DipEP MRTPI was appointed by the City Council, with the consent of West Saltdean Forum, to undertake the examination of the West Saltdean Neighbourhood Plan and to prepare a report of the independent examination. The Neighbourhood Plan examination commenced in early May 2025.
- 2.4 The examiner's report was received on 6 August 2025. It concludes that the West Saltdean Neighbourhood Plan, subject to a number of recommended

modifications, meets the Basic Conditions as defined in the Localism Act 2011, Schedule 10 and Schedule 4B, 8 (2) of the Town and Country Planning Act 1990, and can proceed to referendum.

### **3. Decision**

- 3.1 The Neighbourhood Planning (General) Regulations 2012 require the local planning authority to outline what action it wishes to take in response to the recommendations of an examiner made in a report under paragraph 10 of Schedule 4B to the 1990 Act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.
- 3.2 Having considered each of the recommendations in the examiner's report and the reasons for them, Brighton & Hove City Council, with the consent of Brighton West Saltdean Neighbourhood Forum, has agreed what action to take in response to each recommendation. It has been decided to accept all the modifications to the draft Plan proposed by the examiner in accordance with paragraph 12 of Schedule 4B to the 1990 Act.
- 3.3 Table 1 below sets out the examiner's recommended modifications to the Neighbourhood Plan and the accompanying reasons given in his report. The table indicates what action has been decided by the Council in response to each recommendation.
- 3.4 Please note that the Examiner's recommendations refer to Policy, Figure and page numbers as set out in the Neighbourhood Plan as submitted to the Council. In the Referendum Version of the Plan, the numbering has been changed to reflect modifications.

### **4. The Referendums Area and Procedure**

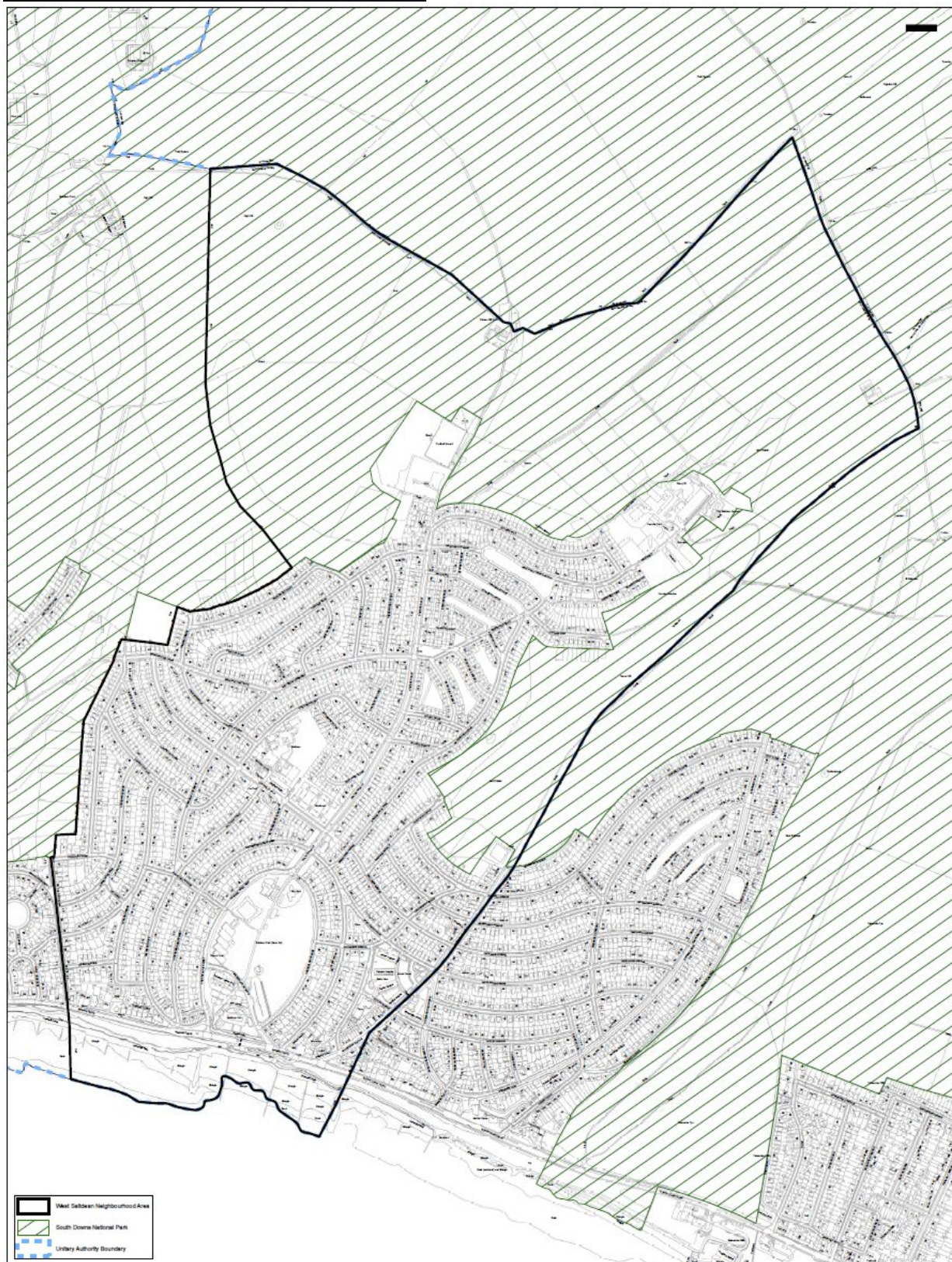
- 4.1 The Council agrees with the Examiner's recommendation that the boundary for the purposes of referendums on the Plan should be the boundary of the designated Neighbourhood Area.

### **5. Conclusion**

- 5.1 Brighton & Hove City Council determines that the West Saltdean Neighbourhood Plan 2024-2030, as modified in Table 1, meets the basic conditions in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act and complies with the provisions made by or under Sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 and may now proceed to Referendum.

**30 September 2025**

## West Saltdean Neighbourhood Area



**(A1) Scale: 1:4,382**

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The Examiner's Report, the draft Neighbourhood Plan (Referendum version, updated to include modifications), and other relevant documents can be viewed on the Brighton & Hove Council website at <https://www.brighton-hove.gov.uk/planning/planning-city/west-saltdean-neighbourhood-area-and-forum>

Hard copy versions of these documents can be viewed at Jubilee, Rottingdean and Whitehawk Libraries.

**Table 1: Recommendations by the Examiner agreed by Brighton & Hove City Council with consent of the West Saltdean Neighbourhood Forum**

PLAN POLICY / PARAGRAPH	RECOMMENDED MODIFICATION	REASONS	COUNCIL DECISION
Modification PM1 Page 2 Map 1 – BHCC City Plan Policies, LGS Designation, Wildlife Corridor, Shopping Areas	Delete existing title and replace with “The West Saltdean Neighbourhood Area”,  and amend Contents Page accordingly.  Delete all BHCP Policy content and other notations from the map, with the exception of the Neighbourhood Area boundary, the Built-Up Area boundary and that part of the South Downs National Park (SDNP) that lies within the Neighbourhood Area.  Adjust Notation Panel accordingly.	The title of the Map is incorrect (as it does not depict Local Green Space (LGS) designations or the Wildlife Corridor) and, at the small scale of this map, the depiction of other BHCP policy notations detracts markedly from the clarity of the map, and which will be difficult for users of the Plan to interpret with accuracy. The BHCP policy content and other notations should be removed, in order to improve its clarity.	All recommended modifications /deletions accepted
Modification PM2 Page 13 Policy WS1 – Achieving High Quality Design	“Where appropriate, all proposals for development should demonstrate how they have taken into consideration the City Council’s Supplementary Planning Document (SPD) No. 17 ‘Urban Design Framework’ (June 2021), the South Downs National Park Authority’s SPD ‘Adopted Design Guide’ (July 2022) and the West Saltdean Design Guidance and Codes (January 2024) (at Appendix 1 to this Plan).”  Delete the text of Part 2 in full, and replace with:	The City Council has made detailed comments regarding this Policy and suggests amendments to Part 2 of the Policy text. Examiner concurred with those suggestions and also considered that several focused amendments to the Policy and text are required to ensure the necessary clarity and accuracy.	All recommended modifications /deletions accepted

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	<p>“All proposals for development should be designed to a high standard of design, minimise construction and demolition waste and use sustainable materials suitable for the location which have low embodied carbon. Developers are encouraged to consider circular economy principles* and ‘Zero Avoidable Waste’ principles**.”</p> <p>Amend Part 4 of the Policy text to read as follows:</p> <p>“Proposals for development should be sympathetic to West Saltdean’s local character and history, which includes the spaces around buildings, landscape and heritage settings and filtered views.”</p> <p>Add new Parts 6 and 7 to the Policy text, as follows:</p> <p>“6. Existing flow routes and drainage features within the development site should be identified and preserved, such as ditches, seasonally dry watercourses and historic ponds. 7. Proposals should integrate sustainable drainage measures to minimise and control surface water run-off and improve habitats and species migration. Such measures include rainwater re-use/harvesting, green roofs, rain gardens, trees and permeable paving.”</p>		

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	<p>Add footnotes to the Policy, as follows:</p> <p>“* Circular economy principles encourage material and resources to be kept in use for as long as possible by re-using, recycling, re-manufacturing and sharing resources.”</p> <p>“**Zero Avoidable Waste’ refers to the Government’s Waste Prevention Programme for England, published in August 2023, and specifically to the Routemap for Net Zero Avoidable Waste in Construction by 2050.”</p>		
<p>Modification PM3 Page 14 Policy WS2 South Downs National Park</p>	<p>Delete Policy text in full, and replace with:</p> <p>“POLICY WS2 – South Downs National Park</p> <p>1. Development within, or impacting upon, the South Downs National Park should have a landscape-led approach to design, having regard to the special qualities of the National Park and, as appropriate, in accordance with the policies of the adopted South Downs Local Plan 2014-2033, including Policies SD4 Landscape Character, SD5 Design, SD6 Safeguarding Views and SD8 Dark Night Skies, and the guidance contained in the Adopted Design Guide SPD.</p> <p>2. Development within, or impacting</p>	<p>The examiner considers that the Policy is rather limited in providing guidance on the acceptability or otherwise of proposals for new developments within or impacting upon the National Park, and that there is no supporting text to justify the Policy or to provide any additional policy guidance for its future implementation.</p>	<p>All recommended modifications /deletions accepted</p>

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	<p>upon, the South Downs National Park must respect the landscape setting of West Saltdean, including meeting the purposes of the South Downs National Park.”</p> <p>Add the following supporting text to precede the Policy:</p> <p>“5.2.1 West Saltdean lies in a valley bordered by the sea to the south, the South Downs National Park (SDNP) to the north and the neighbouring settlements of Rottingdean to the west and East Saltdean to the east. Large parts of the Plan area lie within the SDNP.</p> <p>5.2.2 The South Downs National Park Authority (SDNPA) is the local planning authority for those areas of West Saltdean that are within the SDNP. The SDNPA when making planning decisions is guided by the statutory purposes and duty of the National Park, and by national and local policies.</p> <p>5.2.3 The National Park purposes are: 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public</p> <p>5.2.4 The duty of the SDNPA in</p>		

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	<p>carrying out these purposes is to seek to foster the economic and social well-being of the local communities within the National Park.</p> <p>5.2.5 The National Planning Policy Framework (NPPF), paragraph 189 (as revised December 2024) states: "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."</p> <p>5.2.6 The adopted South Downs National Park Local Plan (SDLP) 2014-2033 requires that a landscape led approach is adopted for those areas of West Saltdean within the SDNP. The landscape led approach to design is defined in the SDNPA's 'Adopted Design Guide' Supplementary Planning Document (SPD), which states that "Design,</p>		

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	<p>which is strongly informed by understanding the essential character of the site and its context (the landscape), creates development which speaks of its location, responds to local character and fits well into its environment. It needs to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and create sustainable and successful places for people.”</p> <p>5.2.7 For the landscape led approach in the SDLP see in particular Policies SD4 Landscape Character, SD5 Design and SD6 Safeguarding Views. The landscape led approach is expanded upon in the SDNPA’s ‘Adopted Design Guide’ Supplementary Planning Document (SPD).</p> <p>5.2.8 The landscape led approach notes that the SDNP is an International Dark Skies Reserve. Development needs to conserve and enhance the dark night skies of the SDNP as set out in the SDLP 2014-2033, Policy SD8 Dark Night Skies. Further guidance is provided in the SDNPA’s ‘Dark Skies’ Technical Advice Note (TAN) (May 2021).</p> <p>5.2.9 The SDNP was designated in recognition of its exceptional natural beauty, for the opportunities to learn about and appreciate its special qualities and as a landscape of</p>		

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	<p>national importance. The special qualities are expanded upon in the Introduction chapter of the SDLP.</p> <p>5.2.10 Proposals should reflect the setting of the National Park including the guidance provided by the South Downs Landscape Character Assessment, Appendix A Landscape Character Type A: Open Downland and specifically A2: Adur to Ouse Open Downs including the Landscape Management/Development considerations for that area.</p>		
<p>Modification PM4 Page 15 Policy WS3 – Affordable Housing</p>	<p>Amend the second paragraph of Policy text to read as follows:</p> <p>“In those circumstances where a case is made that the inclusion of affordable housing within a development scheme would be unviable, where such provision is a policy requirement, robust ‘open-book’ viability assessments should be undertaken in accordance with the National Planning Policy Framework and the guidance contained in ‘Assessing Viability in Planning’ (April 2023), published by the Royal Institution of Chartered Surveyors (RICS) (including any subsequent updates), and should be based on Benchmark Land Values as undertaken by a qualified RICS Assessor.”</p>	<p>The City Council made a comment regarding this Policy. and the Examiner concurs with that comment and recommends an amendment to the Policy text.</p>	<p>All recommended modifications /deletions accepted</p>

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Modification PM5 Page 16 Policy WS4 – Other Types of Low-cost and Specialist Housing	Amend Part 3 of the Policy text to read as follows:  “Proposals for specialised housing/accommodation which take account of the local needs identified in the West Saltdean Housing Needs Assessment (HNA) (August 2023) which is at Appendix 2 to this Plan.”	Two focused amendments to Part 3 of the Policy text improve clarity.	
Modification PM6 Page 17 Policy WS5 – Adaptable Housing	Delete the text of Part 5 of the Policy text in full, and re-number Part 6 as Part 5.	As drafted, this Policy contains a number of potential internal contradictions for its effective implementation. The Examiner does not identify any justification or evidence that supports Part 5 of the Policy, and as such the Examiner concludes that this part of the Policy should be deleted.	All recommended deletions accepted
Modification PM7 Page 19 Policy WS6 – Conserving Local Heritage	Number the two separate paragraphs of this Policy as 1. and 2.  Delete in full the existing text of the first paragraph, and replace with:  “Development proposals should seek to retain the original green roof tiles and pantiles that are characteristic of many existing buildings in the Plan area, and proposals that seek to replace them with tiles of another colour will not be supported.”	The City Council made a number of comments regarding this Policy, which I have considered alongside my own assessment. Examiner considers that a number of amendments are necessary to ensure the Policy’s requirements are clear, for the benefit of users of the Plan.	All recommended modifications /deletions accepted

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<p>Modification PM8 Page 20 Policy WS7 – Incorporating Sustainable Drainage and Water Efficiency Measures</p>	<p>Insert “(SuDS)” after the words “Sustainable Drainage Systems” in the second line of policy text.</p> <p>Delete bullet points and replace with 1. and 2.</p> <p>Add new points 3 and 4 to the Policy text, as follows:</p> <p>“3. To minimise the risk of sewer flooding and to protect water quality, surface water will not be allowed to discharge to the wastewater drainage network.</p> <p>4. Where developments are proposed in areas overlying Source Protection Zones (SPZ), proposals must demonstrate how SuDS designs will protect groundwater quality sufficiently to protect public water supply. SuDS designs should be agreed with the statutory water supplier, and be supported by a hydrogeological risk assessment where required.”</p>	<p>The Examiner has taken into account the representations made by Southern Water concerning this Policy, and recommend a series of amendments to the Policy text to ensure that it provides appropriate and clear guidance for users of the Plan.</p>	
<p>Modification PM9 Page 22 Policy WS8 – Small Scale Renewable Energy Projects including Community Energy Scheme</p>	<p>Amend Policy title to read “Renewable Energy and Low Carbon Technology (LCT) Projects including Community Energy Scheme” and amend Contents Page. Amend Policy text to read as follows:</p> <p>“1. Proposals for renewable energy or Low Carbon Technology (LCT) projects in new or existing developments and Brighton &amp; Hove City Council-owned properties and</p>	<p>A series of amendments are necessary to the Policy text and its supporting text, including the addition of further supporting text, in order that this Policy can be implemented effectively and that it provides appropriately clear guidance for users of the Plan.</p>	<p>All recommended modifications /deletions accepted</p>

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	<p>assets, that are not covered by Permitted Development rights will be supported in principle.</p> <p>2. Proposals should seek to conserve and enhance the surrounding landscape and be sensitively designed, taking account of noise, air pollution and long-term management.</p> <p>3. The ground-mounting of on-site installations which would involve the paving over of gardens or other green spaces will be discouraged, unless this is technically essential and is mitigated by other clearly demonstrable environmental benefits.</p> <p>4. All proposals that require planning permission should satisfy the requirements of the relevant policies in the adopted Brighton &amp; Hove City Plan and South Downs Local Plan. 5. Proposals for new developments in the Plan area should seek to incorporate low carbon or renewable heating sources and avoid the use of gas and solid fuels.”</p> <p>Delete existing Policy footnote.</p> <p>Delete the final sentence of paragraph 5.6.6.</p> <p>Add new paragraphs 5.6.7-5.6.10 as follows:</p> <p>“5.6.7 As part of West Saltdean’s</p>		

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	<p>Decarbonisation Strategy, West Saltdean's potential largest roof-mounted solar opportunities have been identified as the Lido building and the Lido's two car parks, Saltdean United Football Club's building and the roof-spaces of blocks of flats. There are only small publicly owned plots (which are designated as Local Green Spaces) that would be suitable for ground-mounted solar and wind.</p> <p>5.6.8 West Saltdean has the capacity to launch a community energy scheme and work on this is ongoing. A community energy scheme is defined as a defined group of import and/or export electricity meters that are aggregated into a single entity for the purpose of sharing costs and benefits between scheme members served by those meters. The scheme would have a charter, or statement of objectives and rules that detail how the scheme works, what Low Carbon Technologies (LCTs) may be used in the scheme, and how costs and benefits are spread equitably among its members. Larger-scale projects will be encouraged to join the Saltdean community energy scheme.</p> <p>5.6.9 Management of the community energy scheme will be left to its members. Links (technical and financial) to neighbouring community energy schemes will be strongly encouraged, especially where</p>		

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	<p>economies of scale and other benefits from linkage can be demonstrated. Therefore, applications from community-led or by a not-for-profit organisation such as a Co-operative are welcomed by the West Saltdean Neighbourhood Forum.</p> <p>5.6.10 Where there are alternative choices of Renewable Energy or Low Carbon Technology* (LCT) to implement, the fitting of the technology most suitable for the property in question will be encouraged, with reference to the Saltdean Decarbonisation Feasibility Study and Energise Sussex Coast Carbon Footprint Report.”</p> <p>Add Footnote as follows:</p> <p>“*Low Carbon Technology means insulation (external and internal), roof or ground-mounted solar panels and micro-wind turbines, surface or underground battery storage (internal or external), and electric vehicle (EV) charging points for residential, community, private sector and Brighton &amp; Hove City Council-owned assets.”</p>		
<p>Modification PM10 Page 24 Policy WS9 – Encouraging and Enabling Better Travel Planning</p>	<p>Amend Part 2 of the Policy text to read as follows:</p> <p>“Transport statements/assessments should positively encourage reducing the need to travel and facilitate higher levels of walking, cycling and public</p>	<p>The City Council has made two comments regarding the text of this Policy. The Examiner concurs with those comments and recommended modification PM10 sets out the necessary</p>	<p>All recommended modifications accepted</p>

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	<p>transport use by demonstrating how the proposed development creates links to existing walking, cycling and public transport infrastructure and, where possible, by providing new and/or improved facilities to achieve this.”</p> <p>Amend Part 3 of the Policy text to read as follows:</p> <p>“For major development proposals where the development includes new footways, cycleways and highways that will not be adopted by the Highway Authority, a long-term management strategy for their future maintenance and funding, where appropriate, should be submitted as part of the development proposals.”</p>	amendments to the Policy text.	
<p>Modification PM11 Page 24 Policy WS10 – Parking</p>	<p>Amend Part 1 of the Policy text to read as follows:</p> <p>“Proposals for new development that would result in a net gain of residential dwellings should include, where possible, dedicated off-street vehicle parking spaces with electric vehicle (EV) charging points.”</p> <p>Amend Part 2 of the Policy text to read as follows:</p> <p>“Vehicle parking on driveways should be designed to minimise the visual impact on the street scene. Parking areas should include appropriate landscaping features, wherever</p>	<p>The City Council has made a number of comments regarding this Policy. The examiner concurs with these comments, and in particular with the comment regarding the lack of a definition for ‘car-free’ dwellings, which in practice would be extremely difficult to control and enforce by the Local Planning Authority.</p> <p>The amendments provide the necessary clarity for users of the Plan, and also to correct a typographical error.</p>	All recommended modifications accepted

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	<p>possible, to reduce the visual impact.”</p> <p>Amend Part 3 of the Policy text to read as follows:</p> <p>“The removal of existing grass verges and trees to facilitate vehicle parking will not be supported.”</p>		
<p>Modification PM12</p> <p>Pages 26- 42</p> <p>Policy WS11 – Protecting Local Green Spaces</p>	<p>Delete existing Policy text in full and replace with:</p> <p>“The areas listed below and shown on the accompanying map and on the Inset Maps at Pages 27-42 are designated as Local Green Spaces:</p> <ol style="list-style-type: none"> <li>1. Saltdean United Football Club (SUFC) and North Saltdean Recreation Ground</li> <li>2. Land to the rear of Looes Barn Close</li> <li>3. Green Space at Westfield Avenue North and Westfield Avenue South</li> <li>4. Green Space at Coombe Farm Estate</li> <li>5. Green Space at Hailsham Avenue</li> <li>6. Green Space at Stanmer Avenue</li> <li>7. Green Spaces at Hempstead Road</li> <li>8. Green Space at Mount Estate – to the rear of Saltdean Vale</li> <li>9. Green Space at Mount Estate – to the rear of Heathfield Avenue</li> <li>10. Green Space at Mount Estate – to the rear of Arlington Gardens</li> <li>11. Playing Fields at Saltdean Primary School</li> <li>12. Churchyard surrounding St. Nicholas Church</li> </ol>	<p>The revised mapping, information and proposed text amendments that have been supplied by the Qualifying Body addresses all of the matters that were raised in representations to the draft Plan and from the Examiner’s own assessment, recommends the necessary revisions and amendments as part of consolidated modification PM12.</p> <p>Some amendments are necessary to the Policy text, including the descriptors of a number of the sites for improved geographical accuracy.</p> <p>The policy text should be extended to have proper regard to Paragraph 107 of the NPPF in order to satisfy the Basic Conditions..</p>	<p>All recommended modifications /deletions accepted</p>

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	<p>13.Green Spaces at Saltdean Vale 14.Saltdean Oval Park 15.Green Space at Saltdean Lido 16.The Cliff Top Development proposals in the 16 designated Local Green Spaces listed above and defined on the accompanying maps to this Policy will be managed in accordance with national policy for Green Belts.”</p> <p>Amend the site descriptors to conform with the descriptions stated above, including the titles of all relevant maps.</p> <p>Replace the maps for the Index Map (on Page 26), Site 1 (on Page 27), Site 2 (on Page 28), Site 4 (on Page 30), Site 5 (on Page 31) and Site 6 (on Page 32) with the revised maps supplied by the Qualifying Body in response to the fourth of my questions (see also paragraph 4.57 of this report).</p> <p>Amend the site area of Site 1 (on Page 27) to read “2.3 acres”. Add the following text to the description of Site 3 (on Page 29):</p> <p>“This site is also a designated Local Wildlife Site (Ref. BH72) as listed at paragraph 5.8.18.”</p>		

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Modification PM13 Page 44	<p>Policy WS12 – Enhancing Local Green Spaces, Biodiversity and Wildlife Amend Part 1 of the Policy text to read as follows:</p> <p>“Proposals for new development which would cause any potential harm to the designated Site of Special Scientific Interest (SSSI), Local Wildlife Sites (LWS) or Local Green Spaces (LGS) within the Plan area will not be supported unless they are justified in the public interest and appropriate mitigation measures are proposed.”</p> <p>Amend Part 2 of the Policy text to read as follows:</p> <p>“Proposals for new development that would require the removal of any trees that are protected by Tree Preservation Orders (TPOs) will not be supported.”</p> <p>Amend Part 3 of the Policy text as follows:</p> <ol style="list-style-type: none"> <li>1. Replace the seven bullet points with the letters a)-g) respectively.</li> <li>2. Amend the second bullet point text (to be b)) to read as follows: “conserve and enhance wildlife and biodiversity, and provide Biodiversity Net Gains when required”</li> <li>3. Amend the third bullet point text (to be c)) to read as follows: “respect, enhance and provide green linkages</li> </ol>	<p>The City Council and the SDNPA have made comments regarding this Policy. Amendments are necessary to ensure that the Policy provides clear and accurate guidance for users of the Plan.</p>	

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	<p>with biodiversity and green space within and around developments, particularly where the space is in the vicinity of a Local Wildlife Site or Local Green Space”</p> <p>4. Amend the fourth bullet point text (to be d)) to read as follows: “include the planting of tree species that are suitable to Brighton &amp; Hove and, where appropriate, to the South Downs National Park”</p> <p>Amend paragraph 5.8.17 of the supporting text to refer to “5 Local Wildlife Sites” rather than 6 Local Wildlife Sites.</p> <p>Add new paragraph 5.8.18 to the supporting text, to read as follows: “5.8.18: There are five Local Wildlife Sites within the Plan area:</p> <p>1. BH54 - Wivelsfield Rd Grassland – within the South Downs National Park (SDNP). (Also part of an ecological corridor within both the Plan area and the SDNP. This forms part of the existing Nature Improvement Area/Green Network which is designated under the Brighton &amp; Hove City Plan Part 1 Policy CP10)</p> <p>2. BH56 - Quarry Field - within the SDNP</p>		

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	<p>3. BH57 - Looes Barn Woodland – within the SDNP</p> <p>4. BH58 - Coombe Farm - within the SDNP</p> <p>5. BH72 - Westfield Avenue North and South – also designated as a Local Green Space (Site No. 3)</p> <p>These sites are shown on the accompanying map.”</p> <p>Add the map entitled ‘Local Wildlife Sites’ supplied by the Qualifying Body on 12 June 2025 with its response to the questions to follow new paragraph 5.8.18 and to precede Policy WS12.</p>		
<p>Modification PM14</p> <p>Page 47</p> <p>Policy WS13 – Saltdean Lido</p> <p>Paragraph 5.9.9</p>	<p>Delete the words</p> <p>“While the heritage and recreational aspects of the Lido buildings and pool are addressed elsewhere in this plan” from the second sentence of text.</p> <p>Amend the third sentence to read as follows: “The following policy specifically relates to the Lido:”</p>	<p>Paragraph 5.9.9 in the supporting text requires an amendment as it states that “the heritage and recreational aspects of the Lido buildings and pool are addressed elsewhere in the Plan”. However, these aspects are not covered in any other parts of the Plan. Recommended modification PM14 addresses the necessary amendment.</p>	<p>All recommended modifications /deletions accepted</p>
<p>Modification PM15</p> <p>Page 47</p> <p>Policy WS14 – Supporting Local Businesses and Providing a Mix of Employment Opportunities</p>	<p>Amend the opening sentence of Part 1 of the Policy text to read as follows:</p> <p>“Proposals for business and retail developments in the three main shopping areas of the Plan area will be supported, where the</p>	<p>The City Council has made a number of comments regarding this Policy. I concur with those comments, and recommended modification PM15 sets out the necessary revisions to the</p>	<p>All recommended modifications accepted</p>

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	<p>developments would meet the following criteria, as relevant to the specific nature and use of the proposed development:"</p> <p>Amend the four bullet points in Part 1 of the Policy text to the letters a)-d) respectively.</p> <p>Amend the first bullet point text (to be a)) to read as follows: "Provide additional services for residents and visitors and increase local employment opportunities;"</p> <p>Amend the second bullet point text (to be b)) to read as follows: "Include flexible workspaces that would allow for shared and affordable working spaces and training facilities to support the local economy;"</p> <p>Amend the third bullet point text (to be c)) to read as follows: "Provide opportunities for public realm improvements that would create a more attractive user experience, which can be enjoyed by people of all ages and abilities;"</p> <p>Amend the fourth bullet point text (to be d)) to read as follows:</p> <p>"Would support and maintain the retail offering within the Plan area, for the benefit of residents and visitors."</p>	<p>Policy text, in order to provide greater clarity for future users of the Plan.</p>	

PLAN POLICY / PARAGRAPH	RECOMMENDED MODIFICATION	REASONS	COUNCIL DECISION
<p>Modification PM16 Page 48 Policy WS15 – Improving Facilities. Safeguarding the Beach/Clifftop Fauna and Fauna</p>	<p>Amend the first paragraph of Part 1 of the Policy text to read as follows: “Support will be given to planning applications on the Undercliff promenade and beach that comply with Policies SA1 (The Seafront) and DM39 (Development on the Seafront) in the Brighton &amp; Hove City Plan - Part 2, and:” Amend the second and third paragraphs of text in Part 1 of the Policy text to be preceded by the letters a) and b) respectively. Amend the text of Part 2 of the Policy text to read as follows: “The impacts of development proposals upon the designated Site of Special Scientific Interest (SSSI) and Regionally Important Geological Site (RIGS), and on the coastal flora and fauna, should be assessed through an Ecological Impact Assessment and will need to be taken fully into account in accordance with Policy DM37 (Green Infrastructure and Nature Conservation) in the Brighton &amp; Hove City Plan - Part 2.”</p>	<p>The City Council has made a number of comments regarding this Policy. I agree with those comments and have identified a further necessary amendment as part of my own assessment. Recommended modification PM16 sets out the necessary amendments to this Policy, in order to provide greater clarity for users of the Plan.</p>	
<p>Modification PM17 Page 49 Policy WS16 – Retaining Whitecliffs Café/Bar as a Café/Bar/Restaurant and an Employment Site</p>	<p>Amend the words “much-valued” in the Policy text to read “much valued”.  Delete the word “rejected.” in the Policy text and replace with “will not be supported.”</p>	<p>Two focused amendments are necessary to the text of this Policy, which is otherwise suitably drafted. Recommended modification PM17 sets out the two amendments. Since June 2025, the Café/Bar is now known as “Kitti’s”, and thus the Policy title would benefit from being updated accordingly.</p>	<p>All recommended modifications /deletions accepted</p>

PLAN POLICY / PARAGRAPH	RECOMMENDED MODIFICATION	REASONS	COUNCIL DECISION
<p>Modification PM18</p> <p>Page 5</p>	<p>Section 1 – Introduction to Neighbourhood Planning Add new sub-section entitled</p> <p>‘Monitoring and Review’ to follow paragraph 1.4.</p> <p>Add new paragraph 1.5 to read as follows:</p> <p>“1.5 The effectiveness of the policies in the NP will be monitored on a regular basis up to 2030. BHCC and the SDNPA are presently reviewing their current Local Plans, and it may be necessary to formally review the NP prior to 2030 to take account of the policies and proposals in those updated Local Plans, in order that the NP will remain as a key part of the statutory development plan for West Saltdean.”</p>	<p>The draft Plan does not contain a clear statement regarding its future monitoring and review. The Plan’s relationship with the BHCP and the SDLP is particularly important and both of those Local Plans are now being reviewed. There is the likelihood that there will be a need to formally review the Plan during the Plan period, following the completion of those Local Plan reviews and also to take account of any changes to national planning policies. I consider that the Plan should contain a statement regarding the necessity to undertake a future review in order to take account of the new Local Plans and to address the implications for West Saltdean, that may arise from those reviews.</p>	
<p>Modification PM19</p> <p>Various</p> <p>Other Matters</p>	<p>1. The SDNPA advises that specific references to BHCP policies should be removed where those policies apply to both the Brighton &amp; Hove and SDNP areas of West Saltdean, e.g. at Policies WS7 and WS14.</p> <p>2. The City Council suggests an amendment to the Foreword.</p> <p>3. Paragraph 1.3 – “Local Plan” should be “Neighbourhood Plan”.</p>	<p>The draft Plan contains a number of small inconsistencies which have been identified in representations from the City Council and the SDNPA and through my own detailed assessment of the Plan. In the interests of brevity, these are summarised at recommended modification PM19</p>	<p>All recommended modifications /deletions accepted</p>

PLAN POLICY / PARAGRAPH	RECOMMENDED MODIFICATION	REASONS	COUNCIL DECISION
	<p>4. Check and amend references to the SDNPA throughout the Plan where the South Downs National Park is being referred to rather than the SDNPA, e.g. two references within 'Our Vision'.</p> <p>5. Amend all references to "NA" to the "Neighbourhood Area".</p> <p>6. Areas of Outstanding Natural Beauty (AONBs) are now known as National Landscapes.<sup>17</sup> However, as the Plan has been prepared and examined in accordance with the NPPF (December 2023), the AONB reference can be retained in the Plan and its supporting documents but will need to be amended in a future review of the Plan.</p> <p>7. Amend text of paragraph 5.8.5 to also add "or the South Downs Local Plan."</p>		