

## Lewes District Local Plan

### Part 1: Joint Core Strategy – Submission Document

### **Proposed Modifications**

Schedule 2

July 2015

Modifications proposed in the LDC/SDNPA Written Matters Statements as originally submitted in January 2015



## Schedule 2 – Modifications proposed in our Written Matters Statements

### **Context for the Modifications**<sup>1</sup>

**Schedule 2** – below sets out the Main and Additional Modifications proposed to the Inspector in our January 2015 Written Matters Statements. This was originally submitted as Table 2 of examination document LDC/015. Where changes have subsequently been made, or modifications in Table 2 have been superseded in Schedules 3 or 4, this is indicated in Schedule 2.

We have also prepared three other Schedules of proposed modifications:

**Schedule 1** - Main and Additional modifications to the Joint Core Strategy Submission Document that the local planning authorities have identified following the pre-submission publication of the Focussed Amendments document under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These modifications have arisen post-publication and are generally recommended to address a matter raised in representations made; to update information; or to correct drafting errors in the document. The reason for each modification is given in the relevant table. This schedule was originally submitted as examination document CD/004 in September 2014.

**Schedule 3 – Main Modifications** proposed in response to discussions at the Examination Hearings in January 2015 and in response to the Inspector’s Initial Findings Letter of 10 February 2015 [ID-05 [http://www.lewes.gov.uk/Files/plan\\_ID-05\\_Letter to Councils 10 Feb 2015.pdf](http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf)]. NB. This schedule includes Main Modifications originally included in Schedules 1 or 2. Schedule 3 therefore sets out all modifications proposed since September 2014 that are considered to be ‘Main Modifications’. It is the Main Modifications that the Inspector will consider in his Final Report hence they have been compiled together in Schedule 3 for ease of reference.


**Schedule 4** – Additional Modifications (‘non-main’ or ‘minor’ modifications) proposed in response to discussions at the Examination Hearings in January 2015 and in response to the Inspector’s Initial Findings Letter of 10 February 2015 [ID-05 [http://www.lewes.gov.uk/Files/plan\\_ID-05\\_Letter to Councils 10 Feb 2015.pdf](http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf)].


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<sup>1</sup> ‘Main’ Modifications are those changes that are necessary for the soundness of the plan. It is only the Main Modifications that the Inspector will deal with in his final report. ‘Additional’ Modifications are all other changes (sometimes called ‘minor’ modifications) including corrections and additional supporting text and clarification, which the local planning authority considers of benefit to the plan and/or its implementation but do not change the intent of the strategy itself.

## Schedule 2 – Modifications proposed in our Written Matters Statements

The Inspector is invited by the Local Planning Authorities to consider the Main Modifications to the Joint Core Strategy Submission Document under Section 20(7) of the Planning and Compulsory Purchase Act 2004.

MAIN MODIFICATIONS are highlighted in blue 

SUPERSEDED modifications are greyed out 

NB All page numbers, footnotes and paragraph numbers etc quoted relate to the September 2014 Submission Joint Core Strategy document. Page, paragraph and policy numbers may change once the modifications are included in the final draft.

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Schedule 2			
LPA Modification Number	Joint Core Strategy Submission Document Reference /Location	Proposed Change	Reason
MOD28	Page 39, paragraph 6.19	Amend paragraph 6.19 as follows;  The outcome from the appraisal of different options has led the District Council and the National Park Authority to conclude that the overall target for net additional housing in the district should be a minimum of 5, <del>790600</del> dwellings between 2010 and 2030 (an average of <del>29080</del> dwellings per annum).	To reflect the updates made to the level of commitments and completions (from the 1 <sup>st</sup> April 2013 to the 1 <sup>st</sup> October 2014). See paragraphs 2.1 to 2.5 of the LDC and SDNPA response to Issue 4 ii).  Superseded by AM05
MOD29	Page 41, Spatial Policy 1	To amend the first sentence of Spatial Policy 1 as follows;  <b>In the period between 2010 and 2030, a minimum of 5,<del>790600</del> net additional dwellings will be provided in the plan area (this is the equivalent of approximately <del>2980</del> net additional dwellings per annum).</b>	Same as reason for MOD28.  Superseded by MM01
MOD30	Page 42, Table 4	To amend table 4 as follows;	Same as reason for MOD28.

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			(A) Total requirement	(B) Already developed in the plan period (April 2010 – <del>October 2014</del> April 2013)	(C) Units permitted, but not yet implemented (includes units under construction) <sup>2</sup>	(D) Units considered deliverable having made sufficient progress through the planning process <sup>3</sup>	(E) Unimplemented Local Plan allocations for housing <sup>4</sup>	Residual requirement to plan for (A – B, C, D & E)	Superseded by AM08
		Housing (within the National Park)	Plan – wide requirement :	<u>11077</u>	1683	0	0	Plan – wide requirement:	
		Housing (outside of the National Park)	5,790600	<u>788551</u>	<u>1111961</u>	<u>2977</u>	227	3,357544	
MOD31	Pages 45 and 46, Spatial Policy 2.	<p>Amend Spatial Policy 2 as follows;</p> <p><b>Spatial Policy 2 – Distribution of Housing</b></p> <p><b>During the period between 2010 and 2030, a minimum of 5,790600 net additional dwellings will be delivered in the district. Part of this total will be met as follows;</b></p> <ul style="list-style-type: none"> <li><b><u>898628</u> completions in the period between April 2010 and <u>October 2014</u></b></li> <li><b>The delivery of <u>1,535428</u> commitments across the plan area.</b></li> </ul>							<p>Same as reason for MOD28.</p> <p>Superseded by MM02</p>

<sup>2</sup> A discount has been applied to small-scale schemes permitted – see the Justification for the Housing Strategy Paper.

<sup>3</sup> These are schemes granted planning permission subject to a section 106 agreement being put in place.

<sup>4</sup> Only unimplemented allocations that are still deemed deliverable or developable through the SHLAA process have been included within this allowance.

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		<ul style="list-style-type: none"> <li>• <b>An allowance for <del>465518</del> dwellings to be permitted on unidentified small-scale windfall sites during the plan period and subsequently delivered<sup>5</sup>.</b></li> </ul> <p><b>The remaining <del>2,9083,026</del> net additional dwellings will be distributed as follows;</b></p> <ul style="list-style-type: none"> <li>• <b>(1) Housing to be delivered on the following strategic site allocations;</b> <ul style="list-style-type: none"> <li>○ Land at North Street, Lewes – 390 net additional units.</li> <li>○ Land to the north of Bishops Lane, Ringmer – 110 net additional units (contingent on the Ringmer Neighbourhood Plan not being made before the adoption of the Core Strategy or that it does not allocate sufficient sites to deliver 110 net additional units by 2019).</li> <li>○ Land at Greenhill Way, Haywards Heath (within Wivelsfield Parish) – <u>11375</u> net additional units (<u>this is in addition to 62 units already granted permission on this strategic site</u>).</li> </ul> </li> <li>• <b>(2) Housing to be delivered at the following broad location;</b> <ul style="list-style-type: none"> <li>○ Land at Harbour Heights, Newhaven – a contribution towards the 830 planned net additional units at Newhaven (see (3) below)</li> </ul> </li> <li>• <b>(3) Planned housing growth at the following settlements;</b> <ul style="list-style-type: none"> <li>○ Lewes – a minimum of 260 net additional units</li> <li>○ Newhaven – a minimum of 830 net additional units</li> <li>○ Peacehaven &amp; Telscombe – a minimum of <del>550660</del> net additional units (520 of which will all be contingent upon developers identifying and demonstrating to the satisfaction of the local highway authority, and delivering, a co-ordinated package of multi-modal transport measures required to mitigate the impacts of development on the A259)</li> </ul> </li> </ul>	
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<sup>5</sup> See the Core Strategy Background Paper: Justification for the Housing Spatial Strategy 2014

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		<ul style="list-style-type: none"> <li>○ <b>Seaford – a minimum of 170 net additional units</b></li> <li>○ <b>Burgess Hill (within Wivelsfield Parish) – a minimum of <del>80400</del> net additional units</b></li> <li>○ <b>Barcombe Cross – a minimum of 30 net additional units</b></li> <li>○ <b>North Chailey – a minimum of 30 net additional units</b></li> <li>○ <b>South Chailey – a minimum of 10 net additional units</b></li> <li>○ <b>Cooksbridge – a minimum of 30 net additional units</b></li> <li>○ <b>Ditchling – a minimum of 15 net additional units</b></li> <li>○ <b>Newick – a minimum of 100 net additional units</b></li> <li>○ <b>Plumpton Green – a minimum of 50 net additional units</b></li> <li>○ <b>Ringmer &amp; Broyle Side – a minimum of 220 net additional units (although if the contingency allocation for the land to the north of Bishops Lane is implemented through point (1) of this policy, the figure will be 110 net additional units).</b></li> <li>○ <b>Wivelsfield Green – a minimum of 30 net additional units</b></li> </ul> <p><b>For the planned growth identified in section (3) above, individual sites to meet the planned levels of housing provision will be identified in either the District Council’s Site Allocations and Development Management Policies DPD, or the National Park Authority’s Local Plan. Neighbourhood Plans could also be used to identify the individual sites, although should they not be progressed in an appropriate timeframe, fail at Examination or referendum, or not identify sites to deliver the required number of units then the aforementioned local planning authority documents will plan for this growth.</b></p> <p><b>For settlements not listed in section (3) new housing will be limited to affordable housing that meets a local need on exception sites and currently unidentified infill developments within the planning boundary.</b></p>	
	Pages 46 and 47, Table 5	To amend table 5 as follows;	Same as reason for MOD28.

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<b>Table 5 – Planned levels of housing growth, by settlement</b>						Superseded by MM03
<b>Settlement</b> (NP denotes it is in the National Park)	<b>Completion s</b> (April 2010 – <u>October 2014</u> <del>April 2013</del> )	<b>Commitmen ts</b> (as at 1 <sup>st</sup> <u>October 2014</u> <del>April 2013</del> )	<b>Housing delivered on strategic sites</b>	<b>Housing to be delivered through subsequent allocations</b>	<b>Total</b>	
Edge of Haywards Heath (within Wivelsfield Parish)	0	<del>620</del>	11375	0	175	
Seaford	<del>20489</del>	<del>155240</del>	0	170	<del>529499</del>	
Lewes (NP)	<del>9166</del>	<del>147152</del>	390	260	<del>888868</del>	
Newhaven	35	<del>772783</del>	0	830	<del>16371648</del>	
Peacehaven & Telscombe	<del>310223</del>	<del>178137</del>	0	<del>550660</del> <sup>6</sup>	<del>10381020</del>	
Edge of Burgess Hill (within Wivelsfield Parish)	70	<del>290</del>	0	<del>80400</del>	<del>1790</del>	
Ringmer & Broyle Side <sup>7</sup>	<del>34</del>	<del>421</del>	0 (110)	220 (110)	265	
Newick	<del>232</del>	<del>45</del>	0	100	127	
Barcombe Cross	0	1	0	30	31	
Plumpton Green	<del>15</del>	3	0	50	<del>6854</del>	
Wivelsfield Green	<del>175</del>	<del>763</del>	0	30	<del>12348</del>	
Cooksbridge	<del>50</del>	<del>37</del>	0	30	<del>387</del>	
North	34	0	0	30	34	

<sup>6</sup> 520 dwellings of the total ~~550660~~ dwellings are contingent upon the delivery of as yet unspecified transport mitigation measures required to resolve capacity constraints on the A259

<sup>7</sup> The figures in brackets for Ringmer and Broyle Side represent the scenario that the contingency allocation of land north of Bishops Lane is implemented



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		<table border="1"> <tr> <td>Chailey</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>South Chailey</td> <td><u>32</u></td> <td><u>12</u></td> <td>0</td> <td>10</td> <td>14</td> </tr> <tr> <td>Ditchling (NP)</td> <td><u>98</u></td> <td><u>52</u></td> <td>0</td> <td>15</td> <td><u>295</u></td> </tr> <tr> <td>All other settlements and areas</td> <td><u>9589</u></td> <td><u>5752</u></td> <td>0</td> <td>0</td> <td><u>152144</u></td> </tr> <tr> <td><b>Totals</b></td> <td><b>898628</b></td> <td><b>15354428</b></td> <td><b>503565</b></td> <td><b>24052535</b></td> <td><b>53265156</b></td> </tr> </table> <p>The windfall sites allowance of <del>465518</del> units is not accounted for in the table above.</p>	Chailey						South Chailey	<u>32</u>	<u>12</u>	0	10	14	Ditchling (NP)	<u>98</u>	<u>52</u>	0	15	<u>295</u>	All other settlements and areas	<u>9589</u>	<u>5752</u>	0	0	<u>152144</u>	<b>Totals</b>	<b>898628</b>	<b>15354428</b>	<b>503565</b>	<b>24052535</b>	<b>53265156</b>	
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MOD32	Page 50, Spatial Policy 3	<p><b>Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes</b></p> <p>Land amounting to approximately 9 hectares at North Street and the neighbouring part of Eastgate is allocated for a mixed-use development that would create a new neighbourhood for the town of Lewes. <del>A detailed masterplan is to be prepared in advance of a formal planning application that will indicate the exact</del> The development mix should be based on the following uses and broad quantum of development:</p> <ul style="list-style-type: none"> <li>• Approximately 390 residential units, predominantly focused towards the northern part of the site;</li> <li>• Between 4,000 sq metres and 5,000 sq metres of B1a office floorspace, <u>and /or other B1 uses, subject to commercial need;</u></li> <li>• <u>A1</u> retail floorspace that meets a qualitative need in the town, predominantly for comparison goods;</li> <li>• <u>C1</u> hotel;</li> <li>• The redevelopment or relocation of the existing <u>A1</u> food superstore; and</li> <li>• Other uses that are deemed to aid in the successful delivery of a new neighbourhood, whilst not undermining the wider function of the town (this could include A2 Financial and Professional Services, A3</li> </ul>	<p>To respond to concerns about the policy and to make wording more succinct to aid understanding</p> <p>Superseded by MM04</p>																														

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		<p><b>Restaurants and Cafes, A4 Drinking Establishments, A5 Hot Food Takeaways and community floorspace);</b></p> <ul style="list-style-type: none"> <li>• <b><u>C2 Nursing/ Care Home;</u></b></li> <li>• <b><u>D1 Non-Residential Institutions such as</u> medical and health services, <u>crèches, exhibition and training space</u> and <u>D2 Assembly and Leisure floorspace-uses.</u></b></li> </ul> <p><b>Development of this site will be delivered in the period between 2016 and 2020 and this will be further expanded upon in the masterplan, which will be subject to approval from both the National Park Authority and District Council and be developed in consultation with residents, businesses and community groups on site and in the local area.</b></p> <p><b>The redevelopment of the North Street Quarter and the neighbouring part of Eastgate will be permitted subject to compliance with the Core Delivery Policies of this plan, the aforementioned masterplan, and the following criteria:</b></p> <ul style="list-style-type: none"> <li><b><u>i)</u> The development <u>It</u> incorporates the early provision of flood defences to an appropriate standard and to the approval of the Environment Agency;</b></li> <li><b><u>ii)</u> The development <u>It</u> facilitates improved linkages across Phoenix Causeway and Eastgate Street to enable the improved integration of the area to the north of Phoenix Causeway with the wider town centre;</b></li> <li><b><u>iii)</u> The delivery of <u>It delivers</u> enhancements to vehicular access and off-site highway improvements, arising from and related to the development and its phasing;</b></li> <li><b><u>iv)</u> The development <u>It</u> respects and enhances the character of the town and achieves a high standard of design, recognising the high quality built environment, on and within the vicinity of the site, and the site’s setting within the South Downs National Park and the adjacent</b></li> </ul>	
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		<p><b><u>to a Conservation Area;</u></b></p> <p><b><u>y)</u></b> <del>The development will be</del> <b><u>It is</u></b> subject to a programme of archaeological work, including, where applicable, desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching to inform design and appropriate mitigation.</p> <p><b><u>vi)</u></b> A riverside pedestrian route along the western bank of the River Ouse is incorporated <del>into the scheme, which will</del> to extend the town’s riverside focus and contribute to <del>the</del>its character and quality, <del>of the town</del> and additional pedestrian and cycling routes <del>will be</del> <b><u>are</u></b> incorporated <del>into the site</del> to aid in linking the site to the rest of the town;</p> <p><b><u>vii)</u></b> <del>The redevelopment would</del> <b><u>It results</u></b> in no net loss of public parking provision;</p> <p><b><u>viii)</u></b> The retail element <del>of the development</del> is incorporated into the town centre boundary (as designated by Core Policy 6) as far as <del>feasibly possible, with any additional significant retail provision</del> <b><u>large shops</u></b> being directed to the southern part of the North Street Quarter; the <del>exact location and amount of retail provision will be informed by a Retail Impact Assessment, which will be undertaken to inform the masterplanning process;</del></p> <p><del>ix)</del> <del>Subject to the commercial need, flexibility will be</del> <b><u>is applied to the requirement to deliver B1a office floorspace, so that other B1 uses can be explored;</u></b></p> <p><b><u>ix)</u></b> <del>Alternative uses will only be permitted on the bus station site should</del> <b><u>are subject to the facility being</u></b> replaced by an operationally satisfactory and accessible site elsewhere; and</p> <p><b><u>x)</u></b> <b><u>It makes</u></b> contributions towards off-site infrastructure improvements arising from, and related to, the development.</p>	
MOD33	Page 54, Paragraph 6.62	To amend the final 2 sentences of Para 6.62 to read: <del>Despite it not being mentioned within the policy,</del> The incorporation of light industry	To reflect proposed changes to Spatial Policy 3.

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		(Use Class B1c) would, in principle, be acceptable within the redevelopment of the site. This will be determined through the <del>masterplanning process, and any subsequent</del> planning application.	
MOD34	Page 54, Paragraph 6.64	To amend first sentence of Para 6.64 to read:  The re-development of this strategic site <del>will</del> <u>could</u> include the provision of a hotel.	As above
MOD35	Page 54, Paragraph 6.66	To amend last sentence of Para 6.65 to read:  The appropriate housing mix for this site, in terms of type and size of units, will be determined through the <del>masterplanning process</del> <u>planning application</u> .	As above
MOD36	Page 55, Spatial Policy 4	To amend Policy SP4 as follows;  <b>Land amounting to 6 hectares is allocated for residential development of approximately 175 dwellings (of which 62 net units already have planning permission on this strategic site). Development will be permitted subject to compliance with the Core Delivery Policies of this plan and the following criteria:</b>	To reflect the fact that 62 units now have planning permission.  Superseded by MM07
MOD37	Page 69 – Core Policy 1 supporting text new paragraph 7.21	Add new paragraph 7.21:  <u>7.21 Designated rural areas as defined by the Ministerial Statement include National Parks and will therefore include all areas within the South Downs National Park including Lewes Town. The district currently contains no additional designated rural areas for the purposes of this policy.</u>	For clarity
MOD38	Page 70,	Amend Core Policy 1, paragraphs 1 and 2 as follows:	To comply with the

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<p>Referenced MM15 in Schedule 3</p>	<p>Core Policy 1</p>	<p><b>1. A district wide target of 40% affordable housing, including affordable rented and intermediate (<del>shared ownership</del>) housing, will be sought for developments of <del>10</del> <u>11</u> or more dwelling units. For developments of <del>less than 10 units</del>, <u>in designated rural areas</u>, affordable housing, <u>or financial contributions towards</u>, will be sought <u>on developments of 6 or more</u> according to the stepped target and threshold below:</b></p> <table border="1" data-bbox="730 491 1366 751"> <thead> <tr> <th colspan="2">Affordable Housing Target/Threshold</th> </tr> <tr> <th>Scheme size (units)</th> <th>Affordable Housing (units)</th> </tr> </thead> <tbody> <tr> <td><u>6-8</u></td> <td><u>2*</u></td> </tr> <tr> <td><u>9-10</u></td> <td><u>3*</u></td> </tr> <tr> <td><u>11+</u></td> <td><u>40%</u></td> </tr> </tbody> </table> <p>*commuted sum financial payment</p> <p><b>2. The affordable housing requirement may exceptionally be determined on a site by site basis where justified by market and/or site conditions. The target levels will be expected to be provided by all developments of <del>3</del> <u>11</u> or more <u>and 6 or more in designated rural areas</u> (net) dwelling units (including conversions and subdivisions) unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level.</b></p> <p>(The remaining text in Core Policy 1 is unaltered)</p>	Affordable Housing Target/Threshold		Scheme size (units)	Affordable Housing (units)	<u>6-8</u>	<u>2*</u>	<u>9-10</u>	<u>3*</u>	<u>11+</u>	<u>40%</u>	<p>Ministerial Statement 28 November 2014 which sets thresholds below which affordable housing contributions should not be sought.</p> <p>Reference to shared ownership is removed and replaced with a glossary definition for intermediate housing, which provides a fuller meaning as the intention was not to narrow the definition to just shared ownership.</p>
Affordable Housing Target/Threshold													
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<p>MOD39</p>	<p>Page 72,</p>	<p>To amend supporting text as follows;</p>	<p>To reflect the</p>										

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	<p>Core Policy 2, paragraph 7.22</p>	<p>7.22 There has been a general trend over recent years towards the provision of flats/maisonettes, but there was still also a strong growth in the provision of semi detached and detached dwellings in the district. The Local Housing Needs Assessment has identified that the main growth in demand to 2030 will be for dwellings for older people and small homes for single person households and couples with no dependents. However, there will also be a need for family homes, particularly due to the level of under-occupation of larger family homes in the district, creating pressures of demand (and therefore on affordability) for homes of this type. Dwellings suitable for older people are likely to include a combination of smaller units to allow people to downsize in the area in which they want to live; flexible and adaptable ‘Lifetime Homes’; and specialist accommodation such as nursing homes and extra care homes. <u>The District Council and SDNPA are currently working in partnership with East Sussex County Council (ESCC) and all other East Sussex local planning authorities in preparing and updating guidance on housing for older people. This work will include assessing in detail the specific future accommodation needs of older people within the district. The findings of this work will then feed into identifying sites and local requirements through the Site Allocations and Development Policies DPD, SDNPA Local Plan or Neighbourhood Plans where relevant.</u></p> <p>7.23 <u>With an ageing population it is particularly important to accommodate the needs of the elderly with suitably designed accommodation within an environment that provides an appropriate level of care. Traditionally older persons housing has been aimed at a particular stage in an older person’s life, e.g. care homes and sheltered housing, but new models of provision (e.g. continuing care retirement communities) can support older peoples’ housing needs through a range of stages of later life. Paragraph: 3-037 of the NPPG says: “Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against</u></p>	<p>additional work that the District Council and SDNPA are doing with ESCC regarding assessing Older People’s housing needs.</p> <p>Superseded by AM29</p>
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		<p><u>their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.” In monitoring the provision of housing development to meet the requirements of SP2, LDC and the SDNPA will include C2 accommodation against the housing target.</u></p>	
MOD40	<p>Core Policy 3, page 74 – 76, paragraphs 7.29 to 7.35</p>	<p>To amend the supporting text and Policy to read as follows;</p> <p><del>7.29—In 2005 East Sussex Local Authorities and Brighton &amp; Hove City Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) to assess the needs of Gypsies and Travellers in the East Sussex and Brighton &amp; Hove county group. This Assessment was undertaken in response to Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007 Planning for Travelling Showpeople, which emphasised the importance of assessing accommodation needs<sup>8</sup>. The GTAA went through a process of external benchmarking<sup>9</sup>, the outcomes of which then informed formal local planning authority advice submitted to the South East England Regional Assembly (SEERA) as part of the South East Plan (SEP) Gypsy and Traveller provision (Policy H7) Partial Review<sup>10</sup>.</del></p> <p><del>7.30—In response to Government’s announcement in July 2010 to revoke Regional Spatial Strategies, the Review was abandoned. Consequently, East Sussex and Brighton &amp; Hove local planning authorities outlined a joint approach to establish local pitch requirement figures using available robust information.</del></p> <p><del>7.31—This joint approach indicated a need for 13 additional permanent pitches in Lewes District between 2006 and 2016. To ensure the Core Strategy considers a level of planned growth for a five year period from adoption, the 3% compound growth, previously applied to the 2011—2016 period in the</del></p>	<p>To reflect the findings from the 2014 GTAA update.</p> <p>Note - This Modification is further expanded in MODXX in Table 3 below, including updated permanent and transit figures from the December 2014 GTAA.</p>

<sup>8</sup> Section 225 of 2004 Housing Act outlines the requirement of assessing accommodation needs.

<sup>9</sup> GTAA Benchmarking and Audit of Advice, Final Summary Report. Universities of Birmingham, Salford and Sheffield Hallam, January 2008.

<sup>10</sup> Single issue review required to consider accommodation assessments undertaken during the preparation of the SEP. Paragraph 7.27-7.30, SEP(2009)

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		<p><del>draft South East Plan policy, is extended to 2019. Consequently, an additional 2 permanent pitches are required taking the total required provision to 15 pitches. Permanent planning permission for 4 pitches has since been granted, leaving a residual requirement of 11 permanent pitches to 2019.</del></p> <p>7.3429 <u>Current national planning policy for traveller sites<sup>11</sup> reiterates states the importance of local planning authorities assessing accommodation needs based on robust evidence to inform the preparation of local plans and planning decisions. To ensure that the Core Strategy is in line with national policy, an update<sup>12</sup> of accommodation needs for Gypsies, Travellers and Travelling Showpeople has been jointly commissioned by undertaken for East Sussex, the South Downs National Park Authority, Brighton &amp; Hove City Council and the East Sussex local authorities. This update will assess the permanent and transit pitch needs for the 15 year period from 2014. Once the results of this assessment are known the updated pitch requirements will be substituted into the policy as apportioned between the national park area and the remainder of the district. This information is expected to be available late spring/early summer 2014.</u></p> <p>7.30 <u>The 2014 GTAA sets out the recommended level of permanent pitch provision for each of the local planning authorities within East Sussex, including the area of the SDNP that falls within the County. The figure for Lewes District has been disaggregated between those areas that fall within and outside the SDNP in order that each local planning authority is able to plan for their authority area<sup>13</sup>. The disaggregated figures are reflected in Policy CP3.</u></p>	
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<sup>11</sup> ~~Paragraph 4 and 6(c) of DCLG's *Planning policy for traveller sites* (March, 2012).~~

<sup>12</sup> The 2014 Gypsy and Traveller Accommodation Assessment (GTAA) updates the accommodation needs position of the 2005 GTAA. A separate GTAA was undertaken at the same for the Brighton and Hove and applicable areas of the SDNP.

<sup>13</sup> Sites to meet the identified need for areas outside the SDNP will be identified through the Site Allocations and Development Management Policies DPD. The SDNPA Local Plan will allocate sites for those areas within the SDNP, unless there are allocated through Neighbourhood Plans



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		<p><u>7.31 There is currently one formal transit site within East Sussex, Bridie’s Tan, located within the National Park area of Lewes district. This accommodates 9 transit pitches. The 2014 GTAA concludes that currently there is a need for 8 net additional transit pitches within the GTAA area. No preferred location for the transit provision has currently been identified. However, the District Council and National Park Authority will work with the other East Sussex local planning authorities and relevant parties to determine the appropriate location(s) within the County and type of transit provision required. In the event that an allocation is required within Lewes District, or a planning application submitted, any proposal will be assessed against the below criteria taking into consideration the short term nature of transit accommodation.</u></p> <p>7.32 No accommodation needs for Travelling Showpeople have been identified for the <u>areas of the Lewes District either within or outside the SDNP for the Plan period to 2016.</u> Based on current available evidence it is unlikely that a need will arise <u>between 2016 and 2019 over the Plan period.</u> In the event that a need is demonstrated in the short term, then any proposal would be assessed against the criteria below.</p> <p><del>7.33 The draft South East Plan Policy H7 also outlined the requirement for local planning authorities to make appropriate provision for transit and temporary stopping places. There are currently 2 transit sites in the East Sussex/ Brighton &amp; Hove county group: Bridie’s Tan (Lewes District) and Horsdean (Brighton &amp; Hove CC). An indicative need of 8 transit pitches (potentially 2 sites) had been identified for East Sussex/ Brighton &amp; Hove county group area<sup>14</sup>. The local planning authorities will work with relevant partners to locate additional suitable site(s)<sup>15</sup>.</del></p>	
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<sup>14</sup> ~~South East England Gypsy and Traveller Regional Transit Study 2009, University of Birmingham.~~

<sup>15</sup> ~~SEP draft policy did not allocate transit provision on a planning authority level due to insufficiently robust evidence~~

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		<p>7.35 No specific deliverable sites have been identified in the Site Assessment work undertaken to date<sup>16</sup>. In the absence of deliverable sites allocated in the Core Strategy, a range of criteria will be used in preparing future allocations and determining planning applications. These criteria should be used proportionately taking into consideration the type of pitch/site being sought (i.e. small permanent site, larger transit site).</p>	
MOD41		<p><b>Core Policy 3 – Gypsy and Traveller Accommodation</b></p> <p><b>Provision will be made for a net total of 11 <u>5</u> additional permanent pitches for Gypsies and Travellers in the area of the Lewes District district that fall outside the National Park for the period 2011 <u>2014</u> to 2019*<u>2030</u>. <u>A net total of 8 additional permanent pitches are identified for the area of the National Park that falls within Lewes district.</u> The local planning authorities will allocate specific, deliverable sites through a Site Allocations and Development Management DPD and the SDNPA Local Plan, <u>unless allocated through Neighbourhood Plans</u>. These plans will be informed by appropriate Site Assessment work and taking into account any planning permissions granted <u>for</u> permanent use in the interim.</b></p>	Superseded by MM18
MOD42	Page 92, Core Policy 6, part 4, p92	<p>To amend the first sentence of this section of the policy, as follows;</p> <p><b>4. Support and retain local <del>and rural</del> shops and <del>community facilities in</del> locations not identified in the retail hierarchy.</b></p>	For clarity, as Core Policy 7 deals with the retention/loss of community

<sup>16</sup> Gypsy and Traveller Site Assessment (Parker Dann, 2010) and subsequent update (2012)

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			<p>facilities and to make clear that the policy does not relate to garden centres.</p> <p>Superseded by MM23</p>
MOD43	Page 97, Core Policy 9 Key Strategic Objectives box	<p>Add to the end of second bulletpoint:</p> <p><b>“..., and is pro-active regarding climate change initiatives.”</b></p>	To ensure that the full wording of the key strategic objective 10 is referenced.
MOD44	Page 102 – Core Policy 10	<p>Amend criterion ii of Core Policy 10(1) to read:</p> <p><b>ii Ensuring that new development will not harm conservation interests unless the benefits of development <u>at that location</u> clearly outweigh the harm caused. In such cases appropriate mitigation and compensation will be required.</b></p>	<p>For clarity and to reflect discussions with Natural England.</p> <p>Superseded by AM42</p>
MOD45	Page 102 – Core Policy 10	<p>Amend CP10 (2) to read as follows:</p> <p><b><u>2. The highest priority will be given to the <del>conservation and enhancement of the landscape qualities</del> first purpose of the South Downs National Park, and the integrity of European designated sites (SACs and SPAs) in and around Lewes District. Within and in the setting of the South Downs National Park, development will be resisted if it fails to conserve and appropriately enhance its rural, urban and historic landscape qualities, and its natural and scenic beauty, as informed by the South Downs Integrated Landscape Character Assessment and other relevant local landscape character, landscape capacity and visual impact assessments.</u></b></p>	To remove any potential confusion between the policy, guidance and the National Parks’ purposes, to refer to the Integrated Landscape Character Assessment and to respond to

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			concerns from consultees.  Superseded by MM24
MOD46	Page 104, Paragraph 7.106, Core Policy 11 supporting text	Amend paragraph 7.106 to read:  The purpose of Core Policy 11 is to ensure consistency of approach, whilst providing scope for innovative and imaginative design. In the consideration of development proposals, the local planning authority will also have regard to the <del>best practice advice contained in <i>By Design</i> (DETR, 2000), <i>Better Places to Live</i> (DTLR, 2001), <i>Safer Places – The Planning System and Crime Prevention</i> (ODPM 2004) Manual for Streets (DCLG/DETR 2007) and the Lewes District Public Realm Framework (LDC 2013). It is recognised that some of the aforementioned best practice documents have been earmarked for deletion through the Taylor Review of Planning Practice Guidance. Should this occur, then the documents in question will be adopted as ‘local guidance and advice by the District Council and National Park Authority.</del>	To update the text in the light of the Government’s decision to archive some of the guidance publications currently listed in paragraph 7.106.
MOD47	Page 105 – Core Policy 11	Amend criterion (ii) of Core Policy 11 to read:  ii. <b><i>Within the South Downs National Park shall be <u>is</u> in accordance with the <u>National Park purposes and outside of the SDNP regard is had has regard</u> to the setting of the National Park and its purposes;</i></b>	For clarity.
MOD48	Page 106, Core Policy 12	Insert an additional paragraph between 7.110 and 7.111 to read:  <u>The provision of measures to prevent flood risk can have far-reaching positive impacts. The Newhaven Flood Alleviation Strategy is key to achieving the economic and regeneration goals for Newhaven and the wider area and will help to deliver part 3 of Core Policy 4 and the employment land targets of Spatial Policy 2, more generally.</u>	To recognise that the delivery of the Newhaven Flood Alleviation Strategy will play an important role in delivering regeneration of

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			Newhaven.
MOD49	Page 114, Core Policy 14	<p>Amend supporting text to CP14</p> <p>7.126 Achieving ‘zero carbon’ buildings is only one aspect of building sustainability. The use of appropriate building materials, minimising waste and improving water efficiency are all additional aspects that can improve the sustainability of buildings. The Code for Sustainable Homes<sup>36</sup> covers all of these matters <u>and has been in existence during the development of the Core Strategy. The Government’s Housing Standards Review set out that the Code for Sustainable Homes would be wound down and Code Levels have accordingly become part of the building regulations since March 2015.</u></p> <p>7.127 The Environment Agency has identified the whole of the South East, including Lewes District, as an area of “serious water stress” and it is therefore imperative that water resources are managed efficiently within the region. <del>Accordingly, all new homes in the district will be required to comply with Code Level 4 of the Code for Sustainable Homes in relation to water consumption.</del> <u>Accordingly, all new homes in the district will be required to achieve water consumption of no more than 110 litres per person per day. Such a target is equivalent to that proposed as an optional requirement of the Housing Standards Review, which in itself corresponds with Code Level 4 in relation to water efficiency.</u> It is not considered that this will place an undue financial burden upon developers. The Affordable Housing Viability Assessment, which was primarily undertaken to inform the core policy on affordable housing, factored in a number of assumptions, which included all new houses being constructed to meet the full Code Level 4, <u>and not just Code level 4 in respect to water efficiency,</u> as a minimum. The Viability Assessment concluded that alongside affordable housing contributions, and contributions towards new infrastructure, constructing new homes in Lewes District to at least Code Level 4 standards will generally be viable.</p>	To explain that the Code for Sustainable Homes is being wound down.

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<p>MOD50</p>	<p>Page 115, Core Policy 14</p>	<p>Amend CP14(2) to the following:</p> <p><b>Support applications for low carbon and renewable energy installations, subject to the following matters being satisfactorily assessed and addressed:</b></p> <ul style="list-style-type: none"> <li><del>i. Appropriate contribution to meeting national and local renewable heat and energy targets</del></li> <li>ii. <b>i. Meeting the National Park Purposes where proposals lie within the South Downs National Park boundary</b></li> <li>iii. <b>ii. Landscape and visual impact</b></li> <li>iv. <b>iii. Local amenity impact</b></li> <li>v. <b>iv. Ecology impact</b></li> <li>vi. <b>v. Cultural heritage impact, including the need to preserve and enhance heritage assets.</b></li> </ul>	<p>To ensure the policy is consistent with NPPF Paragraph 98</p> <p>Superseded by MM30</p>
<p>MOD51</p>	<p>Page 115, Core Policy 14</p>	<p>Amend CP14(4) to the following:</p> <p><del>4. Require all new dwellings to achieve water consumption of less than 105 litres per person per day, in accordance with the Code for Sustainable Homes Level 4.</del> <b><u>Require all new dwellings to achieve water consumption of no more than 110 litres per person per day, unless it can be demonstrated that it would not be technically feasible or financially viable. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM ‘Very Good’ standard. Developers will be expected to provide certification evidence of the levels achieved in the relevant codes requirements/standards at the planning application stage.</u></b></p>	<p>To remove reference to the Code for Sustainable Homes, which is being wound down.</p> <p>Superseded by MM32</p>
<p>MOD52</p>	<p>Page 120 – Glossary</p>	<p>Add definition for Intermediate housing:</p> <p><u>Intermediate housing - is homes for sale and rent provided at a cost above social</u></p>	<p>To provide an improved and more appropriate</p>

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	Add to the 'Affordable housing' definition	<u>rent, but below market levels subject to the criteria in the Affordable Housing definition in the National Planning Policy Framework. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</u>	definition of intermediate housing that encompasses a broader meaning than Policy CP1 previously implied.																								
MOD53	Page 128, Appendix 3	<p>To amend the following table to:</p> <table border="1" data-bbox="658 528 1809 1374"> <thead> <tr> <th colspan="3" data-bbox="658 528 1809 595"><b>Core Policy 1: Affordable Housing</b></th> </tr> <tr> <th colspan="3" data-bbox="658 595 1809 662"><b>Core Policy 1 will aim to meet the following the Objectives</b></th> </tr> <tr> <th colspan="3" data-bbox="658 662 1809 729">• <b>Objective 2</b></th> </tr> <tr> <th data-bbox="658 729 1070 767"><b>Target</b></th> <th data-bbox="1070 729 1413 767"><b>Indicators</b></th> <th data-bbox="1413 729 1809 767"><b>Current Position</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="658 767 1070 1374" rowspan="4">District wide target of 40% Affordable Housing provision (on developments exceeding 10 dwellings)</td> <td data-bbox="1070 767 1413 847">Gross number of affordable housing completions per annum</td> <td data-bbox="1413 767 1809 847"><b>2012/13: 38</b></td> </tr> <tr> <td data-bbox="1070 847 1413 927">Percentage of affordable dwellings completed</td> <td data-bbox="1413 847 1809 927"><b>2012/13: 45.78%</b></td> </tr> <tr> <td data-bbox="1070 927 1413 1086">Percentage of applications of 10 units or more meeting 40% affordable housing target</td> <td data-bbox="1413 927 1809 1086"><b>2012/13: 50%</b></td> </tr> <tr> <td data-bbox="1070 1086 1413 1374"><u>Average house price by type</u></td> <td data-bbox="1413 1086 1809 1374"> <b>2014 Q2:</b>  <u>All – £299,435</u>  <u>Detached - £389,632</u>  <u>Semi-detached - £276,114</u>  <u>Terraced - £251, 436</u>  <u>Flat/maisonette - £198,584</u> </td> </tr> <tr> <td data-bbox="658 1374 1070 1374"></td> <td data-bbox="1070 1374 1413 1374"><u>Average construction cost by development type</u></td> <td data-bbox="1413 1374 1809 1374"><b>Not yet monitored on a regular basis – to be</b></td> </tr> </tbody> </table>	<b>Core Policy 1: Affordable Housing</b>			<b>Core Policy 1 will aim to meet the following the Objectives</b>			• <b>Objective 2</b>			<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>	District wide target of 40% Affordable Housing provision (on developments exceeding 10 dwellings)	Gross number of affordable housing completions per annum	<b>2012/13: 38</b>	Percentage of affordable dwellings completed	<b>2012/13: 45.78%</b>	Percentage of applications of 10 units or more meeting 40% affordable housing target	<b>2012/13: 50%</b>	<u>Average house price by type</u>	<b>2014 Q2:</b> <u>All – £299,435</u> <u>Detached - £389,632</u> <u>Semi-detached - £276,114</u> <u>Terraced - £251, 436</u> <u>Flat/maisonette - £198,584</u>		<u>Average construction cost by development type</u>	<b>Not yet monitored on a regular basis – to be</b>	<p>To reflect paragraph 7.12 of the Core Strategy.</p> <p>Superseded by AM55</p>
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			<p><u>(construction cost £/m<sup>2</sup>)</u></p> <p><u>A review of Core Policy 1 will be considered in the event of a greater than 10% drop in house prices and/or a significant increase in build costs. In such an event, any decision with reasoning as to whether or not to review the policy will be published by the District Council and National Park Authority.</u></p>	<p><b><u>monitored on an annual basis using the most cost-effective source available. Current position is available:</u></b></p> <p><b><u>4<sup>th</sup> Q 2013 - Residential, 2-5 bed, code 4 - £1,021</u></b></p>	
		To reduce the number of households on the Council Housing Register	Number of households currently on the Council Housing Register	<b>2013: 2,543</b>	