

## APPENDIX 2

### Lewes District Local Plan

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

### Modifications

Schedule 1

July 2015

Modifications arising from the ‘Focussed Amendments’ consultation as originally submitted in September 2014



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

**Schedule 1** below sets out 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.

Subsequently we have prepared three further Schedules of proposed modifications:

**Schedule 2** – 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 Where changes have subsequently been made, or modifications in Table 2 have been superseded by Schedules 3 or 4, this is indicated in Schedule 2.


**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 (essentially ‘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)].

---

<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.

The Inspector is invited by the Local Planning Authorities to consider the proposed 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.

## Schedule 1

LPA Modification Number	Joint Core Strategy Submission Document Reference /Location	Proposed Change	Reason
MOD1	Section1 (Introduction)  National Influences p9	Insert a new paragraph after 1.22 to read:  In the preparation of the Core Strategy regard has been given to UK Marine Policy Statement as the national framework for decisions affecting the marine environment to ensure integration with the marine planning regime. The local planning authority will continue to have regard, where appropriate, to the Marine Policy Statement and the emerging South Marine Plans and designations in subsequent plan making and decision taking.	To ensure compliance with the marine planning regime in accordance with NPPF paragraph 105.
MOD2	Section 6 (Spatial Strategy)  Spatial Policy 3: New criterion (xii), p.51	Amend Spatial Policy 3 by adding new criterion (xii) to read:  <b>The development will provide a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.</b>	To address concerns raised by the representations submitted by Southern Water in response to the Focussed Amendments.  Superseded by MM04

MOD3	Section 6 (Spatial Strategy)  Spatial Policy 3, p.51	Amend Spatial Policy 3 by deleting the final word 'and' from Criterion (x) and re-wording Criterion (xi) to read:  <b>Contributions towards off-site infrastructure improvements arising from, and related to, the development; and</b>	Consequent to MOD2  Superseded by MM04
MOD4  Referenced MM07 in Schedule 3	Section 6 (Spatial Strategy)  Spatial Policy 4, p.55	Amend the first sentence of Spatial Policy 4 by replacing '6 hectares' with '8.5 hectares' to read:  <b>Land amounting to 8.5 hectares is allocated for residential development of approximately 175 dwellings.</b>	To correct the site area to correspond with the extended site allocation.
MOD5  Referenced MM08 in Schedule 3	Section 6 (Spatial Strategy)  Spatial Policy 4, criterion(i), p.55	Replace the words 'Primary and secondary accesses' with 'Access' and add the word '/or' to read:  <b>i) Access including provision for pedestrians and cyclists to be provided from Ridge Way and/or Greenhill Way;</b>	To allow flexibility for alternative suitable access solutions to be considered.
MOD6	Section 6 (Spatial Strategy)  Spatial Policy 4 criterion (ii), p.55	Replace the words ' <b>Environment Agency</b> ' with ' <b>appropriate body</b> '.	To update the policy wording to reflect changes brought about by the Floods and Water Management Act (2010) whereby surface water drainage will become the responsibility of the Lead Local Flood Authority (ESCC). The revised wording updates the position and provides flexibility until this comes into force.

<p>MOD7</p> <p>Referenced MM09 in Schedule 3</p>	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 4: New criterion (viii) p.55</p>	<p>Add new criterion (viii) to read as follows:</p> <p><b>The development will provide a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes.</b></p>	<p>To address concerns raised by the representations submitted by Southern Water in response to the Focussed Amendments.</p>
<p>MOD8</p>	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 4 p.55</p>	<p>Delete the final word '<b>and</b>' from Criterion (vi) and re-word Criterion (vii) to read:</p> <p><b>Ecological and tree surveys and appropriate measures to mitigate adverse impacts on nearby Tree Preservation Orders and Ancient woodland; and</b></p>	<p>Consequent to MOD7.</p>
<p>MOD9</p>	<p>Section 6 (Spatial Strategy)</p> <p>Para 6.72 p56</p>	<p>Amend the second sentence by replacing the words '6 hectares' with the words '8.5 hectares', to read:</p> <p>The many development constraints across the district have made it inevitable that a number of greenfield strategic sites are required in order to meet the local, objectively assessed, housing target. While this site has been assumed to constitute 'best and most versatile agricultural land' it is considered that on balance the economic and social benefits of the development of these 8.5 hectares of land outweigh the loss of the agricultural land.</p>	<p>To correct the site area to correspond with the extended site allocation in MOD4.</p>

<p>MOD10</p>	<p>Section 6 (Spatial Strategy)</p> <p>Para 6.73, p.57</p>	<p>Amend the second sentence by replacing the words 'a secondary access' with the words 'any secondary access', to read:</p> <p>There are two potential access points, from the end of Greenhill Way and from the end of Ridge Way. It is proposed that the principal access will be from Ridge Way with any secondary access being taken from the end of Greenhill Way. This is due to a number of protected trees in the vicinity of the Greenhill Way point of access, which may restrict the achievability of a suitable width for an access point. Taking into account the outputs of a Transport Assessment, to be undertaken at the planning application stage, will ensure a safe and suitable access can be achieved for all people.</p>	<p>For consistency with MOD5.</p>
<p>MOD11</p>	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 5, criterion (iii), p.59</p>	<p>Replace the words '<b>Environment Agency</b>' with '<b>appropriate body</b>'.</p>	<p>To update the policy wording to reflect changes brought about by the Floods and Water Management Act (2010) whereby surface water drainage will become the responsibility of the Lead Local Flood Authority (ESCC). The revised wording updates the position and provides flexibility until this comes into force.</p>

<p>MOD12</p> <p>Referenced MM12 in Schedule 3</p>	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 5: New criterion (viii) p.59</p>	<p>Add new criterion (viii) to read as follows:</p> <p><b>The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</b></p>	<p>To address concerns raised by the representations submitted by Southern Water in response to the Focussed Amendments.</p>
<p>MOD13</p>	<p>Section 6 (Spatial Strategy)</p> <p>Spatial Policy 6: New criterion (vii) p.63</p>	<p>Add new criterion (vii) to read as follows:</p> <p><b>The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.</b></p>	<p>To address concerns raised by the representations submitted by Southern Water in response to the Focussed Amendments.</p> <p>Superseded by MM13 in Schedule 3</p>
<p>MOD14</p>	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 2: Key Strategic Objectives Box, p.71</p>	<p>Amend the third bullet point key strategic objective by deleting the words 'in urban areas' to read:</p> <ul style="list-style-type: none"> <li>• <b>To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.</b></li> </ul>	<p>For consistency with Strategic Objective 8 p.31 where the words 'in urban areas' have been deleted through Focussed Amendment reference FA2.</p>



MOD15	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 2, point 4, p.73</p>	<p>Remove the bullet number <b>4.</b> and insert the words '<b>the local planning authority will</b>' after the words 'Where appropriate', to read:</p> <p><b>Where appropriate, the local planning authority will identify sites and local requirements for special needs housing (such as for nursing homes, retirement homes, peoples with special needs including physical and learning disabilities, specific requirements of minority groups etc) in a Site Allocations and Development Management Policies DPD and/or the SDNPA Local Plan.</b></p>	<p>To correct a drafting error that implies it will be for developers rather than the local planning authorities to produce the subsequent Development Plan Documents.</p>
MOD16	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 3: Key Strategic Objectives Box, p.74</p>	<p>Amend the second bullet point key strategic objective by deleting the words '<b>in urban areas</b>' to read:</p> <ul style="list-style-type: none"> <li>• <b>To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.</b></li> </ul>	<p>For consistency with Strategic Objective 8 p.31 where the words 'in urban areas' have been deleted through Focussed Amendment reference FA2.</p>
<p>MOD17</p> <p>Referenced MM15 in Schedule 3</p>	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 3, criterion 1, p.76</p>	<p>Amend criterion 1 by inserting the words 'and wastewater facilities' to read:</p> <p><b>Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips and wastewater facilities;</b></p>	<p>To address concerns raised by the representations submitted by Southern Water in response to the Focussed Amendments.</p>

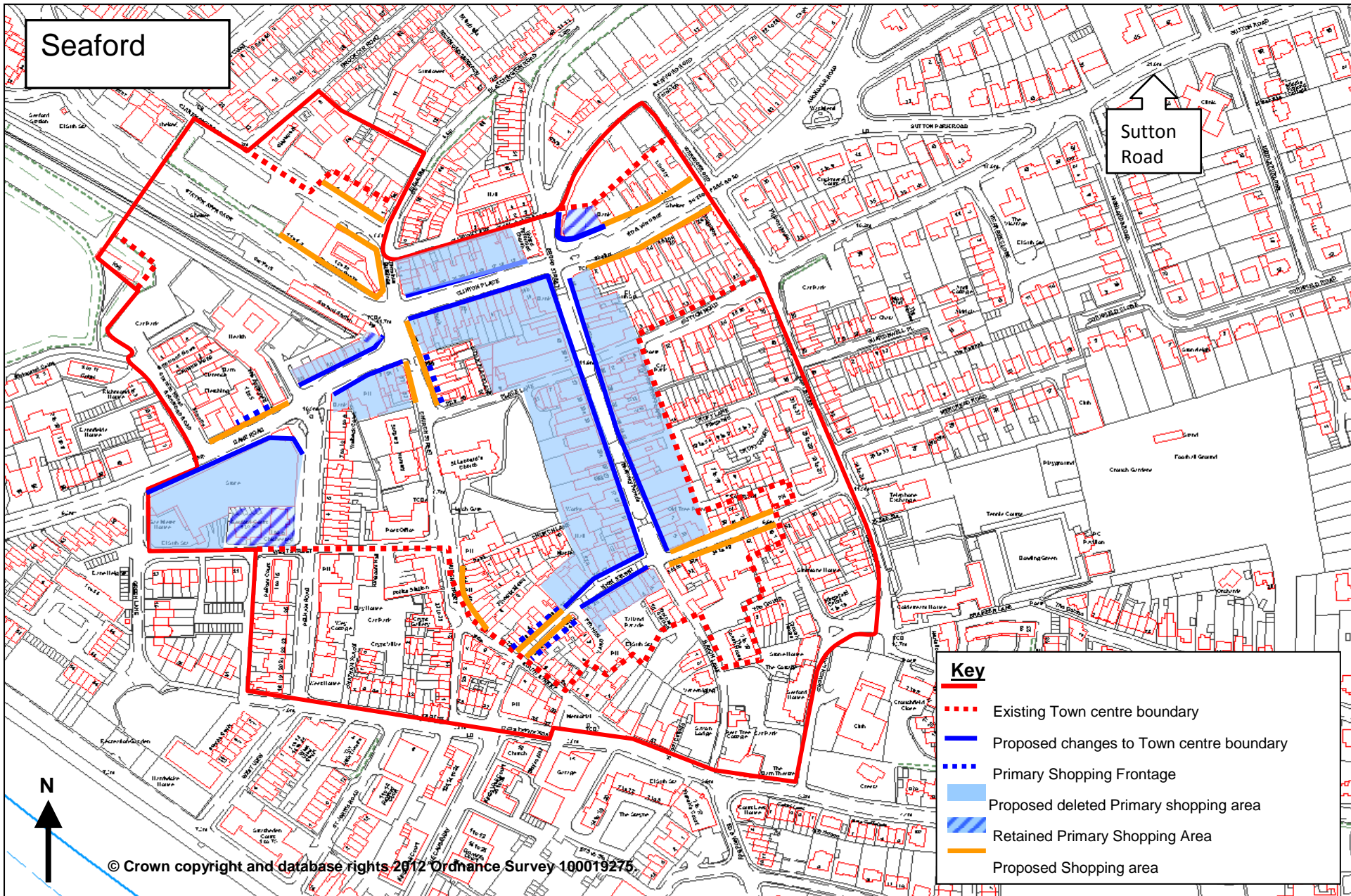
MOD18	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 4: Key Strategic Objectives Box, p.77</p>	<p>Amend the fourth bullet point key strategic objective by deleting the words ‘in urban areas’ to read:</p> <ul style="list-style-type: none"> <li>• <b>To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.</b></li> </ul>	<p>For consistency with Strategic Objective 8 p.31 where the words ‘in urban areas’ have been deleted through Focussed Amendment reference FA2.</p>
MOD19	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 10, Criterion 1(ii), p102</p>	<p>Add the words ‘at that location’ to read:</p> <p><b>ii. Ensuring that new development will not harm conservation interests unless the benefits of development at that location clearly outweigh the harm caused. In such cases appropriate mitigation and compensation will be required;</b></p>	<p>To ensure the policy complies with NPPF paragraph 118.</p> <p>Superseded by AM42</p>
MOD20	<p>Section 7 (Core Delivery Policies)</p> <p>Sustainable Travel, para.7.118, p.110</p>	<p>Insert the words ‘or as set out within a relevant Neighbourhood Plan’, to read:</p> <p>Car and cycle parking requirements at new developments will be determined by taking into account the accessibility of the site and characteristics of the development, in accordance with parking guidance approved by the local planning authority, or as set out within a relevant Neighbourhood Plan.</p>	<p>To recognise that parking requirements could also be a relevant matter to be addressed in Neighbourhood Plans, reflecting local circumstances.</p>

MOD21	<p>Section 7 (Core delivery policies)</p> <p>Core Policy 13 p111</p>	<p>Re-number the final three policy criteria from i. ii. and iii. to a. b. and c. respectively to read:</p> <p><b>The local planning authority will work with East Sussex County Council and other relevant agencies to encourage and support measures that promote improved accessibility, create safer roads, reduce the environmental impact of traffic movements, enhance the pedestrian environment, or facilitate highway improvements. In particular, the local planning authority will:</b></p> <ul style="list-style-type: none"> <li><b>a. Support the expansion and improvement of public transport services, particularly those providing links between the rural and urban areas;</b></li> <li><b>b. Encourage improvements to existing rail services, new or enhanced connections or interchanges between bus and rail services, and improvements to the quality and quantity of car and cycle parking at railway stations; and</b></li> <li><b>c. Support the development of a network of high quality walking and cycling routes throughout the district.</b></li> </ul>	<p>In order to avoid confusion with criteria i. ii. and iii. in Core Policy 13 point 7 immediately above.</p>
MOD22	<p>Appendix 2 - Status of saved local plan policies, p.125</p>	<p>Remove Policies ST5 and ST6 from the list of 'saved' 2003 Local Plan policies to retain in support of Core Policy 11</p>	<p>To correct typing error. These 'saved' policies have been replaced by Core Policy 2.</p>

MOD23	Appendix 2 – Status of saved local plan policies, p.126	Remove policy NH8 from the list of ‘saved’ 2003 Local Plan policies to retain for Newhaven.	This policy will be replaced by Spatial Policy 6 – Land at Harbour Heights, Newhaven.
MOD24	Appendix 2 saved local plan policies P126	Remove policy NH10 from the list of ‘saved’ 2003 Local Plan policies that the Core Policy replaces for Newhaven.  Add policy NH10 the list of ‘saved’ 2003 Local Plan policies to retain for Newhaven.	The site allocation boundary differs from the retail/residential planning application boundary. The council is advised that the consented Asda scheme will not be progressing on the site hence the retention of NH10 is required until the allocation is reviewed through a site allocations DPD.
MOD25	Appendix 2 saved local plan policies P126	Remove saved policy CH2 from the list of ‘saved’ 2003 Local Plan policies to retain for Chailey.	The ‘New Heritage’ development is completed and occupied.
MOD26	Appendix 3 p128, top box, second column.	The figure should read 520 not 440 as follows:  A review of the Spatial Policies 1 and 2 will be triggered in April 2022 if transport mitigation measures to accommodate the additional 520 homes at Peacehaven/Telscombe have not been identified to solve capacity constraints on the A259 to the satisfaction and agreement of the local highway authority	To accurately reflect the requirements of Spatial Policy 2.  Superseded to reflect the content of MM02

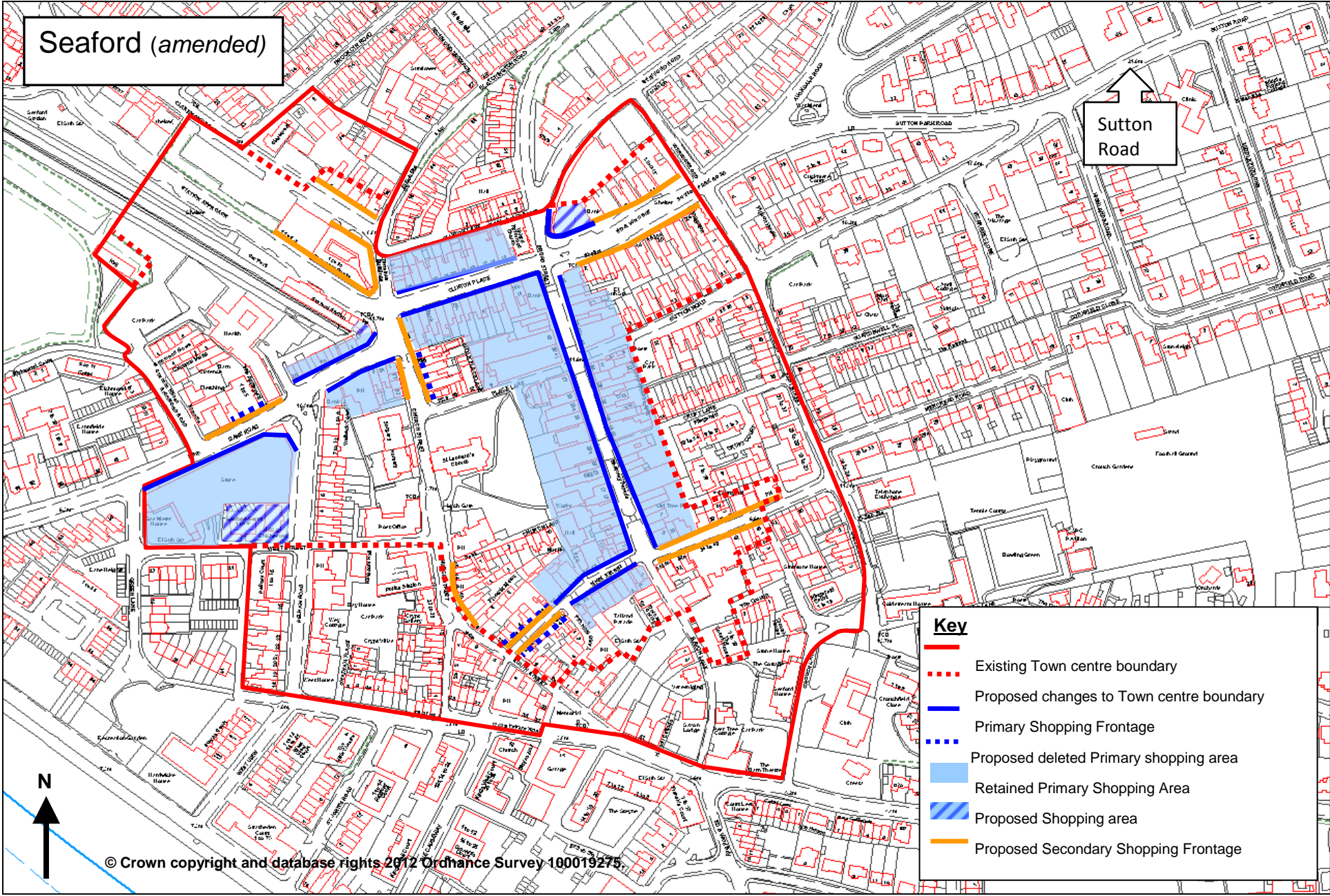
MOD27	Appendix 5 P143, Seaford map	Extend the Proposed Secondary Shopping Frontage to include the Public House (The Cinque Ports) on the High Street. *See maps below.	To correct a mapping error in order that the Proposed Secondary Shopping Frontage for Seaford in the Submission JCS accords with that recommended in the Lewes District Shopping and Town Centres Study.
-------	------------------------------------	--	--

\* MOD27 – Delete this map and replace with the amended map below



# Seaford (amended)

Sutton Road



**Key**

- Existing Town centre boundary
- Proposed changes to Town centre boundary
- Primary Shopping Frontage
- Proposed deleted Primary shopping area
- Retained Primary Shopping Area
- Proposed Shopping area
- Proposed Secondary Shopping Frontage

# Lewes District Local Plan

## Part 1: Joint Core Strategy – Submission Document

### **Modifications**

Schedule 2

July 2015

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





## **Context for the Modifications**<sup>2</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)].

---

<sup>2</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.

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.

## Schedule 2

LPA Modification Number	Joint Core Strategy Submission Document Reference /Location	Proposed Change	Reason
MOD28	Page 39, paragraph 6.19	<p>Amend paragraph 6.19 as follows;</p> <p>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).</p>	<p>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).</p> <p>Superseded by AM05</p>
MOD29	Page 41, Spatial Policy 1	<p>To amend the first sentence of Spatial Policy 1 as follows;</p> <p><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></p>	<p>Same as reason for MOD28.</p> <p>Superseded by MM01</p>
MOD30	Page 42, Table 4	To amend table 4 as follows;	Same as reason for MOD28.

			(A) Total requirement	(B) Already developed in the plan period (April 2010 – <u>October 2014</u> <del>April-2013</del> )	(C) Units permitted, but not yet implemented (includes units under construction) <sup>3</sup>	(D) Units considered deliverable having made sufficient progress through the planning process <sup>4</sup>	(E) Unimplemented Local Plan allocations for housing <sup>5</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>788554</u>	<u>1111964</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><del>2013</del></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>3</sup> A discount has been applied to small-scale schemes permitted – see the Justification for the Housing Strategy Paper.

<sup>4</sup> These are schemes granted planning permission subject to a section 106 agreement being put in place.

<sup>5</sup> Only unimplemented allocations that are still deemed deliverable or developable through the SHLAA process have been included within this allowance.

		<ul style="list-style-type: none"> <li>• An allowance for <del>465</del><u>418</u> dwellings to be permitted on unidentified small-scale windfall sites during the plan period and subsequently delivered<sup>6</sup>.</li> </ul> <p>The remaining <del>2,9083,026</del> net additional dwellings will be distributed as follows;</p> <ul style="list-style-type: none"> <li>• (1) Housing to be delivered on the following strategic site allocations; <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>• (2) Housing to be delivered at the following broad location; <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>• (3) Planned housing growth at the following settlements; <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 <u>550</u><del>660</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>	
--	--	---	--

<sup>6</sup> See the Core Strategy Background Paper: Justification for the Housing Spatial Strategy 2014

		<ul style="list-style-type: none"> <li>○ Seaford – a minimum of 170 net additional units</li> <li>○ Burgess Hill (within Wivelsfield Parish) – a minimum of <del>80400</del> net additional units</li> <li>○ Barcombe Cross – a minimum of 30 net additional units</li> <li>○ North Chailey – a minimum of 30 net additional units</li> <li>○ South Chailey – a minimum of 10 net additional units</li> <li>○ Cooksbridge – a minimum of 30 net additional units</li> <li>○ Ditchling – a minimum of 15 net additional units</li> <li>○ Newick – a minimum of 100 net additional units</li> <li>○ Plumpton Green – a minimum of 50 net additional units</li> <li>○ 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).</li> <li>○ Wivelsfield Green – a minimum of 30 net additional units</li> </ul> <p>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.</p> <p>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.</p>	
	Pages 46 and 47, Table 5	To amend table 5 as follows;	Same as reason for MOD28.

<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>Completions</b> (April 2010 – October 2014/ <del>April 2013</del> )	<b>Commitments</b> (as at 1 <sup>st</sup> October 2014/ <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>178437</del>	0	<del>550660</del> <sup>7</sup>	<del>10384020</del>	
Edge of Burgess Hill (within Wivelsfield Parish)	70	<del>290</del>	0	<del>80400</del>	<del>1790</del>	
Ringmer & Broyle Side <sup>8</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>7</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>8</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

		<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 <b>465518</b> 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>	
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>																												
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>																														



		<p>Restaurants and Cafes, A4 Drinking Establishments, A5 Hot Food Takeaways and community floorspace);</p> <ul style="list-style-type: none"> <li>• <u>C2 Nursing/ Care Home;</u></li> <li>• <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></li> </ul> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li><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;</li> <li><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;</li> <li><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;</li> <li><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</li> </ul>	
--	--	---	--

		<p><u>to a Conservation Area;</u></p> <p><del>y) The development will be</del> <u>It is</u> 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><del>vi) A riverside pedestrian route along the western bank of the River Ouse is incorporated into the scheme, which will to extend the town's riverside focus and contribute to the-its character and quality, of the town and additional pedestrian and cycling routes will be are incorporated into the site to aid in linking the site to the rest of the town;</del></p> <p><del>vii) The redevelopment would</del> <u>It results</u> in no net loss of public parking provision;</p> <p><del>viii) The retail element of the development is incorporated into the town centre boundary (as designated by Core Policy 6) as far as feasibly possible, with any additional significant retail provision large shops being directed to the southern part of the North Street Quarter; the 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) Subject to the commercial need, flexibility will be is applied to the requirement to deliver B1a office floorspace, so that other B1 uses can be explored;</del></p> <p><del>ix) Alternative uses will only be permitted on the bus station site should are subject to the facility being replaced by an operationally satisfactory and accessible site elsewhere; and</del></p> <p><del>x) It makes contributions towards off-site infrastructure improvements arising from, and related to, the development.</del></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.

		(Use Class B1c) would, in principle, be acceptable within the redevelopment of the site. This will be determined through the <del>masterplanning process</del> , and any <del>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

<p>Referenced MM15 in Schedule 3</p>	<p>Core Policy 1</p>	<p>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:</p> <table border="1" data-bbox="730 491 1366 753"> <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>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 (net) dwelling units (including conversions and subdivisions)</u> unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level.</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													
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>MOD39</p>	<p>Page 72,</p>	<p>To amend supporting text as follows;</p>	<p>To reflect the</p>										

	<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>
--	--------------------------------------	--	--

		<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	Core Policy 3, page 74 – 76, paragraphs 7.29 to 7.35	<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 <i>Planning for Gypsy and Traveller Caravan Sites</i> and Circular 04/2007 <i>Planning for Travelling Showpeople</i>, which emphasised the importance of assessing accommodation needs<sup>9</sup>. The GTAA went through a process of external benchmarking<sup>40</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>41</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>9</sup> Section 225 of 2004 Housing Act outlines the requirement of assessing accommodation needs.

<sup>40</sup> GTAA Benchmarking and Audit of Advice, Final Summary Report. Universities of Birmingham, Salford and Sheffield Hallam, January 2008.

<sup>41</sup> Single issue review required to consider accommodation assessments undertaken during the preparation of the SEP. Paragraph 7.27-7.30, SEP(2009)

		<p>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.</p> <p>7.3429 Current national planning policy for traveller sites<sup>12</sup> reiterates <u>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>13</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>14</sup>. The disaggregated figures are reflected in Policy CP3.</u></p>	
--	--	---	--

<sup>12</sup> Paragraph 4 and 6(c) of DCLG's *Planning policy for traveller sites* (March, 2012).

<sup>13</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>14</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

		<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>45</sup>. The local planning authorities will work with relevant partners to locate additional suitable site(s)<sup>46</sup>.</del></p>	
--	--	---	--

<sup>45</sup> ~~South East England Gypsy and Traveller Regional Transit Study 2009, University of Birmingham.~~

<sup>46</sup> ~~SEP draft policy did not allocate transit provision on a planning authority level due to insufficiently robust evidence~~



		7.35 No specific deliverable sites have been identified in the Site Assessment work undertaken to date <sup>17</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).	
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>17</sup> Gypsy and Traveller Site Assessment (Parker Dann, 2010) and subsequent update (2012)

			<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

			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 (ODPM 2004)</i> 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 to the setting of the National Park and its purposes;</u></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

			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.

MOD50	Page 115, Core Policy 14	Amend CP14(2) to the following:  <b>Support applications for low carbon and renewable energy installations, subject to the following matters being satisfactorily assessed and addressed:</b> <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>	To ensure the policy is consistent with NPPF Paragraph 98  Superseded by MM30
MOD51	Page 115, Core Policy 14	Amend CP14(4) to the following:  <b><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. 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.</del></b>	To remove reference to the Code for Sustainable Homes, which is being wound down.  Superseded by MM32
MOD52	Page 120 – Glossary	Add definition for Intermediate housing:  <u>Intermediate housing - is homes for sale and rent provided at a cost above social</u>	To provide an improved and more appropriate

	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 1803 1372"> <tr> <th colspan="3" data-bbox="658 528 1803 592"><b>Core Policy 1: Affordable Housing</b></th> </tr> <tr> <th colspan="3" data-bbox="658 592 1803 663"><b>Core Policy 1 will aim to meet the following the Objectives</b></th> </tr> <tr> <td colspan="3" data-bbox="658 663 1803 727"> <ul style="list-style-type: none"> <li><b>Objective 2</b></li> </ul> </td> </tr> <tr> <th data-bbox="658 727 1070 727">Target</th> <th data-bbox="1070 727 1413 727">Indicators</th> <th data-bbox="1413 727 1803 727">Current Position</th> </tr> <tr> <td data-bbox="658 727 1070 1372" rowspan="4">District wide target of 40% Affordable Housing provision (on developments exceeding 10 dwellings)</td> <td data-bbox="1070 727 1413 847">Gross number of affordable housing completions per annum</td> <td data-bbox="1413 727 1803 847"><b>2012/13: 38</b></td> </tr> <tr> <td data-bbox="1070 847 1413 935">Percentage of affordable dwellings completed</td> <td data-bbox="1413 847 1803 935"><b>2012/13: 45.78%</b></td> </tr> <tr> <td data-bbox="1070 935 1413 1094">Percentage of applications of 10 units or more meeting 40% affordable housing target</td> <td data-bbox="1413 935 1803 1094"><b>2012/13: 50%</b></td> </tr> <tr> <td data-bbox="1070 1094 1413 1372">Average house price by type</td> <td data-bbox="1413 1094 1803 1372"> <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></td> <td data-bbox="1070 1310 1413 1372">Average construction cost by development type</td> <td data-bbox="1413 1310 1803 1372"><b>Not yet monitored on a regular basis – to be</b></td> </tr> </table>	<b>Core Policy 1: Affordable Housing</b>			<b>Core Policy 1 will aim to meet the following the Objectives</b>			<ul style="list-style-type: none"> <li><b>Objective 2</b></li> </ul>			Target	Indicators	Current Position	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>	Average house price by type	<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>		Average construction cost by development type	<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>
<b>Core Policy 1: Affordable Housing</b>																											
<b>Core Policy 1 will aim to meet the following the Objectives</b>																											
<ul style="list-style-type: none"> <li><b>Objective 2</b></li> </ul>																											
Target	Indicators	Current Position																									
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>																									
	Average house price by type	<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>																									
	Average construction cost by development type	<b>Not yet monitored on a regular basis – to be</b>																									

			<p>(construction cost £/m<sup>2</sup>)</p> <p>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.</p>	<p><b>monitored on an annual basis using the most cost-effective source available. Current position is available:</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>	

# Lewes District Local Plan

## Part 1: Joint Core Strategy – Submission Document

### **Additional Modifications**

Schedule 4

July 2015

Additional Modifications proposed in response to the Hearing Sessions and the Inspector's Initial Findings Letter





## **Context for the Modifications**<sup>18</sup>

**Schedule 4** – below sets out 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)].

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 2** – 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.


**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.

---

<sup>18</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.

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.

Schedule 4			
Additional Modification Number	Joint Core Strategy Submission Document Reference / Location	Proposed Change	Reason
AM01	Section 5 (Strategic Objectives)  Strategic Objective 10, p.32	Amend Strategic Objective 10 by adding the words 'locally contributing' after the word 'reduces' and deleting the words ', including through the implementation of the highest feasible standards of sustainable construction techniques in new developments,' to read:  <b>To ensure that the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives</b>	As agreed at the Hearings in response to a representation by the Home Builders Federation and to correct a typing error/omission .
AM02	Section 6 (Spatial Strategy)  Para.6.14, p.38	Delete the final two sentences of paragraph 6.14.	Consequent to MM01
AM03	Section 6 (Spatial Strategy)  Para. 6.15, p.38	Amend the first sentence of paragraph 6.15 by deleting the words 'This latter assessment explains how' to read:  The District Council and the National Park have sought to explore a range of options in order to accommodate the full objectively assessed need for housing within the plan area.	Consequent to AM02

AM04	Section 6 (Spatial Strategy)  Para 6.18 p.39	Delete the final two sentences of paragraph 6.18.	Consequent to AM02
AM05	Section 6 (Spatial Strategy)  Para 6.19, p.39	Delete paragraph 6.19 and insert new text to read:  In the light of these considerations, it is concluded that the overall target for net additional housing in the district should be a minimum of 6,900 dwellings between 2010 and 2030 (an average of 345 dwellings per annum). This target is less than the full objectively assessed housing need for the district. However, it is considered to be the level of housing growth that most appropriately balances the objective of meeting housing needs with the aims of achieving sustainable development and sustainable communities.	Consequent to MM01
AM06	Section 6 (Spatial Strategy)  Para.6.22, p.40	Amend paragraph 6.22 by deleting the final three sentences and inserting new text to read:  If a longer-term potential solution which affects the plan area is agreed, the District Council and the National Park Authority are committed to a review of the Core Strategy if this is necessary to deliver it.	To update the text
AM07	Section 6 (Spatial Strategy)  Para.6.27, p.41	Amend the final sentence to read:  Spatial Policies <u>1</u> and <u>3</u> addresses this issue.	For clarity.

AM08	Section 6 (Spatial Strategy)  Table 4, p.42	<p>Amend the figures in Table 4 as follows:</p> <table border="1" data-bbox="689 268 1765 1161"> <thead> <tr> <th></th> <th>(A) Total requirement</th> <th>(B) Already developed in the plan period (April 2010 – April <del>2012</del>2015)</th> <th>(C) Units permitted but not yet implemented (includes units under construction)<sup>16</sup></th> <th>(D) Units considered deliverable having made sufficient progress through the planning process<sup>17</sup></th> <th>(E) Unimplemented Local Plan allocations for housing<sup>18</sup>.</th> <th>Residual requirement to plan for (A – B, C, D &amp; E)</th> </tr> </thead> <tbody> <tr> <td>Housing (within the National Park)</td> <td>Plan – wide requirement :</td> <td>77 <u>220</u></td> <td>463 <u>142</u></td> <td>0</td> <td>0</td> <td>Plan – wide requirement:</td> </tr> <tr> <td>Housing (outside of the National Park)</td> <td><del>5,600</del> <u>6,900</u></td> <td>554 <u>800</u></td> <td>964 <u>1131</u></td> <td>77 <u>183</u></td> <td>227 <u>102</u></td> <td><del>3,544</del> <u>4,322</u></td> </tr> </tbody> </table>		(A) Total requirement	(B) Already developed in the plan period (April 2010 – April <del>2012</del> 2015)	(C) Units permitted but not yet implemented (includes units under construction) <sup>16</sup>	(D) Units considered deliverable having made sufficient progress through the planning process <sup>17</sup>	(E) Unimplemented Local Plan allocations for housing <sup>18</sup> .	Residual requirement to plan for (A – B, C, D & E)	Housing (within the National Park)	Plan – wide requirement :	77 <u>220</u>	463 <u>142</u>	0	0	Plan – wide requirement:	Housing (outside of the National Park)	<del>5,600</del> <u>6,900</u>	554 <u>800</u>	964 <u>1131</u>	77 <u>183</u>	227 <u>102</u>	<del>3,544</del> <u>4,322</u>	To update the figures and consequent to MM01
	(A) Total requirement	(B) Already developed in the plan period (April 2010 – April <del>2012</del> 2015)	(C) Units permitted but not yet implemented (includes units under construction) <sup>16</sup>	(D) Units considered deliverable having made sufficient progress through the planning process <sup>17</sup>	(E) Unimplemented Local Plan allocations for housing <sup>18</sup> .	Residual requirement to plan for (A – B, C, D & E)																		
Housing (within the National Park)	Plan – wide requirement :	77 <u>220</u>	463 <u>142</u>	0	0	Plan – wide requirement:																		
Housing (outside of the National Park)	<del>5,600</del> <u>6,900</u>	554 <u>800</u>	964 <u>1131</u>	77 <u>183</u>	227 <u>102</u>	<del>3,544</del> <u>4,322</u>																		
AM09	Section 6 (Spatial Strategy)	Delete footnote 15. Re-number subsequent footnotes accordingly.	Consequent to AM02																					

	Footnote 15, p.42		
AM10	Section 6 (Spatial Strategy)  Para.6.35, p.44	Amend paragraph 6.35 by deleting the final three sentences.	Consequent to MM06
AM11	Section 6 (Spatial Strategy)  Para.6.36, p.44	Delete paragraph 6.36	There are no broad locations in the plan consequent to MM13
AM12	Section 6 (Spatial Strategy)  Para.6.37, p.44	Amend the first sentence of paragraph 6.37 by deleting the words 'and the identification of broad locations'.	Consequent to MM13
AM13	Section 6 (Spatial Strategy)  Footnote 18, p.45	Delete footnote 18.	Consequent to AM02
AM14	Section 6 (Spatial Strategy)  Para.6.38, p.46	Delete paragraph 6.38 and insert new text to read:  The planned levels of housing growth for each settlement over the plan period is summarised in Table 5 below. This summary sets out the homes already built, committed developments, strategic site allocations, and planned growth to	Consequent to MM02

		<p>be brought forward through future allocations, by settlement. The residual 207 homes that are yet to be attributed to any settlement will be identified through subsequent non-strategic allocations. All reasonable options for distributing these 207 homes in the most sustainable manner will be considered. This will be achieved through subsequent allocations in Local Plan Part 2, the SDNPA Local Plan or Neighbourhood Plans. For some settlements this may involve some additional housing land allocation in Local Plan Part 2 or SDNP Local Plan, beyond those identified in a Neighbourhood Plan. In considering all reasonable options regard will be had to a number of factors, including: each settlements capacity for appropriate housing development; the relative sustainability of settlements; the cumulative impacts of existing and potential allocations; and relevant policy considerations and constraints including policy requirements of Neighbourhood Plans as relevant to housing site selection (in such cases weight will be attributed according to how advanced the Neighbourhood Plan is at the time of site selection).</p>	
AM15	<p>Section 6 (Spatial Strategy)</p> <p>Footnote 19, p.46</p>	Delete footnote 19.	Consequent to MM02
AM16	<p>Section 6 (Spatial Strategy)</p> <p>Footnotes 20, p.46</p>	Delete footnote 20.	Consequent to MM02
AM17	<p>Section 6 (Spatial Strategy)</p> <p>Para.6.41, p.47</p>	Delete paragraph 6.41.	Consequent to MM02

AM18	Section 6 (Spatial Strategy)  Para.6.42, p.47	Delete paragraph 6.42.	Consequent to MM02
AM19	Section 6 (Spatial Strategy)  Para.6.46, p.49	Delete the words:  “, as well as the broad locations for growth,”	To reflect that there are no broad locations now included in the plan.
AM20	Section 6 (Spatial Strategy)  Para.6.50, p.49	Amend paragraph 6.50 to read:  Very few sites are suitable for strategic level opportunities for growth and redevelopment within and around Lewes town. The main current opportunity is for the redevelopment of a centrally located site, as detailed within the following policy <u>Spatial Policy 3</u> . <u>A further opportunity is presented by a greenfield site at Old Malling Farm as described in Spatial Policy 4 and its justification below.</u>	Consequent to MM05
AM21	Section 6 (Spatial Strategy)  Spatial Policy 5 additional wording to justification text paragraphs 6.85 and 6.86 p60	Insert additional wording to the end of paragraph 6.85 to read:  At present the site is in agricultural use and is primarily used for grazing purposes. The site lies within an area with some archaeological (from Medieval pottery production) and ecological interest, although the site itself is not subject to any formal biodiversity designations such as SSSI's, SNCI's and Ancient Woodland. With regards to these interests a Phase 1 Habitat Survey and an Archaeological Desk Based Assessment have already been undertaken. This survey and assessment demonstrate that these ecological and archaeological interests will not preclude development of this site, although further survey work will be	For justification and explanation of the additional criterion iii) above.



		<p>required and any mitigation measures appropriately implemented. <u>In addition, preliminary hedgerow surveys have been undertaken on the existing boundary and internal hedgerows. The surveys concluded the existence of potentially 'important' hedgerows. It is not considered that this would preclude development of this site, including access on to Bishops Lane, but should form part of the detailed planning consideration at the planning application stage.</u></p> <p>Delete paragraph 6.86.</p> <p><del>6.86 The policy requires the housing to be completed only once increased capacity is provided at the Neaves Lane Waste Water Treatment Works, which will serve this development. At present, the treatment works is operating close to its designed capacity with only limited headroom for accommodating additional housing (there is not enough headroom to accommodate the 110 units planned for this strategic site). Southern Water has indicated that the works can be expanded, whilst according with the Environment Agency's consenting requirements. Southern Water will seek funding for these works through the periodic review process. The next periodic review is due to take place in 2014 and assuming that funding for the required works is approved, the additional capacity should be provided by 2016. Although construction of the properties will be able to commence in advance of the additional capacity being provided, completion and occupation will only be permitted once this has occurred.</del></p>	Consequent to MM12.
AM22	Core Policy 1 para 7.10 and 7.11 p68	<p>Amend and merge the two paragraphs to read:</p> <p>7.10 The Affordable Housing Viability Assessment recommended a flexible approach to affordable housing delivery, with a district wide target (rather than requirement) of 40% and a graduated threshold for delivery <del>as set</del></p>	For clarification and to reflect the changes to national

		<p>out in the core policy below.</p> <p>7.11— The graduated threshold for developments of less than 10 units is to reflect the increased build costs and generally somewhat reduced viability demonstrated for the smaller development sites.</p>	policy.
AM23	Core Policy 1 para 7.14 p68	<p>Amend paragraph 7.14 to read:</p> <p>The actual affordable housing requirement may be determined on a site by site basis, taking into consideration market and site conditions. The target levels <del>shown in the policy below</del><sup>above</sup> will be expected to be provided by all developments<sup>19</sup> of <u>6 (net) dwellings within the national park (Designated Rural Area) and 11<del>3</del> (net) or more dwelling units elsewhere in the district</u> (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. Such evidence is required to be submitted by the applicant with the planning application to justify any reduced levels of affordable housing provision proposed and may be subject to independent assessment (by the Valuation Office Agency or <del>equivalent</del><u>other appropriately qualified independent assessor</u>). An open-book approach will be taken and with the onus being on the applicant to clearly demonstrate the case for the reduced level of affordable housing proposed. Applicants intending to make a planning application with a reduced level of affordable housing provision below the relevant identified target are strongly advised to raise this with planning officers in pre-application discussions.</p>	For clarification and to reflect the changes to national policy.
AM24	Core Policy 1 para 7.15 p69	<p>Insert additional footnote regarding contributions in lieu to read:</p> <p><u>For developments of 6 – 10 units inclusive located in a Designated Rural Area</u></p>	For clarification and to reflect

<sup>19</sup> Where a development has a maximum combined gross floorspace of more than 1000sqm (gross internal area) it will be expected to provide the target level of affordable housing even if the total number of units provided is 10 or less (5 units or less in Designated Rural Areas), unless robust viability evidence demonstrates otherwise.

		<u>the local planning authority will seek affordable housing contributions as commuted sum financial payments in accordance with the targets/thresholds in the policy below.</u>	the changes to national policy.
AM25	Core Policy 1 para 7.16 p69	Delete wording as follows :  {shared ownership}	For clarification to reflect the amended definition of intermediate housing as added in the glossary.
AM26	Core Policy 1 para 7.19 p69	Amend the paragraph as follows:  For clarity, the affordable housing policy applies to sheltered, extra care and assisted living residential development in the same way as it does to general dwelling houses, where each residential unit has its own kitchen and bathroom facilities and therefore falls within the C3 Use Class. It also applies to conversions and subdivisions where there is a net residential gain of <del>3 or more</del> dwelling units <u>in accordance with the target and thresholds set out in the policy below.</u>	For clarification and to reflect the changes to national policy.
AM27	Core Policy 1 para 7.21 p69	Additional paragraph 7.21:  <u>In November 2014 a Written Ministerial Statement set out changes in Government policy relating to planning obligations intended to support small-scale developers, custom and self-builders. This included disallowing local planning authorities from seeking affordable housing contributions for schemes of 10 dwelling units or less and of 5 units or less in Designated Rural Areas where the combined gross internal floor space of the units does not exceed 1,000sqm. This position is reflected in Core Policy 1. Designated Rural Areas,</u>	For clarification and to reflect the changes to national policy.

		<u>as defined by the Written Ministerial Statement, include national parks and therefore includes all areas of the district within the South Downs National Park, including the town of Lewes. The district currently contains no other designated rural areas for the purposes of this policy.</u>	
AM28	Core Policy 2 p73	<p>Criterion 1 – delete part second sentence to read:</p> <p><b>1. Provide a range of dwelling types and sizes to meet the identified local need, based on the best available evidence. This need will generally include accommodation appropriate for the ageing population, and 1 and 2 bedroom homes for single person households and couples with no dependents. Account will also need to be given to the existing character and housing mix of the vicinity and, where appropriate, the setting of the National Park and its Purposes and Duty.</b></p>	This is better located in criterion 2.
AM29	Core Policy 2 supporting text p72	<p>Insert additional sentences to paragraph 7.22 and additional paragraphs 7.23 and 7.24 to read:</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>LDC and SDNPA are currently working</u></p>	<p>This supersedes MOD39.</p> <p>To explain the amendment to Criterion 2 with regard to Lifetime Homes requirements.</p> <p>To explain when C2 units will be counted against the</p>

		<p><u>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><u>7.23 In order to provide clarity for prospective developers the minimum requirement for new homes of 10% of homes to meet the Lifetime Homes Standard has been set out in the policy. This requirement has been assessed for viability to ensure deliverability. Lifetime Homes Standard requires a range of features that make housing more functional and adaptable for everyone including families, disabled people and older people. The Standard is based on sixteen design criteria which cover both internal and external features of individual dwellings and also internal and external communal areas of blocks of dwellings.</u></p> <p><u>7.243 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 PPG says: "Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against 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</u></p>	<p>housing requirement.</p> <p>To reflect the additional work that the District Council and SDNPA are doing with ESCC regarding assessing Older People's housing needs.</p>
--	--	---	---

		<p><u>the requirements of SP2, LDC and the SDNPA will include against the housing target individual units of C2 accommodation where they provide self-contained homes with private kitchen and bathroom facilities, living area and own front door (including where the front door is accessed from a communal and/or internal hall or corridor).</u></p>	
AM30	Core Policy 2 p73	<p>Amend Criterion 3 to read:</p> <p><b>3. <del>Achieve residential densities</del><u>Reflect the site context including the character of the surrounding area, site accessibility, and the size and type of dwellings needed in the locality, to achieve densities in the region of 47 to 57 dwellings per hectare for the towns and 20 to 30 dwellings per hectare for the villages.</u><del>Exceptions will be made where individual sites merit lower or Hhigher or lower densities may be justified by the specific character and context of a site.</del><u>when taking into consideration the site context including the character of the surrounding area, site accessibility, and the size/type of dwellings needed in the locality.</u> Densities to be achieved on <u>strategic sites are indicated in the capacity and development principles of each strategic allocation in this Core Strategy. Densities to be achieved on non-strategic allocated sites will be similarly identified in the development principles that accompany each</u>the site allocation in the relevant <u>subsequent</u> DPD.</b></p>	For clarification of the expectations of development proposals for site density.
AM31	Core Delivery Policies paragraph 7.30  <u>Expanded from MOD40</u>	<p>Amend text to read:</p> <p>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. <u>The GTAA sets out an overall figure of 13 net additional permanent pitches to be delivered within Lewes district.</u> The figure for Lewes District has been disaggregated <u>in the GTAA</u> between those areas that fall within and outside the SDNP, <u>8 and 5 net additional permanent</u></p>	To include updated figures from the December 2014 GTAA.

		<p><u>pitches respectively, in order that each local planning authority is able to plan for their authority area. These disaggregated figures are reflected in Policy CP3. The local planning authorities will consider how best to meet the identified additional permanent pitch needs of the district. This may mean making allocations within the area outside the National Park to serve some or all of the disaggregated needs of the National Park area of the district. Conversely, it may mean making allocations within the National Park area to serve the disaggregated needs of the part of the district outside the national park. These allocations will be provided in subsequent DPDs.</u></p>	
AM32	<p>Core Delivery Policies paragraph 7.31</p> <p>In addition to MOD40</p>	<p>Insert an additional paragraph to read:</p> <p>Provision of 8 net additional transit pitches in East Sussex, including the area within the National Park, will be made over the Plan period having regard to the above criteria. This work will be progressed with the other East Sussex local planning authorities.</p>	<p>To clarify the need identified in the 2014 GTAA for additional transit pitches for the whole county. Further work will be undertaken to identify where in the county these should be located.</p>
AM33	<p>Core Delivery Policies paragraph 7.44 p79</p>	<p>Add to paragraph 7.44 to read:</p> <p>Where an application is made to change the use of an employment site to another use it will need to be supported by appropriate and robust evidence to demonstrate the economic viability or environmental amenity case proposed for</p>	<p>To provide clarification on what would be required to demonstrate</p>

		not retaining the site for employment use. A demonstrated lack of developer <u>or tenant/occupier</u> interest would include, as a minimum, evidence of at least 12 months of active and continuous marketing, including advertising, for employment use at an appropriate market level and evidence of no unreasonable barriers to potential employment <u>tenants/occupants</u> . Details of the numbers and types of interested parties and reasons for not pursuing their interest in the site for employment use will be expected.	CP4 criteria 2 i. and ii. for an application to change the use of an existing employment site to a non-employment use.
AM34	Core Policy 6 p87 Lewes District Retail Hierarchy table	Delete 'Newhaven' from the <u>Local Centre</u> box.  Insert 'Newhaven town centre (within the ring-road)' to the <u>District Retail Centre</u> box.	To reflect Newhaven town centre's position in the hierarchy as agreed at the Hearing session.
AM35	Core Policy 6 p88 paragraph 7.61	Amend paragraph to read:  In Newhaven town centre (the area within the ring road) there has been a marked decline in the range of retail and retail services available and the area has struggled further through the recent adverse economic conditions. <del>Consequently the retail function of the area has reduced and is classified as a Local Centre in the retail hierarchy.</del> However, it is envisaged that with the wider regeneration of the town, including a revitalised and more accessible town centre, <u>the vibrancy and vitality of the town centre will increase, befitting of its classification as a District Retail Centre</u> <del>the position of Newhaven town centre will be upgraded to District Retail Centre in time.</del> In addition, Newhaven occupies an important geographic location between Seaford and Peacehaven whereby it offers the ideal strategic position to service the surplus retail needs	Consequent to AM34



		of Seaford and Peacehaven that cannot be met within those towns, as well as its own needs.	
AM36	Section 7 (Core Delivery Policies)  Core Policy 9 p.97	Amend Key Strategic Objectives Inset Box by deleting the words ‘, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments,’ and inserting the words ‘and is proactive regarding climate change initiatives’ to read:  <b>To ensure that the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives</b>	To reflect the Hearing discussions and the Housing Standards Review.
AM37	Section 7 (Core Delivery Policies)  Paragraph 7.84 p.97	In general, air quality in the district is good. However, there are concerns with regard to nitrogen dioxide emissions in certain areas. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes town centre for nitrogen dioxide, mainly due to emissions from traffic. <u>In 2014 an AQMA was declared in Newhaven town centre, also as a result of nitrogen dioxide emissions from transport.</u> Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached. <del>There are similar concerns in the South Way area of Newhaven, which has not yet been declared an AQMA but where nitrogen dioxide has been recorded at levels approaching the maximum acceptable limits.</del>	To reflect the declaration of the Newhaven AQMA.
AM38	Section 7 (Core Delivery Policies)  Paragraph 7.86 p.97	Update paragraph to read:  Air quality is closely controlled by European Directives that set out statutory health-based objectives for key air pollutants that Member States are expected to achieve by certain dates. These targets have been transposed into minimum national standards for certain air pollutants, which are set out in the Air Quality Standards Regulations 2010. For nitrogen dioxide there are two targets: <ul style="list-style-type: none"> <li>• Level not to exceed 200µg.m-3 more than 18 times a year (1 hour mean) - something which is not currently an issue in Lewes District.</li> </ul>	To reflect the declaration of the Newhaven AQMA.

		<ul style="list-style-type: none"> <li>• The annual mean should not exceed 40µg.m-3 – currently exceeded in Lewes and Newhaven, causing the AQMAs to be declared town centre, causing the AQMA to be declared.</li> </ul>	
AM39	<p>Section 7 (Core Delivery Policies)</p> <p>Paragraph 7.87 p.97</p>	<p>Update paragraph to read:</p> <p>An Air Quality Action Plan (AQAP) has been produced for the Lewes town centre AQMA, including a number of measures that aim to improve air quality. It is expected that development will aid in the delivery of the AQAP by either providing measures set out in the AQAP or by funding their delivery, thereby mitigating the development’s potential negative impacts. <u>An AQAP will be produced for Newhaven in 2016.</u></p>	To reflect the declaration of the Newhaven AQMA.
AM40	<p>Section 7 (Core Delivery Policies)</p> <p>Paragraph 7.99 p.101</p>	<p>Amend first sentence of para 7.99 to read:</p> <p>As such, additional residential development within the 7km zone will be required to mitigate their potential harm by aiding in the delivery of Suitable Alternative Natural Greenspaces (SANGs) and <u>the Ashdown Forest Strategic Access Management and Monitoring Strategy (SAMMS)</u> <del>other measures as listed in Core Policy 10</del>. The District Council and National Park Authority, working in partnership with neighbouring authorities, will develop guidance that details the costs that will be sought from such development towards mitigation measures.</p>	To clarify what is meant by ‘other measures’.
AM41	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 10 p.102</p>	<p>Amend criterion 1.i. to read:</p> <p><b>i. <u>Maintaining and where possible enhancing</u> Seeking to conserve and enhance the natural, locally distinctive and heritage landscape qualities and characteristics of the district including hedgerows, ancient woodland and shaws, as informed by the East Sussex County Landscape Assessment and the Lewes District Landscape Capacity Study;</b></p>	To reflect discussions at the Hearings.

AM42	Section 7 (Core Delivery Policies)  Core Policy 10 p.102	Amend criterion 1.ii. to read:  <b>ii Ensuring that new development will not harm <u>nature</u> 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>	For clarity and to reflect discussions with Natural England.  Note – this supersedes MOD43
AM43	Section 7 (Core Delivery Policies)  Core Policy 10 p.102	Amend criterion 1.iii. to read:  <b>iii. Maintaining and where possible enhancing <del>Seeking the conservation, enhancement and net gain in</del> local biodiversity resources including through maintaining and improving wildlife corridors, ecological networks and avoiding habitat fragmentation in both rural and urban areas;</b>	To reflect discussions at the Hearings.
AM44	Section 7 (Core Delivery Policies)  Core Policy 11 p.103	Amend Key Strategic Objectives Inset Box by deleting the words ‘, including through the implementation of the highest feasible construction techniques in new developments,’ and inserting the words ‘and is proactive regarding climate change initiatives’ to read:  <b>To ensure that the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives</b>	To reflect the Hearing discussions and the Housing Standards Review
AM45	Section 7 (Core Delivery Policies)  Paragraph 7.110 p.106	Amend paragraph to read:  Fluvial flooding from the River Ouse and inundation from the sea are the primary flood risks in the district. However, there are also other more limited flood risks that nonetheless can have a significant impact on homes and businesses, such as surface water flooding <u>and groundwater flooding</u> , with some areas more susceptible than others. Many of these areas <u>of surface</u>	To reflect discussion at the Hearings to include reference to groundwater flooding,

		<p>water flood risk have been identified in the <u>East Sussex Preliminary Flood Risk Assessment</u>. This has been prepared by East Sussex County Council, <u>which is</u> <del>, which has an emerging role as the Lead Local Flood Authority</del>. As part of this role, <u>the ESCC is responsible for</u> <del>will take on</del> the management of surface water flooding risk and <u>is a statutory consultee on surface water drainage matters for major development proposals. Sustainable Drainage Systems (SuDS)</u>. <del>All</del> development proposals will be required to demonstrate how they will manage surface water drainage in line with the hierarchy of drainage options set out in the national Planning Practice Guidance and the non-statutory <u>Technical Standards</u><sup>20</sup>. Proposed drainage systems will be required to be supported with <u>a maintenance schedule, including the identification of the body responsible for maintenance and demonstrating the ongoing funding and maintenance of drainage systems</u>. The local planning authority will use <u>planning conditions or planning obligations, as appropriate, to secure the ongoing maintenance and operation of approved drainage systems</u>.</p>	<p>which also occurs in the district. To update ESCC's role and requirements as Lead Local Flood Authority.</p>
AM46	<p>Section 7 (Core Delivery Policies)</p> <p>Core Policy 12, p.108</p>	<p>In criterion 5 delete 'liaise with' and replace with 'consult' to read:</p> <p><b>5. Seeking the appropriate management of surface water run-off and ensuring there is no increase in surface water run-off from new developments. This will include requiring new development to incorporate Sustainable Drainage Systems (SuDS), unless it is demonstrated that SuDS are not technically appropriate. The local planning authority will <u>consult</u> <del>liaise with</del> East Sussex County Council, the lead local flood authority, on the whole life management and maintenance of SuDS.</b></p>	<p>To update <u>ESCC's role as lead local flood authority as a statutory consultee for major development</u>.</p>
AM47	<p>Section 7 (Core Delivery Policies)</p>	<p>Amend Key Strategic Objectives Inset Box by deleting the words ' , including through the implementation of the highest feasible construction techniques in new developments,' and inserting the words 'and is proactive regarding climate</p>	<p>To reflect the Hearing discussions</p>

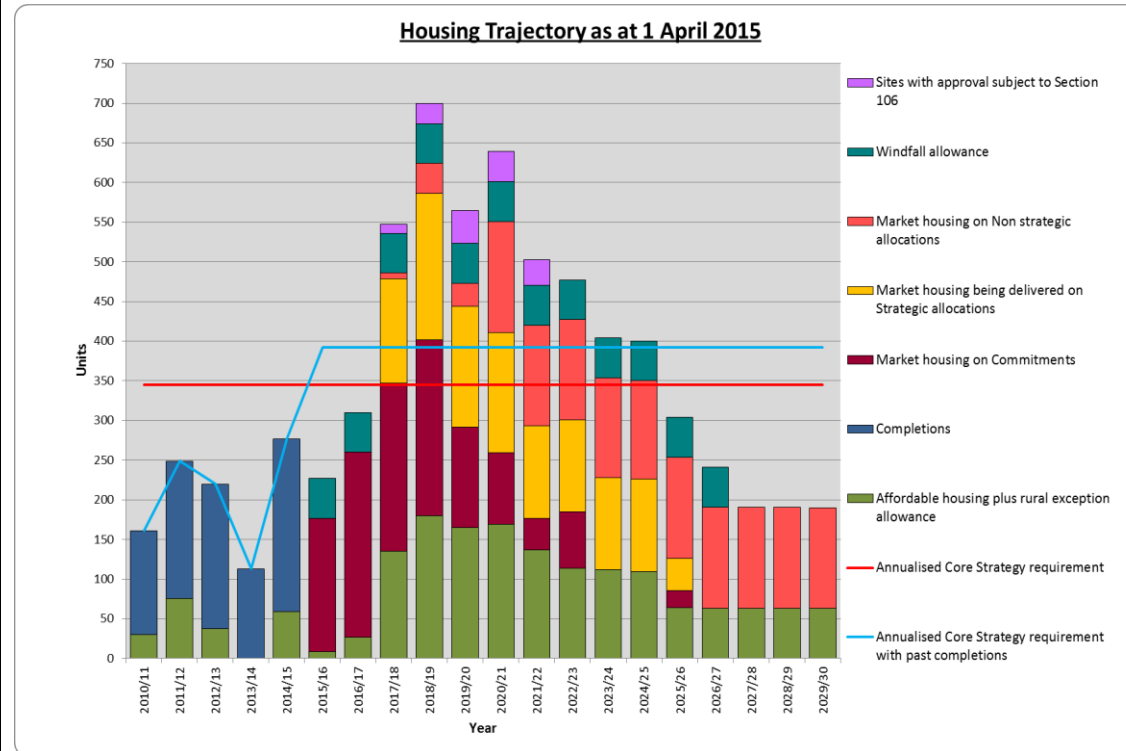
<sup>20</sup> Sustainable Drainage Systems non-statutory technical standards for sustainable drainage systems March 2015 DEFRA  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415773/sustainable-drainage-technical-standards.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf)

	Core Policy 13, p.109	change initiatives' to read:  <b>To ensure that the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives</b>	and the Housing Standards Review.
AM48	Section 7 (Core Delivery Policies)  Core Policy 14, p.111	Amend Key Strategic Objectives Inset Box by deleting the words ', including through the implementation of the highest feasible construction techniques in new developments,' and inserting the words 'and is proactive regarding climate change initiatives' to read:  <b>To ensure that the district reduces locally contributing causes of climate change and is proactive regarding climate change initiatives</b>	To reflect the Hearing discussions and the Housing Standards Review.
AM49	Section 7 (Core Delivery Policies)  Paragraph 7.123 p.112	Amend paragraph to read:  A Renewable Energy & Low Carbon Development Study has been prepared as part of the evidence for the Core Strategy. Part of the output from this study is an Energy Opportunities Map, which identifies the renewable and low carbon technologies that are most viable in different parts of the plan area. The map is <del>shown below</del> <u>included in Appendix 6</u> .	To reflect discussions at the Hearings that the map should be enlarged and improved for better legibility and relocated to the Appendices.
AM50	Section 7 (Core Delivery Policies)  Paragraph 7.124 p.112-113	Delete the Energy Opportunities Map.	Consequent to AM49
AM51	Section 7 (Core Delivery Policies)	Update the paragraph to read:	To update to reflect the

	Paragraph 7.128 p114	The <u>Housing Standards Review and the new technical standards for housing Code for Sustainable Homes</u> only applies to residential development and there will also be new non-residential development coming forward in the district. Therefore, the core policy sets building sustainability standards for non-residential development, as supported by the Renewable Energy & Low Carbon Development Study.	Housing Standards Review
AM52	Appendix 1	Insert definition of Intermediate housing in the glossary:  <u>Intermediate housing - homes for sale and rent provided at a cost above social 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>	For clarity.
AM53	Appendix 1	Delete the 'Code for Sustainable Homes' definition from the glossary.	To reflect the updated position.
AM54	Appendix 2, p.126	Amend the Peacehaven section of the table by inserting <b>PT16</b> in the column titled ' <i>Saved</i> ' 2003 Local Plan policies that the Core Policy replaces and deleting <b>PT16</b> from the column titled ' <i>Saved</i> ' 2003 Local Plan policies to retain.	Consequent to MM14
AM55	Appendix 3	Delete the existing table from p127 through to 136 and insert the replacement modified monitoring and delivery framework table as shown below from p26 to 35 of this schedule.	To reflect the modifications as necessary for plan monitoring.
AM56	Appendix 4, p.137	Amend the second sentence in the text by deleting the numeral <b>5,600</b> and inserting numeral <b>6,900</b> in its place.	Consequent to MM01
AM57	Appendix 4, p.137	Update the text to reflect the modified housing number and to reflect the position as at 1 April 2015 and the 2014 SHLAA.	Consequent to MM02

Delete the 1 April 2013 housing trajectory graph.

Insert updated Housing Trajectory as at 1 April 2015 graph below:



AM58

Additional Appendix 6

Insert new 'Appendix 6 – Energy Opportunities Map' with enlarged and more legible map as deleted from paragraph 7.124 (modified map as shown on p36 below)

Consequent to AM50

AM59

Proposals Map 1 - Lewes

Amend Proposals Map 1 to insert the strategic housing allocation at Old Malling Farm, Lewes.

Consequent to MM05

AM60

Proposals Map 2 – Newhaven

Amend Proposals Map 2 to reflect the strategic housing allocation at Harbour Heights, Newhaven.

Consequent to MM13

AM61	Proposals Map 3 -Peacehaven	Amend Proposals Map 3 to insert the strategic housing allocation at Lower Hoddern Farm, Peacehaven.  Delete 2003 Local Plan allocation PT16.	Consequent to MM14
------	--------------------------------	--	-----------------------



**AM55 Modified Joint Core Strategy Appendix 3 – Monitoring and Delivery Framework**

<b>Spatial Policies 1 – 86 (all policies collectively monitored)</b>		
<b>Collectively, the Spatial Policies are expected to make a contribution towards all of the strategic objectives</b> (Note: targets identified for subsequent core policy areas will also be used to monitor the effectiveness of the spatial strategy).		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
To deliver a minimum of <del>5,600</del> <u>6,900</u> net additional dwellings between 2010 and 2030 ( <del>280-345</del> per annum) and maintain a sufficient housing land supply.	<p>Cumulative number of dwelling completions (net)</p> <p>Total number of housing completions for previous monitoring year (net)</p> <p>Housing land supply – position</p> <p><u>Number of dwellings permitted on unidentified windfall sites per annum.</u></p> <p><u>Number of dwellings permitted on rural exception sites</u></p> <p>A review of the Spatial Policies 1 <del>and 2</del> <u>and 8</u> will be triggered in April 2022 if <u>the required</u> transport mitigation measures to accommodate <del>the</del> additional 440 homes at Peacehaven/Telscombe have not been identified to solve capacity constraints on the A259 to the satisfaction and agreement of the local highway authority</p>	<p><b>As at April 2013:</b> 626 net completions ( 209 p/a average for plan period)</p> <p><b>2012/13: 218</b></p> <p><b>As at <del>January</del><u>April 2015</u>:</b> <del>87</del><u>106.46</u>% of a 5 year housing land supply requirement (+5%) <u>when calculated against the Core Strategy housing requirement</u></p> <p><b><u>Not monitored yet – to be monitored</u></b></p> <p><b>Not monitored yet – to be monitored</b></p>
To explore opportunities for increasing housing delivery so that the projected level of housing need is more closely met.	A review of Spatial Policies 1 and 2 will be undertaken in the event that the current cross-authority work examining housing potential within the Sussex Coast Housing Market Area and adjoining areas identifies sub-regional housing delivery options that could be delivered within or partially within the Lewes District plan area. The timetable for this work is	<b>N/A</b>

	currently not <del>currently</del> available ( <del>but is expected by the time the JCS is submitted for examination</del> ).	
To deliver 74,000 sq metres of employment floorspace (gross) between 2012 and 2031	Amount of floorspace developed for employment land (gross)  Cumulative amount of floorspace developed for employment land (gross)	<b>2012/13: 1,597m<sup>2</sup></b>  <b>Not monitored yet – to be monitored</b>

<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 <del>exceeding 10 of 11 dwellings or more</del> )	Gross number of affordable housing completions per annum	<b>2012/13: 38</b>
	Percentage of affordable dwellings completed	<b>2012/13: 45.78%</b>
	<u>Percentage of applications of 10<del>1</del> units or more meeting 40% affordable housing target</u>	<b><u>2012/13: 50% (this figure reflects 10 dwellings or more – subsequent monitoring will reflect the policy requirement of 11 or more)</u></b>
	<u>Average house price by type</u>	<b><u>2014 Q2:</u></b> <b><u>All – £299,435</u></b> <b><u>Detached - £389,632</u></b> <b><u>Semi-detached - £276,114</u></b> <b><u>Terraced - £251, 436</u></b> <b><u>Flat/maisonette - £198,584</u></b>
	<u>Average construction cost by development type (construction cost £/m<sup>2</sup>)</u>	<b><u>Not yet monitored on a regular basis – to be monitored on an annual basis using the most cost-effective source available. Current position is available:</u></b>  <b><u>4<sup>th</sup> Q 2013 - Residential, 2-5 bed, code 4 - £1,021</u></b>
	<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</u>	

	<u>Authority.</u>	
To reduce the number of households on the Council Housing Register	Number of households currently on the Council Housing Register	<b>2013:</b> 2,543

<b>Core Policy 2 – Housing Type, Mix and Density</b>		
<b>Core Policy 2 will aim to meet the following the Objectives</b>		
• <b>Objective 1</b>		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
Provide a range of dwelling types and sizes to meet the identified local need	Household spaces and <u>accommodation type as a percentage %</u>  Number of C2 dwellings permitted and completed	<b>2011:</b> - Whole house/bungalow (detached) – 35.1% - (semi-detached) – 26.5% - (terraced) – 19.1% - Flat, maisonette or apartment (flats/tenement) – 14.3% - (part of a converted/shared house) – 3.3% - (in commercial building) – 1.3% - (caravan or mobile/temporary structure) – 0.5%  <b>Not monitored yet – to be monitored</b>
Provide flexible and adaptable accommodation and <u>encourage require Lifetime Homes standards on a minimum of 10% of homes in new build residential developments of 11 units or more homes</u>	Percentage of affordable dwellings built to Lifetime Homes Standards	<b>Not monitored yet – to be monitored</b>
Achieve residential densities in the region of 47 – 57 dwellings per hectare for towns and 20 – 30 dwellings per hectare for villages	Average density of new house building, dwellings per hectare (dph)  Average density of residential developments over 6 units for i) towns and ii) villages (planning applications received not completions)  Percentage of new dwellings completed at: less than 30dph; between 30 and 50dph; and above 50dph	<b>2012/13:</b> 69 dph  <b>2012/13:</b> Average for towns: 77  Average for villages: 28  <b>2012/13:</b> Less than 30 dph – 38%; Dwellings between 30 and 50 dph –31%; Dwellings above 50 dph – 31%

<b>Core Policy 3 – Gypsy &amp; Traveller Accommodation</b>
<b>Core Policy 3 will aim to meet the following the Objectives</b>

<ul style="list-style-type: none"> <li>Objective 1</li> <li>Objective 6</li> </ul>		
Target	Indicators	Current Position
<p>To provide a net total of 135 Gypsy &amp; Traveller pitches between 2006 and 2019<del>2014</del> and 2030* to meet the identified need as identified in the GTAA Update</p> <p>* pitch requirements for the plan period to be updated once the current Gypsy, Traveller and Travelling Showpeople requirements update results are known.</p>	<p>Pitches granted <u>planning permission since 2006<del>2014</del> in the area of Lewes District outside of the SDNP</u></p> <p>Pitches granted planning permission since 2014 in the area of Lewes District within the SDNP</p> <p>Number of pitches allocated in the Site Allocations and Development Policies DPD</p>	<p><b><u>Not monitored yet – to be monitored</u></b> As at 2013: 4 Pitches</p> <p><b>Not monitored yet – to be monitored</b></p> <p><b><u>Not monitored yet – to be monitored</u></b></p>
To meet the long term need identified in the updated GTAA	<b>Identified need not available yet</b>	<b>Not monitored yet – to be monitored</b>

<b>Core Policy 4 – Encouraging Economic Development and Regeneration</b>		
<b>Core Policy 4 will aim to meet the following Objectives</b>		
<ul style="list-style-type: none"> <li>Objective 2</li> <li>Objective 10</li> </ul>		
Target	Indicators	Current Position
Identify sufficient sites to meet current and future needs (including office space)	Net amount of floorspace developed for employment land	<b>2012/13:</b> -225m <sup>2</sup>
No loss of employment land unless there are <u>demonstrable economic viability</u> or environmental <u>amenity</u> reasons for not doing so (see policy wording)	<p>Net and gross employment land supply (hectares that have planning permission)</p> <p>Loss of employment land in local authority area.</p>	<p><b>2012/13:</b> Net 1.63 Gross 2.79</p> <p><b>2012/13:</b> Net loss of 225 m<sup>2</sup></p>
Encourage sustainable tourism and promote growth in this sector	<p>Number of jobs in the tourism sector</p> <p>Contribution to the District's economy made by visitors – turnover of local businesses</p>	<p><b>2012:</b> 3,399</p> <p><b>2012:</b> £177,223,000</p>
To bring about improvements to the condition of existing and future employment premises and to encourage sustainable working practices	<p>Number of business enterprises by age of business: Less than 2 years old</p> <p>Number of Local</p>	<p><b>2013:</b> 500</p> <p>None</p>

	<p>Development Orders</p> <p>Percentage of residents working at or from home</p> <p>Percentage of all people in employment travelling less than 5km to work</p>	<p><b>2011:</b> 14.3%</p> <p><b>2001:</b> 31.7%</p>
Support opportunities for the up-skilling of the Districts labour supply	<p>Percentage of adults with degree level (or equivalent) qualifications</p> <p>Numbers of Adult learners</p>	<p><b>2011:</b> 37.3%</p> <p><b>2008/09:</b> 2,638</p>

### Core Policy 5 – The Visitor Economy

#### Core Policy 5 will aim to meet the following Objectives

- Objective 2
- Objective 4
- Objective 5
- Objective 7
- Objective 10

Target	Indicators	Current Position
To promote the growth of the tourism sector: improving linkages; the quality and number of visitor attractions; accommodation	Contribution to the District's economy made by visitors – turnover of local businesses	<b>2012:</b> £171,223,000
	Number of day visitors to the district	<b>2012:</b> 3,034,000
	Number of jobs in the tourism sector	<b>2012:</b> 3,399

### Core Policy 6: Retail and Sustainable Town and Local Centres

#### Core Policy 6 will aim to meet the following Objectives

- Objective 6
- Objective 10

Target	Indicators	Current Position
Ensuring town and local centres and essential services are accessible through sustainable transportation methods	Average minimum travel time (minutes) to the nearest service by public transport/walking	<b>2011:</b> Employment, 10; Food stores 9; FE College, 22; GP's, 11; Hospitals, 43; Primary Schools, 9; Secondary School, 14; Town Centre, 15.
	Average minimum travel time (minutes) to the nearest service by cycling	<b>2011:</b> Employment, 7; Food stores 6; FE College, 20; GP's, 6; Hospitals, 33; Primary Schools, 5; Secondary School, 8; Town Centre, 13.
	Access to town centres (percentage of households)	<b>2011:</b> Public Transport/walking, 55.3%; Cycle, 63.3%; Car, 99.7%

	who have access to a town centre within 15 minutes via different transport modes)	
To promote the vitality and viability of the district and town centres, but where local shops and facilities are no longer viable, consider for alternative uses.	<p>Retail unit vacancy rate in town centres</p> <ul style="list-style-type: none"> <li>- Lewes town centre</li> <li>- Newhaven town centre</li> <li>- Peacehaven SCR</li> <li>- Peacehaven Meridian Centre</li> <li>- Seaford town centre</li> </ul> <p>Net amount of completed retail development (sq m)</p>	<p><b>2012</b></p> <ul style="list-style-type: none"> <li>- Lewes Town Centre (TC) – 5.2%</li> <li>- Newhaven TC – 21% (2009)</li> <li>- Peacehaven SCR – 10 %</li> <li>- Peacehaven Meridian Centre – 6.25%</li> <li>- Seaford TC – 7.2%</li> </ul> <p><b>2012/13: -819.56m<sup>2</sup></b></p>

<b>Core Policy 7: Infrastructure</b>		
<b>Core Policy 7 will aim to meet the following Objectives</b>		
<ul style="list-style-type: none"> <li>• <b>Objective 3</b></li> <li>• <b>Objective 7</b></li> </ul>		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
To maintain and enhance the level of provision of community facilities/services	Net loss/gain (completions) of community services and facilities (d1 and D2) in the past year (sq m)	<b>2012/13 – 807.66 m<sup>2</sup></b>
To ensure essential infrastructure is provided for by the Community Infrastructure Levy (CIL)	List of infrastructure projects funded by CIL in the past year	<b>Not monitored yet – to be monitored</b>
	Amount of CIL funds received per annum	<b>Not monitored yet – to be monitored</b>
	Infrastructure improvements identified in Infrastructure Delivery Plan implemented	<b>Not monitored yet – to be monitored</b>

<b>Core Policy 8: Green Infrastructure</b>		
<b>Core Policy 8</b>		
<ul style="list-style-type: none"> <li>• <b>Objective 2</b></li> <li>• <b>Objective 3</b></li> <li>• <b>Objective 5</b></li> <li>• <b>Objective 7</b></li> </ul>		
<b>Target</b>	<b>Indicators</b>	
To protect and enhance the quality of open space within the district	Number and extent of SNCIs and LNRs	<b>2011:</b> SNCIs – 115, 1,235 hectares (4.2% of District) 4 LNRs – 354 hectares (1.2% of District)
	Condition of internationally and nationally important wildlife and geological sites (SSSIs and SACs)	<b>2013:</b> SSSIs – 16 (2,437 hectares of land): 99.4% of SSSI land favourable or unfavourable but recovering, 0.4% unfavourable and stable,

		<p>0.2% unfavourable and declining.</p> <p><b>2013:</b> SACs – 2:          Castle Hill – 114.52 hectares (both in Lewes District and Brighton &amp; Hove). 100% of SAC land favourable.          Lewes Downs – 161.29 hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but declining.</p>
--	--	---

<b>Core Policy 9: Air Quality</b>		
<b>Core Policy 9 will aim to meet the following Objectives</b>		
<ul style="list-style-type: none"> <li>• Objective 7</li> <li>• Objective 8</li> </ul>		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
To reduce the total number of Air Quality Management Areas (AQMA's)	Number of Air Quality Management Areas	<b>2013:</b> 24 (Lewes Town Centre and Newhaven Town Centre)
To ensure that annual mean Nitrogen Dioxide levels in any designated AQMA's do not rise year on year	Annual Mean Nitrogen Dioxide Levels	<b>2013:</b> Lewes AQMA: 19 ug/m3
To improve air quality through the promotion of suitably located new development/services and through sustainable transport	<p>Mode of travel to work</p> <p>Number of large development completions estimated to be within 30 minutes of public transport and walking/cycling journey time of services</p> <p>Average minimum travel time (minutes) to the nearest service by public transport</p>	<p><b>2001:</b> Private vehicle, 63%; Public Transport, 16%; Foot or Cycle, 13%; People who work at or mainly at home, 8%; Other, 0.6%.</p> <p><b>2012/13:</b> 100%</p> <p><b>2011:</b> Employment, 10; Food stores 9; FE College, 22; GP's, 11; Hospitals, 43; Primary Schools, 9; Secondary School, 17; Town Centre, 15.</p>

<b>Core Policy 10: Natural Environment &amp; Landscape Character</b>		
<b>Core Policy 10 will aim to meet the following Objectives</b>		
<ul style="list-style-type: none"> <li>• Objective 2</li> <li>• Objective 4</li> <li>• Objective 5</li> </ul>		
<b>Target</b>	<b>Indicators</b>	<b>Current position</b>

<p>To ensure that international, national and local designations are conserved and enhanced to a high quality</p>	<p>Condition and size of internationally and nationally important wildlife and geological sites (SSSIs and SACs)</p>          <p>Area of land designated as Site of Nature Conservation Interest (SNCI) - district</p>       <p>Area of Land designated as Local Nature Reserve</p>	<p><b>2013:</b> SACs – 2:            Castle Hill – 114.52 hectares (both in Lewes District and Brighton &amp; Hove). 100% of SAC land favourable.            Lewes Downs – 161.29 hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but declining.</p> <p><b>2013</b> - 99.4% of SSSI's considered favourable or unfavourable but recovering; 0.4% unfavourable and stable; 0.2% unfavourable and declining.</p> <p><b>2011</b> - 1235 (ha)</p>       <p><b>2011</b> – 354 (ha)</p>
<p>To seek a net gain in biodiversity resources, therefore contributing to the targets set out in the Sussex Biodiversity Action Plan</p>	<p>Total number of SAC's, SSSI's, SNCI's and LNR's designations</p>   <p>Total area (m<sup>2</sup>) of land designated as SAC's, SSSI's, SNCI's and LNR's</p>	<p><b>2011</b> – 137 (2 SAC's; 16 SSSI's; 115 SNCI's; 4 LNR's)</p>      <p><b>2011</b> – 4,301 (ha)</p>

<p><b>Core Policy 11: Built &amp; Historic Environment and High Quality Design</b></p>		
<p>Core Policy 11 will aim to meet the following Objectives</p> <ul style="list-style-type: none"> <li>• Objective 4</li> <li>• Objective 8</li> </ul>		
<p><b>Target</b></p>	<p><b>Indicators</b></p>	<p><b>Current Position</b></p>
<p>To improve sustainable construction standards year on year <u>Adequately address the need to reduce resource and energy consumption</u></p>	<p><del>Cumulative number of Code for Sustainable Homes certificates issued</del></p> <p>A new indicator has not been established at this point but the district council, and SDNP, will look to introduce an effective way of monitoring this target at the earliest opportunity</p>	<p><b>2012</b> – 44 (total to date; 2007-2012) <b><u>Not monitored yet – to be monitored by LDC</u></b></p>
<p>The safeguarding of historic assets</p>	<p>Number of Listed Buildings part-demolished/ demolished</p>	<p><b>Not monitored yet – to be monitored by LDC</b></p>



<b>Core Policy 12: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability</b>		
<b>Core Policy 12 will aim to meet the following Objectives</b>		
<ul style="list-style-type: none"> <li>• <b>Objective 9</b></li> </ul>		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
To steer development away from areas of flood risk and coastal erosion	Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial & tidal)	<b>2012 - 0</b>
To incorporate Sustainable Urban Drainage Systems (SuUD's) into new development where appropriate	Percentage of appropriate developments incorporating sustainable urban drainage systems	<b>Not monitored yet – to be monitored</b>

<b>Core Policy 13: Sustainable Travel</b>		
<b>Core Policy 13 will aim to meet the following objectives:</b>		
<ul style="list-style-type: none"> <li>• <b>Objective 3</b></li> <li>• <b>Objective 6</b></li> <li>• <b>Objective 7</b></li> <li>• <b>Objective 8</b></li> </ul>		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
To ensure that new development is located in sustainable locations with good access to services	Average minimum travel time (minutes) to the nearest service by public transport/walking	<b>2011:</b> Employment, 10; Food stores 10; FE College, 22; GP's, 11; Hospitals, 43; Primary Schools, 9; Secondary School, 14; Town Centre, 15.
	Average minimum travel time (minutes) to the nearest service by bicycle	<b>2011:</b> Employment, 7; Food stores 6; FE College, 20; GP's, 6; Hospitals, 33; Primary Schools, 5; Secondary School, 8; Town Centre, 13.
	Amount of large residential development within 30 minutes public transport time of a GP, hospital, primary and secondary schools, areas of employment and a major health centre(s)	<b>2012/13:</b> 100%
Improvements to facilities allowing the uptake of sustainable travel (walking/cycling/public transport)	Percentage who travel to work by public transport	<b>2011:</b> 15.4%
	Net increase/decrease in rights of way	<b>2012 – 352 miles</b>
Year on year increase in the number of people travelling to work by sustainable	Number of people travelling to work by public transport	<b>2011:</b> 6,974

modes of transport		
--------------------	--	--

<b>Core Policy 14 – Renewable and Low Carbon Energy and Sustainable Use of Resources</b>		
<b>Core Policy 14 will aim to meet the following Objectives</b>		
<ul style="list-style-type: none"> <li>• <b>Objective 1</b></li> <li>• <b>Objective 6</b></li> <li>• <b>Objective 8</b></li> </ul>		
<b>Target</b>	<b>Indicators</b>	<b>Current Position</b>
To support low carbon and renewable energy installations	<p>Number of planning applications received and granted consent relating to renewable energy installations</p> <p>Carbon Dioxide emissions per capita per sector: Total emissions (kt)</p>	<p><b>2012/13:</b> 10 (plus 1 solar related application withdrawn)</p> <p><b>2011:</b> 488</p>
All new dwellings to achieve Code for Sustainable Homes Level 4 in relation to water consumption. <u>Require all new dwellings to achieve water consumption of no more than 110 litres per day per person</u>	<p><u>Percentage of new dwellings which meet Code Level 4 in relation to water consumption</u></p> <p><u>Percentage of new dwellings meeting the required water consumption standard</u></p>	<b>Not monitored yet – to be monitored</b>
All new non-residential developments over 1,000 square metres will be expected to achieve the BREEAM 'very good' rating standard.	Percentage of new non-residential developments over 1,000 square metres which achieve a BREEAM design certificate rating of 'very good'	<b>Not monitored yet – to be monitored</b>

**AM58 Modified Energy Opportunities Map to be inserted as and A3 fold-out page in additional Joint Core Strategy Appendix 6.**



## APPENDIX 3

### Equality Analysis Report

<b>Title:</b>	<b>Lewes District Local Plan – Part 1 (Joint Core Strategy) Publication of Main Modifications for consultation</b>
<b>EA Lead :</b>	<b>Edward Sheath</b>
<b>EA Team:</b>	<b>Edward Sheath &amp; Catherine Jack</b>
<b>Date Commenced:</b>	<b>April 2015</b>
<b>Target Completion Date:</b>	<b>Decision to be taken by Cabinet on the 6<sup>th</sup> July and full Council on the 16<sup>th</sup> July</b>
<b>Reason for assessment:</b>	<b>Cabinet and Council Key Decision</b>

### **Context and Scope**

1. What are the main purposes and aims of the service/project/decision?

To seek Council approval to publish modifications to the Joint Core Strategy for public consultation.

2. What effect does it have on how other organisations operate and what commitments of resources are involved?

No impact. Although the plan being produced is being undertaken in partnership with the South Downs National Park Authority,



they will be making their own decision (See question 1).

3. How does it relate to the demographics and needs of the local community?

No obvious impacts.

4. How does it relate to the local and national political context?

Progressing the Core Strategy through to adoption is a key priority for the Council – publishing proposed modifications to this plan for public consultation will be a key step in achieving this.

5. Is there any obvious impact on particular equality groups?

Impact	Race (includes ethnic origins, colour, & nationality)			Disability (includes mental & physical)			Gender (includes gender reassignment)			Pregnancy (includes maternity & paternity)			Sexual Orientation (includes heterosexual, homosexual & bisexual)			Religion & Belief (includes all faiths, beliefs & agnostic)			Age (includes all age groups)		
	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None	Positive	Negative	None
Tick if relevant			x			x			x			x			x			x			x

6. How does it help to us meet our general duties under the Equality Act 2010?

By having no obvious impacts on particular equality groups, the general duties under the Equality Act 2010 are not being compromised.

7. What is the scope of this analysis?

The Core Strategy itself, along with the proposed modifications, has not been subject to this Equality Analysis. A separate Equality Impact Assessment has been undertaken on the Core Strategy, see: <http://www.lewes.gov.uk/planning/backgroundreps.asp#eia> . Hence, the scope of this analysis is focussed on the decision as to whether to publish the modifications, or not.

### **Information gathering and research**

8. What existing information and data was obtained and considered in the assessment?

A comprehensive baseline picture of the District, as set out in chapter 2 of the Joint Core Strategy. See: [http://www.lewes.gov.uk/Files/plan\\_Core\\_Strategy\\_PSD\\_Jan.pdf](http://www.lewes.gov.uk/Files/plan_Core_Strategy_PSD_Jan.pdf)

9. What gaps in information were identified and what action was undertaken/is planned to address them?

None identified.

10. What communities and groups have been involved and what consultation has taken place as part of this assessment?

Any consultation on the Joint Core Strategy will be undertaken in accordance with the Council's and SDNPA's Statements of Community Involvement. These statements were extensively consulted upon when prepared (including all statutory consultees, town and parish councils and the voluntary sector (e.g. 3VA).

Also, see Consultation Summary Statements prepared as part of the Joint Core Strategy. See: <http://www.lewes.gov.uk/corestrategy/index.asp> . There is not considered to be a need to consult on this equality analysis, in light of the previous consultations undertaken.

## Analysis and assessment

11. What were the main findings, trends and themes from the research and consultation undertaken?

*None identified, given the narrow scope of the decision to be made.*

12. What positive outcomes were identified?

*None identified, given the narrow scope of the decision to be made.*

13. What negative outcomes were identified?

None identified, given the narrow scope of the decision to be made.

**Action planning**

14. The following specific actions have been identified: *(see paragraph 25 of the guidance)*

Issue Identified	Action Required	Lead Officer	Required Resources	Target Date	Measure of Success



## Summary Statement

Between *(insert start date)* and *(insert end date)* Equality Analysis was undertaken by *(insert Lead Officer)* on the *(insert strategy, policy, service, decision, action, project or procedure)*.

Due regard was given to the general equalities duties and to the likely impact of the policy/service/decision/project\* on people with protected characteristics, as set out in the Equality Act 2010.

The assessment identified: *(\*delete as appropriate)*

\*The policy/service/decision/project was found to have positive outcomes for *(insert the relevant protected characteristic groups)* by *(insert the key benefits)*.

\*No major changes are required. The EA demonstrates the service/policy/decision/project is robust, there is little potential for discrimination or adverse outcomes, and opportunities to promote equality have been taken.

\*Minor adjustment is required. There are potential problems or missed opportunities, and so actions have been identified to remove barriers and better promote equality. The EA Action Plan will be incorporated and monitored within the service/project plan.



Lewes District Council

\*Major adjustment is required. There is potential for adverse outcomes or missed opportunities to promote equality. (*Insert compelling justifications for continuing the policy/service/decision/project or state that it will be discontinued until remedial action has been taken*). Actions have been identified to remove barriers and better promote equality, and will be undertaken as a matter of priority. The EA Action Plan will be incorporated and monitored within the service/project plan.

\*The policy/service/decision/project\* needs to be immediately removed or discontinued as unlawful discrimination is likely to occur. Actions have been identified to remove barriers and better promote equality, and these will be undertaken as a matter of priority. The EA Action Plan will be incorporated and monitored within the service/project plan. Once actions have been undertaken, the position will be reassessed.

## Approval

Director/Head of Service	
Signed	
Dated	