

Assessment of Soundness

Soundness Test and Key Requirements	Evidence Provided
<p>Positively Prepared: <i>the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>	
<p><i>Vision and Objectives</i></p> <ul style="list-style-type: none"> • Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve? • Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives? • Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Have reasonable alternatives to the quantum of development and overall spatial strategy been considered? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Section 3 of the Core Strategy identifies the issues and challenges that the plan aims to overcome. These issues help inform the visions for the separate parts of the district, seen in Section 4 which identify the desired outcomes of the plan. • The objectives of the plan are shown in Section 5 and have been developed to achieve the visions. They relate to aspects such as the National Park, regeneration of the coastal settlements and the conservation of the character of the district's environment. • Each of the Core Policies in Section 7 is preceded by the strategic objectives which relate to it. All of the objectives are covered by at least one of the Core Policies. Indeed all objectives, except objective 11, are covered by multiple Core Policies. • A range of options for the district-wide housing delivery target and for a number of settlements were considered. A number of different strategic sites were considered to help achieve the housing target. Assessments of these options were undertaken for the Sustainability Appraisal. • The policies are internally consistent and help towards achieving the objectives. For instance, the policy on affordable housing would not prohibit the delivery of strategic housing allocations as it is flexibility written, which allows site-specific circumstances to be taken into account. • Each of the Core Strategy's policies help to achieve at least one of the plan's objectives. This is highlighted at the start of each policy.
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <ul style="list-style-type: none"> • Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: 	<ul style="list-style-type: none"> • A Housing Background Paper (2014) has been produced which shows how the housing target was arrived at and explains that the target is based on evidence from the Duty to Cooperate Housing Study (2013) and related updates, the SHLAA (2013), SHMA (2008) and Local Housing Needs Assessment (2011) as well as other documents such as the Rural

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<ul style="list-style-type: none"> – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted. 	<p>Settlement Study (2012) and Landscape Capacity Study (2012). It also took into account the fact that over half of the district lies within the South Downs National Park.</p> <ul style="list-style-type: none"> • Although we have not been able to achieve the objectively assessed housing target that would meet district needs (between 9,200 and 10,400), the housing target is above that set out in the South East Plan (which recognised the district’s constraints). We have asked neighbouring authorities whether they are able to accommodate our additional needs.
<ul style="list-style-type: none"> • Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. 	<ul style="list-style-type: none"> • The first policy in the Core Strategy is called ‘The Presumption in Favour of Sustainable Development’ and reflects the PINS model policy found at www.planningportal.gov.uk.
<p><i>Objectively assessed needs</i></p> <ul style="list-style-type: none"> • The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues. • Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above). 	<ul style="list-style-type: none"> • An Assessment of Housing Needs Study (2014) was produced on behalf of Councils in the Sussex Coast Housing Market Area. It concluded that the need was in the range of 9,200 to 10,400 over the plan period (460-520 per year). A Housing Background Paper (2014) has been produced to explain how the housing target has been arrived at. This includes balancing the importance of meeting the objectively assessed needs whilst balancing other social, economic and environmental factors. • Cross-boundary issues are considered in the Duty to Cooperate Compliance Statement which demonstrates how we have worked with neighbouring authorities and other bodies in preparing the Core Strategy.
NPPF Principles: Delivering sustainable development	
1. Building a strong, competitive economy (paras 18-22)	
<ul style="list-style-type: none"> • Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21), 	<ul style="list-style-type: none"> • The need to improve the district’s economy features prominently in the vision section of the Core Strategy. Objectives 1 and 2 both relate to supporting and enhancing the economic fortunes of the district. These

Soundness Test and Key Requirements	Evidence Provided
	objectives are reflected in the Core Strategy (Spatial Policy 1 and Core Policies 4-6) and are supported by the findings of the Employment and Economic Land Assessment (EELA) and its partial update (2012).
<ul style="list-style-type: none"> Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21) 	<ul style="list-style-type: none"> Core Policy 4 recognises that the recession is affecting the district and highlights that Newhaven is particularly struggling in the current economic conditions. Newhaven's situation is reflected in the Regeneration Strategy for Lewes District 2012-2015 and is a priority for the council to address. Support for improving the situation in Newhaven is given in the policy.
2. Ensuring the vitality of town centres (paras 23-37)	
<ul style="list-style-type: none"> Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23) 	<ul style="list-style-type: none"> Core Policy 6 seeks to promote and enhance the vitality and viability of the retail and town centres in the district. The policy is based upon the findings of the Lewes District Shopping and Town Centres Study (2012).
<ul style="list-style-type: none"> Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23) 	<ul style="list-style-type: none"> The Core Strategy sets the framework to bring forward allocations for a range of land uses. Small scale-allocations will be made following the adoption of the Core Strategy in the Site Allocations and Development Management Policies DPD that will be prepared by Lewes District Council or the South Downs National Park's Local Plan.
3. Supporting a prosperous rural economy (para 28)	
<ul style="list-style-type: none"> Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28) 	<ul style="list-style-type: none"> Core Policy 4 seeks to support and stimulate the rural economy and included wording that supports farm diversification, the conversion of existing buildings for business uses (where appropriate) and for tourism.
4. Promoting sustainable transport (paras 29-41)	
<ul style="list-style-type: none"> Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29) Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different 	<ul style="list-style-type: none"> Core Policy 13 seeks to improve sustainable transport options and reduce the need for car travel. It seeks to increase walking and cycling, which should have a positive impact on health, safety and air quality in the district. Spatial Policy 3 seeks to ensure that Lewes Bus Station is protected and remains on its current site unless an alternative facility is delivered.

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<p>communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <ul style="list-style-type: none"> • Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30) • Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31) • Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32) • Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34) • Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35) • Policies should aim for a balance of land uses so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. (37) • For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on 	<ul style="list-style-type: none"> • The housing target will largely be delivered by development in the district's towns, which have the greatest sustainable transport offer in the district. • Core Policy 13 commits the local planning authorities to adopt guidance which ensures that adequate car and cycle parking will be provided in new developments. Such guidance will be produced in consultation with East Sussex County Council and other stakeholders. • The views of East Sussex County Council were gathered when identifying the spatial distribution of housing and when considering strategic development sites. They have carried out studies and produced notes (http://www.lewes.gov.uk/planning/backgroundreps.asp#sts) that have influenced the plan. West Sussex County Council has also been consulted. • The IDP identifies infrastructure needs that will be necessary to facilitate the level of development outlined in the Core Strategy. For example, it highlights transport improvement at junctions in Lewes, Newhaven and Peacehaven.

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<p>site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <ul style="list-style-type: none"> • The setting of car parking standards including provision for town centres. (39-40) • Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41) 	
5. Supporting high quality communications infrastructure (paras 42-46)	
<ul style="list-style-type: none"> • Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43) • Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44) 	<ul style="list-style-type: none"> • Core Policy 4 (part 8) seeks to promote modern and high speed e-communications and IT infrastructure. • The Core Strategy does not impose bans on telecommunications development.
6. Delivering a wide choice of high quality housing (paras 47-55)	
<ul style="list-style-type: none"> • Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing (47) 	<ul style="list-style-type: none"> • A Housing Trajectory has been produced which shows that we will have a 5 year housing land supply on adoption of the Core Strategy, which includes a 5% buffer. • The Core Strategy allocates additional strategic sites which will add to our housing land supply position.

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<ul style="list-style-type: none"> Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47). 	<ul style="list-style-type: none"> The Core Strategy commits the District Council and Park Authority to prepare documents that would allocate smaller sites in the future. It also identifies a broad location at Harbour Heights, Newhaven. This broad location will help meet the housing target for the town.
<ul style="list-style-type: none"> Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47) 	<ul style="list-style-type: none"> The housing delivery trajectory as at April 2013 is set out in Appendix 4 of the Core Strategy and shows the expected delivery of both market and affordable housing. An updated version as at April 2014 is included in the Housing Implementation Strategy which shows how a five year supply will be maintained and considers risks to housing delivery and mitigation measures.
<ul style="list-style-type: none"> Set out the authority's approach to housing density to reflect local circumstances (47). 	<ul style="list-style-type: none"> Core Policy 2 sets out the approach to densities. The density ranges reflect local circumstances in so much as they differentiate between the urban and rural areas.
<ul style="list-style-type: none"> Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159) 	<ul style="list-style-type: none"> Core Policy 2 sets out an approach to provide housing to meet the needs of the current and future population of the district. Part 1 of the policy recognises that housing is needed to for the ageing population and that 1 and 2 bedroom homes are needed for single people/ those without children. In addition, part 2 of the policy encourages lifetime homes standards to be incorporated into a development.
<ul style="list-style-type: none"> In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities. 	<ul style="list-style-type: none"> The spatial strategy allocates homes to rural areas to meet local and district needs. The Core Strategy retains RES10 which allows exception site development.
7. Requiring good design (paras 56-68)	
<ul style="list-style-type: none"> Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58). 	<ul style="list-style-type: none"> Core Policy 11 sets out the design principles that will ensure that development is of high quality design and relates to its surroundings.
8. Promoting healthy communities (paras 69-77)	

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<ul style="list-style-type: none"> • Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69). 	<ul style="list-style-type: none"> • Core Policy 11 addresses these provisions.
<ul style="list-style-type: none"> • Policies should plan positively for the provision and use of shared space, community facilities and other local services (70). 	<ul style="list-style-type: none"> • Core Policy 7 seeks to retain and, where possible, enhance community facilities and services.
<ul style="list-style-type: none"> • Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73). 	<ul style="list-style-type: none"> • The Outdoor Playing Space Review (2004), the Informal Recreation Study (2005) and the East Sussex Strategic Open Space Study (2011) have identified that green infrastructure is generally adequate but there are deficiencies in some areas. The District Council has adopted standards that are based on the Fields in Trust recommended levels which will provide such facilities. An updated Open Space Study 2014 has also been completed.
<ul style="list-style-type: none"> • Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78). 	<ul style="list-style-type: none"> • Core Policy 8 commits both the District Council and Park Authority to identify, where the potential exists, such sites in either the Site Allocations and Development Management Policies DPD or the SDNPA’s Local Plan.
9. Protecting Green Belt land (paras 79-92)	
<ul style="list-style-type: none"> • Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81) • Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83) • When drawing up or reviewing Green Belt 	<ul style="list-style-type: none"> • N/A - the district does not have any Green Belt.

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<p>boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <ul style="list-style-type: none"> Boundaries should be set using 'physical features likely to be permanent' amongst other things (85) 	
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)	
<ul style="list-style-type: none"> Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94) 	<ul style="list-style-type: none"> Core Policy 12 recognises the district's vulnerability to climate change – in particular flooding and coastal erosion and introduces a number of measures to minimise negative effects. Part 4 of Core Policy 10 aims to maintain or improve the quality of water in the district and seeks to protect watercourses from encroachment in line with the objectives of the South East River Basin Management Plan (2009).
<ul style="list-style-type: none"> Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97) 	<ul style="list-style-type: none"> Core Policy 14 introduces policies to reduce locally contributing causes of climate change by promoting renewable and low carbon energy and encouraging the sustainable use of resources.
<ul style="list-style-type: none"> Minimise vulnerability to climate change and manage the risk of flooding (99) 	<ul style="list-style-type: none"> Core Policy 12 seeks to guide development away from the areas of flood risk identified in the Lewes District Strategic Flood Risk Assessment (2009).
<ul style="list-style-type: none"> Manage risk from coastal change (106) 	<ul style="list-style-type: none"> Parts 6 and 7 of Core Policy 12 guides development away from both undeveloped and unstable areas of the coast, such as those identified in the Beachy Head to Selsey Bill (South Downs) Shoreline Management Plan 1st Review (2006).
11. Conserving and enhancing the natural environment (paras 109-125)	
<ul style="list-style-type: none"> Protect valued landscapes (109) 	<ul style="list-style-type: none"> The Core Strategy recognises that the district is home to valued landscapes. Over half of the district lies in the South Downs National Park and thus has the protection of the National Park purposes as outlined in the Environment Act (1995). In addition to protecting landscapes in the National Park, Core Policy 10 seeks to protect other valued landscapes in the district.

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<ul style="list-style-type: none"> Prevent unacceptable risks from pollution and land instability (109) 	<ul style="list-style-type: none"> Core Policy 9 seeks to reduce air pollution thereby improving air quality, particularly in Air Quality Management Areas. It also seeks to reduce dust and other pollutants produced by/during development. Core Policy 12 seeks to prevent development at unstable coastal locations.
<ul style="list-style-type: none"> Planning policies should minimise impacts on biodiversity and geodiversity (117) Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117) 	<ul style="list-style-type: none"> Core Policy 10 seeks to conserve and enhance biodiversity and geodiversity assets. Parts 2-4 of Core Policy 10 seeks to protect European designated sites both in and around the district.
12. Conserving and enhancing the historic environment (paras 126-141)	
<ul style="list-style-type: none"> Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126) 	<ul style="list-style-type: none"> Core Policy 11 recognises that the district is home to a historic environment and seeks to conserve and enhance such assets.
13. Facilitating the sustainable use of minerals (paras 142-149)	
<ul style="list-style-type: none"> It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142) Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146) 	<ul style="list-style-type: none"> N/A – this is not a minerals and waste plan
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. The most appropriate strategy when considered against reasonable alternatives. 	

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<p><i>Participation</i></p> <ul style="list-style-type: none"> • Has the consultation process allowed for effective engagement of all interested parties? 	<ul style="list-style-type: none"> • Between May and July 2010 we published the Core Strategy Issues and Emerging Options Topic Papers and made them available for public consultation. Individuals and bodies on our consultation database were written to informing them of the consultation, posters were displayed advertising the consultation and an advertisement appeared in the Sussex Express. 7 drop-in sessions were held around the district, allowing members of the public to discuss the core strategy with officers, view static displays on different topics and submit comments and ideas to us. 2 discussion forums were held to allow the public to ask questions about the Core Strategy. We received many comments and a consultation summary document was produced showing how we had taken into account the comments when developing the Emerging Core Strategy. • Between September and December 2011 we consulted on the Emerging Core Strategy. Individuals and bodies on our consultation database were contacted, notifying them of the consultation. Posters were displayed on noticeboards throughout the district and a summary leaflet was produced and handed out at key locations. Twitter and Facebook were used to notify interested parties by social media and a press release was produced to gain the interest of social media. Over 800 responses to the consultation were received either by email, letter or by completion of an online survey. A consultation document was produced showing how we had taken into account the comments when developing the Proposed Submission Document. • The Proposed Submission Core Strategy went out for a period of representation between January and March 2013. Individuals and bodies on our consultation database were contacted (over 1,100) and notified of the representation period. A statement of representations procedure was written, and a representation form was made to receive comments. A summary leaflet was produced to assist people in understanding the document. Twitter and Facebook were used as another means of notification and a press release was produced to gain the interest of local

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	<p>media. Representations from about 350 consultees were received and will be forwarded to the inspector.</p> <ul style="list-style-type: none"> • Since the publication of the Proposed Submission Core Strategy, a number of focussed amendments were made to the Core Strategy to reflect changes to national planning policy, the revocation of the South East Plan and to address matters raised in the previous consultation. These amendments were presented in a Schedule of Focussed Amendments and a Schedule of Minor Amendments. The schedules were consulted on, along with a track changed Proposed Submission Core Strategy and Sustainability Appraisal. The consultation took place between 16th May and 11th July 2014. About 190 individual representations were received and will be forwarded to the inspector.
<p><i>Research / fact finding</i></p> <ul style="list-style-type: none"> • Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it? • What assumptions were made in preparing the DPD? Were they reasonable and justified? 	<p>Presumption in Favour of Sustainable Development</p> <ul style="list-style-type: none"> • The policy supports the intention of the NPPF and reflects the model policy put forward by the Planning Inspectorate. <p>Spatial Policy 1:</p> <ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been produced which has found that the stated growth can be met and identifies the infrastructure required to support such growth. • A Housing Background Paper (2014) has been produced which shows how the housing target was arrived at and explains that the target is based on evidence from the SHLAA (2013), SHMA (2008) and Local Housing Needs Assessment (2011) as well as other documents such as the Rural Settlement Study (2012) and Landscape Capacity Study (2012). • The findings of the 2010 Employment and Economic Land Assessment (EELA) and its partial update (2012) support the employment land targets. <p>Spatial Policy 2:</p> <ul style="list-style-type: none"> • The SHLAA and Rural Settlement Study, allied with the work carried out for the Sustainability Appraisal (2012) have been used to identify the

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	<p>distribution of housing in the district until 2030. The distribution of housing was also informed by Transport studies carried out in 2011 and 2012.</p> <p>Spatial Policies 3-6:</p> <ul style="list-style-type: none"> • The SHLAA identified the housing sites/broad locations allocated in these policies. The findings of the EELA and its update justifies the inclusion of employment land as part of the allocation for Spatial Policy 3. <p>Core Policy 1:</p> <ul style="list-style-type: none"> • The Housing Needs Register indicates that there are over 2,000 households who require affordable housing in the district and that in the last decade only an annual average of 33 affordable homes were built. • An Affordable Housing and CIL Viability Study was undertaken, which recommended an affordable housing policy and has been incorporated into Core Policy 1. It was found that the approach was both likely to be viable in most cases and would significantly increase affordable housing provision. <p>Core Policy 2:</p> <ul style="list-style-type: none"> • The SHMA suggests that we should not prescribe precise size, mix and densities and thus the policy allows for flexibility. • After undertaking analysis of the densities of recent developments, the policy does suggest the density range which is likely to be acceptable (depending on whether the development is in a rural or urban environment). • The SHMA also suggested that there should be a policy on the needs of the ageing population and this is set out in the policy. <p>Core Policy 3:</p> <ul style="list-style-type: none"> • The updated Gypsy and Traveller Availability Assessment (2014) identifies the pitch requirement and explains how the figure has been

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	<p>determined. The Gypsy and Site Assessment Addendum (2012) identifies that, at present, there are no deliverable sites meaning that allocations cannot be made.</p> <p>Core Policy 4:</p> <ul style="list-style-type: none"> • The EELA and its update has been undertaken and underpin this policy as it seeks to address the qualitative need for additional office and employment space. <p>Core Policy 5:</p> <ul style="list-style-type: none"> • The Hotel & Visitor Accommodation Study (2009) and the Touring Caravan & Camping Study (2011) justify the policy in terms of the provision of a wide range of accommodation types. • The Environment Act (1995) in setting the National Park's purposes justify the approach taken with regard to the development of tourism facilities in the district. <p>Core Policy 6:</p> <ul style="list-style-type: none"> • The Lewes District Shopping and Town Centres Study (2012) underpins the policy and identifies gaps and deficiencies in provision around the district which the policy aims to overcome. <p>Core Policy 7:</p> <ul style="list-style-type: none"> • The IDP identifies the infrastructure needs that the policy aims to deliver in order for the district to accommodate growth. <p>Core Policy 8:</p> <ul style="list-style-type: none"> • The Lewes District Outdoor Playing Space Review (2004), The Lewes District Informal Recreation Study (2005) and the East Sussex Strategic Open Space Study (2011) have identified deficiencies in provision that the policy attempts to overcome.

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	<p>Core Policy 9:</p> <ul style="list-style-type: none"> The policy relating to AQMAs is supported by the Lewes Air Quality Action Plan (2009). The mitigation of any future AQMA designations is necessary under the Environment Act (1995) <p>Core Policy 10:</p> <ul style="list-style-type: none"> The Lewes District Landscape Capacity Study (2012) and the East Sussex County Landscape Assessment (2010) support the policy approach with regards to the protection of landscape. The Habitat Regulations Assessment (2012) and subsequent addendum (2014) provides justification of policies for development within 7km of the Ashdown Forest The South East River Basin Management Plan (2009) supports the policy aim to maintain or improve water quality in the district. <p>Core Policy 11:</p> <ul style="list-style-type: none"> As well as over half of the district being in a National Park, there are 35 conservation areas and a number of historic assets (listed building, scheduled ancient monuments, etc.) and justify the stance of the policy. <p>Core Policy 12:</p> <ul style="list-style-type: none"> The Strategic Flood Risk Assessment (2009) identifies areas at flood risk and is the main evidence document that this policy relies upon. Parts of the policy approach are justified by the Beachy Head to Selsey Bill Shoreline Management Plan (updated in 2006) and the River Ouse Catchment Flood Management Plan (2009) <p>Core Policy 13:</p> <ul style="list-style-type: none"> The East Sussex Local Transport Plan 3 (2011-2026) is the main evidence document that has been used in developing the policy. <p>Core Policy 14:</p>

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	<ul style="list-style-type: none"> The policy reflects the recommendations of the Renewable Energy and Low Carbon Development Study (2010). We have assumed that site availability, deliverability and achievability reflect the findings of the SHLAA and discussions with site proponents. It is assumed that the required infrastructure will come forward and be delivered through other organisations' asset management plans. Discussions with infrastructure providers have not suggested anything different.
<p><i>Alternatives</i></p> <ul style="list-style-type: none"> Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken? Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start? 	<ul style="list-style-type: none"> The Sustainability Appraisal that accompanies the Core Strategy has assessed the reasonable alternatives for the policy areas and explains why particular options/approaches were chosen. The options/approaches were assessed using a sustainability framework that balanced social, environmental and economic considerations to identify sustainable options. Sustainability was an important consideration from the start of the production of the Core Strategy process. Each time a draft version of the Core Strategy was published (Issues and Emerging Options Topic Paper, Emerging Core Strategy, Proposed Submission Core Strategy) it was accompanied by a Sustainability Appraisal.
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> Be deliverable Demonstrate sound infrastructure delivery planning Have no regulatory or national planning barriers to its delivery Have delivery partners who are signed up to it Be coherent with the strategies of neighbouring authorities Demonstrate how the Duty to Co-operate has been fulfilled 	

Soundness Test and Key Requirements	Evidence Provided
<ul style="list-style-type: none"> • Be flexible • Be able to be monitored 	
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Section 4 of the Core Strategy identifies the visions and Section 5 sets out the objectives to meet the visions. Each Core Policy is preceded by the strategic objectives that relate to it. All of the objectives are covered by at least one of the Core Policies. • The policies complement each other and contribute towards sustainable development. For instance, the achievement of the housing target identified in Spatial Policy 1 is helped by the allocations identified in other Spatial Policies. • None of the strategic objectives have given end dates, it is taken that they are all ongoing throughout the overall delivery of the strategy, which aims to deliver the visions of the district in 2030.
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • The Infrastructure Delivery Plan (IDP) has been published alongside the Core Strategy. The IDP identifies the infrastructure needed to support development outlined in the Core Strategy. • The IDP states when the infrastructure is needed and the importance of the infrastructure project to the achievement of the plan. It also sets out how funds will be obtained and who will deliver projects.
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p>Yes the Core Strategy is based on the concept of Spatial Planning. It seeks to influence the distribution of people and activities appropriately around the district, integrating land use specifications with other considerations to achieve a plan for sustainable development to 2030. The plan has been influenced by many other plans and strategies, a multitude of evidence documents and comments from stakeholders. It seeks to locate new homes in the most sustainable locations and thereby allow people to be integrated with transport options, job opportunities etc to try to deliver the most holistic development strategy possible for the district when factored against the various constraints to sustainable development faced here.</p>

Soundness Test and Key Requirements	Evidence Provided
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> • A number of the policies in the plan recognise that, as a long-term plan, changes may occur in circumstances during the plan period. For instance there is flexibility in Core Policy 1 (Affordable Housing) that allows for less than 40% affordable housing to be provided if it can be proven through viability evidence that providing affordable housing at such levels would prevent development from coming forward. • The Core Strategy includes a Monitoring Framework as Appendix 3. The framework sets targets and introduces indicators to evaluate the success of the policies. It is through this mechanism that issues with policies will be found causing policies to be reviewed if appropriate.
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<p>As set out in the Duty to Cooperate Compliance Statement, Statement of Common Ground circulated to all East and West Sussex authorities. Also MoU with MSDC and CWSGB agreement etc.</p> <p>Engagement throughout with infrastructure providers etc and generally supportive representations on the focussed amendments version of the Core Strategy from such stakeholders allow us reasonable confidence that necessary action by external providers will be implemented as expected.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies (including housing trajectories whether the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> • Appendix 3 of the Core Strategy contains the monitoring framework for each of the policies containing targets and indicators using data from multiple sources. There is a commitment in the framework to monitor the success of the policies and report the results of the monitoring in the respective Authority Monitoring Reports of both the Council and the National Park Authority. If it is found that a policy is not delivering on the desired outcome this will be identified and we will take appropriate action which may include undertaking a review of the policy. • Like the Core Strategy, the Sustainability Appraisal includes a monitoring framework and seeks to monitor the effects of the Local Plan (including the Core Strategy) on the objectives and indicators that make up the framework. This framework will be used to identify whether the Local Plan is leading to significant negative effects. If it is found that there are

Soundness Test and Key Requirements	Evidence Provided
	significant effects it may be necessary to review and make modifications to policies to rectify the situation.
<p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p>	
<p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>	
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> • The Core Strategy complies with the NPPF and other legislation. • The Presumption in favour of Sustainable Development policy in the only policy in the Core Strategy that does not add anything to existing national guidance. The reason for its inclusion is that it is PINS' model policy and we have been advised that it is necessary to be in the Core Strategy.

Policy Expectations	Evidence Provided
<p>Policy A: Using evidence to plan positively and manage development (para 6)</p>	
<ul style="list-style-type: none"> • Early and effective community engagement with both settled and traveller communities. 	<ul style="list-style-type: none"> • East Sussex and Brighton & Hove GTAA (2005) engaged both settled and Traveller communities to assess local needs. • Early consultation with settled and Traveller communities, town/ parish councils and key stakeholders in establishing the Lewes District Site Assessment (2010) methodology and site assessment criteria.
<ul style="list-style-type: none"> • Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas. 	<ul style="list-style-type: none"> • East Sussex and Brighton & Hove GTAA (2005) engaged both settled and Traveller communities to understand local needs. • Early consultation with settled and Traveller communities, town/ parish councils and key stakeholders in establishing the Lewes District Site Assessment (2010) methodology and site assessment criteria. • Joint Officer and Member working on East Sussex County Council Traveller Strategy. The current Strategy (2010-2013) is a multi-agency plan focussing on identifying and addressing cross boundary accommodation, health and education issues.
<p>Policy B: Planning for traveller sites (paras 7-11)</p>	

Policy Expectations	Evidence Provided
<ul style="list-style-type: none"> • Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs. • Set criteria to guide land supply allocations where there is identified need. • Ensure that traveller sites are sustainable economically, socially and environmentally. 	<ul style="list-style-type: none"> • Core Policy 3 sets out the targets for Gypsy and Traveller Provision, which is based on a collective approach used by all East Sussex local authorities and Brighton & Hove City Council to determine their need. • The South East England Gypsy and Traveller Regional Transit Study (2009) did not identify a need for Transit sites and thus the Core Strategy does not plan for any such sites. • Core Policy 3 sets criteria that will be used to guide allocations for Gypsy and Traveller pitches. The pitches will be allocated in forthcoming documents produced by the separate planning authorities.
Policy C: Sites in rural areas and the countryside (para 12)	
<ul style="list-style-type: none"> • When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community. 	<ul style="list-style-type: none"> • N/A – The Core Strategy does not allocate Gypsy and Traveller sites.
Policy D: Rural exception sites (para 13)	
<ul style="list-style-type: none"> • If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites. 	<ul style="list-style-type: none"> • N/A – The Core Strategy does not allocate Gypsy and Traveller sites.
Policy E: Traveller sites in Green Belt (paras 14-15)	
<ul style="list-style-type: none"> • Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. • Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process. 	<ul style="list-style-type: none"> • N/A – no Green Belt in the district.
Policy F: Mixed planning use traveller sites (paras 16-18)	
<ul style="list-style-type: none"> • Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants 	<ul style="list-style-type: none"> • The East Sussex and Brighton & Hove GTAA (2005) suggests no current need for additional space for business (storage/workshop). • With regards to Travelling Showpeople, no need has currently been identified for mixed-use plots. However, Core Policy 3 sets criteria that

Policy Expectations	Evidence Provided
and neighbouring residents.	will be used to guide decision making should a need arise.
Policy G: Major development projects (para 19)	
<ul style="list-style-type: none"> Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site. 	<ul style="list-style-type: none"> N/A – The Core Strategy does not allocate Gypsy and Traveller sites. This will be done in Part 2.