



DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Lewes District Council and the South Downs National Park Authority

DATE: 20 December 2018

Introduction

This Statement of Common Ground (SCG) is a jointly agreed statement between Lewes District Council (LDC) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters as of the date of the statement, and agreed actions to resolve outstanding matters. It supplements the SCG signed by the two parties dated 14 March 2018¹. It is not binding on any party, but sets out a clear and positive direction to inform ongoing strategy and plan-making. At the date of this statement, the South Downs Local Plan (SDLP) is at examination stage, with the final Inspector's report expected in spring 2019. It is therefore possible, pending the outcome of the SDLP examination that this statement will need updating at that time.

Disaggregating the Joint Core Strategy Housing Requirement

It is agreed between the parties that the housing requirement figure identified within the Lewes Local Plan Part 1, the Joint Core Strategy (JCS) (minimum 6,900 net additional dwellings) can be satisfactorily disaggregated between those parts of Lewes District inside and outside the National Park. This can be done primarily using Spatial Policy 2 (*Distribution of Housing*) of the JCS. It should be noted that Spatial Policy 2 housing figures actually total 6,926 dwellings.

Spatial Policy 2 illustrates that a proportion of the housing requirement figure is already met by completions from the first five years of the Plan and commitments as at 1 April 2015. The remainder of the housing requirement will be met firstly by strategic and non-strategic allocations, which can be simply disaggregated by settlements inside and outside the National Park. The final source of housing is from windfall and rural exception sites allowances, which can be less readily disaggregated. The windfall figure is

¹ Statement of Common Ground between the South Downs National Park Authority and Lewes District Council dated 14 March 2018

based upon historical delivery rates. The rural exception sites have been attributed to settlements where the need is considered (by Lewes District Council as the Housing Authority) most likely to arise over the remaining Plan period.

Separating the requirement between SDNP settlements and non-SDNP settlements can be undertaken to equate to 5,494 dwellings outside the SDNP and 1,432 dwellings within the SDNP. The Lewes Local Plan Part 2 covers the same planning period 2010-2030 as the JCS, whereas the South Downs Local Plan covers the planning period 2014-2033. Apportioning the JCS housing requirements neatly between the two Plans is therefore slightly complicated by this fact and needs to account for dwellings built or committed at different points in time.

The SDNPA has, as of April 2018, identified a provision of 1,307 dwellings for that part of the National Park within Lewes District within the evidence base for the Submission Local Plan; this is set out in the South Downs National Park Duty to Cooperate Statement dated April 2018. The small difference of 125 dwellings in identified provision for the SDNP between the LPP2 and the South Downs Local Plan most likely arises from the difference in Plan periods between the two plans. For example, the figure of 1,307 does not include completions within the National Park for the first four years of the Lewes JCS period namely 2010/11 to 2013/14.

Gypsies and Travellers

The East Sussex Joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) published in 2015² accounts for the whole of Lewes District, both inside and outside the SDNP. It identified a need for 13 net additional permanent pitches for the period 2014 to 2028. Core Policy 3 of the JCS sets a requirement for 13 net additional permanent pitches for Gypsies & Travellers across Lewes District. The South Downs Local Plan allocates five pitches in that part of Lewes District within the National Park. In addition to these allocations, permission has been granted for two further pitches on an existing site at Offham Barns .

The Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Pre-Submission version published for Regulation 19 consultation in September 2018 allocates one site for five net permanent Gypsy and Traveller pitches (GT01). Therefore there remains an unmet need for one Gypsy and Traveller pitches to serve the needs of the District arising within the National Park.

Whilst there is currently limited scope for meeting this remaining identified need through the allocation of sites, both parties consider that Lewes JCS

² East Sussex Joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, January 2015, University of Salford

Core Policy 3 and South Downs Local Plan Strategic Policy SD33 respectively set positive frameworks for bringing as-yet unidentified sites forward through the development management process.

Habitat Regulations Assessment - air quality impact assessment

It is agreed between the parties that there is a strategic cross boundary issue in the assessment of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) and Lewes Downs SAC, predominantly arising from traffic associated with new development of multiple local plans. The assessment methods have been considered through the Ashdown Forest Statement of Common Ground to which both authorities are signatories.

The LDC and SDNPA joint 2015 Habitat Regulations Assessment (HRA) Addendum on air quality impacts on the Lewes Downs SAC and the joint 2017 and 2018 HRA Addendums on air quality impacts on the Ashdown Forest SAC both include robustly carried out, industry standard methodology. The assessments are in combination with other plans and programmes and both conclude no adverse effects on integrity on the SACs, a conclusion endorsed by Natural England.

Signed on behalf of Lewes District Council	
	
Date	20-12-18
Position	Planning Policy Manager

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