# Lewes District Council South Downs National Park Authority

### **Core Strategy Background Paper**

Identifying a housing delivery target for the District

### September 2011



#### **Purpose of this Background Paper**

During the process of preparing the Lewes District Core Strategy a number of background papers have and will be prepared that provide further information relating to either certain policy areas, or certain procedures undertaken in developing the Core Strategy document. This is one such paper and it is concerned with identifying a housing delivery target for the Core Strategy. This paper has initially been prepared to inform the Emerging Core Strategy. Hence, revisions may be made to the paper in advance of the Proposed Submission document being prepared.

#### 1. Introduction

- 1.1 The Lewes District Core Strategy will set out the vision, objectives and spatial development strategy for the plan area. The Core Strategy needs to contain policies in relation to housing issues, including a target figure for the number of new homes to be built over the period 2010-30. This figure needs to be based on a robust evidence base and will need to be set in the context of government guidance and policy.
- 1.2 A housing delivery target was set for Lewes District in the South East Plan, which was adopted in May 2009. Policy H1 of this plan set Lewes District a total of 4,400 net additional dwellings to be delivered in the District between 2006 and 2026 (an annual average of 220 net additional dwellings). Policy SCT5, which is contained within the Sussex Coast sub-region section of the South East Plan, specifies that out of the total housing requirement for the District, 3,400 of the net additional dwellings need to be delivered within the sub-region. The Sussex Coast sub-region includes the town of Lewes and the part of the District that is to the south of the town. Hence, the sub-region also incorporates the coastal towns of Seaford, Newhaven, Peacehaven and Telscombe.
- 1.3 As part of the planned reforms of the planning system through the Localism Bill, the Government is intending to abolish all Regional Spatial Strategies, of which the South East Plan is one. Therefore, the remaining policy lifetime of the South East Plan is limited<sup>1</sup>. One of the key drivers behind the planned abolition of Regional Spatial Strategies is the desire to move away from Local Planning Authorities having their levels of housing growth imposed at a regional level. Instead the Government wants Planning Authorities to decide for themselves what their 'locally derived housing target' should be.
- 1.4 It is the opinion of the District Council and National Park Authority that by the time the production of the Lewes District Core Strategy reaches the Examination stage the South East Plan will no longer be in place. In addition the South East Plan only set Lewes District with a housing target up to 2026. With the Lewes District Core Strategy having a time horizon of 2030 there is also a need to consider a level of housing growth for the period beyond the end date of the South East Plan.
- 1.5 We have therefore taken the decision to establish a housing delivery target to be contained within the Lewes District Core Strategy, which includes reviewing the validity of the current target in the South East Plan.

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<sup>&</sup>lt;sup>1</sup> The Localism Bill was published on 13 December 2010. Clause 89 provides for the abolition of regional planning and revocation of regional strategies. It is expected that the Bill will receive Royal Assent in late 2011. At the Commons Committee stage there were no arguments advanced to retain regional planning, though substantial concerns have been voiced about the need for consideration of strategic issues locally. At this stage it is therefore reasonable to work on the basis that regional planning will indeed be abolished.

- 1.6 The reason for the involvement of the National Park Authority is that on the 1<sup>st</sup> April 2011 they became the planning authority for the whole of the National Park area, which includes a significant part of Lewes District. From the 1<sup>st</sup> April 2011, work to progress the Lewes District Core Strategy has been undertaken on a joint authority basis so that the part of the District within the National Park is not excluded from the plan area.
- 1.7 This background paper sets out the methodology that has been used to establish a housing delivery target and then sets out how the various elements, which make up the methodology, have been brought together to identify potential housing delivery targets for the District. Included within this paper is the consideration of the housing delivery target that was set out in the South East Plan and whether or not this merits continuing with, based on our own evidence and the wider strategic planning context.

#### 2. Methodology

- 2.1 To date no detailed set procedure has been given by the Government as to how Local Planning Authorities should arrive at a 'locally derived housing target' and it is considered unlikely that such guidance will be forthcoming. Therefore, in accordance with the broad policy content of Planning Policy Statement 3 (Housing), other Planning Policy Statements (such as PPS4 Planning for Sustainable Economic Growth, and having regard to the draft National Planning Policy Framework, Local Planning Authorities need to decide how to arrive at a planned housing target.
- 2.2 It is apparent that the planned level of housing growth to be set by the Local Planning Authority will need to be justified. The term justified, in the context of Planning Policy Statement 12 (Local Spatial Planning) means "founded on a robust and credible evidence base" and "the most appropriate strategy when considered against the reasonable alternatives." (para 4.36, PPS12). With this in mind the housing target for Lewes District will need to clearly founded upon the evidence base that has been collected to inform the content of the emerging Core Strategy document.
- 2.3 This stance to developing the housing target was reflected in the letter that was sent to Chief Planning Officers from the Department for Communities and Local Government on 6 July 2010<sup>2</sup>. In the guidance that accompanied this letter the following question and answer was included:
  - "Will we still need to justify the housing numbers in our plans?

    Yes it is important for the planning process to be transparent, and for people to be able to understand why decisions have been taken. Local authorities should continue to collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process. They should do this in line with current policy in PPS3."
- 2.4 It is recognised that the aforementioned correspondence was issued when the Secretary of State took the decision to revoke regional strategies. In November 2010 a legal challenge by Cala Homes against the action of the Secretary of State was upheld, essentially for the reason that primary legislation should have been used. The effect of the judgement is that regional strategies were never actually revoked and remain part of the development plan. A further legal challenge against the stated intention to abolish regional planning was heard in the High Court in January 2011 and dismissed, though leave to appeal was granted. Despite this, the Government has made it clear that the Localism Bill will lead to the abolition of the Regional Spatial Strategies and therefore the statement provided in the correspondence of the 6<sup>th</sup>

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<sup>&</sup>lt;sup>2</sup> http://www.communities.gov.uk/documents/planningandbuilding/pdf/1631904.pdf

- July 2010 provides a clear indication that housing delivery targets will still need to be based upon robust evidence.
- 2.5 Justifying the level of housing growth is also emphasised in PPS3 (Housing). Paragraph 32 states, "the level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders."
- 2.6 Paragraph 33 of PPS3 does provide some policy context for determining the planned level of housing provision. This paragraph states the following;
  - "In determining the local, sub-regional and regional level of housing provision, Local Planning Authorities and Regional Planning Bodies, working together, should take into account:
  - Evidence of current and future levels of need and demand for housing and affordability levels based upon:
  - Local and sub-regional evidence of need and demand, set out in Strategic Housing Market Assessments and other relevant market information such as long term house prices.
  - Advice from the National Housing and Planning Advice Unit (NHPAU)<sup>3</sup> on the impact of the proposals for affordability in the region.
  - The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.
  - Local and sub-regional evidence of the availability of suitable land for housing using Strategic Housing Land Availability Assessments and drawing on other relevant information such as the National Land Use Database22 and the Register of Surplus Public Sector Land.
  - The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply.
  - A Sustainability Appraisal of the environmental, social and economic implications, including costs, benefits and risks of development. This will include considering the most sustainable pattern of housing, including in urban and rural areas.
  - An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required."
- 2.7 The Government has issued a draft National Planning Policy Framework, which will eventually replace the existing Planning Policy Statements, which includes the aforementioned PPS3. Despite this, the critical message remains that the planned levels of housing need to be based upon robust evidence.

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<sup>&</sup>lt;sup>3</sup> It is recognised that the NHPAU was closed in June 2010 and no longer operates.

2.8 Taking the above into account, we have identified the range of factors that will need to be considered in arriving at potential options for a housing delivery target for Lewes District. This will also include the identification of the option that is considered to be the preferred approach for the level of housing growth to be planned for at this stage. A summary of the approach to determining the housing delivery target is presented in the figure below.

Figure 1 – Methodology for identifying the housing delivery target for Lewes District

	Housing provision ta	rget for th	e District (for the period betwee	n 2010 an	d 2030)
Housing need & demand		Pot	ential capacity for housing	Delivering the vision	
Demographic factors	Projected demographic trends		SHLAA (incorporates environmental constraints mapping, including the updated Ancient Woodland survey)	ioning R	Emerging Vision for the LDF (inc. the Visions for the sub-areas)
	Projected household formation rates	Infrastructure factors	Infrastructure capacity issues (e.g. where the road network may preclude further development in a particular area)	LDF Visioning work	Representations made on the emerging Vision
	Migration trends	Infras	Planned changes in infrastructure provision (Asset Management Plans, Transport Plans, etc)		Sustainable Community Strategy Vision
Housing factors	Outputs from the SHMA	ental	Appropriate Assessment work - capacity of SACs & SPAs to accommodate growth		
	Housing Needs Surveys	ironme factors	Landscape Capacity Study		
	Housing Strategy	Environmental factors	SFRA & Sequential Test		Aspirations of the towns and villages (Rural Settlement Study, Parish & Town Plans, etc)
	Past delivery rates for housing and housing land supply position		Further viability analysis of strategic sites & locations (if required)		National Park Visioning exercise
Economic factors	Economic forecasts for the District				
Ecor	Employment & Economic Land Assessment				
	National Park factor r	needs to be	e applied - PPS7, National Park pr	urposes ar	nd duty
			the wider strategic planning conte		
	Sus	tainability /	Appraisal/SEA of options identified		

2.9 Referring to the above figure it is considered worthwhile to elaborate on some of the aspects that will be taken into account in establishing the proposed housing delivery target.

#### 3.0 Housing need and demand

Establishing the level of housing need for the plan period is one of the main tasks and contributing factors towards determining a housing delivery target. A number of different factors need to be taken into account in establishing the level of housing need. Such factors include changes to the demographics of the District, the impact of predicted migration on housing need, and how changes to the local economy could impact upon the need for additional housing.

- 3.1 The Lewes District Strategic Housing Market Assessment (SHMA) did not put forward proposals for the overall level of housing provision that would be required to meet need because the housing target for Lewes District was then being derived through the South East Plan process. In the knowledge that the South East Plan is likely to be revoked a Local Housing Needs Assessment (LHNA) has since been undertaken. by Nathaniel Lichfield & Partners, to establish the level of housing need in the district to 2030
- 3.2 The LHNA considered many of the differing factors that drive housing need, namely projected demographic trends, household formation rates, migration and economic issues. A number of scenarios were tested and presented and the study eventually recommended a level of housing need to plan for (from a number of identified options). It is important to note that this study did not take into account the capacity for housing growth in the District, or the aspirations of the plan area. The study is available to view at: http://www.lewes.gov.uk/planning/backgroundreps.asp

#### <u>3</u>.3 The plan period

As can be seen from figure 1 it is proposed to identify a housing delivery target for the period between 2010 and 2030. The reason for having the start date of 2010 is because the Local Housing Needs Assessment established housing need levels in the District from this date.

In line with PPS3, the District Council's Core Strategy will need to set 3.4 "policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption" (para 53, PPS3<sup>4</sup>). With the Lewes District Core Strategy due to be adopted in late 2012/early 2013 it is evident that it will need to set out a housing target and delivery strategy until at least 2027/2028. It has been decided to extend this period up until 2030 as such an approach is in line with a number of neighbouring authorities and is also the end date used in a number of pieces of evidence that have been prepared to inform the Core Strategy (it will also mean that the National Park Authority can use this target in the preparation of their own Core Strategy document, see below).

#### 3.5 South Downs National Park

A significant part of the plan area, where a housing target is to be derived, is within the South Downs National Park. Although a housing delivery target will be set for the whole of the plan area, eventually it will be sub-divided between the part within the National Park and the part outside. Amongst other reasons, this will aid the National Park

<sup>&</sup>lt;sup>4</sup> A 15 year planning horizon is also being proposed in the National Planning Policy Framework.

- Authority in the preparation of their own Core Strategy as the part of the target that applies to their area should be able to be incorporated into their Core Strategy, which is due for adoption in 2014.
- 3.6 National Park status does not mean an embargo on new development, including housing, within the area affected by the designation. However, further considerations need to be made in developing any proposals for a National Park area and in particular this includes the twin National Park purposes, as defined in the Environment Act 1995. These purposes are:
  - To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and
  - To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public.
- 3.7 In establishing a housing target, for the part of the plan area within the National Park, it will be important to demonstrate that these purposes are met.

## 4. Consideration of the Regional Planning Policies, as contained within the South East Plan

- 4.1 As mentioned in the introduction it is considered sensible to examine the housing target for Lewes District, as contained in the South East Plan, and the reasoning and evidence behind how and why this target was set.
- 4.2 The process of determining housing provisions in the South East Plan was a long and complicated process and began in 2004. Not only did the process examine the level of housing growth to be accommodated across the South East region, it also examined housing growth targets for sub-regions, which included the Sussex Coast, and each individual Local Planning Authority.
- 4.3 In October 2004, the local planning authorities in Sussex submitted the 'Sussex Coast Sub-Regional Strategy' to the South East England Regional Assembly (SEERA), the leading body in the preparation of the South East Plan. This Strategy tested and evaluated options for the level and broad distribution of growth, including housing, for the period up until 2026. The Strategy concluded that the best strategic balance between economic and housing growth would be achieved by continuing housing development at a level approaching that contained in the Regional Planning Guidance 9, which existed at the time, alongside a more vigorous drive for economic development and regeneration. In terms of the level of housing growth, the aim was to provide about 76,000 dwellings in the sub-region from 2001 to 2026.
- 4.4 The Strategy conclusions were based on the concern that there was very limited scope for further development in sustainable locations in and around the coastal towns. The reasons for this were extensive environmental designations (in particular the South Downs, which was designated as an Area of Outstanding Natural Beauty at the time) and constraints on development, such as significant areas of flood risk. These constraints meant that the towns in the Sussex coast area had been intensifying within their boundaries for a number of years and this was a reducing the opportunities for further development within the existing urban areas.
- 4.5 The need to give greater priority to economic development over housing development to achieve a better balance between jobs and labour supply also supported the Strategy. This was due to significant levels of net out-commuting and very low locally-generated demand for housing (housing demand arose primarily from people wanting to move into the sub-region to live).
- 4.6 Taking into account the aforementioned Strategy and other evidence prepared, SEERA agreed options for the annual rate of housing provision in the South East region. The options were contained within

the Consultation Draft of the South East Plan. The options and the basis for them were as follows:

**Dwellings per annum** 

Average regional build rate 1999 – 2004	25,500
Regional Planning Guidance	28,000
To meet SEERA's 10 year migration trend population projection	32,000

- 4.7 These options were elaborated upon in disaggregated distributions of regional development options, by sub-regional and rest of county areas, in Technical Note 2 Spatial Options, SEERA, January 2005.
- 4.8 For the three different options concerning the level of housing development, two spatial distributions were set out for the part of the plan area that was applicable to Lewes District. These were as follows:

Table 1 – Options considered for the level and distribution of housing growth in the South East Plan

Net dwellings	Existing Policy			Sharper Focus		
per annum						
SE Region	25,500	28,000	32,000	25,500	28,000	32,000
Sussex	2,700	3,000	3,600	2,300	2,600	3,100
Coast						
Rest of East	300	400	500	400	400	500
Sussex						

- 4.9 Public consultation on the Draft South East Plan took place between January and April 2005. During this period work also progressed in the sub-regions on district level distributions of housing provisions. The proposed provisions were set out in the 'New Homes for East Sussex' consultation document.
- 4.10 In the case of Lewes District a total of 4,400 net additional homes (220 per annum) was proposed for the period between 2006 and 2026. Out of this total, it was proposed that 3,400 net additional homes (170 per annum) would need to be provided in the Sussex Coast sub-region, with the remaining 1,000 dwellings (50 per annum) being provided in the remaining part of Lewes District (generally the area north of Lewes town).
- 4.11 The District Council's position was to support the figure of 220 net additional homes per annum as a suitable level of housing growth to plan for in the period between 2006 and 2026. However, some concern was raised that this figure should be expressed as an overall target rather than being broken down into separate figures for the Sussex Coast sub-region and the rest of the District.

- 4.12 SEERA ultimately agreed an overall regional housing target of 28,900 dwellings per annum in July 2005. This formed the basis of the 'South East Plan Consultation on Submitted Documents', which incorporated the housing numbers contained within 'New Homes for East Sussex' into its housing distribution.
- 4.13 The housing distribution figures that were relevant to Lewes District and which formed part of the consultation on the 'South East Plan Consultation on Submitted Documents' remained the same during the subsequent stages undertaken leading to the adoption of the South East Plan in 2009.
- 4.14 Throughout the process of preparing the South East Plan, Lewes District Council supported the overall housing allocation to the District. Given the significant environmental designations and constraints on development, the level of housing proposed was seen as challenging to meet, but capable of being delivered provided there was sufficient investment in infrastructure provision. It was acknowledged by the Council that the housing target was predominantly driven by the potential capacity to accommodate housing growth.

#### 5. Consideration of the housing target

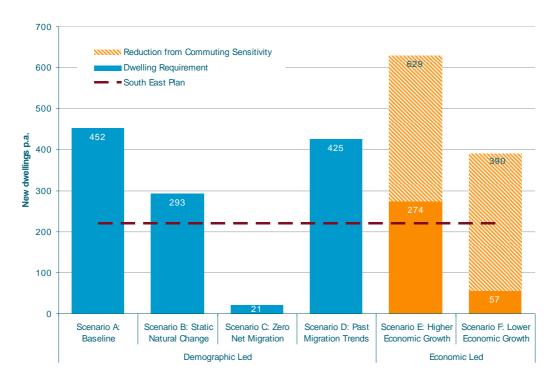
5.1 As a starting point for establishing a housing target it is considered appropriate to consider the likely level of housing need over the plan period.

#### 6. What is the level of housing need up to 2030?

- 6.1 As previously mentioned, to help establish the level of housing need in the plan area, the District Council commissioned Nathaniel Lichfield & Partners to prepare the 'Lewes District Assessment of the Local Need for Housing' (LHNA). The study considers the future housing, economic and demographic pressures the District will face. To help in this, the study sets out the context of what has happened previously relating to these factors, alongside current circumstances. For the purposes of brevity this information is not repeated here, but it can be viewed in section 2 of the aforementioned report.
- 6.2 In order to assess housing need over the lifetime of the plan, six different scenarios were developed and tested. These scenarios were based on differing demographic factors (including migration patterns) and economic scenarios. The six scenarios can be summarised as follows (further information on the scenarios can be obtained from section 3 of the report):
  - **A. Baseline** a demographic led scenario based upon ONS assumptions and ONS projections for fertility, mortality and migration, meaning the sensitivity of forecast future shifts in natural change factors (i.e. birth and death rates) are assessed.
  - **B. Static Natural Change** a demographic led scenario based upon existing fertility and mortality rates combined with projected migration rates from the ONS 2008-based sub national population projections (SNPP).
  - C. Zero Net Migration a demographic scenario whereby both net internal and international migration is equal, meaning there is only population churn in the district and not growth from net in-migration. This theoretical scenario examines the potential housing requirement if Lewes District was to provide only for the population pressures arising from in and out migration being in balance. It should be noted that this does not represent a scenario of providing only for the needs of indigenous residents (as a nil migration scenario would) as this would involve churn of people moving in and out (having an impact on the profile of the population as in-migrants have different characteristics from out-migrants). Although this is an almost wholly theoretical scenario as there is no evidence of a location successfully planning for and achieving a nil net migration scenario where such a scenario has been substantially at odds with past trends, it is considered a useful comparator, illustrating the population impacts of such a scenario.
  - **D. Past Migration Trends** in addition to the baseline scenario, a further demographic scenario based on past migration trends is adopted

- reflecting the level of in and out migration that has taken place in the local area in the longer term.
- E. Higher Economic Growth this represents an economic led scenario identifying the necessary demographic changes (i.e. migration) required to underpin growth in employment, appreciating the challenge the District faces in maintaining an adequate labour force to support economic growth against the backdrop of an ageing population.
- **F. Lower Economic Growth** a further economic led scenario identifying the demographic change required to provide a sufficient labour force to support a static employment base. This scenario is identified in the context of past trends (in the last 10 years) in employment growth for Lewes District, which show minimal, and even negative, job growth.
- 6.3 For the last two scenarios, 'commuting sensitivities' were applied in order to see what the level of housing need would be if a better balance was struck between jobs and labour supply (a key aspiration of the Sussex Coast sub-regional strategy in the South East Plan and an emerging aspiration of part of the District-wide vision in the Core Strategy). Although the inferred commuting rate was maintained across all six scenarios, the commuting sensitivities assumed that there would be a reduced level of net out-commuting from Lewes District as a result of a greater level of jobs becoming available in the District.
- 6.4 The output from the above scenarios can be summarised by the figure below (taken from section 5 of the LHNA):

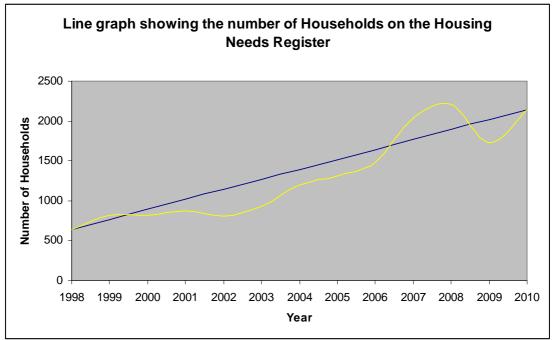
Figure 2 –Summary of Scenarios



- 6.5 Five of the six scenarios have established that in order to meet the need for housing, the annualised rate of new dwellings to be delivered will need to be in excess of the annual housing delivery rate for Lewes District, which was set in the South East Plan. The only scenario that differs from this (zero net migration) is not considered credible, "as there is no evidence to suggest that this would be achievable without a substantial impact upon the population structure, with a substantial reduction in economic activity caused by an ageing population and also potential housing market outcomes such as overcrowding, concealed households and declining affordability" (para 5.5 of the Assessment). It is therefore apparent that in order to maintain the viability of services and facilities and the vitality of the local economy there is a requirement for significant new housing development within the District.
- 6.6 Based on the scenarios tested, the LHNA has "considered that a dwelling requirement of between 300 and 450 dwellings per annum is the most reasonable to plan for." Over the period from 2010 to 2030 this would equate to between 6,000 and 9,000 dwellings being required in order to meet housing need. Despite these findings, it is essential to recognise that this recommendation is only based on meeting housing need and has no regard to whether or not there is sufficient land capacity to deliver this quantum of development, or how such a housing delivery target fits in with the vision and aspirations for the District. The LHNA concludes that planning for a level of growth within the recommended range would maintain an indigenous labour force sufficient to support the existing number of jobs in the District and some modest growth.
- 6.7 As well as the findings of the LHNA, there are other pieces of evidence that point towards the principle of a need for further housing to be delivered in Lewes District, and in some instances the wider subregion.
- 6.8 The District Council's Housing Register is an indicator of housing need as it represents an up to date register of need for housing in terms of those who have registered for affordable housing. Although the Housing Register is a good measure of local need, it is recognised that many households, although in housing need, do not apply to the local authority for housing. There are many reasons for this. Frequently, households do not believe that they have a realistic chance to be housed due to the shortage of affordable housing in the area in which they wish to live in. They may also not apply as they may want affordable home ownership (shared ownership) but they associate the housing register with rented accommodation.
- 6.9 The Housing Register demonstrates that housing need has been steadily rising throughout the district since 1998. Figure 2 below identifies this, with the blue line demonstrating an average annual increase of 125 households registering for affordable housing per annum. The figure also shows that in 1998 there were 642 households

on the housing needs register, which by 2010 had reached 2,142. This represents a growth rate of 334% since 1998 which is far higher than the national average (172%), the south east average (210%) and the East Sussex average (171%) over the same period.

Figure 3 – a graph showing the number of households on the Housing Needs Register since 1998



- 6.10 In 2008 a Strategic Housing Market Assessment (SHMA) was prepared for Lewes District. Although this study made no quantifiable assessment of the level of housing that would have to be delivered in order to meet need, it did accept that a significant need for housing does and will continue to exist in Lewes District. Such conclusions were generally based on the evidence that was prepared to support the South East Plan, particularly that relating to the Sussex Coast subregion (see paragraphs 8.43 to 8.47 of the SHMA).
- 6.11 The demand for housing in an area can often be demonstrated by the cost of housing, particularly when compared to the average household income in that area. The house price to earnings ratio for Lewes District in 2010 was 7.30<sup>5</sup>. This compares unfavourably to the figure for the southeast region, which is 6.55 and that for England and Wales, which is 5.56. However, this figure is not dissimilar to those authorities of similar characteristics that border, or are within close proximity of Lewes District.

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<sup>&</sup>lt;sup>5</sup> Source: East Sussex in Figures, See: http://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=documentation&submode=c atalog&catalog=http%3A%2F%2Fesfigures01s.escc.gov.uk%3A80%2Fobj%2FfCatalog%2FC atalog23&top=yes

- 6.12 In May 2010 the District Council issued a set of Issues and Emerging Options Topic Papers for consultation. One of the issues that had been identified in the papers, and which was predominantly supported by those who submitted representations, was improving access to housing. This issue/challenge was elaborated upon as follows:
  - "Improving the amount and availability of affordable housing, both rented and shared ownership, is a priority due to relatively high house prices, below average wages, and continued in-migration.
  - We need to be flexible in terms of housing provision in order to be able to respond effectively to changes in the housing market."
- 6.13 Although many respondents to the Topic Papers recognised the need to deliver affordable housing over the plan period, quite often they did not also specify the need for market housing. However as the SHMA recognises, "the output of affordable housing is now inextricably linked to the delivery of market housing" (para 9.17).
- 6.14 Based on the findings of the LHNA, and other evidence, it is clear that further housing needs to be planned for and delivered. The following sections of this paper consider the historic housing delivery rates in Lewes District; whether the suggested level of housing development to meet the needs arising could actually be delivered; and, what level of housing development will be compatible with the wider aspirations for the District.

#### 7. Past housing delivery rates in Lewes District

7.1 In setting a housing delivery target it is important to consider what has happened in the past, in terms of the rate of housing delivery as this provides an indication of the level of new housing that the housing market can sustain.

Table 2 – Net housing completions since 2000

Year	Total number of housing completions	Completions within the National Park (net)	Completions outside the National Park (net)	Proportion of completions within the National Park
2000/04	(net)	FC	447	(%)
2000/01	173	56	117	32.36
2001/02	245	19	226	7.76
2002/03	318	48	270	15.09
2003/04	142	41	101	28.87
2004/05	170	36	134	21.18
2005/06	265	56	209	21.13
2006/07	296	48	248	16.22
2007/08	416	112	304	26.92
2008/09	257	14	243	5.45
2009/10	175	22	153	12.57
2010/11	161	12	149	7.45
Average	238	42	196	17.72
(per				
annum)				

- 7.2 The period represented within the table reflects a period of buoyancy in the housing market with rising house prices and significant developer activity. It also represents the 'credit crunch' period and the subsequent recession when the housing market was on the downturn. t Nationally many developers struggled to secure equity to develop housing schemes, a number of developers went bankrupt and in general the rate of developer activity fell quite dramatically.
- 7.3 What is evident from table 2 is that despite the housing market downturn, the number of completions in Lewes District did not reduce dramatically when compared to the average completions over the previous few years. This is likely to indicate a relatively strong demand for housing in the District, even during a period of economic downturn.

#### 8. Delivering the vision

- 8.1 The Sustainable Community Strategy for East Sussex "Pride of Place" (see: http://www.essp.org.uk/essp/esiscs.htm) contains within its list of key tasks an objective to "increase the supply of homes and increase and diversify the supply of affordable homes, housing and tenures in all areas, both rural and urban".
- 8.2 The Sustainable Community Strategy for Lewes District "Local Voices, Local Choices" identifies a number of shared community themes and priorities. One of the priority themes is "Decent, Affordable Housing For All everyone has the opportunity to live in a decent, sustainably constructed and affordable home, regardless of tenure." Underpinning this theme are a number of priority actions, which are particularly focused on the delivery of affordable housing across the District.
- 8.3 In progressing with the Lewes District Core Strategy a vision for the plan area has been developed. The version that has been taken into account in this paper is the one that is contained within the Emerging Core Strategy document. The full version can be viewed at <a href="https://www.lewes.gov.uk/corestrategy">www.lewes.gov.uk/corestrategy</a>. Based on this vision, key District-wide priorities relate to; responding to the challenges of climate change; conserving and enhancing the National Park; improving employment opportunities and reducing the need for out-commuting; addressing imbalances in the standard of living across the District; and delivering appropriate new housing, particularly affordable housing. A vision has also been prepared for the constituent parts of the District. Based on these, the main priorities for the constituent areas can be summarised as follows:

Newhaven – regeneration and a strengthened economic base.

Peacehaven and Telscombe – improving accessibility.

Seaford – regenerated seafront and improved provision of tourist facilities and accommodation.

**Lewes town** – achieving National Park purposes and the provision of affordable housing and a range of premises to meet modern businesses needs.

The rural area of the Low Weald – retaining the attractive character and identity of the villages and wider countryside, whilst accommodating development that meets local affordable housing and community needs and supports the rural economy.

The rural area of the South Downs National Park – protecting and enhancing the National Park and meeting the social and economic needs of the existing communities, including the provision of affordable housing.

#### 9. Environmental Factors

- 9.1 Lewes District contains many outstanding environmental assets, as is recognised in the emerging Core Strategy vision.
- 9.2 The main asset is the South Downs National Park, which covers approximately 56% of the land area of the District. The National Park designation fully encapsulates Lewes town and the boundary is drawn tightly around the coastal towns. It is worth noting that the National Park area in Lewes District is more extensive than the area that was covered by the previous Area of Outstanding Natural Beauty (AONB) designation. The AONB designation was recognised as imposing a significant constraint on the overall quantum of development in the part of Lewes District in the Sussex Coast Sub-region during the preparation of the South East Plan.
- 9.3 Although a National Park designation does not mean an embargo on development, there is a need to meet the National Park purposes, as set out in the Environment Act 1995. One of these purposes is "to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park." It is inevitable that in order to meet this purpose opportunities for significant levels of growth in greenfield locations (particularly urban extensions to the towns) will be very limited.
- 9.4 Lewes District contains two sites that have international nature conservation importance. The Castle Hill Special Area of Conservation (SAC) is within the southwest part of the District and it straddles the administrative boundary with Brighton and Hove City Council. The Lewes Downs SAC lies between Lewes and Ringmer. Through the Appropriate Assessment Screening Opinion, it has been concluded that the Castle Hill SAC should not preclude any reasonable development options in the District. Further assessment is required in order to determine the impact of any development options on the Lewes Downs SAC. However, at this stage it is thought that probable levels of growth in the Lewes and Ringmer area would not have an adverse impact upon the SAC.
- 9.5 Flood risk is a significant constraint upon further development in Lewes District. Newhaven and Lewes town have significant parts of their existing urban areas at risk from fluvial and tidal flooding. Smaller settlements, including Ringmer, Plumpton and Barcombe also have areas at risk from fluvial flooding, as well as localised surface water drainage problems. Further information on these constraints is contained within the Strategic Flood Risk Assessment and the Preliminary Flood Risk Assessment undertaken by East Sussex County Council. Although not at risk from either tidal or fluvial flooding, Peacehaven and Telscombe are at risk from coastal erosion. As the greater areas of flood risk tend to exist in and around the existing towns in the District, this is a significant constraint on further

- development and was recognised as such during the South East Plan preparation.
- 9.6 Additional environmental constraints that affect various parts of the District include sixteen Sites of Special Scientific Interest, two National Nature Reserves, four Local Nature Reserves, three Wildlife Trust Reserves, four historic parks included on the English Heritage Register of Parks and Gardens and one historic battlefield site (Lewes 1264). There are also 35 Conservation Areas, over 1,700 Listed Buildings, and 1,156 hectares of designated ancient woodland (approximately 4% of the district land area) mainly in the area to the north of the South Downs.
- 9.7 As part of the evidence base for the Core Strategy, the District Council has undertaken a Landscape Capacity Study. This study does not formally designate land but does identify areas of the District that could accommodate a level of development without adversely impacting upon landscape character. The study shows that there are a number of areas around the towns and villages in the District that are sensitive to change in landscape terms. Such areas will generally be unsuitable for development. The study has concluded that areas of the District that have the greatest potential for growth, in landscape terms, are generally limited to the edge of existing towns and villages located outside of the National Park. This is not to say that any development on the edge of settlements outside of the National Park will be acceptable in landscape terms. The study has shown that there are sensitive landscape areas in these localities with such examples being to the east of Plumpton Green and to the south of Newick.

#### 10. Infrastructure Capacity

10.1 In order to accommodate housing growth it is essential that suitable infrastructure is in place to meet the needs of that development, or if not, that such infrastructure can be delivered (both in terms of physical provision and development viability). To aid in this process an Infrastructure Position Paper has been progressed, which. will eventually form the basis for an Infrastructure Delivery Plan. Highways is a key element of infrastructure in Lewes District and to help establish the current position and evaluate development scenarios, a Position Statement has been prepared by East Sussex County Council, in partnership with the District Council and National Park Authority. This statement is supported by two detailed transport studies (one for the Newhaven area and one for the Lewes town area).

#### 10.2 Transport

Through the Lewes town transport study it has been demonstrated that development is acceptable in the Lewes and Ringmer area in highway terms, although this is contingent on a number of mitigation measures being undertaken. In this area there are currently a number of critical junctions, in that the junction, or part of it, is operating at or over capacity during peak travel times. These junctions are as follows:

- A26/B2192 Earwig Corner
- A26/Church Lane
- A26/Phoenix Causeway (Snail) roundabout
- A277/A275 Prison crossroads.
- 10.3 With the exception of the Prison crossroads<sup>6</sup>, it is considered technically feasible to provide additional capacity at these junctions in order to accommodate the increased traffic that would result from the potential development options at Lewes and Ringmer. However, the cost of implementing such mitigation measures has not yet been established.
- 10.4 The Newhaven transport study has considered development options in the Newhaven and Peacehaven areas. The study has shown that in the future, any of the junctions on the A259 as it passes through Newhaven may become critical, including all junctions on the Ring Road, and along the A259 to the east of the river. The scope to mitigate some of the critical junctions in Newhaven (particularly at South Way) is considered to be limited.
- 10.5 A comprehensive scheme to accommodate increased traffic in the Newhaven area has been explored through the study entitled 'Physical Development Vision for Newhaven' by BBP Regeneration. This scheme included a Western Link Road but was determined to be financially unviable as funding well in excess of potential developer

<sup>6</sup> The Prison crossroads junction is remote from all the development scenarios in the Lewes town and Ringmer area and as such is unlikely to be impacted upon.

contributions would be required. With this being the case, the ability to accommodate significant levels of development in and around Newhaven is considered to be limited. This also applies to Peacehaven, albeit to a lesser extent, as part of traffic generated from new development in this area will impact upon the junctions on the Ring Road in Newhaven.

10.6 The option to accommodate development in the northwest part of the District has been explored. East Sussex County Council has assessed this option in terms of its potential impact upon the highway network and concluded that, "any new development in this area would lead to additional traffic on the B2112 through Ditchling. No significant increase would be acceptable." To address this concern any significant development in this locality should be conditional on effective measures being in place to improve the balance of attractiveness between the A273/A23 and the B2112 for north/south movements, in favour of increased use of the A273/A23. At present there are no obvious solutions to the problem, although the completion of the Haywards Heath Relief Road (due in late 2017) should.help redress the balance.

#### 10.7 Other infrastructure

Through work undertaken on the Infrastructure Position Paper, and aside from the transport issues previously highlighted, no other "showstoppers" in terms of infrastructure constraints have been identified to date. This is not to say that no new infrastructure will be required to support development in individual settlements, or areas of the district. Where such infrastructure is required there are no reasons to suggest that it is not deliverable.

#### 11. Deliverable capacity for housing

- 11.1 The starting point for identifying the potential housing capacity in the District is the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA was initially prepared by the consultants Nathaniel Lichfield and Partners, but has since been updated by the District Council, in partnership with the South Downs National Park Authority. The SHLAA identifies the position concerning the sites assessed as at the 1<sup>st</sup> April 2011.
- 11.2 The SHLAA has been undertaken in a very rigorous manner and in accordance with the published best practice guidelines<sup>7</sup>. We are confident that at this stage all potential sources of housing have been explored in undertaking the SHLAA, but are mindful that further sites could be identified as deliverable or developable over time (i.e. new sites could be submitted, further information could come to light on existing sites). The SHLAA has only identified and assessed sites that are capable of accommodating a minimum of 6 net additional residential units.
- 11.3 As at the 1<sup>st</sup> April 2011, the SHLAA identified sites with potential for some 5,384 dwellings across the District by 2030. Although this figure is in excess of the housing figure from the South East Plan it needs to be recognised that additional assessment needs to be undertaken on certain sites and that certain other factors need to be taken into account. This includes consultees inputs, future aspirations for current employment sites and whether delivering the potential number of dwellings is seen as compatible with meeting National Park purposes.
- 11.4 An example of why the potential 5,384 dwellings is unlikely to be a reasonable level of housing growth to plan for can be seen with regards to certain sites within Lewes town. The SHLAA has assessed the North Street area, the County Hall site and a site at South Downs Road as all having potential for housing over the plan period (up to a potential 825 dwellings). However, once policy aspirations are applied to these sites (something that the SHLAA does not do) it is clear that this level of housing growth on the 3 sites combined is highly unlikely to be reasonable to plan for. For example, evidence shows a shortfall of new employment land in Lewes town and therefore recommends a presumption in favour of retaining existing employment sites. However all three of the aforementioned sites are allocated for. or currently in employment use. To bring them all forward for housing development would therefore conflict with other Core Strategy aims and evidence.
- 11.5 The SHLAA has identified significant potential housing capacity in a number of the villages in the District, particularly Ringmer, Plumpton Green and Newick. However, in assessing these sites the SHLAA has

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<sup>&</sup>lt;sup>7</sup> See:

http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment

not had regard to the findings of the Rural Settlement Study, or the emerging Vision for Lewes District. Therefore, the potential level of housing growth for these villages needs to be tempered against these additional factors.

#### 12. Conclusions

- 12.1 This background paper sets out the range of factors that need to be taken into account in determining the most appropriate level of housing growth to plan for. In arriving at this level a balance needs to be struck between the various 'drivers' for housing growth (i.e. housing need) and the environmental and infrastructure constraints. In addition, whatever level of housing growth is planned for it will need to be aligned with the Vision for the District, as summarised in section 8 of this document.
- 12.2 The Assessment of the Local Need for Housing has demonstrated a need for additional housing in Lewes District, predominantly driven by internal immigration. The Assessment notes that the in-movement of people into an area can reduce the likelihood of a reduction in economic activity caused by an ageing population. This is particularly pertinent in Lewes District given that certain areas have a population that is already skewed towards the older age groups, a trend that is expected to continue through the plan period. The Assessment also examined scenarios where more jobs would be created in the District, reducing the level of out-communing, but a significant level of housing need would still occur, even for the lower economic growth scenario.
- 12.3 It is considered most appropriate to plan for the level of housing need that will predominantly be driven by in-migration, but to do this within the scope of the specific environmental constraints and infrastructure capacities of the District and having regard to the Vision for the District.
- 12.4 The analysis of the environmental constraints has demonstrated that these will have a major bearing on the district's capacity for development. It is not considered appropriate to compromise the valued environmental assets of the District, which would undermine the delivery of many aspects of the Vision and be incompatible with the National Park purposes.
- 12.5 Significant levels of development would be inappropriate in the rural northern part of the District that lies outside the National Park. Significant development in this area would not accord with the vision for this part of the District, which includes retaining the attractive character and identity of the villages and wider countryside. In addition, transport infrastructure constraints have been identified in some locations and in certain settlements the SHLAA has demonstrated a lack of deliverable sites for housing development.
- 12.6 Section 7 of this report shows that the housing delivery rate over recent years is compatible with the annualised housing delivery rate from the South East Plan. However, there has been a downturn in the build rate over the last couple of years, partly reflecting the economic downturn. If the South East Plan were to remain in place it would necessitate delivering approximately 210 net additional dwellings per annum for the

- lifetime of the Core Strategy (this rate assumes that 220 net additional dwellings per annum would be planned for in the period between the end of the South East Plan and the end of the plan period for the Core Strategy).
- 12.7 Given the findings elsewhere in this report and that the arguments behind the South East Plan housing delivery target for Lewes District are still relevant, it is considered appropriate to plan for a rate of housing development that is comparable with the rate required to meet the residual target from the South East Plan (approx 210 dwellings per annum). However, due to the first year of the plan period (2010/11) having a housing delivery rate of 161 net additional dwellings, significantly below the annualised rate of 210 additional dwellings, it is considered appropriate to only plan for this rate for the remaining part of the plan period. This equates to a housing delivery target for Lewes District of 4,150 net additional dwellings for the period between 2010 and 2030.

#### Consideration of the sub-regional need for housing

- 12.8 This report has considered the level of housing growth for Lewes District, including that part of the District within the National Park. Little consideration has been given to the issue of meeting housing needs that exist beyond the boundary of the plan area.
- 12.9 Given that the proposed housing target for the Lewes District Core Strategy does not meet the recommended level of predicted housing need in the plan period, the ability of the Lewes District Core Strategy to plan to meet a wider sub-regional need for housing is essentially non-existent.

#### What other options for housing growth exist?

- 12.10 It is not apparent that any additional reasonable options exist, although the Sustainability Appraisal process has assessed the options of having a target that equates to the range of housing growth recommended in the Assessment of the Local Need for Housing (300 to 450 dwellings per annum). Given the findings of this paper it could be argued that these options are unrealistic. However, they have been subjected to the Sustainability Appraisal process as this provides an objective assessment of their likely implications. The findings of the Sustainability Appraisal support the recommended housing target identified in this paper.
- 12.11 The other reason for undertaking this assessment is partly due to the content of the draft National Planning Policy Framework. Paragraph 20 of this document states that, "plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this

Framework taken as a whole." The Sustainability Appraisal process is one way of showing this.

#### What development is already committed?

- 12.12 The period that the Core Strategy is planning for is between 2010 and 2030. Up to the 31<sup>st</sup> March 2011, there had already been 161 net additional dwellings completed for this plan period. These completions are counted against the overall proposed housing target.
- 12.13 Also against the proposed housing target a significant amount of housing development is already committed and planned for. These 'commitments' include; dwellings that are under construction, but not yet completed; dwellings that have been granted planning permission (full or outline permission) but work to implement these permissions has yet to commence, and; sites that are allocated in the existing Local Plan for a number of residential units but have not yet been implemented, but are still considered deliverable. The total number of commitments amounts to 1,295 dwellings.

#### Sub-dividing the housing target between the two planning authorities

12.14 As mentioned in the methodology, the exercise to identify a housing target for the plan area has taken into account that two planning authorities (Lewes District Council and the South Downs National Park Authority) are covered by this area. To date, due to the relatively early stage reached in the plan preparation this task has not been undertaken. Once the consultation has taken place on the Emerging Core Strategy, the housing figure will be sub-divided between the two planning authorities and detailed and consulted upon in the Proposed Submission document.

## <u>Sub-dividing a housing target between the Sussex Coast sub-region and the remainder of the plan area?</u>

- 12.15 The South East Plan sub-divided the housing target for Lewes District between the Sussex Coast Sub-Region and the remaining part of the District. Despite this the South East Plan did state that "some flexibility will be allowed for those authorities not wholly within the sub-region to vary the relative amounts between the sub-region and the rest of county areas where this is necessary to meet the overall district provision, and achieve a more sustainable pattern of development without compromising the regeneration of the coastal towns."
- 12.16 Given that the housing target for Lewes District will need to be subdivided between the District Council and National Park Authority, a further sub-division between the Sussex Coast sub-region area and the rest of the plan area is considered unnecessarily complex. Nevertheless, the factors that have determined the proposed housing delivery target (housing need, meeting the vision, environmental)

constraints, infrastructure capacity etc) mean that the resulting distribution of development is likely to be similar to that envisaged in the South East Plan.

#### Appendix 1 – Affordable Housing need across Lewes District

#### **North of the District**

#### Lewes

Lewes town has 467 households on the housing register. This represents 6.38% of the town's total households<sup>8</sup>, which is the largest proportion of any of the settlements within the district. 242 of the households (52% of those on the housing register) need a 1 bedroom home, 149 (32%) of those households on the register require 2 bedroom homes, 62 households (13%) need a 3 bedroom home and 14 (3%) require a 4 bedroom home.

There are 1,137 council-owned properties in Lewes town. 369 (32%) of the properties are 1 bedroom, 403 (35%) are two bedroom, 341 (30%) are 3 bedroom properties, 23 (2%) are 4 bedroom homes and there is 1 5 bedroom house.

Lewes town's average household size (2.23 per residence) is similar to that of the district's average (2.27<sup>9</sup>). The amount of residents above the retirement age (19.0%) is slightly below the district's average, consequently there are a slightly above average proportion of people in the younger age bands. Although there is evidence of some deprivation in Lewes, the town as a whole is not considered to be deprived.

#### Newick

Newick has 44 households on the housing register, representing 4.37% of the parish's total households. 27 households (61% of those on the housing register) require a 1 bedroom home, 9 (20%) need a 2 bedroom property, 7 (16%) households require a 3 bedroom property and there is 1 (2%) household that requires a 4 bedroom home.

There are 106 properties owned by the council in Newick. Of these properties, 13 (12%) have 1 bedroom, 59 (56%) have 2 bedrooms, 33 (31%) have 3 bedrooms and there is one 4 bedroom house.

Newick is the least deprived settlement in the district and is in the top 2% of places nationwide in terms of least deprivation. It is categorised as having a household size (2.44) is above the district-wide average (2.27) and has an above average proportion of residents in the younger age categories.

#### Plumpton

Plumpton has 9 households on the housing register, which represents 1.5% of the parish's total households. 5 households (55% of those on the register) require a 1 bedroom home, 3 households (33%) require a 2 bedroom property, and 1 (11%) household requires a 3 bedroom house.

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<sup>&</sup>lt;sup>8</sup> Based upon 2010 estimates

<sup>&</sup>lt;sup>9</sup> Based upon 2001 Census data

There are 39 council-owned properties in Plumpton. 17 (44%) of these properties have 1 bedroom, 8 (21%) are two bedroom properties and there are 14 (36%) 3 bedroom houses.

Plumpton is categorised as being the second least deprived settlement in the district. Its average household size (2.67) is far above the district's average. This fact, coupled with the knowledge that the parish has a youthful age profile suggests that it is home to a high proportion of families.

#### Ringmer

Ringmer has 69 households on the housing register, representing 3.43% of the parish's total housing. 38 households (55% of those on the register) require a single bedroom home, 21 households (30%) need a 2 bedroom home, 8 (12%) households need a 3 bedroom property and 2 (3%) households require a 4 bedroom home.

The council owns 152 properties in Ringmer. 20 (13%) of the properties have 1 bedroom, 70 (46%) properties have 2 bedrooms and 62 (41%) have 3 bedrooms.

Ringmer has a similar average household size (2.33) when compared to the district as a whole (2.27). Its elderly population (21.7%) is slightly below that of the district (23.8%). Ringmer is amongst the least deprived settlements in the district.

#### Wivelsfield

Wivelsfield has 11 households on the housing register, which represents 1.43% of the parish's total housing. 6 households (55% of those on the register) require a 1 bedroom home, 2 households (18% of those on the register) require a 2 bedroom home and 3 households (27%) need a 3 bedroom home.

54 of the properties in Wivelsfield are owned by Lewes District Council. 13 (24%) properties have 1 bedroom, 19 (35%) have 2 bedrooms, while there are 21 (39%) 3 bedroom homes and 1 4 bedroom house.

Wivelsfield can be categorised as an area with a high proportion of families. This is as the age profile is one of the youngest in the district and that household size is the highest (2.68), much higher than the district average (2.27). It is recognised as being one of the least deprived places in the district.

#### North

Additionally, there are 133 households who have specified that they require a home in the other settlements/parishes of the northern part of the district. Of these households, 63 (47%) require a single bedroom property, 44 (33%) need a home with 2 bedrooms, 20 (15%) households require a 3 bedroom home, 5 (4%) households need a home with 4 bedrooms and there is 1 household that requires a property with at least 5 bedrooms.

306 of the properties in the rest of the settlements in the north of the district (i.e. Ditchling, Cooksbridge, Chailey) are council-owned. Of these properties 55 (18%) are 1 bedroom, 136 (44%) have 2 bedrooms, 109 (36%) have 3 bedrooms and 6 (2%) are 4 bedroom properties.

In addition to those on the housing register who have specified particular towns or parishes in the north of the district, there are 279 households on the register who have stated that they desire to live anywhere in the north of the district. 140 (50%) of these households require a 1 bedroom home, 76 (27%) households require a property with 2 bedrooms, 52 (19%) households need a property with 3 bedrooms, 9 (3%) households require a 4 bedroom home and there are 2 households who require a 5 or more bedroom home. A large majority of these households are likely to be accommodated in the most sustainable settlements.

#### **South of the District**

#### Newhaven (and Denton)

Newhaven has 241 households on the housing register. This equates to 4.46% of the town's total households. 131 of the households (54% of those on the housing register) require a 1 bedroom property, 67 (28%) of those households on the register need a 2 bedroom home, 33 households (14%) require a 3 bedroom property, 7 (3%) require a 4 bedroom home and there are 3 (1%) households which have need of a 5 bedroom or more property.

There are 501 council-owned properties in Newhaven. 123 (25%) are 1 bedroom properties, 167 (33%) are two bedroom homes, 193 (39%) are 3 bedroom properties and there are 18 (4%) 4 bedroom homes.

Newhaven has an above average household size (2.36 compared to the district's 2.27) and its percentage of residents who are considered to be elderly (18.5% compared to the District's 23.8%) is fairly low, and the lowest in the south of the district.

Newhaven is the most deprived settlement in the district. The amount of deprivation is shown in the Index of Multiple Deprivation where all but one Super Output Area (SOA) in the town is considered to be in the top half of most deprived SOAs in the country.

#### Peacehaven/Telscombe

Peacehaven/Telscombe has 297 households on the housing register, which equates to 3.08% of the area's total households. 146 of the households (49% of those on the housing register) need a 1 bedroom home, 90 (30%) of those on the register require a 2 bedroom property, 51 (17%) households are in need of a 3 bedroom home and 10 (3%) households require a 4 bedroom property.

In Peacehaven/Telscombe there are 423 council-owned properties. In total there are 170 (40%) 1 bedroom properties, 180 (43%) two bedroom homes,

66 (16%) three bedroom homes, 6 (1%) are 4 bedroom properties and there is 1 five bedroom house.

The area is categorised as having a large elderly population (around 25% of the areas population), higher than the district's average of 23.8%. Its average household size (2.25) is very similar to the district's average (2.27). The area is not considered to be particularly deprived, even though it houses the district's most deprived super output area.

#### Seaford

Seaford has 347 households on the housing register, which represents 3.12% of the town's total households. 174 of the households (50% of those on the housing register) need a 1 bedroom home, 113 (33%) households on the register require a 2 bedroom property, 50 (14%) households are in need of a 3 bedroom home, 9 (3%) households require a 4 bedroom property and there is 1 household in need of a 5 bedroom or more home.

The council owns 597 properties in Seaford. 294 (49%) of the properties are 1 bedroom, 157 (26%) are two bedroom homes, 137 (23%) of the properties are 3 bedroom, whilst there are eight (1%) 4 bedroom houses and one 5 bedroom house.

Seaford is the least deprived town in the south of the district and has the largest elderly population in the district with around a third of its population over the age of 65 (compared to the district average of 23.8%), a trend which is increasing. This has impacted on the household size (2.13) which is the lowest in Lewes District.

#### South

There are an additional 102 households who require a property in the other settlements/parishes in the south of the district (i.e. Rodmell, Glynde, Iford). Of these 102 households, 53 (52%) require a 1 bedroom property, 29 (28%) need a 2 bedroom home, 15 (15%) require a 3 bedroom home, 2 (2%) are in need of a 4 bedroom home and 2 households require a property than has 5 or more bedrooms..

In this area of the district, there are 31 council-owned properties. One (3%) property has 1 bedroom, 23 (74%) homes have 2 bedrooms and 7 (23%) properties have 3 bedrooms.

In addition to households on the register who have specified particular towns or parishes in the south of the district, there are 228 households on the housing register who have stated that they desire to live anywhere in the south of the district. 131 (57%) of these households are in need of a 1 bedroom home, 63 (28%) households require a 2 bedroom property, 29 (13%) households need a property with three bedrooms and there are 5 (2%) households who require a 4 bedroom home. A large majority of these households are expected to be accommodated in the settlements above.

#### **Notes**

The SHMA does acknowledge that it may not be appropriate to supply the types of homes 'needed' saying that: "It may not always be sensible to provide smaller units even if it reflects the current requirements, if it is anticipated that the number of families requiring social housing will increase in future as those households currently being housed have more children." (Para 9.32)

It follows up by stating: "First the need to plan for future requirements in terms of household types – where the evidence presented in earlier sections highlights a substantial increase in single person households. This should not be taken as simplistically meaning that all, or even necessarily the majority, of new provision should be of 1 or 2 bed properties. The authorities must consider how this growth is likely to be accommodated. Satisfying demand for larger property through new development could well free up significant volumes of smaller dwellings" (Para 9.46)

It is worth noting that where details on council-owned properties is provided, this does not include the housing stock that is owned by Registered Providers. Hence, the actual amount of affordable housing is likely to be a lot greater.