

**Lewes District Council
South Downs National Park Authority**

Lewes District Local Plan Part 1

Joint Core Strategy Background Paper

Identifying a housing delivery target for the District

Revised Version

January 2013



Purpose of this Background Paper

During the process of preparing the Lewes District Core Strategy a number of background papers have been 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 was initially prepared in September 2011 to inform the Emerging Core Strategy (see: http://www.lewes.gov.uk/Files/plan_Housing_Background_Paper.pdf). It has since been updated in order to reflect updated circumstances, evidence base documents prepared and changes to national planning policy.

The appendices to this paper provide further information on how the allowance for housing to be delivered on windfall sites has been justified (see Spatial Policy 2 of the Core Strategy – Proposed Submission document) and how a the level of committed housing developments on small sites has been determined.

- 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.

2.15 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. Consideration should also be given to the UK Government Vision and Circular 2010 for English National Parks and the Broads. Paragraph 78 of this DEFRA publication states; “The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.”

Appendix 1 – Justification for an allowance for housing to be delivered on windfall sites

Windfall sites are those sites which have not been previously identified as available to come forward for housing development and have therefore not been planned for. Lewes District historically has a high rate of completions on unidentified (windfall) sites, particularly on small sites (5 units or less).

Previously the District Council and National Park Authority did not include windfall sites in its method of determining a suitable local housing figure for the District, consistent with previous Government policy⁵, which stated that local planning authorities should not include allowances for windfalls in the first 10 years.

Paragraph 48 of Government's recent National Planning Policy Framework (NPPF) now states that local planning authorities may make an allowance for windfall sites in the first 5 years' supply where there is compelling evidence that such sites have consistently become available in the local area and will continue to be a reliable source of supply. However, paragraph 48 also states that in this windfall allowance residential gardens, now defined as greenfield land, should not be included.

The District Council and National Park Authority are of the opinion that an allowance can be for windfall sites in the first 5 years of the plan period as there is evidence that such sites have consistently come forward for housing over a number of years in the plan area. It is considered that this will continue to be a reliable source of housing supply in the first few years of the Core Strategy plan period as a minimum. The following paragraphs set out why this is the case.

In order to establish an accurate and realistic rate of housing delivery on windfall sites an exercise was undertaken to determine the proportion of completions on windfall sites, excluding garden land, against annual net completions over the past eight years. The information was gathered from the annual Housing Land Availability monitoring documents.

The table below shows the number of net completions achieved on large and small sites since 2004/05 together with the number of small windfall sites that were completed, excluding those completions that were on garden land. The last six years, from 2006/07, show a total of 227 windfall net completions, excluding garden land (an average of 38 per annum). This annual average figure has been projected forward for a five year period, which gives a figure of 190 small site completions to take forward as windfall allowance.

⁵ Planning Policy Statement 3: Housing (DCLG, 2011)

Year	Net completions (large & small)	Total small site (5 units or less) net completions	Net windfall exc. garden land	Percentage of completions on windfall
2004/05	170	65	45	26.47
2005/06	265	85	65	24.53
2006/07	296	65	40	13.51
2007/08	415	88	61	14.70
2008/09	247	49	39	15.79
2009/10	175	61	39	22.28
2010/11	161	47	25	15.53
2011/12	257	45	23	8.95
Total	1986	505	337	16.97
Past 6 years	1551	355	227	14.63

The rate of windfall completions over the last 6 years only has been used in determining a windfall allowance because windfall sites delivering net additional dwellings may not be an infinite source of housing supply. Hence, over time windfall sites are likely to result in fewer and fewer net additional dwellings per annum. As the years 2004/05 and 2005/06 achieved relatively high rates of net additional dwellings on small-scale windfall sites, it is considered that by including these years in the calculation to work out a projected rate of windfall delivery could result in an unrealistically high windfall allowance being established.

Appendix 2 – Rationale for applying a discount to the housing supply on small sites

Approved residential developments (large and small), which are either under construction or not started, form the majority of the District's housing supply (as at the 1st April 2012).

Within the urban parishes of Lewes, Peacehaven/Telscombe, Seaford and Newhaven the small site (5 units or less) supply figure makes up between 10 and 50 percent of the parish's total housing supply. In the smaller rural parishes, such as Barcombe and Rodmell, small sites often form 100% of the supply.

To date, when establishing the District's five year supply it has been assumed that all approved small sites will be built out. However, in reality this has not always been the case with a number of permissions for small housing sites expiring without being implemented. To ensure that the five year supply is as accurate as possible, the actual build out rate of small sites between 2004/05 and 2010/11 was assessed. Verifying the level of non-implemented units enabled a discount figure to be applied to the total supply addressing the assumption that all permissions are built.

The table below shows the net number of dwellings granted in each year across the District followed by the number of units built out or expired, as at 1 April 2011. At the point of undertaking this analysis a number of sites were either under construction or not started but still had an extant permission. Consequently, the rows highlighted in blue are indicative figures and will need annually updating to monitor the position over a longer timeframe. At this point it can be expected that the percentage of small housing sites not built, for the years highlighted in blue, will decrease slightly.

Year	Granted	Built	Expired	% Not built
2004/05	276	187	89	32
2005/06	102	68	34	33
2006/07	96	66	30	31
2007/08	131	82	49	37
2008/09	92	53	39	42
2009/10	55	23	32	58

Considering the rate of small site build outs in the period between 2004/05 and 2007/08 a discount of 35% (to the nearest 5%) has therefore been applied to the small site supply.

Commitments

Table 5, *Planned level of growth by settlement*, in the Core Strategy Proposed Submission Document summarises the number of net completions and commitments, as well as the planned level of growth on strategic allocations and subsequent allocations as at 1 April 2012.

Commitments are defined as sites where the principle of development has been established through the planning process. These include large and small sites with planning permission (with a percentage discount applied to the small sites with permission), existing 2003 Local Plan allocations (concluded to be deliverable or developable within the 2012 Strategic Housing Land Availability Assessment (SHLAA)), and development proposals approved subject to Section 106 (S106) agreement sign off.

The Completion and Commitment figures are shown by settlement area rather than parish area. Completions and commitments outside of the immediate settlement areas, or within settlements not highlighted in the table, are included within '*All other settlements and areas*'.

To ensure a consistent approach, as employed in establishing an accurate housing supply figure on small sites, a 35% discount is applied to small sites with planning permission.

Appendix 3 – Affordable Housing need across Lewes District

North of the District

Lewes

Lewes town has 438 households on the housing register. This represents 5.7% of the town's total households⁶, which is the largest proportion of any of the settlements within the district. 236 of the households (54% of those on the housing register) need a 1 bedroom home, 131 (30%) require 2 bedroom homes, 60 households (14%) need a 3 bedroom home and 11 (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 just one 5 bedroom house.

Lewes town's average household size (2.23 per residence) is similar to that of the district's average (2.27⁷). 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 33 households on the housing register, representing 3.26% of the parish's total households. 23 households (70% of those on the housing register) require a 1 bedroom home, 8 (24%) need a 2 bedroom property and 2 (6%) households require a 3 bedroom property.

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 7 households on the housing register, which represents 1.15% of the parish's total households. 5 households (71% of those on the register) require a 1 bedroom home and 1 (14%) household requires a 3 bedroom house and 1 household (14%) requires a 4 bedroom house.

⁶ Based upon 2010 estimates

⁷ 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 71 households on the housing register, representing 3.52% of the parish's total housing. 39 households (55% of those on the register) require a single bedroom home, 20 households (28%) need a 2 bedroom home, 11 (15%) households need a 3 bedroom property and 1 (1%) 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 41 households on the housing register, which represents 5.07% of the parish's total housing. 21 households (51% of those on the register) require a 1 bedroom home, 12 households (29% of those on the register) require a 2 bedroom home, 7 households (17%) need a 3 bedroom home and 1 (2%) household requires a 4 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 just one 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 238 households who have specified that they require a home in the other settlements/parishes of the northern part of the district. Of these households, 123 (52%) require a single bedroom property, 69 (29%) need a home with 2 bedrooms, 35 (15%) households require a 3 bedroom home, 9 (4%) households need a home with 4 bedrooms and there are 2 households that requires a property with at least 5 bedrooms.

Hence, the actual amount of affordable housing stock is likely to be significantly greater in most locations.