

Lewes District Local Plan Part 2 Examination

Additional comments and proposed new policy on **Qualitative Aspects of Housing Provision**

submitted at the request of Inspector Fox by the Lewes District Branch of CPRE Sussex

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Matter 3 Housing Provision

Matter 3.5 Qualitative Aspects of Housing Supply

- 1.01 NPPF paragraph 50 (2012) requires the Council to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups including, specifically, families with children, older people, people with disabilities and people wishing to build their own homes. LPP1 did not include any policies to meet this requirement, as this was then expected to be covered by new DM policies to be included within LPP2.
- 1.02 To be effective any new LPP2 DM policy must also be in accordance with the NPPF iteration currently in force (Feb 2019). This issue is now covered in significantly greater detail and with greater clarity in NPPF paragraphs 59-61 (2019). NPPF paragraphs 59 and 61 (2019) essentially repeat the requirements of NPPF paragraph 50 (2012). NPPF60 (2019) requires the mix of new housing delivered to reflect current and future demographic trends.
- 1.03 To be in accordance with national policy it is essential that LPP2 includes a policy to meet this NPPF requirement. You have heard evidence that the Council relies on the market to reach the correct conclusion, despite the evidence you have also heard that such an approach is not being effective and will not be effective in delivering the types of homes actually required in Lewes District.
- 1.04 Policy SD27 of the emerging SDNP Local Plan is one example of a recently approved DM policy to meet this requirement. This policy was found sound at Examination.

Strategic Policy SD27: Mix of homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.
 - a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:
 - 1 bedroom dwellings: 35%*
 - 2 bedroom dwellings: 35%
 - 3 bedroom dwellings: 25%
 - 4 bedroom dwellings: 5%
 - b) Proposals for market housing should provide the following mix of units:
 - 1 bedroom dwellings: at least 10%
 - 2 bedroom dwellings: at least 40%
 - 3 bedroom dwellings: at least 40%
 - 4+ bedroom dwellings: up to 10%
2. Planning permission will be granted for an alternative mix provided that:
 - a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or
 - b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met.
3. Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult homecare requirements. Development proposals of 5 or more homes will be permitted where it is clearly demonstrated that evidence of local need for older people's or specialist housing is reflected in the types of homes proposed.

*1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

- 1.05 The new policy should recognise that needs vary across the District. Local housing need in Low Weald villages (high need for affordable family homes) is quite different from that in Lewes

town (credible base for in-migrating London commuters; sustainable location for those with very low incomes providing they can obtain affordable housing), and housing need in Lewes town is very different from that in Seaford (high proportion of in-migrating households of retirement age) or in Newhaven (one of the very few areas of Greater Brighton, and the only area in Lewes District, where a significant proportion of market rents fall within the Local Housing Allowance). It is thus essential that the new policy should defer to, and not over-ride, adopted neighbourhood plans where such plans have identified the types of new housing required by that specific community.

1.06 The most recent ONS 2016-based household projections (published in Sep 2018) project that a very high proportion of new households formed across England will be headed by older people. 100% of the projected increase in household number is in households headed by people aged over 55; almost 90% of the projected increase is in households headed by people of retirement age; and a full 25% of the total projected increase in household number in England is due to a projected doubling of the number of households headed by people aged over 85, as shown in the ONS table below. While no supplementary local assessment for the District’s population over the plan period has been provided by the Council, population data at ward, parish and superoutput area are available from the East Sussex County Council ‘East Sussex in Figures’ website [www.eastsussexinfigures.org.uk]. This shows that Lewes District overall, and especially Seaford and some Low Weald villages, have a particularly high proportion of older residents, far higher than the average for England.

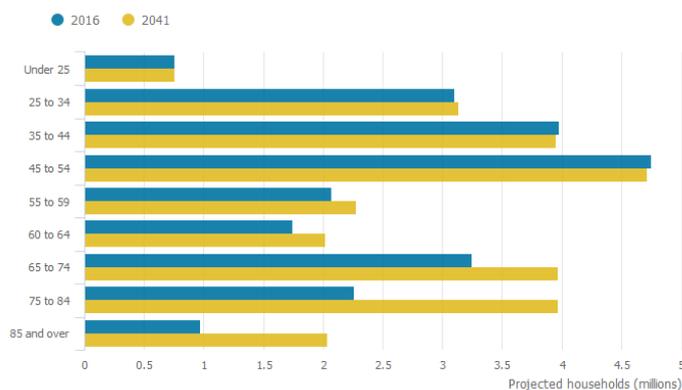
5. The largest growth is in households headed by older people

Households headed by someone aged 65 years and over are projected to increase by 54% by 2041, while those headed by someone aged under 65 years are projected to grow by just 3%.

88% of the total growth of households in England between 2016 and 2041 is for households headed by someone aged 65 years and over. This is due mainly to the growing proportion of older people in the population.

Figure 2: Projected households by age of head of household

England, 2016 and 2041



Source: Office for National Statistics

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/2016basedhouseholdprojectionsinengland/2016basedhouseholdprojectionsinengland>

1.07 Older residents, especially those aged over 85, are more likely to have disabilities, and many will require adapted or adaptable accommodation to enable them to live independently for as long as possible. As this age group grows an increasing number of people will require supported living or care home accommodation.

1.08 There is a strong demand for all types of affordable housing across the District. This includes especially housing for older residents with limited means, housing for single people with disabilities and housing for lower income families. Statistically the highest level of identified need (based on the imperfect tool of the District’s housing list) is for 1-bed accommodation.

Many of those needing 1-bed accommodation are the poorest members of our community, and the least well served by the benefits system: people of working age who are unable to work for health reasons. They may have to live on as little as £73 per week, from which they have to cover food, fuel, living expenses and a 20% contribution towards their council tax. For this group in particular high rural transport costs and the high prices in village shops are unaffordable. It is essential that most new housing for this group is provided in urban areas, where the need to travel and transport costs are minimised. For this reason the delivery of new 1-bed affordable accommodation should be focused in the District's urban areas. Rural affordable housing should be predominantly focused on those who are better able to afford rural transport costs, including those seeking intermediate housing, retired people and families with children.

- 1.09 Because the draft LLP2 has not recognised the scale of these needs and currently includes no plans to meet them, it cannot be considered positively prepared, it will not be effective and it is not in accordance with national policy. Inclusion of a new DM policy to ensure that new housing delivered reflects actual housing need reflect is essential for the Plan to be considered sound.
- 1.10 If appropriately-located new residential sites proposed for allocation, or parts thereof, were identified and specifically allocated to meet the needs of older residents (e.g. for new care homes, new wardened or extra-care accommodation or new retirement villages) it is likely that development density, and thus site capacity, could be increased beyond that currently planned for standard residential developments. It is essential that such sites are either sustainably located or on a scale that makes the provision of shared transport for residents a realistic and viable option.
- 1.11 In the event that it is concluded that the current LLP2 site allocations for residential development are not sufficient to meet the LLP1 target of at least 6,900 new dwellings, CPRE Sussex recommends that any additional allocations to be made should be of sites specifically identified and allocated to meet the unmet need for additional specialist housing for older people and the unmet need for affordable housing.
- 1.12 Unlike new market housing (where sales are currently challenging, leading to unnecessary delays in completions) new affordable housing is occupied as soon as it is built. There is also a strong demand for suitable and sensibly-priced sites from the providers of specialist housing for older residents. The long-delayed Newhaven Marina site would be ideal for this use, as would the lower section of the Harbour Heights allocation. In accordance with the recommendations of the Letwin Report, subdivision of this latter large strategic site would be very likely to expedite its delivery.

Proposed new DM policy on the types of new housing required

- X.01 Demographic data for Lewes District derived from the 2011 census show that it has a much higher proportion of residents over retirement age [22.7%] than England and Wales overall [16.4%] or the South east region [17.2%]. The proportion of older residents is particularly high in the District's largest town, Seaford [30.0%] and in some Low Weald villages, such as Ditchling [38.3%].
- X.02 The 2016-based household projections issued in September 2018 by the Office for National Statistics show that these proportions will increase through the plan period. In particular there will be a very substantial increase in the number of households headed by people aged over

85, many of whom will require specially designed accommodation to continue to live independently and some of whom will need ongoing care. All new developments of 10 dwellings or more should contribute to meeting this need.

- X.03 There is an unmet need for affordable housing for rent and intermediate housing throughout the District. Much of this need is for smaller dwellings, including 1-bed dwellings. A significant proportion of this unmet need is from very low income households, for whom high rural travel costs are not affordable, so the provision of matching accommodation should be made at sustainable locations where such costs are minimised.

Policy DMX

Where a new residential development is proposed for an area covered by an adopted Neighbourhood Plan that includes policies specifying the types of development needed, the proposal should be in conformity with those policies.

Otherwise, except where there is clear evidence that a different housing mix is required to meet local need, proposals for the development of 10 or more dwellings should meet the guidelines below.

For new market housing:

- (i) At least 25% of the dwellings should be 1-bed or 2-bed dwellings specifically designed to meet the needs of elderly or disabled residents; and**
- (ii) No more than 25% of the dwellings should include 4 or more bedrooms.**

For new affordable housing for rent in urban areas:

- (i) At least 50% of the dwellings should be 1-bed dwellings; and**
- (ii) At least 25% of the dwellings should be 1-bed or 2-bed dwellings specifically designed to meet the needs of elderly or disabled residents.**

For new affordable housing for rent in the rural parts of the District

- (i) At least 75% of the dwellings should be 2-bed or 3-bed dwellings; and**
- (ii) At least 25% of the dwellings should be 1-bed or 2-bed dwellings specifically designed to meet the needs of elderly or disabled residents.**

For new intermediate affordable housing

- (i) At least 50% of the dwellings should be 2-bed dwellings.**

The Council will review housing need in the District regularly and may vary the requirements above in the light of evidence of changing need.

Proposals for the use of allocated residential sites for developments entirely for older residents, including accommodation with shared facilities and/or on-site wardens and/or retirement villages will be welcomed. For such developments the development densities may exceed those normally expected.