

Lewes District Local Plan Part 2 Examination

Further comments made by the Lewes District Branch of CPRE Sussex

John Kay

CPRE Sussex address: Brownings Farm, Blackboys, East Sussex, TN22 5HG

Matter 4 Housing Shortfall in Neighbouring Authorities

- 4.1 At the Examination held into the soundness of the Lewes District Joint Core Strategy (Lewes Local Plan part 1) prior to its being found sound (subject to modifications) and adopted in 2016, it was concluded that (for the reasons specified by the Inspector in his Report) Lewes District could not reasonably be expected to accommodate all the new housing suggested by the Objectively Assessed Housing Need (OAHN) calculated for the District. The Inspector agreed that the District's target should be set at 6,900 (345 p.a.) as the most that could be delivered while maintaining compliance with the National Planning Policy Framework.
- 4.2 It would thus be unreasonable to expect that a District shown to be unable to meet its own OAHN should be expected to accommodate any unmet need from neighbouring Districts. This is in any case primarily a matter for the Local Plan part 1 review, due by 2021.
- 4.3 It should be noted that in Lewes District natural increase in population is negative, as deaths exceed births. The District's assessed housing need is thus based not on any local need, but on centrally projected in-migration into the District from other parts of the UK, primarily from Greater London. It should also be noted that a substantial proportion of those moving into the District intend to continue in Greater London-based employment, but that the capacity of the rail and road transport systems that they need to use to commute to such employment is operating at or above its capacity.
- 4.4 Lewes District does not logically fall into any single Housing Market Area (HMA). Given that out-migration from Greater London is the prime driver for growth, the most logical HMA would cover all those areas of England to which such out-migration occurs, and should take into account ease of commuting by road and rail and the capacity to accommodate such commuting. The ONS model actually used is far less sophisticated, but its deficiencies are unacknowledged.
- 4.5 The HMA on which the studies underpinning the Lewes District Joint Core Strategy (Local Plan part 1) were based has Lewes right at its eastern edge. It includes areas of West Sussex, with which Lewes has very limited physical and economic connections, and which have very different access to Gatwick/Crawley and London. It does **not** include Wealden District or Eastbourne Borough, with which many parts of the District, and especially its major town, Seaford, have close physical, social and economic connections.
- 4.6 As specific evidence, three distinct Local Housing Allowances (LHA: based on rents and used to restrict Housing Benefit) apply in different parts of Lewes District. In Seaford the Eastbourne LHA applies. In the Low Weald rural villages closest to Haywards Heath the Crawley/Reigate LHA applies. In the rest of the District the Brighton LHA is used. These LHAs are very different (see Table below). The Brighton & Crawley/Reigate LHA rates are fairly similar (though the Crawley/Reigate LHA is higher for small dwellings and the Brighton LHA higher for larger dwellings). The Eastbourne LHA is 20-30% lower for all sizes of dwelling. The omission of Eastbourne from the Lewes HMA might be considered particularly surprising, given that Lewes District Council and Eastbourne Borough Council share a common officer team. The omission of Wealden District is also completely inappropriate, given the everyday

reality that many households priced out of Lewes District migrate to Wealden District towns like Uckfield and Hailsham. The explanation is more likely poor relationships between the councils (especially over Ashdown Forest issues) at the time the decision was taken than actual housing market reality.

Local Housing Allowance (LHA) Rates: 01 April 2019 to 31 March 2020							
BRMA	Areas Covered	Frequency	1 room with shared facilities £	1 Bed self contained £	2 Beds £	3 Beds £	4 Beds £
Crawley & Reigate	Plumpton, Newick, Chailey, Wivelsfield Green	Monthly	366.74	698.41	856.53	996.02	1385.96
		Weekly	84.40	160.73	197.12	229.22	318.96
Brighton & Hove	Everywhere else in Lewes District area	Monthly	359.18	684.85	887.30	1030.65	1518.83
		Weekly	82.66	157.61	204.20	237.19	349.54
Eastbourne	Seaford, Eastbourne	Monthly	299.86	537.20	678.07	816.56	1022.61
		Weekly	69.01	123.63	156.05	187.92	235.34

General information about the Local Housing Allowance is available at: <https://www.gov.uk>

Source: https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/278368.pdf