



Lewes District Council Housing Delivery Test Action Plan

August 2019



Lewes District Council

LEWES DISTRICT COUNCIL

ACTION PLAN

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1. INTRODUCTION

The housing challenge

- 1.1 In a bid to address the national housing crisis Government published its Housing White Paper (HWP) - *Fixing our broken housing market* in 2017. The HWP identifies the need for at least 225,000 more homes to be built every year to meet the needs of the country's growing population and tackle the under-supply of housing to date. The HWP sets out Government's plans to reform the housing market and boost the housing supply.
- 1.2 The HWP was followed by revisions to the National Planning Policy Framework (NPPF) and updates to the National Planning Policy Guidance (PPG) published in 2018. The 2018 NPPF and PPG introduced the Housing Delivery Test (HDT), with further supporting documents; Housing Delivery Test: Measurement Rule Book (July 2018) and Housing Delivery Test: 2018 Measurement Technical note (February 2019).
- 1.3 Local planning authorities (LPAs) have a longstanding role in planning for and demonstrating a sufficient supply of housing. Paragraph 73 of the NPPF sets out the requirement for LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum five years' worth of housing against their requirement.
- 1.4 The HDT is one of Government's initiatives to boost housing growth and seeks to encourage LPAs to have a more proactive role in supporting delivery, as well as greater accountability for under-delivery.
- 1.5 The production of this first Action Plan is a result of the HDT. The HDT is considered to be a 'live' document and therefore will be updated on at least an annual basis, usually following subsequent HDT result publications. Interim amendments may also be made to keep the document up to date.

2. HOUSING DELIVERY TEST

- 2.1 The HDT is a measurement of the number of homes *built* against the number of homes *required* over the previous three year period:

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

- 2.2 The NPPF sets out certain ‘actions’ that must be implemented depending on the HDT result, these are:
- a) Less than 95%: an LPA should produce an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
 - b) Less than 85%: a 20% buffer should be applied to the five year housing land supply calculation, as well as an Action Plan prepared;
 - c) Less than 75%: Policies are considered out of date and the presumption of favour of sustainable development applies to decision-taking¹.
- 2.3 As mentioned above, the HDT is a ‘live’ document in the sense that the HDT will be updated periodically. Whilst the first 2018 HDT results were not published until February 2019, it is expected that the 2019 HDT results will be issued November 2019, as initially intended by the NPPF.
- 2.4 Lewes District Council (the Council) has prepared this Housing Delivery Test Action Plan to provide an overview of housing delivery in the district. The PPG states that action plans need to be published within six months from publication of the HDT results. This first Action Plan will have a shorter lifespan (seven, rather than 12, months), if the 2019 HDT results are published in November, at which point the actions will need to be reviewed.
- 2.5 The Action Plan includes an analysis of recent housing delivery, potential barriers to delivery and identifies actions needed to support and improve housing delivery going forward. The actions identified within this document aim to obtain a detailed understanding of local issues and help stimulate housing delivery.
- 2.6 It should be noted that the HDT does not apply to National Parks, therefore the outputs of this Action Plan only relate to the areas of the district outside the South Downs National Park (SDNP). However, due to the influence of the

¹ The 75% threshold is enforced from November 2020. Transitional arrangements are in place so that the threshold is below 25% in November 2018 and 45% for November 2019.

SDNP on the rest of the district, particularly in understanding housing delivery and potential barriers (Section 2), commentary may also be provided within the context of the whole district.

HDT within the context of Lewes

- 2.7 Local Plan Part 1: Joint Core Strategy (LPP1) is the district's strategic development plan, adopted by the Council on the 16th May 2016. The South Downs National Park Authority (SDNPA) subsequently adopted LPP1 on the 23rd June 2016.
- 2.8 Spatial Policy 2 (*Distribution of Housing*) of LPP1 sets out the housing requirement for the district; a minimum 6,926 net additional dwellings (equivalent to 345dpa) between 2010 and 2030.
- 2.9 Since 2016, the housing requirement figure has been disaggregated between the areas inside and outside of the SDNP. This firstly recognises that Spatial Policy 1 (*Provision of Housing and Employment Land*) and SP2 are quashed, so far as they relate to the SDNP, and secondly, the emerging Local Plan Part 2: Site Allocations and Development Management Policies (LPP2) only plans for the area of the district outside the SDNP. In addition, the SDNPA have been progressing their, now adopted, Park-wide Local Plan. Consequently, the separation of the housing requirement was essential to the two LPAs being able to properly plan for their respective areas.
- 2.10 As a result, the disaggregated housing requirement figure for Lewes district, outside the SDNP, is a minimum 5,494 net additional dwellings (equivalent to 274.7dpa). A Statement of Common Ground² between LDC and the SDNPA which outlines and agrees the housing requirement position has been signed by both parties. The disaggregated housing position has been presented as part of the LPP2 Examination in Public. The Inspector has not, to date, raised any concerns, nor has he recommended any Main Modifications relevant to the housing requirement.
- 2.11 The table below sets out the 2018 HDT figures for Lewes. The HDT result is calculated using the disaggregated housing numbers. It is these figures which the Council believes to provide the correct HDT position³.

² [Duty to Cooperate Statement](#), incorporating Statement of Common Ground

³ Government's published figures firstly, incorrectly use household growth figures which should only be used when the Local Plan is out of date (Lewes only adopted in 2016) and secondly, do not reflect Lewes' specific situation of having disaggregated housing requirement figures.

Table 1: 2018 Housing Delivery Test for Lewes outside the SDNP

	Net completions	Annualised requirement figure
2015/16	257	274.7
2016/17	167	274.7
2017/18	286	274.7
	709	824.1

- 2.12 The above figures give an HDT result of 86%. As it falls below the prescribed 95% threshold the Council is required to prepare an Action Plan.

Five year housing land supply

- 2.13 Paragraph 73 of the NPPF requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.
- 2.14 In calculating the Council's five year housing land supply, a 5% buffer is currently included, in line with paragraph 73. As at 1st April 2019 the Council are able to demonstrate a five year housing land supply of 5.59 years (a surplus of 207 dwellings) outside the SDNP.
- 2.15 Should future HDT results fall below the 85% threshold then a 20% buffer would be applied instead. Therefore, whilst the supply of housing land is comparatively strong the rate of delivery needs to improve to maintain an HDT of at least 85%.

Links with other key Council plans and strategies

- 2.16 The importance of delivering housing in the district is not limited to planning. Other service areas of the Council recognise the local need for housing, the challenges that exist to delivering it and the part housing has in achieving sustainable communities. As such, the Council has a collective role and responsibility to proactively address this need. The table below outlines the existing plans and strategies which the Action Plan should complement.

Table 2: Relationship between housing delivery and key Council plans/ strategies

Document	Description
Local Plan Part 1: Joint Core Strategy 2010-2030 (2016)	Sets out the framework for delivering housing and growth in the district, including setting out the level and distribution of housing growth. Includes strategic allocations to deliver a proportion of the housing requirement. The Action Plan supports the Council in achieving the Local Plan's Vision, Strategic Objectives and commitments.
Emerging Local Plan	Identifies allocations to deliver LPP1, including housing

<p>Part 2: Site Allocations and Development Management Policies</p>	<p>allocations where neighbourhood plans are not being prepared or allocating housing sites. It also contains development management policies to guide development.</p> <p>The Action Plan supports the delivery of housing allocations.</p>
<p>‘Made’ Neighbourhood Plans*: <i>Ditchling, Streat & Westmeston (2018)</i> Hamsey (2016) Lewes (2019) Plumpton (2018) Newick (2015) Ringmer (2016) Wivelsfield (2016)</p>	<p>Identify allocations and policies to deliver and support growth, including housing, in the respective neighbourhood plan areas. Hamsey NP does not identify allocations and those in italics are wholly or predominately within the SDNP.</p> <p>The Action Plan supports the delivery of housing allocations and aspirations of the local community.</p>
<p>Affordable Housing Supplementary Planning Document (2018).</p>	<p>Sets out detailed guidance on how to implement and achieve the aims of Core Policy 1 (<i>Affordable Housing</i>) and provide a range of affordable housing to meet local needs.</p> <p>The Action Plan seeks to identify opportunities to increase housing delivery, including affordable housing, helping to improve local affordability.</p>
<p>The Council Plan (2016-2020) (2018)</p>	<p>Recognises that Lewes district has above average house prices. This can make it challenging for first time buyers and those on low incomes to purchase a house or rent their own home.</p> <p>The Action Plan supports the delivery of a range of development types to help ensure a suitable choice of homes is available to own/ rent.</p>
<p>Newhaven Enterprise Zone Strategic Framework (2018)</p>	<p>The NEZ covers 8 key sites within Newhaven town that offer the opportunity to deliver new and refurbish existing employment space and, in turn, stimulate investment and support sustainable development within the town. The Framework sets out the vision and priorities for the NEZ.</p> <p>The Action Plan supports partnership working to better understand local and site specific challenges, particularly in towns such as Newhaven which has a range of potential constraints to development.</p>
<p>Eastbourne and Lewes Street Communities Strategy 2018-2021</p>	<p>Acknowledges that the current housing market makes it challenging to reduce rough sleeping. The strategy sets out a framework to identify and address the needs of the ‘street community’, including ensuring there is suitable accommodation and mechanisms to help relieve and prevent rough sleeping.</p> <p>The Action Plan supports the delivery of a range of accommodation types to meet the needs of the local community.</p>
<p>Lewes District Council and Eastbourne Borough Council Corporate Asset</p>	<p>The Plan will help to unlock the potential of land and buildings across the two authority areas, including opportunities to stimulate provision of affordable housing, helping to deliver on the priorities of the Councils’ corporate plans.</p>

Management Plan (2017-2020)	The Action Plan supports the delivery of housing, including working with internal partners to explore Council-owned development opportunities.
Pride of Place: A Sustainable Community Strategy (2008-2026) <i>Joint strategy produced by the six Local Strategic Partnerships (LSP)</i>	Sets out a long term vision for improving people's quality of life and creating sustainable communities. The Action Plan supports the delivery of affordable housing through a range of mechanisms, including through Council-owned land, development contributions and working with Parish Councils identifying rural exceptions site options.
<i>* Italicised NPs are led by the SDNPA</i>	

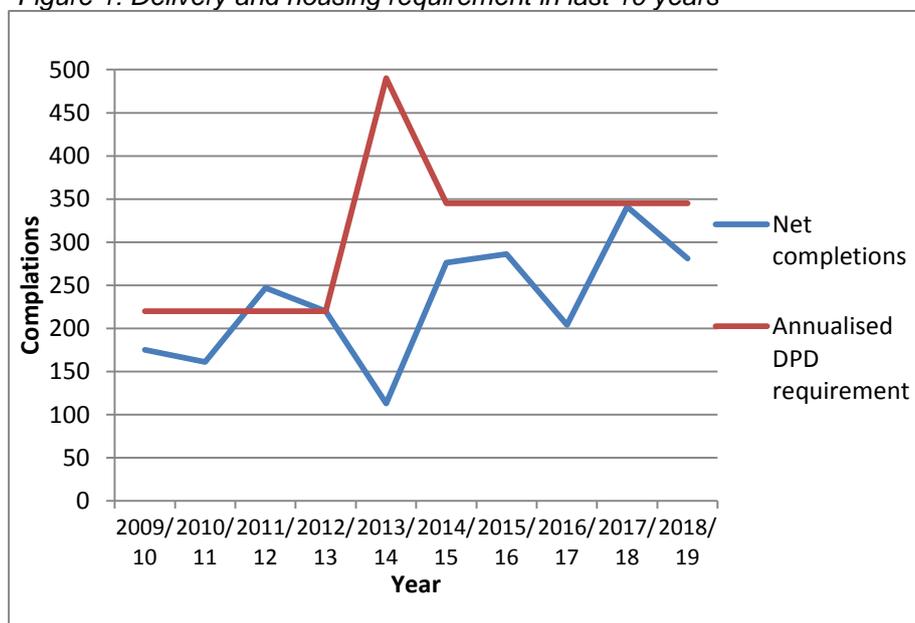
3. HOUSING DELIVERY ANALYSIS

- 3.1 This section looks at the Council's past housing delivery performance and explores the challenges facing key stakeholders in bringing forward residential developments in the district.
- 3.2 Prior to LPP1, the South East Plan (SEP) identified the required level of housing growth for the district; 4,400 (220dpa) between 2006 and 2026. LPP1 requires a minimum 6,926 net additional dwellings (345dpa) to be built within Lewes district between 2010 and 2030. This is a significant uplift in the level of housing to be built.

Completions

- 3.3 Within the first eight years of the Plan period (to the end of 2017/18), a total of 1,848 net dwellings have been delivered within the district, as a whole. This is against a cumulative annual target of 2,769 (345dpa x 8) net dwellings over the same period. Therefore, as at the end of 2017/18, there has been a total cumulative shortfall of 912 net dwellings.
- 3.4 The below graph compares the number of homes built in the district over the last 10 years against the respective requirement figures.

Figure 1: Delivery and housing requirement in last 10 years

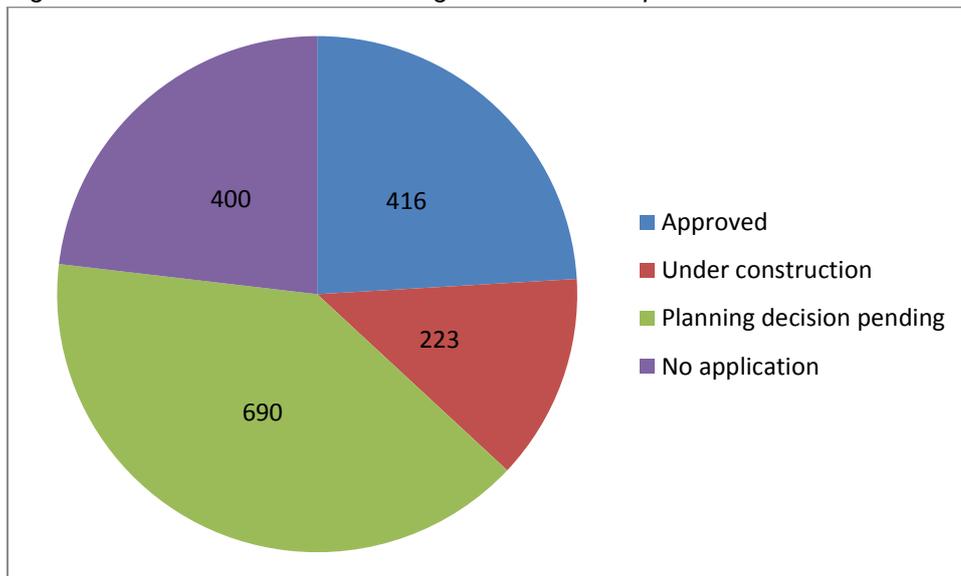


- 3.5 For 2013/14 the requirement figure significantly increases. This spike is an anomaly which coincides with the period where the SEP was revoked and weight could not be given to the emerging LPP1.
- 3.6 Whilst the number of housing completions naturally fluctuates year on year there has been a general upward trend, with the exception of 2013/14 which

saw an abnormal low level of completions. This upward trend is expected to continue largely due to completions coming through a number of strategic allocations that are either currently under construction or due to start building in the next year.

- 3.7 The below graph shows the status of dwellings on strategic allocations within the planning application process.

Figure 2: Status of Local Plan strategic sites as at 1 April 2018

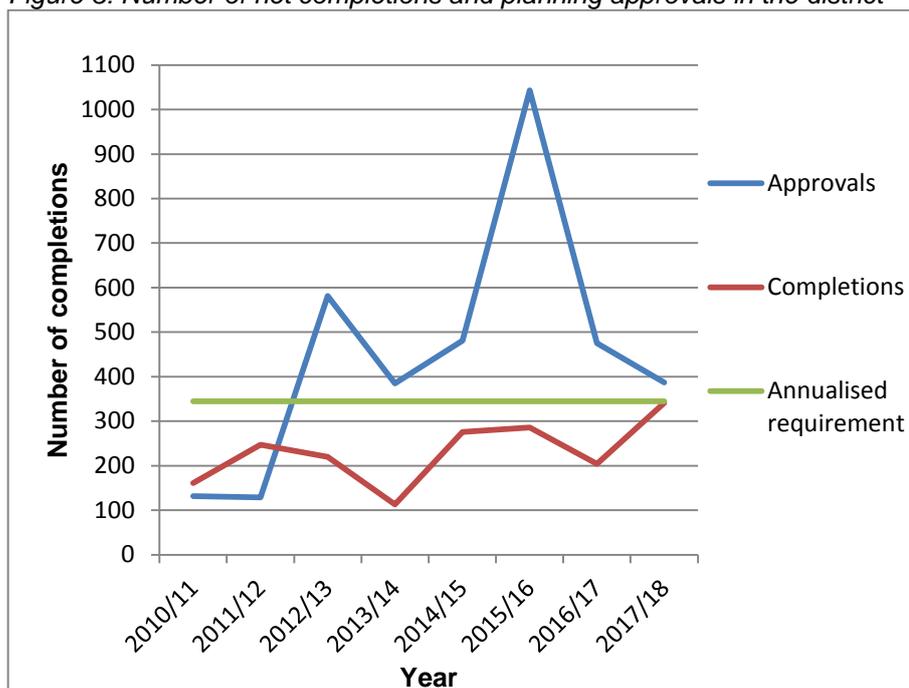


- 3.8 Since April 2018, 450 of the 690 dwellings previously 'pending decision' are now approved and under construction. Another site previously under construction; Greenhill Way (phase 2) has delivered approximately 25 completions within 2018/19. The remaining strategic site, Land at Harbour Heights, was submitted as a planning application in January 2019.

Planning approvals

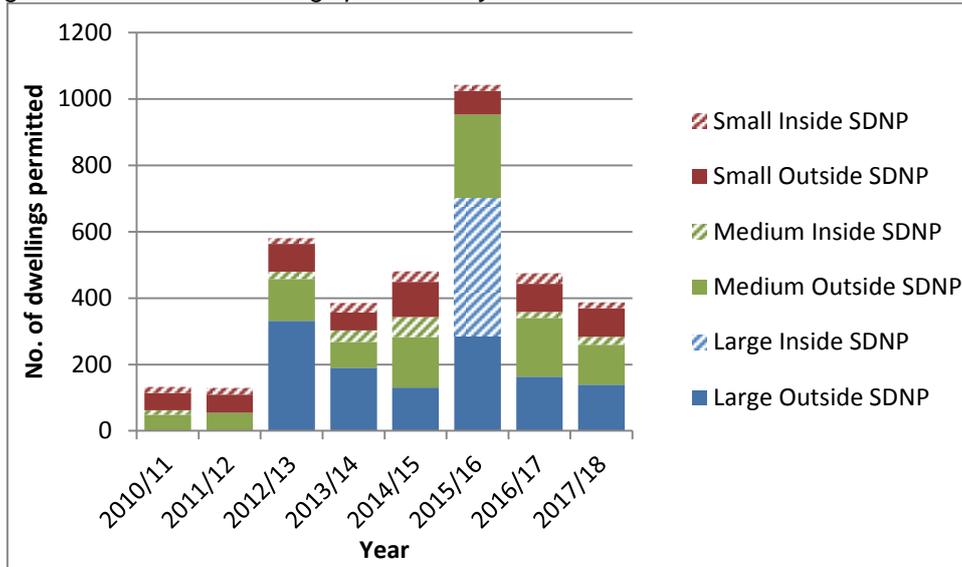
- 3.9 Over the last eight years the Council has shown a strong and consistent rate of planning approvals. This has been supported by the preparation and adoption of LPP1 which has given landowners/ developers of strategic allocations the certainty and confidence to bring sites forward. In response, the number of completions has been steadily increasing.

Figure 3: Number of net completions and planning approvals in the district



- 3.10 As can be seen from the above graph, the number of dwellings approved in any one year generally exceeds the number of dwellings needed to meet the annualised housing requirement. The significant increase in approvals in 2015/16 is largely due to a single strategic site (416 dwellings) receiving planning permission.
- 3.11 As expected, the pattern in completions usually shows a one or two year lag behind approvals. Consequently, the level of completions is anticipated to continue to steadily increase and exceed the annualised requirement.
- 3.12 In 2017/18 385 net dwellings were granted planning permission bringing the total supply to 2,019 net dwellings, as at 1st April 2018 within the whole Lewes district.
- 3.13 It is clear that having an up-to-date development plan in place has an important role in transforming allocations into planning applications. It is also essential that the strategy within the Plan is clear and deliverable so that its objectives can be implemented expediently. Therefore, adopting LPP2 and providing continuing support to neighbourhood plans will be key milestones and roles for the Council.
- 3.14 In terms of how permissions are split between the areas inside and outside the SDNP, the majority of dwellings permitted each year are outside the SDNP. The exception to this is the North Street Quarter strategic allocation in Lewes town which was permitted in 2015/16.

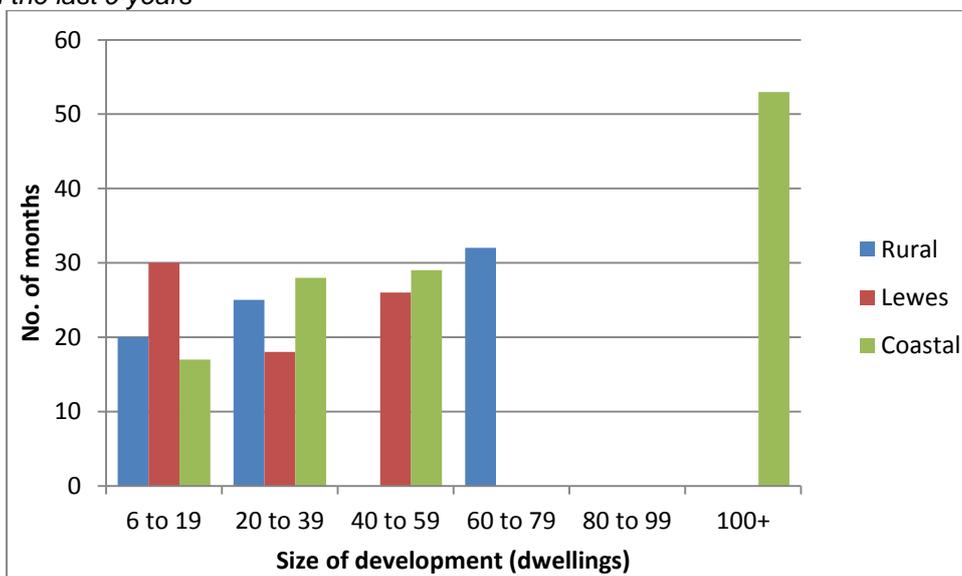
Figure 4: Number of dwellings permitted by site size.



3.15 On average, dwellings permitted outside the SDNP account for 82% of the total with consistent levels of dwellings being permitted on medium sites (between 6 and 49 dwellings). Over the last eight years large and medium sized sites have provided a similar number of permitted dwellings, despite large sites counting for only 2% of approved applications outside the SDNP. Given the comparatively significant contribution of large sites to the housing supply, it is important that potential risks are identified and understood early in the process to facilitate the timely delivery of developments.

3.16 An initial analysis has been undertaken to understand the pattern, if any, between the time it takes for developments to be built out and their location. For this, the district has been divided into thirds: Rural (north of Lewes town); Lewes town; and Coastal (Peacehaven & Telscombe, Newhaven and Seaford). Developments have also been grouped into six sizes.

Figure 5: Average number of months between approval and completion by site size and area in the last 9 years



3.17 The figure above shows that, as expected, larger developments take longer to complete. The exception to this were developments in Lewes in the smallest category which took on average 30 months. The average here is skewed by one site taking almost two and a half years to commence and another, a redevelopment rather than conversion, taking two years to complete. Developments in the coastal area generally take longer to complete. This could be due to a number of reasons, such as: potential contamination; flood risk; weaker housing market; and landowner intentions. Further patterns may emerge as more developments are completed.

Identifying challenges to housing growth

3.18 The Council monitors planning applications throughout the year. The data collected on housing approvals and completions feeds into the Council's Authority Monitoring Report (AMR) and annual five year housing land supply position note. Occasionally, an additional mid-year position update is produced for the purposes of a planning appeal.

3.19 In determining the five year housing land supply position the Council's Planning Policy team carries out an extensive monitoring exercise. This involves speaking to case officers, colleagues in the Council's Building Control team, Legal and Commercial Business teams, planning agents, landowners and developers. These discussions help to establish: the status of planning applications, progress on development sites; anticipated build out rates; and if there have been, or will be, any challenges that might delay delivery.

3.20 Where possible, sites are monitored throughout the planning process; from pre-application and early allocation discussion stages to the development's completion. The information is fed into the Council's housing trajectory, which is monitored as part of the AMR.

3.21 At the plan-making stage the Council has worked closely with proponents of housing allocations to ensure that sites are deliverable and that emerging policy requirements are not a barrier to the timely delivery of future development. This also includes advising neighbourhood plan steering groups in assessing potential housing sites and drafting policy. The Council and proponents of LPP2 housing allocations have sought to highlight and agree the basic principles of proposed allocations through Statements of Common Ground. These have helped secure a degree of certainty for the parties involved until LPP2 is adopted.

3.22 The below table outlines the key areas of work that the Council is involved in and its role in supporting housing delivery within the district.

Table 3:

Current Position and housing delivery mechanisms

Adopted **Local Plan Part 1: Joint Core Strategy** which identifies six strategic allocations delivering 1,729 of the 6,926 net additional dwellings to be built

between 2010 and 2030.

www.lewes-eastbourne.gov.uk/planning-policy/lewes-core-strategy-local-plan-part-1/

Currently at examination on **Local Plan Part 2: Site Allocations and Development Management Policies** which identifies non-strategic allocations helping to deliver the 6,926 net additional dwellings.

'Made' (adopted) 6 **neighbourhood plans** and supporting the production of a further 4 neighbourhood plans across the district to empower the local community to identify how and where housing will be delivered within their area.

www.lewes-eastbourne.gov.uk/planning-policy/neighbourhood-planning/

In July 2018 the Council published an **Affordable Housing Supplementary Planning Document** to provide detailed advice to stakeholders on how the Council's affordable housing policy should be implemented. It is intended to provide clarity on what is expected from developments and should be used to inform proposals at its early stages; this will help to avoid unnecessary delays.

Established a **Self-build and Custom Housebuilding Register** to record the interest of people wanting to build their own home within the areas of the district outside the SDNP.

www.lewes-eastbourne.gov.uk/planning-policy/self-build-and-custom-housebuilding-register/

The Council maintains a **Brownfield Land Register** containing sites that are appropriate for residential development. The Register is updated on an annual basis. Future updates will ascertain if any sites should be granted 'permission in principle'.

Committed to a **review of the Local Plan Review** from 2020 in line with Government policy.

Updating the **Strategic Housing and Employment Land Availability Assessment (SHELAA)** to identify further potentially suitable housing sites to be considered for development in future Local Plan review and neighbourhoods plans, as well as inclusion in Brownfield Land Register.

In June 2017 Lewes District and Eastbourne Borough Councils set up the development arm of the Council; **Aspiration Homes**. Together with **Lewes Housing Investment Company Ltd** approximately 30 dwellings have been granted planning permission/ built in the last two years, with approximately a further 130 dwellings in the pipeline.

Working with the Local Enterprise Partnerships (LEPs) the Council successfully established the **Newhaven Enterprise Zone**. Newhaven is recognised by the LEP as a key growth hub and opportunity area. The NEZ is a 25 year programme that aims to unlock key development sites, helping to delivery sustainable communities and regenerate the town.

The Council has worked with **funding providers**, such as Homes England, and partners to identify and bid for financial support to unlock and support, either directly or indirectly, housing within the district. For example, £10million of HIF monies have been secured towards the North Street Quarter development.

As a founding member of the **Greater Brighton City Region** the Council has worked with the One Public Estate programme to raise the profile of stalled and/ or important sites which may benefit from outside assistance, either on a financial or

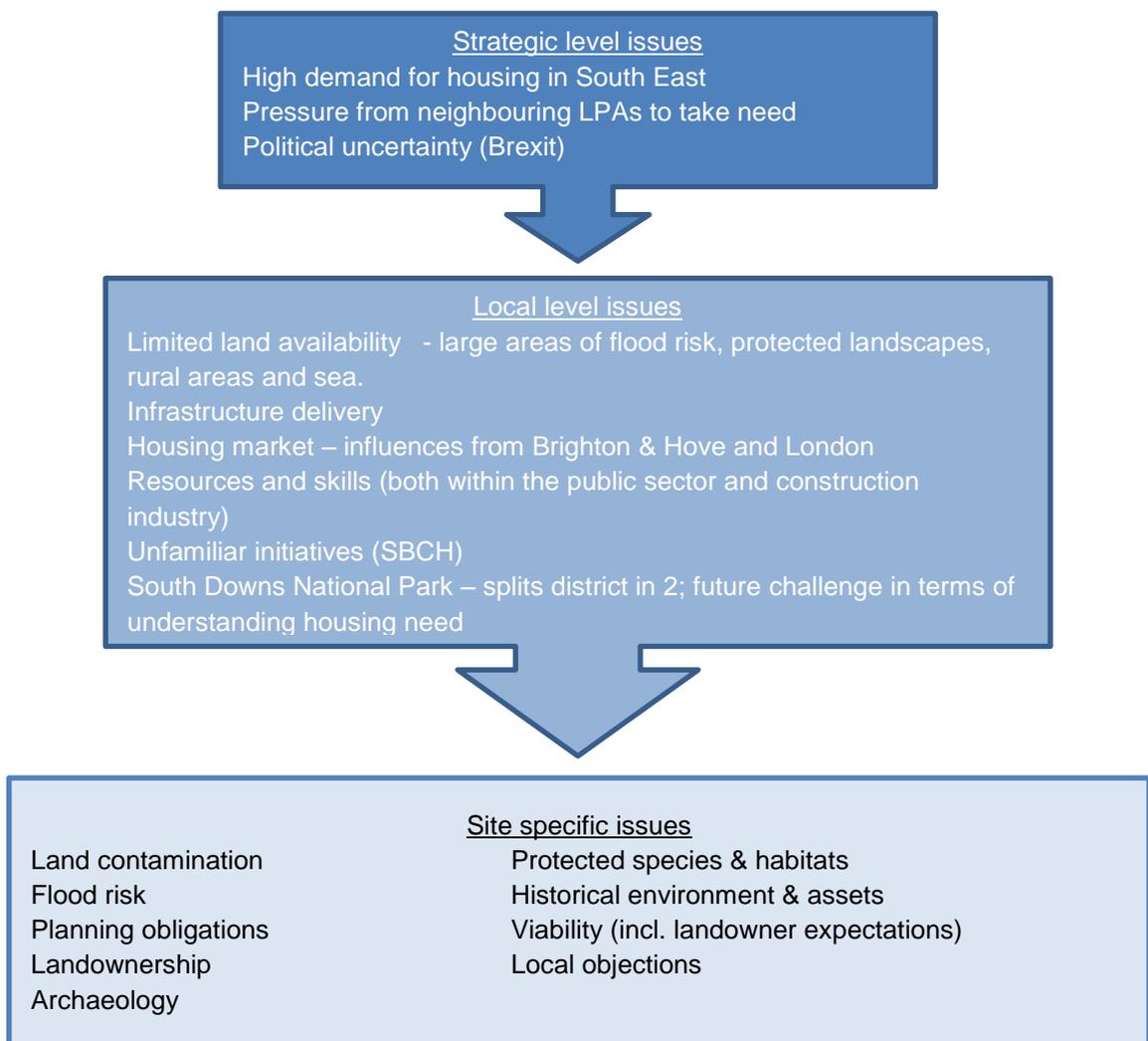
advisory basis.

Departments across the Council, including Planning, have recently undertaken **induction and training sessions** for new and existing Councillors. A specific session focussed on the 5 year housing land supply and Housing Delivery Test. The aim was to help Councillors understand Government requirements and the Council's role in, and the significance of, maintaining a sufficient supply of housing land and implications for decision-taking.

The **Planning Service User Group** is formed of local planning agents, Development Management and Planning Policy officers and Councillor representatives. It meets quarterly to discuss key areas of planning from both a customer and service provider perspective. It is also a useful forum for providing updates and training on specific matters.

3.23 The below figure highlights the different layers of challenges to housing delivery.

Figure 4



3. ACTIONS

- 3.1 This section highlights what mechanisms the Council already has in place to support and increase housing delivery, as well as what actions are required to continue this work. The Action Plan aims to identify where there may be opportunities to strengthen and/ or improve across the Council.
- 3.2 The table below outlines the actions to be taken by the Planning Policy, with input from other teams within the Council where relevant. Each action is given a timescale within which the action should be progressed.

Table 4: Actions and timescales

	Action to be taken	Timescale
Local Plan Part 1: Joint Core Strategy	Continue to monitor and analyse policy performance and delivery against LPP1 Monitoring Framework and publish results in annual Authority Monitoring Report.	Short
	Embark on Local Plan Review to ensure the Plan is up-to-date and the Council is planning for the appropriate level of housing growth.	Medium
	Continue to participate in PAS pilot	Ongoing
Local Plan Part 2: Site Allocations and Development Management Policies	Adoption of LPP2 (anticipated Autumn 2019)	Short
Neighbourhood Plans	Support emerging NPs to adoption: <i>Newhaven (November 2019)</i> <i>Seaford (January 2020)</i>	Short
	Support reviews of 'made' NPs	Medium
Planning applications	Continue to monitor weekly planning lists to identify proposals that need early Planning Policy input.	Ongoing
Brownfield Land Register	Continue to update Register on an annual basis.	Short
	Review Part 1 of the Register to establish if there are any suitable sites to grant 'permission in principle'.	Medium
Self-build and Custom Housebuilding Register	Undertake review of registered interested parties to ensure still actively seeking SBCH style plot.	Medium
	Identify alternatives to the private sector to help deliver suitable plots.	Medium
Aspiration Homes & Lewes Housing Investment Ltd	Review portfolio of sites and explore opportunities for the Council to feed into and deliver housing through the Brownfield Land Register and SBCH Register	Ongoing
	Planning and Commercial Business teams to engage at early stages of development projects to better understand potential challenges and	Ongoing

	reduce risk of delay at planning application stage.	
Funding providers	Explore appropriate funding opportunities to help unlock sites with help from Regeneration and Economic Development Team.	Medium
Rural exceptions sites	Contact Parish Councils to ascertain interest for delivering rural exceptions sites in area.	Short
Strategic Housing and Employment Land Availability Assessment	Review 'call-for-sites' form to ensure it is up-to-date.	Short
	Contact proponents of existing registered sites to confirm availability.	Medium
	Undertake update for Local Plan Review	Medium
Engage with developers	Attendance at Developers East Sussex forum and discuss constraints to housing delivery with developers	Ongoing
	Continue involvement with Team East Sussex and representation in SELEP Board	Ongoing
Planning Service User Group (PSUG)	Engage with the Group to understand potential issues as experienced by customers of the planning service, but also as agents working within the local development market.	Medium
	Continue with quarterly meetings to gather feedback on service performance and opportunities for improvement.	Ongoing
<i>Short: 0-6 months; Medium: next 2 years; next 5 years.</i>		

4. MONITORING

Next Steps

- 4.1 The Action Plan will be monitored on a regular basis alongside the Council's Authority Monitoring Report. The effectiveness of the actions will be reviewed and, where necessary, revised or new actions introduced.
- 4.2 As highlighted in paragraphs 2.3 and 2.4, this Action Plan is likely to have a shorter lifespan than subsequent action plans; therefore feedback may be limited within this year's AMR.
- 4.3 Feedback and progress on the outcomes of the actions contained within this plan will be outlined in the 2019 Action Plan.