

Lewes District Council Housing Delivery Test Action Plan

June 2025



Lewes District Council

LEWES DISTRICT COUNCIL

HOUSING DELIVERY TEST ACTION PLAN

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1. Introduction

- 1.1 Local planning authorities (LPAs) have a longstanding role in planning for and demonstrating a sufficient supply of housing as required by the National Planning Policy Framework (NPPF) December 2024 (Paragraph 72).
- 1.2 The strategic housing policies which are set out in Local Plan Part 1: Joint Core Strategy (LPP1) are more than five years old and therefore the district's need is calculated using the standard method set out in national planning guidance. The Housing Delivery Test (HDT) measurements, measuring the number of homes delivered against the housing need, for 2023 were published in December 2024¹, The HDT score for the district is 89% against the 2023 HDT.
- 1.3 The Council has prepared this HDT Action Plan to provide an overview of housing delivery in Lewes District and to identify actions to assist in increasing delivery.² The Action Plan covers the area of the district for which the Council is the local planning authority and includes an analysis of recent housing delivery and potential barriers to delivery. The action plan also identifies actions which would support and increase housing delivery going forward. The actions identified in this document aim to obtain a micro understanding of local issues and help stimulate housing delivery.

2. Why a HDT Action Plan is being prepared

- 2.1 The HDT is one of the Government's initiatives to boost housing delivery across the country. The government is seeking to encourage LPAs to have a more proactive role in supporting the delivery of housing, as well as focussing a greater level of accountability for under-delivery against the identified housing need.
- 2.2 The consequences of failing the HDT test are set out in the NPPF and these will apply until delivery has recovered as demonstrated through subsequent HDT results. [NPPF Paragraph 79](#) states that, where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under delivery and identify actions to increase delivery in future years.

¹ <https://www.gov.uk/government/collections/housing-delivery-test>

² Previously, Action Plans were published in 2019 and 2020. These can be accessed via the Council's website

- 2.3 Delivering housing growth in the district is complex. Whilst some actions identified are within the remit of the Council, such as the production of the new local plan and the timely determination of planning applications, to increase the delivery of new homes, the council will also require the support and co-operation of those involved in delivering the homes, including landowners, developers and infrastructure providers.

3. Measuring the HDT

- 3.1 The method for calculating the HDT are set out within the [Housing Delivery Test Rule Book](#) and [Planning Practice Guidance](#). The data used to assess delivery are Ministry of Housing, Communities and Local Government (MHCLG) statistics for the total net housing completions in a local planning authority (LPA) area over a rolling three-year period. This includes student accommodation and other communal accommodation, using a ratio to adjust for occupancy. The calculation compares the number of new homes delivered over the previous three years with the authority's housing requirement.
- 3.2 The test results are usually published in November/December annually and use financial years.

4. Local Context

- 4.1 Over half of Lewes District is within the South Downs National Park which runs through the centre of the district separating the coastal towns of Seaford, Newhaven and Peacehaven from the countryside and villages of the Low Weald in the north of the district. As such there are two local planning authorities covering the geographic area of Lewes District, Lewes District Council (LDC) and the South Downs National Park Authority (SDNPA).
- 4.2 The HDT result does not apply to National Park Authorities. The HDT Technical Note³ sets out that where a LPA's boundary overlaps with a National Park, and it has a local plan which contains a district specific housing requirement which excludes the national park, the HDT would be measured against the delivery within the plan area against the plan requirement (therefore excluding the housing delivery within the National Park). However, where the local plan is out of date and therefore the housing delivery is being tested against the local housing need as calculated by the standard method as set out in national planning policy, the HDT test would measure delivery in the whole district against the local housing need (which is also calculated at a

³ <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement/housing-delivery-test-2023-measurement-technical-note>

district level). Figures within the Action Plan relate to the whole of Lewes district rather than just the LDC local plan area.

- 4.3 The SDNPA adopted the South Downs Local Plan in 2019. The local plan sets out how the SDNPA will manage development within the National Park based on the statutory purposes and duty for national parks.
- 4.4 Local Plan Part 1: Joint Core Strategy (LPP1) is the district's strategic development plan, adopted by the Council on 16th May 2016. Spatial Policy 2 (*Distribution of Housing*) of LPP1 sets out the housing requirement for the district.
- 4.5 Following adoption of LPP1, the housing requirement figure was disaggregated between the areas inside and outside of the SDNP. This firstly recognised that Spatial Policy 1 (*Provision of Housing and Employment Land*) and SP2 were quashed, so far as they relate to the SDNP. Secondly, the Local Plan Part 2: Site Allocations and Development Management Policies (LPP2) only plans for the area of the district outside the SDNP. As above, the SDNPA adopted a park-wide Local Plan in 2019.
- 4.6 As a result, the disaggregated housing requirement figure for Lewes district, outside the SDNP, was a minimum 5,494 net additional dwellings (equivalent to 274.7dpa)⁴. A Statement of Common Ground⁵ between LDC and the SDNPA which outlined and agreed the housing requirement position was signed by both parties in 2018.
- 4.7 In May 2021 LPP1 reached its fifth anniversary of adoption, and as required by the NPPF was reviewed. This review found that the local plan could no longer be considered up to date in light of the Standard Method (SM). Introduced through changes to the NPPF in 2018, the SM requires local planning authorities to calculate their housing need using the SM provided by the government. Work commenced on preparing a new Local Plan immediately on conclusion of the review.
- 4.8 Given the HDT test does not apply to the South Downs National Park⁶ the main consideration for this action plan and the outputs relate to the areas of the district for which the Council is the local planning authority ie outside the SDNP.

⁴ The district wide housing requirement figure identified within LPP1 was a minimum of 6,900 net additional dwellings.

⁵ [Duty to Cooperate Statement](#), incorporating Statement of Common Ground

⁶ Paragraph 3, [Housing Delivery Test Measurement Rule Book](#) 2024.

5. Links with other key council plans and strategies

- 5.1 The importance of delivering housing in the district is not limited to the council's planning function. Other council service areas recognise the local need for housing, the challenges that exist to delivering it and housing's key role in achieving overall sustainable communities. As such, the Council has a collective role and responsibility to proactively address the identified housing need. **Error! Reference source not found.**¹ outlines the existing plans and strategies that the action plan seeks to complement.

Table 1: Relationship between housing delivery and key Council plans/ strategies

Document	Description
Local Plan Part 1: Joint Core Strategy 2010-2030 (2016)	<p>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.</p> <p>The Action Plan supports the Council in achieving the Local Plan's vision and strategic objectives.</p>
Local Plan Part 2: Site Allocations and Development Management Policies (2020)	<p>Identifies allocations to deliver LPP1, including housing 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>
'Made' Neighbourhood Plans* : Chailey (2021) Hamsey (2016) Newhaven (2019) Newick (2015) Plumpton (2018) Ringmer (2016) Seaford (2020) Wivelsfield (2016)	<p>Identify allocations and policies to deliver and support growth, including housing, in the respective neighbourhood plan areas⁷.</p> <p>The Action Plan supports the delivery of housing allocations and aspirations of the local community.</p>
Affordable Housing Supplementary	Sets out detailed guidance on how to implement and achieve the aims of Core Policy 1 (<i>Affordable Housing</i>)

⁷ Hamsey NP and Chailey NP do not identify housing allocations.

<u>Planning Document (2018).</u>	<p>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>
<u>Re-imagining Lewes District Corporate Plan 2024-2028 (2024)</u>	<p>Identifies that access to housing that local people can afford is fundamental to supporting wellbeing and enabling our communities to thrive.</p> <p>The Action Plan supports the delivery of a range of development types to help ensure a suitable choice of homes is offered.</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>
<u>Homelessness and Rough Sleeping Strategy (2022-2027)</u>	<p>Sets out strategic objectives and frameworks focused on preventing homelessness, intervening effectively when it occurs and putting in place sustainable solutions to support re-housing options.</p> <p>The Action Plan seeks to identify opportunities to increase housing delivery, including supporting the delivery of affordable housing through a range of mechanisms.</p>
<p>Pride of Place: A Sustainable Community Strategy (2008-2026)</p> <p><i>Joint strategy produced by the six Local</i></p>	<p>Sets out a long term vision for improving people's quality of life and creating sustainable communities.</p> <p>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.</p>

6. Housing Delivery Test

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

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

- 6.2 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-taking.
- 6.3 The 2023 HDT results were published on the 12 December 2024. The PPG states that an LPA needs to publish an action plan within six months from publication of the HDT results, where delivery is below 95% but higher than 85%.
- 6.4 LDC has prepared this Housing Delivery Test Action Plan to provide an overview of housing delivery in the district. 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 to help stimulate housing delivery.
- 6.5 Table 2 below sets out the 2023 HDT figures for Lewes District.

Number of homes required				Number of homes delivered				HDT: 2023 measurement
2020-21	2021-22	2022-23	TOTAL	2020-21	2021-22	2022-23	TOTAL	
183	373	783	1,339	224	337	613	1194	89%

Table 2: 2023 Housing Delivery Test for Lewes

- 6.6 The number of homes required is different for each of the three years. For the year 2020/2021 the local plan was 'in date' and therefore the delivery was tested against the LPP1 housing requirement for the district outside the SDNP. The HDT Measurement Technical note also confirmed that, due to the unprecedented national lockdown from March 2020, the requirement in year 2020/21 was adjusted to reflect the temporary disruption to local authority planning services and the construction sector. The 'homes required' for the 2020/21 year was reduced by four months. For the year 2021/2022 LPP1 was still in date for two months. For the year 2022-2023 when LPP1 was out of date the district was tested against the local housing need as calculated by the standard method.
- 6.7 As set out in paragraph 4.2, for the years 2020/2021 and until LPP1 was considered out of date in year 2021/2022 the number of homes delivered excluded delivery within the SDNP. The year 2022/2023 delivery includes total delivery across the district because the housing delivery is being tested against the local housing need as calculated by the standard method which is calculated at a district level.
- 6.8 The above figures in Table 2 give an HDT result of 89%. As it falls below the prescribed 95% threshold the Council is required to prepare an action plan.

7. Housing Delivery Analysis

- 7.1 This section looks at the district's past housing delivery performance and explores the challenges facing key stakeholders in bringing forward residential developments in the district.
- 7.2 The Council monitors planning applications throughout the year, yearly completions monitoring takes place in April and consists of engaging with developers and, where necessary, site visits to development sites to understand delivery rates and completion targets. The data collected on housing approvals and completions feeds into the Council's Authority Monitoring Report (AMR)⁸ which is published annually.
- 7.3 This section also looks at, the extent to which permissions for development are granted, and the average timescales for housing development to commence and complete.

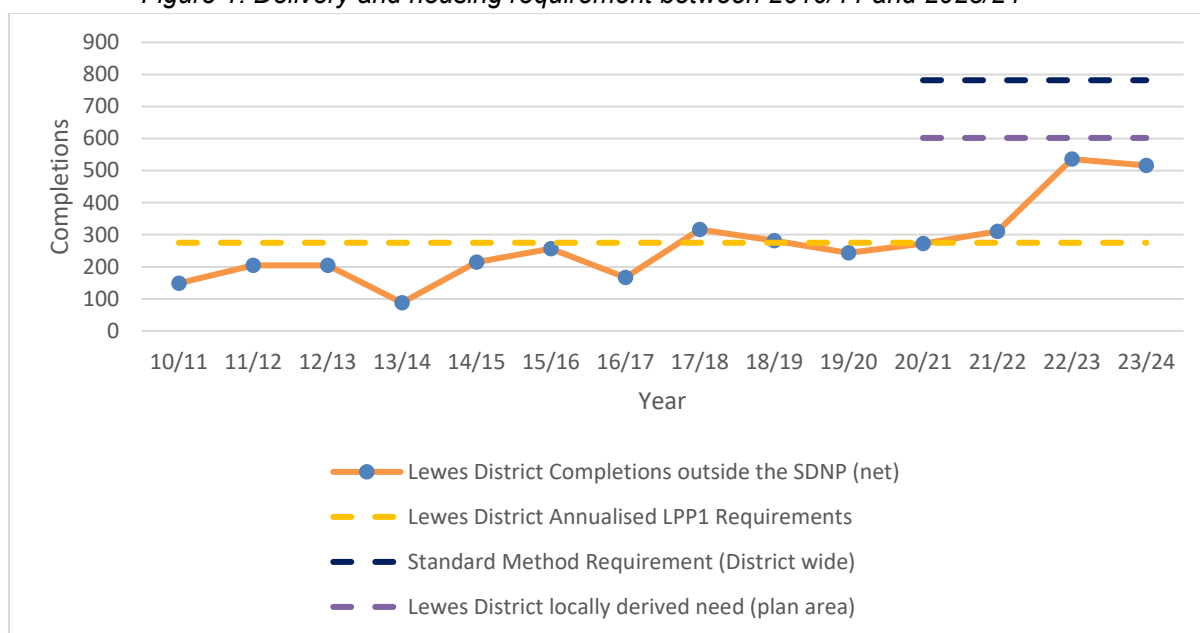
Housing Completions

- 7.4 Below are a series of graphs showing housing delivery against relevant Local Plan housing requirement figures.

⁸ <https://www.lewes-eastbourne.gov.uk/article/1660/Authority-Monitoring-Report>

- 7.5 Figure 1 compares the number of homes built in the district between 2010 and 2024 against the respective requirement figures.

Figure 1: Delivery and housing requirement between 2010/11 and 2023/24

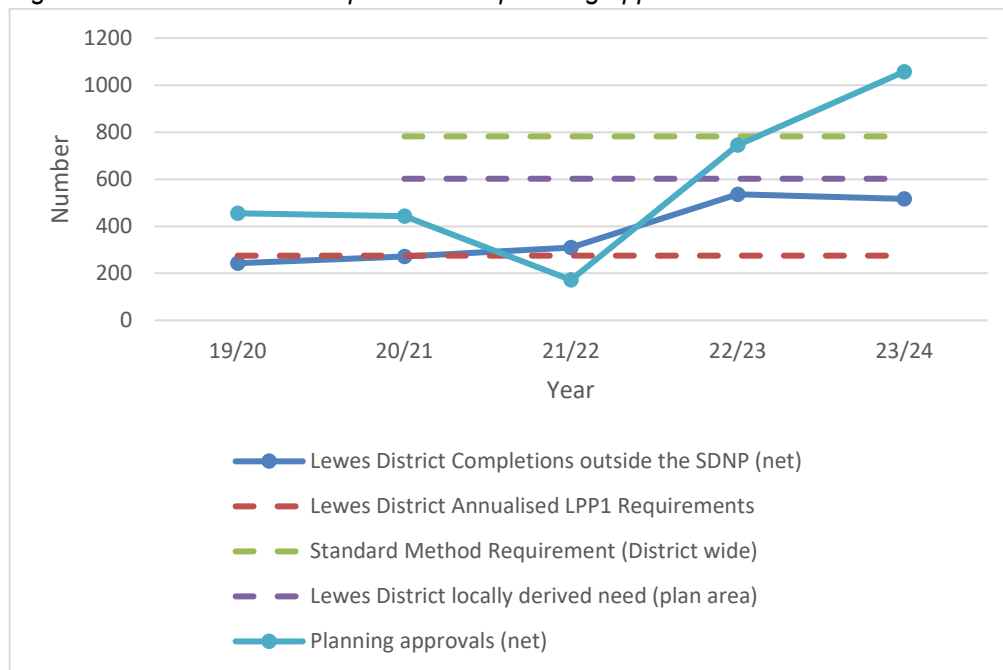


- 7.6 Whilst the number of housing completions naturally fluctuates year on year there has been a general upward trend since LPP1 was adopted, with recent years showing the highest levels of delivery since the beginning of the LPP1 plan period.

Planning approvals

- 7.7 The Council has shown a strong and consistent rate of planning approvals. This has been supported by the preparation and adoption of LPP1 and LPP2 which have given landowners/ developers of strategic allocations the certainty and confidence to bring sites forward. In response, the number of completions has been steadily increasing since the adoption of LPP1 .
- 7.8 As can be seen from the below graph, the number of dwellings approved in the previous two years has significantly increased since 2021/2022 This could be due to the local plan being considered out of date, and therefore the presumption in favour of sustainable development being implemented in decision making. The lower level of approvals in the year 2021/2022 year could be due to the industry slowdown in the Covid-19 pandemic.

Figure 4: Number of net completions and planning approvals



- 7.9 In 2023/2024, 1054 dwellings were granted planning permission, 373 of which were on allocated sites, including Newhaven Marina NH02 LPP2 (337 dwellings). This high level of approvals also includes a large student accommodation block (388 dwellings).
- 7.10 In 2022/2023 745 dwellings were granted planning permission of which 299 dwellings were on allocated sites (LPP1, LPP2).
- 7.11 It should be noted however that of the unallocated sites granted planning permission in 2022/2023 and 2023/2024, 299 and 145 dwellings respectively, were on sites granted outline planning permissions. Which may take longer to see completions on site as they require further reserved matters permission.
- 7.12 A review of the remaining allocations from LPP1 and LPP2 has taken place as part of the 2024 Land Availability Assessment⁹. Three site allocations, together with a capacity of 420 dwellings from LPP1 and LPP2 have not, to date, been granted planning permission (see table 3 below). There are also 22 allocations (373 dwellings) from Neighbourhood Plans which have not yet been granted planning permission. The LAA review of these sites seeks to understand why they have not yet come forward for development.

⁹ <https://www.lewes-eastbourne.gov.uk/article/1934/Land-Availability-Assessment>

Table 3: LPP1 and LPP2 site allocations without planning permission

Policy Reference and Site Name	Delivery Projection
LPP1 SP7 Land at Harbour Heights	The site is allocated for a mixed use development including employment units and up to 400 dwellings in LPP1. An application for outline consent (all matters reserved) for the development of 400 dwellings and approximately 1,500sqm of commercial floorspace was submitted in June 2023 (LW/23/0380). It was resolved to grant planning permission subject to the completion of the S106 agreement at Planning Committee in December 2024.
LPP2 BA01 Hillside Nurseries, Barcombe	The site is allocated for 10 dwellings in LPP2. A planning application was withdrawn (Ref: LW/20/0288) with indication that the site is not viable for residential development and will be reserved for the enjoyment of Hillside House.
LPP3 CH03 Land Adjacent Mill Lane, Chailey	The site is allocated for 10 dwellings in LPP2. No planning applications have been submitted.

Permission to Commencement and Commencement to Completion

- 7.13 Some analysis of lead in time for completions on sites granted planning permission has been undertaken for the period since 2010. This shows that on average sites of between 50-99 dwellings have taken an average of 2-3 years to see completions on site. Thereafter the average number of delivery years is 2-3 years with an average annual delivery of around 25 dwellings. On larger sites of 100+ units the average lead in time is around 2 years and on average these sites take over 3 years to complete with an average delivery of just below 50 dwellings a year.
- 7.14 However, it should be noted that as there are a limited number of larger sites in this period which have been built out in the district therefore the analysis of larger sites should be treated with a degree of caution.

8. Five Year Housing Land Supply

- 8.1 Paragraph 78 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. 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, 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.

- 8.2 In calculating the Council's five year housing land supply, a 5% buffer is currently included, in line with NPPF paragraph 78. As at September 2023 Lewes district's five year housing land supply is 2.73 years outside the SDNP.

9. Planning Performance

- 9.1 This section investigates the performance of the Council's planning service in order to identify any issues in performance that may be influencing housing delivery in Lewes.

Designation

- 9.2 Government have set national performance criteria on speed and quality of planning decisions against which all Councils are measured. Persistent failure to perform against the targets runs the risk of the Council being designated as 'non-performing', special measures could follow and would be initiated by Central Government. Where an authority is designated, applicants may apply directly to the Planning Inspectorate (on behalf of the Secretary of State) for the category of applications for which the authority has been designated.
- 9.3 The assessment of designation is based on the Council's performance over a specified period. The targets for speed are 60% of 'major' applications to be determined within 13 weeks and for 70% of non 'major' applications to be determined within 8 weeks, assessed over a 12 month period. The targets for quality of decision making, both for 'major' and 'non-major' application is not more than 10% of decisions being overturned (allowed) at appeal.
- 9.4 In the 12 months to the end of December 2024¹⁰ the Council determined 92% of major development decisions and 73% of non-major (inc Other) development decisions within these set timescales or by extension. Therefore, the Council has exceeded the performance criteria for speed.
- 9.5 Over the period April 2021 to March 2023 of the 40 major applications determined by the Council, there were 13 (32%) successful appeals and subsequently Lewes District (planning authority) was designated in respect of

¹⁰ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>
(Live tables 151, 153, P152a and P154)

planning applications for major developments in May 2024. Of the total major decisions (41), to March 2024, 15 were allowed on appeal (36%).

Development Management

- 9.6 Table 3 identifies the volume of planning applications determined over recent years. It shows a consistent level of decisions made over the period. A peak around 2022 could coincide with the Local Plan being considered out of date and the presumption in favour of sustainable development which saw a rise in the number of speculative planning applications.

Table 4 - Decisions made on planning applications

Decisions	2020	2021	2022	2023	2024
All Decisions	587	690	717	564	517
Refused	63 (11%)	81 (12%)	77 (11%)	72 (13%)	59 (11%)

- 9.7 Decisions remain relatively consistent with planning permission granted for around 90% of all applications received showing that the planning services of Lewes District Council have supported the development industry and helped to meet the aspirations of the applicants.
- 9.8 In March 2020 in anticipation of the local plan review an interim policy statement for housing delivery was published¹¹. The statement was produced as a positive and pro-active way forward if the Council were unable to demonstrate a five year supply of deliverable housing sites after 11 May 2021 when LPP1 was to reach its 5 year anniversary of adoption. The interim statement applied to planning applications for the provision of housing on sites located outside of planning boundary (as defined on the Local Plan Policies Map). Its purpose is to facilitate the delivery of new housing by providing a clear and consistent approach to the assessment of development proposals and to ensure that new housing is delivered in the right places and at an appropriate scale to help meet the needs of the plan area in the short term until the adoption of a new local plan.
- 9.9 In addition to the formal applications received, the Council offers a paid for pre application advice service. **Error! Reference source not found.**⁵ indicates the numbers of pre-application enquiries received by the Council over recent years.

Table 5 - number of pre-application enquiries received

¹¹ https://www.lewes-eastbourne.gov.uk/media/2498/Interim-Policy-Statement-for-Housing-Delivery-Appendix-1/pdf/Interim_Policy_Statement_for_Housing_Delivery_-_Appendix_1.pdf?m=1684774473163

Pre-Application Advice	2020	2021	2022	2023	2024
TOTAL	91	44	86	123	108

Planning Policy

- 9.10 The Lewes Local Plan Part 1 was adopted in May 2016, which meant that its 5-year anniversary was in 2021. A review of LPP1 in 2021 determined that the Core Strategy cannot be considered to be up to date. Therefore work commenced on a new local plan for the district outside the SDNP in 2021. The status of the Local Plan and progress against the LDS is monitored on an annual basis through the Authority Monitoring Report (AMR).
- 9.11 The LDS 2025-2028 was adopted in March 2025. It identifies a timetable for the production of a new Local Plan for Lewes District outside the SDNP, covering the period 2020-2042, which will contain both strategic and non-strategic policies that will, once adopted, superseded all current planning policies for the district outside the SDNP.
- 9.12 Three Regulation 18 consultations on the new local plan have been completed to date;
- [Issues and Options Consultation 09/07/2021-03/09/2021](#)¹²
 - [Towards a Lewes Local Plan: Spatial Strategy and Policy Directions](#)¹³
 - [Defining our policies and early site allocation proposals](#)¹⁴
- 9.13 A Land Availability Assessment (LAA) was published alongside the latest consultation in January 2025, showing a potential housing capacity of just over 8000 dwellings over the plan period. A further updated version of the LAA is expected to be published by the end of the year.
- 9.14 In December 2024, the Council published an update to the Brownfield Land Register¹⁵, as required by legislation. The purpose of the Brownfield Land Register is to provide up-to-date, publicly available information on brownfield land (previously developed sites) that are suitable for housing. The intention is that it will provide certainty to developers and communities, encourage investment in local areas, and bring forward derelict and underused land for new homes.

¹² https://planningpolicyconsult.lewes-eastbourne.gov.uk/LDLP_IO/consultationHome

¹³ https://planningpolicyconsult.lewes-eastbourne.gov.uk/LDC_PO_2023/consultationHome

¹⁴ https://planningpolicyconsult.lewes-eastbourne.gov.uk/LP_DefiningPolicies25/consultationHome

¹⁵ <https://www.lewes-eastbourne.gov.uk/article/1661/Brownfield-Land-Register>

- 9.15 The 2024 Brownfield Land Register contains 60 sites that meet the criteria for inclusion. The 60 sites have sufficient capacity to accommodate 1,666 new dwelling units. Of these 60 sites, 36 sites have already been granted planning permission (60% of the total sites), equating to 1211 units (73% of the total units).

10. Council Plans and Initiatives

- 10.1 The below Table 6 outlines the key areas of work that the Council is involved in and its role in supporting housing delivery within the district.

Table 6: Current mechanisms to support housing delivery

Current Position and housing delivery mechanisms
<p>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.</p> <p>www.lewes-eastbourne.gov.uk/planning-policy/lewes-core-strategy-local-plan-part-1/</p>
<p>Adopted Local Plan Part 2: Site Allocations and Development Management Policies in February 2020. LPP2 identifies non-strategic allocations helping to deliver the 6,926 net additional dwellings.</p> <p>https://www.lewes-eastbourne.gov.uk/Lewes-District-Local-Plan-Part-2-Site-allocations-and-development-management-policies</p>
<p>'Made' (adopted) 10 neighbourhood plans and supporting the production of further neighbourhood plans across the district to empower the local community to identify how and where housing will be delivered within their area.</p> <p>www.lewes-eastbourne.gov.uk/planning-policy/neighbourhood-planning/</p>
<p>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.</p> <p>www.lewes-eastbourne.gov.uk/planning-policy/self-build-and-custom-housebuilding-register/</p>
<p>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'.</p> <p>https://www.lewes-eastbourne.gov.uk/article/1661/Brownfield-Land-Register</p>
<p>Committed to the development of a new Local Plan for the district (outside the SDNP).</p> <p>https://www.lewes-eastbourne.gov.uk/local-development-scheme</p>

Updating the **Land Availability Assessment (LAA)** 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.

<https://www.lewes-eastbourne.gov.uk/Land-Availability-Assessment>

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** to provide housing including affordable housing.

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 deliver 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.

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.

The **Affordable Housing Working Group** is a group of Council Officers who meet regularly to develop operating arrangements and a policy framework to maximise delivery of affordable homes in Lewes District.

11. Actions

- 11.1 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 areas where there may be opportunities to strengthen and/ or improve actions across the Council.
- 11.2 As shown above, the delivery of housing in the district has consistently met or exceeded the housing requirements set out in the adopted local plan. Following the fifth anniversary of the adoption of the local plan and the housing need figure for the district increasing significantly under the standard method, the council have been unable to identify a five year supply of deliverable housing. The latest Land Availability Assessment indicates that Lewes District will not be able to meet the need identified by the standard method. But until such time as a realistic requirement for housing is set through the adoption of the new local plan, delivery in the district is likely to remain below the standard method identified housing need.

11.3 However, the Council has identified the following actions that it can take to increase housing delivery in the district.

Implementation of Interim Policy Statement for Housing

11.4 As set out in section 9 above this statement was published in March 2020 as a positive and pro-active way forward to facilitate the delivery of new housing by providing a clear and consistent approach to the assessment of development proposals and to ensure that new housing is delivered in the right places and at an appropriate scale to help meet the needs of the plan area in the short term until a new local plan was adopted.

11.5 The statement has been taken into consideration in determining planning applications. A number of applications (meeting the document's criteria) have been granted planning permission on sites which were not identified/allocated through LPP1 or LPP2.

Review of development management decisions

11.6 Following the designation of Lewes District Council in May 2024 as set out in section 9 above, a review of the decision making of the authority has taken place. Reviews of the decisions overturned have taken place and planning committee members have undertaken further training in relation to decision making.

Improvements to the Planning Service

11.7 Planning Service Users Group (PSUG) is a meeting between service users and Senior Planning Staff to provide regular updates and to understand any issues with the planning system. Feedback from the group is regularly used to improve the planning service offering.

11.8 The council's legal and Development Management officers are undertaking a programme of training for Members particularly in ensuring that decisions at planning application committee are made on justified grounds in an effort to ensure that any potential appeals are minimised.

Preparing a new local plan

11.9 The Council is preparing a new Local Plan for Lewes District outside the SDNP covering the period to 2042. The new Local Plan will contain both strategic and non-strategic policies, and will allocate sites for housing development to provide greater levels of certainty for developers and to secure the housing land supply.

Our recently updated LDS anticipates the submission of the new local plan by December 2026.

- 11.10 Part of the development of the local plan will be reaching consensus through the examination, of the housing need for the district outside the national park. This will be critical to ensure that housing need is accommodated in a way that reflects the sensitivity of the district's landscape particularly around National Landscapes.
- 11.11 The new local plan will seek to support Community Land Trusts to deliver homes, specifically in villages or rural areas, to support the delivery of affordable housing.
- 11.12 The new local plan is also looking through the Land Availability Assessment, at small sites and the contribution these can make to housing delivery; and policies will also be seeking to better support the delivery of self build and custom house building to boost supply of new homes.

Direct Provision of new homes by the Council

- 11.13 The Council will deliver new affordable and market homes through its local authority company Aspiration Homes LLP, which is a joint venture with Eastbourne Borough Council.
- 11.14 Homes have already been delivered and there are a number that are currently in the pipeline or under construction. The Council also continues to work with developers in helping to bring forward the affordable housing elements of their schemes, and where necessary directly investing in affordable housing to help delivery of the whole site.

Updating the Land Availability Assessment

- 11.15 The Council has taken a proactive approach to identifying and assessing potential development sites through the LAA, including undertaking regular 'calls for sites' and maintaining regular contact with site proponents to understand site availabilities and barriers to delivery.
- 11.16 The LAA is being updated with a review of existing allocations, and will continue to be updated on an annual basis. The 'call for sites' will remain open throughout the period of the local plan's preparation.

Updating the Brownfield Land Register

11.17 The Council updates the Brownfield Land Register on an annual basis and ensures that the list of sites and site plans are made publicly available. The Council will also review Part 1 of the Brownfield Land Register to establish if there are any suitable sites for Part 2 of the register that will grant 'permission in principle'.

Maintaining Self-Build and Custom Housebuilding Register

11.18 The Council continues to maintain a Self-Build and Custom Housebuilding Register on its website. The Local Plan will also support self-build and custom housebuilding through new policies.

Investigating funding opportunities

11.19 The Council will explore appropriate funding opportunities to help unlock sites, both to increase delivery and to speed it up.

Actions and Timescales

11.20 Table 7 below outlines the actions to be taken by the Council. Each action is given a timescale within which the action should be progressed.

Table 7: Actions and timescales¹⁶

	Action to be taken	Timescale
Local Plan Part 1: Joint Core Strategy and Local Plan Part 2: Site Allocations and Development Management Policies	Continue to monitor and analyse policy performance and delivery against LPP1 and LPP2 Monitoring Framework and publish results in annual Authority Monitoring Report. <i>Published the 2024 AMR</i>	Short
Prepare a New Local Plan	Work commenced on preparation of a new Local Plan in 2021.	Medium
Neighbourhood Plans	Continue support for emerging neighbourhood plans: Peacehaven & Telscombe. Support reviews of 'made' NP's	Short Medium
Planning applications	Continue to monitor weekly planning lists to identify proposals that need early Planning Policy input.	Ongoing

¹⁶ Short: 0-6 months; Medium: next 2 years; long: next 5 years.

	Action to be taken	Timescale
Brownfield Land Register	Continue to update Register on an annual basis. <i>2024 BLR updated and published.</i>	Short
	Continue to monitor register against decisions made.	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. Planning and Commercial Business teams to engage at early stages of development projects to better understand potential challenges and reduce risk of delay at planning application stage.	Ongoing
Funding providers	Explore appropriate funding opportunities to help unlock sites with help from Regeneration and Economic Development Team.	Medium
Land Availability Assessment	Undertake regular updates to support the local plan preparation.	Short
Engage with developers	Attendance at Developers East Sussex forum and discuss constraints to housing delivery with developers	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

12. Monitoring

- 12.1 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.

12.2 Feedback and progress on the outcomes of the actions contained within this plan will be outlined in subsequent action plans.