

Affordable Housing Proof of Evidence of James Stacey BA (Hons) DipTP MRTPI

Land South of Green Road, Wivelsfield Green, East
Sussex, RH17 7QL



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Outline Planning Application for the erection of up to 150 dwellings, with associated works, parking, landscaping, publicly accessible open space, land for education or community use, with access from Green Road and Eastern Road

Land South of Green Road, Wivelsfield Green, East Sussex, RH17 7QL

Taylor Wimpey UK Ltd

June 2026

PINS REF: APP/P1425/6005671

LPA REF: LW/24/0820

OUR REF: M26/0216-01.RPT

TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

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- CD12.2 [Written Ministerial Statement: Building the Homes we Need \(2024\)](#)
- CD7.1 [Lewes District Local Plan Part 1: Joint Core Strategy \(2016\)](#)
- CD7.2 [Lewes District Local Plan Part 2: Site Allocations and Development Management Policies \(2020\)](#)
- CD7.3 [Wivelsfield Neighbourhood Plan \(2016\)](#)
- CD7.8 [Five Year Housing Land Supply Annual Position Statement \(May 2023\)](#)
- CD7.6 [Lewes Affordable Housing Supplementary Planning Document \(2018\)](#)
- CD13.8 [Emerging Regulation 18 Local Plan 'Defining our policies and early site allocation proposals' consultation document \(January 2025\)](#)
- CD14.1 [Lewes Council Corporate Plan 2024-2028, 'Re-imagining Lewes District'](#)
- CD14.2 [Lewes District Council Homelessness and Rough Sleeping Strategy 2022-2027](#)
- CD14.3 [Lewes District Local Housing Needs Assessment \(2023\)](#)
- CD10.12 [Appeal decision: Oving Road, Chichester \(August 2017\)](#)
- CD10.13 [Appeal decision: Malmesbury, Wiltshire \(January 2022\)](#)
- CD10.14 [Appeal decision: Sondes Place Farm, Dorking \(November 2023\)](#)
- CD4.2 [LPA Statement of Case](#)
- CD10.15 [Appeal decision: Langton Road, Norton \(September 2018\)](#)
- CD10.16 [Appeal decision: Coombebury Cottage, Dunsfold \(May 2024\)](#)
- CD10.17 [Appeal decision: Hawkhurst, Kent \(March 2022\)](#)
- CD10.1 [Appeal decision: Land to the South of Allington Road, Newick \(April 2026\)](#)

Executive Summary

- i. This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in the planning decision in light of the evidence of need in the Lewes area.
- ii. The proposed development is for up to 150 dwellings, of which 40% (up to 60 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Core Policy 1 (40%) of the adopted Lewes District Local Plan Part 1: Joint Core Strategy (2016).
- iii. The tenure split will be developed and detailed at the later Reserved Matters stage.
- iv. The proposed affordable housing will be secured by way of a Section 106 planning obligation.

Key Findings

Corporate Documents

- v. Corporate documents identify the delivery of affordable housing as a high corporate priority of Lewes. These include the Lewes Council Corporate Plan 2024-2028 and the Lewes District Council Homelessness and Rough Sleeping Strategy 2022-2027.

Affordable Housing Needs

- vi. The 2023 Lewes District Local Housing Needs Assessment currently provides the most up to date assessment of need for affordable housing to rent and affordable housing to buy Lewes District.
- vii. The 2023 LHNA identifies an on-going **total net need for 290 new affordable homes per annum between 2020 and 2040 in Lewes District**. This comprises a need for 125 net affordable rented homes per annum and a need for 165 net affordable homeownership dwellings per annum for the 20-year period from 2020 to 2040.
- viii. This assessment of affordable housing need applies to the part of the district outside of the SDNP based on its share of population and dwellings.

Affordable Housing Delivery

- ix. In the past 15-years since the base date of the Lewes District Local Plan Part 1: Joint Core Strategy (2016) in 2010/11, Lewes District Council has added 1,158 affordable homes to its affordable housing stock. This equates to just 77 gross affordable

dwelling per annum, equivalent to 27% of the total number of net housing completions.

- x. Unfortunately, Right to Buy data excluding the SNDP is not publicly available for the above period. The above figures are likely to decrease if losses to existing stock through the Right to Buy and demolitions were to be accounted for. As such the 77 gross affordable housing completions figure for the period can only be seen as a maximum.
- xi. Irrespective of the differences between gross and net affordable housing delivery, when comparison is drawn between gross affordable housing delivery and the needs identified in the 2023 LHNA, there has been a shortfall in the delivery of affordable housing of some -792 gross affordable homes against an identified need for 1,450 net dwellings between 2020/21 and 2024/25.
- xii. When comparison is drawn between gross affordable housing delivery and the councils corporate affordable housing delivery target averaged on a per annum basis (125 affordable dwellings per annum between 2024 and 2028), in the 2024/25 monitoring period there has already been a shortfall of some -85 affordable homes.

Affordability Indicators

- xiii. The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Lewes for any household seeking an affordable home:

Housing Register

- The Council's Freedom of Information response (**Appendix JS1**) confirms that on 31 March 2025 there were 748 households on the Housing Register. This represents a 17% increase in a single year from 641 households on 31 March 2024 (which itself was a 22% increase from 524 households on 31 March 2023).

Temporary Accommodation

- MHCLG statutory homelessness data highlights that on 31 March 2024, there were 78 households housed in temporary accommodation by the Council, with 53% (41 households) of these households having children.
- Furthermore, MHCLG data indicates that Lewes spent £995,000 on temporary accommodation between 1 April 2024 and 31 March 2025.

Homelessness

- MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 175 households in need of homelessness prevention duty¹, and a further 149 households in need of relief duty² from the Council.

Private Rental Market

- Office for National Statistics (“ONS”) data (first produced in 2014/15) shows that average (mean) private rents in Lewes stood at £1,240 per calendar month (“pcm”) in 2024/25. This represents a 39% increase from 2014/15 where average private rents stood at £893 pcm.

Median House Prices

- The ratio of median house prices to median incomes in Lewes now stands at **9.66**. A ratio of 9.66 in 2025 stands substantially above the national median of 7.63 (+27%) and broadly in line with, although slightly above, the South East median of 9.58 (+1%).
- The median house price across Lewes has risen by 84% from £210,500 in 2010 to £386,498 in 2025. This figure is some 29% higher than the national figure of £300,000, which has seen an increase of 71% over the same period and 1% higher than the South East figure of £384,000 which has seen an increase of 83% over the same period.
- The median house price across MSOA ‘Lewes 002’ has risen by 51% from £350,000 in 2010 to £527,500 in 2025. This figure is 3% higher than the Lewes figure of £386,498, (which has seen an increase of 84% over the period) and 37% higher than the South East figure of £384,000 (which has seen an increase of 83% over the period).

Lower Quartile House Prices

- For those seeking a lower quartile priced property (typically considered to be the ‘more affordable’ segment of the housing market), the ratio of lower quartile house price to incomes in Lewes in 2025 stood at **9.80**. Once again, it remains the case

¹ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

² The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

that the ratio in Lewes stands substantially above the national average of 6.98 (+40%) and notably above the South East average of 9.56 (+3%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

- The lower quartile house price across Lewes has risen by 80% from £167,000 in 2010 to £300,000 in 2025. This compares to an 80% increase across the South East and a national increase of 62% over the same period.
- In 2025 lower quartile house prices in Lewes (£300,000) were 5% higher than across the South East (£284,838) and 49% higher than the national figure (£202,000).
- The lower quartile house price across MSOA 'Lewes 002' has risen by 56% from £270,000 in 2010 to £420,750 in 2025. This figure is 40% higher than the Lewes figure of £300,000, (which has seen an increase of 80% over the period) and 48% higher than the South East figure of £284,838 (which has also seen an increase of 80% over the period).

The Future Supply of Affordable Housing

- xiv. In the first five years of the 2023 LHNA period, the Council has overseen the delivery of 658 affordable homes against a net need of 1,450 affordable homes, which has resulted in a shortfall of -792 affordable homes. I consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG³ and endorsed at appeal.
- xv. When the shortfall is factored into the 2023 LHNA identified need of 290 affordable homes per annum for the period 2020 and 2040, the number of affordable homes the Council will need to complete increases by 54% to 448 net affordable homes per annum over the period. This would ensure that for the remainder of the LHNA period up to 2040 the annual affordable housing need reduces to 290 per annum to deal solely with newly arising needs.
- xvi. The Council has published its latest Five-Year Housing Land Supply Statement ("5YHLS") in May 2023 (**CD7.8**), covering the period 1 April 2023 to 31 March 2028. If we were to generously to assume that the 1,735 dwellings included in the 5YHLS, not including small sites, will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (40%) as

³ Paragraph: 022 Reference ID: 68-031-20190722

a proportion of overall housing completions, this is likely to deliver only 694 affordable dwellings over the period, equating to 139 affordable dwellings per annum.

- xvii. This figure falls very substantially short of the 448 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and significantly short of the 290 net affordable housing needs per annum identified in the 2023 LHNA.
- xviii. More realistically, if one were to assume that the past gross affordable housing provision of 27% is to be continued over the next five years, this is likely to deliver only 468 affordable dwellings over the period, equating to just 94 new affordable dwellings per annum.
- xix. Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

Conclusion

- xx. In light of the key findings of my evidence and the acute need for affordable housing within Lewes, I consider that **very substantial weight** should be attributed to the delivery of up to 60 affordable homes through the appeal scheme in the planning balance.

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **James Stacey BA (Hons) DipTP MRTPI** of **Tetlow King Planning** on behalf of **Taylor Wimpey UK Ltd**.
- 1.2 The proposed development is for up to 150 dwellings, of which 40% (up to 60 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Core Policy 1 (40%) of the adopted Lewes District Local Plan Part 1: Joint Core Strategy (2016).
- 1.3 The tenure split will be developed and detailed at the later Reserved Matters stage.
- 1.4 The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.5 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision⁴ considering evidence of need in the area. It should be read alongside the Appellant's Planning Proof of Evidence.
- 1.6 My credentials as an expert witness are summarised as follows:
 - I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England ("UWE") (1997). I am a member of the Royal Town Planning Institute ("RTPI").
 - I have over 30 years professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and been in private practice since 2001.
 - During my career I have presented evidence at more than 170 Section 78 appeal inquiries and hearings. I act for a cross-section of clients and advise upon a diverse range of planning housing related matters.

⁴ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- In December 2022, I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plan documents and supplementary planning documents on affordable housing throughout the UK.

1.7 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal in this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

1.8 I further confirm that none of this evidence has been produced with the use of AI technology.

1.9 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper (2017).

1.10 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.11 As part of my evidence, I have sought data from the Council, upon which I rely, through a Freedom of Information ("FOI") request submitted to Lewes District Council on 16 March 2026. A response was received on the 17 April, with further clarification provided on 24 April. Following this, two clarifying FOI requests were issued to the Council on 6 and 21 May which are still awaiting responses; I reserve the right to submit supplemental evidence to the inquiry following receipt of the Council's FOI responses. The FOI correspondence to date is attached at **Appendix JS1**.

1.12 This proof of evidence comprises the following ten sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;

- Section 3 considers the consequences of failing to meet affordable housing needs;
- Section 4 analyses the development plan and related policy framework including corporate documents;
- Section 5 sets out the identified affordable housing needs;
- Section 6 examines past affordable housing delivery against identified needs;
- Section 7 covers a range of affordability indicators;
- Section 8 considers the future supply of affordable housing;
- Section 9 sets out the council's assessment of the application;
- Section 10 identifies the benefits of the proposed affordable housing at the appeal site; and
- Section 11 considers the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024)

- 2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-making processes.
- 2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations."* (My emphasis).
- 2.4 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

*"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...] **The overall aim should be to meet an area's identified housing need.** including with an appropriate mix of housing types for the local community." (My emphasis).*

- 2.5 It should be stressed that paragraph 61 identifies the 'overall aim' as to meet an area's identified housing need. Paragraph 62 clarifies that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."*

- 2.6 Paragraph 63 also makes clear that *“within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing...”* (My emphasis).
- 2.7 The national guidance places a core responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 66 establishes that *“where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.”*
- 2.8 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *“housing for sale or rent, for those whose needs are not met by the market [...] and which complies within one or more of the following definitions”* before identifying four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

“Building the Homes We Need” Written Ministerial Statement (30 July 2024) – CD12.2

- 2.9 On 30 July 2024, the Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement (“WMS”) indicating the ‘direction of travel’ for the new Government’s intentions for national planning policy.
- 2.10 The WMS set out the Government’s aspirations to drive the delivery of affordable homes, stating that *“the Government are committed to the biggest growth in social and affordable housebuilding in a generation”* and setting an objective to deliver 1.5 million homes during the current Parliament.

“Building the Homes We Need” Written Ministerial Statement (12 December 2024) – CD12.2

- 2.11 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series

of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.” (my emphasis)

“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025)

- 2.12 Another WMS from Matthew Pennycook MP once again references the scale of the housing crisis, but places an emphasis specifically on affordable housing, alongside the ambition to “deliver the biggest increase in social and affordable housebuilding in a generation”:

“England is in the grip of an acute and entrenched housing crisis. The detrimental consequences of this disastrous state of affairs are now all pervasive. We have a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into insecure, unaffordable and far too often sub-standard private rented housing; and 160,000 homeless children living in temporary accommodation.

- 2.13 Among the most important causes of the housing crisis is a failure over many decades to build enough homes of all tenures to meet housing demand and housing need.”

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.14 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. **Appendix JS2** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.15 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of

successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy⁵ sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Lewes.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:
- “I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”*
- 3.4 When asked to clarify the word “*crisis*” by the MP for Tewkesbury, Nick Boles, commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.
- 3.5 In response to questions, Nick Boles reaffirmed that:
- “Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.*

⁵ Laying the Foundations: A Housing Strategy for England (November 2011)

- 3.6 He went on to say: *“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years and then make plans to provide them.”*
- 3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.
- 3.8 Mr Boles indicates that there are *“a lot of statistics to prove it”*. My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.
- 3.9 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024, the Minister addressed the Housing, Communities and Local Government Committee: He began with a powerful reminder:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

- 3.10 He went on to say:

It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns

and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.

Consequences of Failing to Meet Affordable Housing Need

- 3.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.12 In August 2019, the Children's Commissioner produced a report titled *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.13 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms⁶.
- 3.14 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 3.15 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *"Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work"*.
- 3.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a *"deeply disruptive impact on family life"*. This can include lack of support (from grandparents for example) and travel costs.
- 3.17 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.18 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

⁶ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.19 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.
- 3.20 More recently, in May 2021, Shelter published its report “*Denied the Right to a Safe Home – Exposing the Housing Emergency*” which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that “*we will only end the housing emergency by building affordable, good quality social homes*” (page 10).
- 3.21 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.” (Page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.” (Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (Page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (Page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (Page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (Page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (Page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (Page 30)

3.22 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).

3.23 The Report concludes (page 33) that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there’s only one way to end the housing emergency. **Build more social housing**”* (emphasis in original).

3.24 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holding back building”*. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings.

Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

3.25 The Executive Summary goes on to state that **“An affordable and secure home is a fundamental human need”** (emphasis in original) noting that one in three of us don’t have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

3.26 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the ‘infrastructure levy’. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

3.27 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *“That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.”* The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach; it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

3.28 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that *“TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.”*

3.29 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*

- 3.30 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (emphasis in original).
- 3.31 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent.”*
- 3.32 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness.”*
- 3.33 Finally, page 21 is clear that:
- “For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory but also contributes to the threads of society by helping people contribute to their communities.*
- The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that is not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.”* (My emphasis).
- 3.34 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone (**CD10.14, p.16, [88]**) was clear at paragraph 88 of his decision that:
- “The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children's education and development. In Mole Valley, the number of people on the housing register has*

risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent."

The Cost of Temporary Accommodation

- 3.35 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.
- 3.36 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year. In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.
- 3.37 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government ("MHCLG"), has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.
- 3.38 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only *"outrageous, but it's also illogical"*. She went on to say that:

"We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [..]"

This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks. (Emphasis added)

- 3.39 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.
- 3.40 On the 5 March 2024 MHCLG published data on the age of children under ten in temporary accommodation. The study found that there were 86,945 children under the age of ten living in temporary accommodation at the 30 June 2023, with 19,430 of these children less than 12 months old.

- 3.41 The Inside Housing article also highlighted that the growing cost of temporary accommodation is putting local authorities' budgets under strain. It noted that that Hastings Borough Council recently faced bankruptcy, partly due to its large expenditure on temporary accommodation, which had risen to £5.6m per year, compared with £730,000 in 2019.
- 3.42 The report added that London councils are expected to overspend on temporary accommodation by £90m this year.
- 3.43 In December 2023, ITV News reported that almost one in five council leaders in England expect to issue Section 114 notices⁷ in 2024.
- 3.44 On the 23 January 2024, ITV News reported that the increasing cost of housing homeless people in temporary accommodation is putting local authorities on the brink of financial ruin.
- 3.45 The ITV News article added that according to homelessness charity Crisis, some 298,430 households approached their local council for homelessness support in the past year. Jasmine Basran, head of policy and campaigns at Crisis, said:
- "Crippling financial pressures from rising living costs, unaffordable rents and a severe lack of social homes is forcing more and more people into homelessness."*
(Emphasis added)
- 3.46 The ITV News article continued, adding that Eastbourne Borough Council ("EBC") is currently spending 49p of every £1 on temporary accommodation for homeless people. Stephen Holt, the leader of EBC said ministers must "recognise the gravity of this situation" and work out how to resolve it "before it is too late", adding that:
- "Simply put, without government intervention to tackle the tremendous cost of temporary accommodation and homelessness, the next step for many councils of all stripes is emergency budgets and section 114 notices."*
- 3.47 A further article from Inside Housing on 24 January 2024 reported that the surge in spending on temporary accommodation could spell the "end of local government".
- 3.48 The article highlighted that Councillors from across the political spectrum had expressed serious concerns over temporary accommodation spending at an emergency meeting in Westminster on 23 January 2024 where more than 50 local

⁷ A section 114 notice means the council cannot make new spending commitments and must meet within 21 days to discuss what to do next.

leaders met to discuss the “national crisis” caused by the cost of temporary accommodation.

- 3.49 I agree that the cost of housing people in affordable housing is spiralling out of control. I also agree with Polly Neate that, *“We simply can’t keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home.”*

Summary and Conclusions

- 3.50 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children’s education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

- 3.51 These harsh consequences fall upon real households and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

- 3.52 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.

- 3.53 The acute level of affordable housing need in Lewes coupled with worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for Lewes District Council comprises the Saved Policies of the Lewes District Local Plan (2003), the Lewes District Local Plan Part 1: Joint Core Strategy (2016), the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies (2020) and the Wivelsfield Neighbourhood Plan (2016).
- 4.3 Other material considerations include the National Planning Policy Framework (2021), the Planning Practice Guidance (March 2014, Ongoing Updates), the Lewes District Council Affordable Housing SPD (2018) and the emerging Lewes District Local Plan as well as a number of corporate documents.

The Development Plan

Saved Policies of the Lewes District Local Plan (2003)

- 4.4 The Lewes District Local Plan 2003 was adopted in March 2003 and included strategic policies to cover the period 1991 – 2011 as well as a suite of development management policies.
- 4.5 Following adoption of the Local Plan Part 2 in February 2020, only nine policies from the Local Plan 2003 remain in force. None of the ‘saved’ policies relate to the provision of affordable housing at the appeal site and are therefore of no relevance to the determination of this appeal.

Lewes District Local Plan Part 1: Joint Core Strategy (2016) – CD7.1

- 4.6 The Core Strategy was adopted on 11 May 2016 and covers the 20-year period from 2010 to 2030.

- 4.7 The Forward to the Core Strategy (page 5) written by Cllr Tom Jones sets out that the Plan will address important local issues *“including the delivery of increased levels of affordable housing”*.
- 4.8 Section 2, titled ‘Characteristics of Lewes District’ (page 21), sets out a spatial portrait of the district and its characteristics. These characteristics include those relating to the availability and affordability of housing, such as:
- Mean household incomes of around £36,585, which is higher than the county and national average but lower than the South East regional average; and
 - Relatively high house prices, with average prices in 2010 stated as being more than 7 times average earnings⁸.
- 4.9 ‘Key Strategic issues and Challenges’ are addressed under Section 3 of the Plan. Under the subheading ‘Accommodating and delivering growth’ (page 29) the Plan highlights that:
- “We need to determine the best way of ensuring that these new homes meet local needs, particularly the provision of affordable housing, housing for an ageing population and accommodation for other groups with particular needs, such as veterans.”* (My emphasis).
- 4.10 Similarly, under the subheading ‘Improving access to housing’ (page 29) the Plan is clear that *“Improving the amount and availability of affordable housing, both rented and shared ownership, is a priority due to relatively high house prices⁹, below average wages, and continued in-migration.”*
- 4.11 Section 7 of the Plan deals with ‘Core Delivery Policies’. Paragraph 7.3 (page 81) of the Plan highlights that:
- “A sufficient supply of housing of all tenures, **including affordable housing**, is essential to meet the objectives of the Core Strategy and to meet the wide range of housing needs that will be experienced in the district over the plan period as far as sustainably possible.”* (My emphasis).
- 4.12 Paragraph 7.4 (page 81) explains that, in the context of a Plan which does not meet the district’s full objectively assessed housing needs, younger households or those with lower incomes risk being pushed out of the housing market. It states that this

⁸ Section 7 of this evidence demonstrates that in 2021 the median affordability ratio for the District was 11.64 and the lower quartile affordability ratio was 11.86 (see Figures 7.6 and 7.8).

⁹ Section 7 of this evidence demonstrates that house prices across the District have continued to increase (see Figures 7.7 and 7.9).

“could have significant consequences, particularly in terms of sustaining an economically active population and supporting the local economy”.

- 4.13 In this context, paragraph 7.5 (page 81) highlights that *“The delivery of the highest feasible levels of affordable housing is a clear way of mitigating the potential negative impacts of not delivering the full objectively assessed housing needs”.*
- 4.14 Paragraph 7.7 (page 82) details the 2008 Strategic Housing Market Assessment’s (“2008 SHMA”) findings, noting that it identified an annual requirement of 230 net affordable dwellings per annum.
- 4.15 The paragraph goes on to note that the 2014 Affordable Housing Needs Assessment (“2014 AHNA”) identified a higher need of 389 affordable dwellings per annum over the next five years (2013/14 and 2017/18) to meet the both the current backlog and newly arising need, on top of the affordable homes already expected to be delivered.
- 4.16 Paragraphs 7.7 to 7.12 (pages 82 to 83) explain how the 2008 SHMA requirement is translated into policy, having regard to the Affordable Housing Viability Assessment. As paragraph 7.10 (page 83) states, a target (rather than a numerical requirement) of 40% affordable housing is to be sought.
- 4.17 **Core Policy 1 ‘Affordable Housing’** (page 85) sets out the Council’s approach to affordable housing. It seeks the delivery of 40% affordable housing on sites of ten dwellings or more. For sites below 10 dwellings the policy provides a target number of affordable units to be delivered on site depending on the scheme size.
- 4.18 Part 3 of the policy explains that a tenure split of 75% affordable rented and 25% intermediate housing will be sought and negotiated on a site-by-site basis. It notes that the Council will monitor the delivery of affordable housing through its Authority Monitoring Report, and in the event of persistent under delivery or a 10% drop in average house prices compared with 2011 prices, the thresholds and targets of the policies will be reviewed.
- 4.19 Paragraph 7.20 which precedes the policy states that future changes in Government policy will supersede relevant parts of Core Policy 1. The Council placed an update on their website in July 2018 explaining that in order to be consistent with the updated NPPF, affordable housing will only be sought on schemes of ten or more dwellings or on a site area of 0.5 hectares or more.

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies (2020) – CD7.2

- 4.20 The Site Allocations and Development Management Policies Plan was adopted on 24 February 2020 and covers the period up to 2030. It adds detail to the Core Strategy, providing a series of site-specific allocations in order to meet the Core Strategy's housing requirement in full.
- 4.21 The Part 2 document only contains one policy for affordable housing, namely policy DM2 'Rural Exception Sites'. For the avoidance of doubt, the appeal scheme is not proposed as a rural exception site.

Wivelsfield Neighbourhood Plan (2016) – CD7.3

- 4.22 The Wivelsfield Neighbourhood Plan was made in September 2016 and sets out a vision for the Parish up to 2023. The Plan provides objectives on key themes such as Housing & Development; Infrastructure, Facilities & Local Economy; Transport & Traffic and Environment & Countryside.
- 4.23 Pages 23 and 24 of the document contain the results of a housing needs survey undertaken in 2014. Paragraph 3.9 is clear that the survey *"provides a snapshot of the scale and nature of affordable housing required by local people in Wivelsfield Parish"*, while paragraph 3.11 notes that the survey only returned a response rate of 24.5% out of the 854 households in the Parish.
- 4.24 Paragraph 3.12 (page 24) outlines the results of part 1 of the survey highlighting, among other things, that:
- *"100.0% of respondents currently have their main home in the Parish"*
 - *"51.7% of respondents currently own their own home without a mortgage."*
 - *"67.9% of respondents would support an affordable housing development of 15 units for local people in the Parish if there were a proven need"; and*
 - *"9.8% of respondents knew of a household that would need to leave the Parish in pursuit of affordable housing."*
- 4.25 In respect of the part 2 survey paragraph 3.13 (page 24) notes that the survey form contained questions used to capture information on the specific household circumstances and housing requirements of respondents. This section was to be completed by those households who currently are, or expect to be, in need of affordable or more appropriate housing.

- 4.26 The page goes on to highlight at paragraph 3.14 that part 2 of the survey was only completed by 33 correspondents, a 4% response rate, who indicated that their current home was unsuitable for their household's needs.
- 4.27 The paragraph also notes that these responses were then assessed against criteria of personal circumstance, income level and evidence of a local connection in order to determine whether each household was a potential candidate for affordable housing in the Parish.
- 4.28 The paragraph goes on to set out that:
- *“12 households that had completed Part 2 of the survey were excluded from the subsequent analysis on the basis that they had sufficient income to obtain housing via the open market, that their current home was adequate in meeting their current housing requirements or that they did not possess a sufficiently strong local connection to the Parish. This made them ineligible for affordable housing and given that they did not express a desire for market housing, they were excluded from that analysis also.*
 - *A total of 15 households were identified as being in need of affordable housing, meeting the requirements of local connection, income and personal circumstances. 4 were located in Wivelsfield and 11 in Wivelsfield Green.*
 - *6 households that completed Part 2 of the survey expressed a desire to obtain open market housing. 3 were located in Wivelsfield and 3 in Wivelsfield Green.”*
- 4.29 It is wholly unclear from the survey results how the local connection, income and personal circumstances criteria were derived in order to discount the 12 households listed under the first bullet point. It is also unclear what tenures of affordable housing the 15 households listed under the second bullet point were identified as being in need of.
- 4.30 Given that just 4% (33 households) of the 854 households in the Parish provided data on this subject it is reasonable to conclude that the survey did not robustly assess the need for affordable housing within the parish.
- 4.31 The Neighbourhood Plan policies are listed at Section 5. It is stated on page 44 that, *“to achieve the Neighbourhood Plan’s vision a number of key objectives have been identified”*. Under the subheading ‘Housing’ the following two key objectives are identified:

- *“To provide a mix of dwelling types including particularly smaller dwellings for young families and older people wishing to downsize, and starter homes for younger people and key workers”; and*
- *“To provide some affordable homes for local people”*

4.32 Policy 2 ‘Housing Site Allocations’ sets out the three housing allocations included within the Plan. It notes that *“All of the housing site allocations will be required to adhere to the Lewes development plan policy on the provision of affordable housing”*.

4.33 Aside from this reference to development plan policy the Neighbourhood Plan does not include any dedicated affordable housing policies.

4.34 The only allocated site of the three large enough to trigger affordable housing contributions is “Land at Springfield Industrial Site, West of B2112” which was allocated for ‘approximately 30 dwellings. An application (ref: LW/21/0867) was made on the site on 12 November 2021 for 30 dwellings comprising 21 Shared Ownership units and 9 Affordable Rented units and was approved. The permission features in the councils latest Five Year Housing Land Supply Annual Position Statement (**CD7.8**) published in May 2023 indicating that completions are expected from 2025/26 at the earliest.

Other Material Considerations

Lewes Affordable Housing Supplementary Planning Document (2018) – CD7.6

4.35 The Affordable Housing Supplementary Planning Document (“SPD”) was adopted by the Council in July 2018. It provides guidance on the application of Core Strategy Core Policy 1 ‘Affordable Housing and Core Policy 2 ‘Housing Type, Mix and Density’

4.36 The SPD sets out a series of detailed guidance points to assist the delivery of affordable housing. It includes (amongst other points):

- Expectations at paragraph 3.7 (page 10) that affordable housing will be ‘pepper potted’ throughout a scheme, visually indistinguishable from open market housing,
- A preferred mix of housing at paragraph 3.10 (page 11), with a preference of 50% one-bedroom, 30% two-bedroom, 15% three-bedroom and 5% four or more-bedroom properties. This is subject to local evidence and information on the Council’s housing register.
- The expectation at paragraph 3.13 (page 12) that most affordable housing will be delivered without grant funding.

- 4.37 Paragraphs 4.4 to 4.6 (pages 13 and 14) explain how the Council will prioritise the delivery of affordable housing, noting at paragraph 4.5 that:

“The priority for Lewes District Council is to increase the number of affordable homes within the district, and ideally developers will build the correct number and mix of affordable dwellings on site in accordance with Core Policies 1 and 2.”

Emerging Lewes District Local Plan

- 4.38 The Council is currently in the process of producing a new Local Plan. The Council has held a number of Regulation 18 consultations to date; most recently, a Regulation 18 consultation held between 18 December 2025 and 28 February 2026 seeking views on a new spatial strategy and site allocations.
- 4.39 The Council previously consulted on its ‘Defining our policies and early site allocation proposals’ consultation document (**CD13.8**) between 6 January 2025 and 28 February 2025. The Foreword, provided on page 2 of the document and provided by Councillor Laurence O’Connor, sets out that much of the future provision of much needed homes in Lewes will need to be affordable homes or council housing.
- 4.40 The Council’s Vision for the district is set out on page 25, which states that *“We will narrow the inequality which exists and ensure that we provide the truly affordable homes, the employment opportunities and access to services that all our residents, and especially the most vulnerable, need.”* (my emphasis).
- 4.41 To support the Vision, the Council has drafted a number of Aims for the Local Plan, including ‘Homes for All’ which is presented on page 26. It reads as follows:
- “...housing will be tailored to respond to population growth and provide access to a wide range and mix of high-quality housing. This will include genuinely affordable homes that meet the varying needs of our population...”*
- 4.42 Draft Strategic Policy SDS1 (The emerging spatial strategy) is guided by the Councils aspiration to increase the supply of affordable homes in Lewes.
- 4.43 The Council sets out the following on page 98:

“The 2023 LHNA found that there is a substantial need for affordable homes to rent and a considerable potential market for affordable homes to buy. The LHNA will be updated following publication of the revised NPPF, and we will ensure that the approach to affordable housing reflects the findings of the

updated study. The need for affordable rented housing in the district represents a high proportion of our development needs.” (my emphasis).

- 4.44 Draft Policy H3 (Affordable Housing) on page 103 seeks 40% affordable housing from qualifying sites. The appeal scheme proposes 40% affordable housing on site, aligning with the emerging affordable housing policy requirement in Lewes.
- 4.45 Supporting text to Draft Policy H3 on page 104 specifies that *“Housing costs in our plan area, in common with many areas of the South East of England, are among some of the highest in the country. Households with median incomes are unlikely to be able to purchase a home at market rates, and households with lower quartile incomes are unlikely to be able to afford market rents. While housing elements of universal credit may support some households with meeting their housing costs, this does not apply to all low-income households.”*
- 4.46 Furthermore, *“Our corporate plan not only supports the provision of social, affordable and sustainable homes but commits the council to using our planning system to support the provision of truly affordable housing.”*
- 4.47 Boosting the supply of affordable housing in Lewes is clearly a key priority for the Council at this moment in time.

Corporate Documents

Lewes Council Corporate Plan 2024-2028, ‘Re-imagining Lewes District’ – CD14.1

- 4.48 In the Foreword to the Corporate Plan on page 2, Council Leader, Cllr Zoe Nicholson, sets out that *“Our corporate plan reflects what our residents told us is important. It means the work the council is doing in local communities, is the work residents asked us to do.”*
- 4.49 Furthermore, the Foreword also mentions that continuing to support people who are struggling with the cost of living crisis and providing decent, warm and affordable homes are top priorities for the Council. *“We need more social and affordable homes”* is stated alongside a four year target for the 2024-2028 period to deliver 500 new affordable homes.
- 4.50 Page 3 sets out some of the challenges that the Corporate Plan seeks to address, including no.5 which is *“building genuinely affordable homes”*.

- 4.51 Page 12 sets out the Council's objectives in respect of delivering homes. It notes that *"Access to safe and secure housing, that local people can afford, is fundamental to supporting wellbeing and enabling our communities to thrive."*
- 4.52 Page 13 goes on to set out a series of broad actions that the Council will take, which include supporting the provision of affordable housing, delivery of more rented homes in the district, using the planning system to support affordable housing delivery, and reducing reliance on temporary and emergency accommodation.
- 4.53 The Corporate Plan lists a set of four-year goals (page 13) for the 2024-2028 period in respect of housing, which include:
- An additional 300 new affordable homes in line with national definitions; and
 - 200 additional council houses.

Lewes District Council Homelessness and Rough Sleeping Strategy 2022-2027 – CD14.2

- 4.54 The Lewes District Council Homelessness and Rough Sleeping Strategy 2022-2027 sets out how the Council seeks to prevent and relieve homelessness and rough sleeping in the District over the five year period from 2022 to 2027.
- 4.55 Page 3 of the Strategy presents the following vision, based around three Strategic Priorities:
- *"Prevent – to reduce the incidence of homelessness*
 - *Intervene – to reduce the impact where homelessness has occurred*
 - *Sustainable solutions – to promote housing options and effective support services"*
- 4.56 The Foreword to the Strategy, written by Councillor William Meyer (Lead Member for Housing), is set out on pages 3 and 4 and states the following:

*"Lewes is a great District in which to live and work, but too many local households still struggle to secure suitable housing at a price they can afford. Lewes District has the highest average property prices in East Sussex, whilst rising rents, restricted availability in the private rented sector and a **shortage of affordable housing**, have left many local families with limited and costly housing options. As a result, the demand for social housing is high. There are currently 1,050 households waiting for homes on the Council's housing*

register, each of whom meets one or more category of preferential need.” (My emphasis)

- 4.57 The Council recognises at paragraph 2.1¹⁰ that the Covid-19 pandemic has had significant effects on homelessness in Lewes, placing a higher number of individuals in temporary accommodation¹¹:

“Increasing house prices, rising private sector rents and the reduced income many local households have experienced as a result of the pandemic, continue to have an impact, sustaining the high number of households accessing services and needing to be placed in temporary accommodation.”

- 4.58 At paragraph 2.2 (page 7), the Strategy lists several issues that restrict access to local housing markets on pages 7 and 8. These include:

- High affordability ratios:
 - *“By autumn 2020, median property prices were over ten times the local full-time salary¹².”*
 - *“High house prices have a knock on effect on private rents, and in many parts of the District these continue to challenge the ability of local households to secure suitable housing.”*
 - *“By March 2020, the average rent (all bed sizes) stood at £960 per month, a rise of 13 percent over the past five years¹³.”*
- Housing tenure and supply:
 - *“Overall, the growth in social housing stock has been small, amounting to a net increase of only 243 homes in the past ten years, once Right to Buy losses are taken into account.”*
- Housing demand and availability:
 - *“Private rents in many parts of the District are higher than the Local Housing Allowance (LHA) ... This presents a real barrier to the market for those on lower*

¹⁰ Note that paragraphs in Section 4 are incorrectly numbered in the Strategy; paragraph 2.1 should be paragraph 4.1 (and so on) as it falls under Section 4 of the Strategy.

¹¹ Section 7 of this evidence demonstrates that as of 2025 there were 78 households housed in temporary accommodation by the Council.

¹² Section 7 of this evidence demonstrates that in 2025 the median affordability ratio for the District was 9.66 and the lower quartile affordability ratio was 9.80 (see Figures 7.3 and 7.6).

¹³ Section 7 of this evidence demonstrates that both median and lower quartile private sector rents have continued to increase (see Figure 7.2).

incomes, who often have to look for cheaper areas to live in beyond the District or use 'living money' to supplement housing rental costs."

- *"The relatively small size of the private rented sector compounds the problem, with a shortage of supply contributing to high rents."*
- *"Meanwhile, the demand for social housing is high and there are currently 1,050 households waiting for homes on the Council's housing register¹⁴, whilst both new supply and available re-lets are low. During 2019/20 a total of only 1152 council homes and 70 housing association homes became available."*
- *"This combination of high house prices and rents, along with restricted housing availability in both the private and social rented housing sectors, create a pressing housing challenge to residents of the District."*

4.59 Section 9 of the Strategy recognises the *"importance of having in place a range of options to meet housing demand across the District"* (page 13). Of particular relevance is the objective to 'rehouse' which is analysed at paragraph 9.2 (page 13) and reads as follows:

"Re-housing - establish a range of sustainable housing and move-on options for homeless households. The housing offered to households will include privately rented, council, social and supported housing, so the focus of the strategy here will be to help back the expanded provision of each. Carrying out robust housing needs assessments and taking steps to ensure that the needs identified are reflected in new developments is key. This will help ensure that new homes commissioned through developers and residential social landlords, maximising the use of Government grants where available, help meet local needs. Focussing on boosting the supply of supported move-on accommodation and opening up access to the private rented sector, particularly to those on low incomes, are other important areas of focus."
(emphasis in original).

4.60 A key action for the rehousing objective (referring to the delivery plan set out on page 22) is to *"Accelerate the delivery of new affordable & council general needs and supported housing, in partnership with the Council's development team, developers and registered providers"* (page 22). The expected outcome is that this action will lead

¹⁴ Section 7 of this evidence demonstrates that as of 31st March 2022 there were 1,133 households on the Housing Register (see Figure 7.1).

to an on-going *“Increased development pipeline of new affordable homes across the District”*¹⁵ (page 22).

Conclusions on the Development Plan and Related Policies

- 4.61 The Development Plan for Lewes currently comprises the Saved Policies of the Lewes District Local Plan (2003), the Lewes District Local Plan Part 1: Joint Core Strategy (2016), the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies (2020) and the Wivelsfield Neighbourhood Plan (2016).
- 4.62 It is my opinion that the evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Lewes.
- 4.63 The appeal proposals provide an affordable housing contribution which meets requirements of Local Plan Part 1: Joint Core Strategy (2016), Core Policy 1.
- 4.64 The up to 60 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the district, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 6 of my evidence.

¹⁵ Section 8 of this evidence demonstrates that the council have a committed supply of 537 gross affordable dwellings over the five-year period, equating to just 107 gross affordable homes per annum.

Affordable Housing Needs

Section 5

The Development Plan

- 5.1 The Development Plan does not define a numerical target for the provision of affordable homes within adopted policy. Instead, the adopted Local Plan seeks 40% affordable housing provision is made from qualifying developments.
- 5.2 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of housing need.

Affordable Housing Needs Evidence Base

- 5.3 The 2008 SHMA and 2014 AHNA were produced as part of the evidence base for the Lewes District Local Plan Part 1: Joint Core Strategy (2016) and both pre-date the change in definition to affordable housing in the 2018 NPPF and subsequent revisions.
- 5.4 The 2014 AHNA identified an annualised figure of 389 net affordable homes per annum over the five-year period between 2013/14 and 2017/18.
- 5.5 The 2014 AHNA has since been superseded by the 2023 Lewes District Local Housing Needs Assessment (LHNA).

Lewes District Local Housing Needs Assessment (2023) - (CD14.3)

- 5.6 The 2023 LHNA forms part of the housing evidence base for the emerging Lewes District Local Plan and provides the most up to date assessment of need for affordable housing to rent and affordable housing to buy in Lewes District at the time of writing.
- 5.7 The assessment period of the 2023 LHNA is from 2020 to 2040 to align with the emerging Lewes District Local Plan.
- 5.8 In discussing the overall need for affordable housing in Lewes District (excluding the part of the district that lies within the South Downs National Park (SDNP)) the 2023 LHNA specifies at paragraph 8.77 that there is a need for 125 net affordable rented homes per annum for the 20-year period from 2020 to 2040.

- 5.9 In addition, paragraph 8.78 summarises the need for affordable homeownership dwellings, identifying a need for 165 net affordable homeownership dwellings per annum for the 20-year period from 2020 to 2040.
- 5.10 Together, this presents a **total net need for 290 new affordable homes per annum between 2020 and 2040 in Lewes District** (see paragraph 8.79 of the 2023 LHNA). This applies to the part of the district outside of the SDNP based on its share of population and dwellings.

Local Housing Need vs Affordable Housing Need

- 5.11 The council's latest Five Year Housing Land Supply Annual Position Statement 2023-2028 (**CD7.8**) published in May 2023 sets out that that due to the Development Plan being more than 5 years old the Councils housing supply is measured against a figure based on the Government's standard methodology for assessing Local Housing Need. I set out in Section 8 my assessment of the likely delivery of affordable housing arising from qualifying sites.
- 5.12 Whilst the Standard Method for calculating Local Housing Need applies an affordability adjustment, the PPG is clear that:

*“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the **affordability of homes**¹⁶.”*
(My emphasis)

- 5.13 Evidently providing an affordability adjustment to start to address the affordability of homes in an authority is clearly different from calculating an affordable housing need figure. The affordability uplift is simply a function of the standard methodology, and it is not a basis for determining the numerical need for affordable housing nor the types of affordable housing required as defined in Annex 2 of the NPPF (2021).
- 5.14 This is further supported by the fact that calculating such need for an authority is dealt with under a separate section of the PPG titled ‘*How is the total annual need for affordable housing calculated?*’ which clearly sets out that:

“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total

¹⁶ Paragraph: 006 Reference ID: 2a-006-20190220

gross need) and converting total net need into an annual flow based on the plan period¹⁷.”

- 5.15 Whilst the Standard Method calculation may be appropriate for monitoring general housing needs and supply across the authority it does not purport to provide a need figure for affordable housing in line with the PPG. As such it does not reflect affordable housing need; nor is it an appropriate basis with which to monitor affordable housing supply.
- 5.16 In a similar fashion, the achievement of Housing Delivery Test targets does not signify that affordable housing needs have been being met over a period when using the standard method to calculate the ‘number of homes required’ for a Local Authority area.

Corporate Targets

- 5.17 The Lewes Council Corporate Plan 2024-2028 (**CD14.1**) commits the council to deliver 200 new council houses and 300 new affordable homes between 2024 and 2028¹⁸. This is equivalent to an average of only 50 new council houses and just 75 new affordable homes per annum over the period. It is unclear how the Council has identified these figures and no explanation is provided within the document.
- 5.18 The 2023 LHNA identifies an on-going need for 125 net affordable rented homes and 165 net affordable home ownership homes per annum, equal to 290 net affordable homes per annum. The corporate target of 125 affordable homes per annum is 57% lower than the 290 dwelling needs figure which seems wholly inadequate.
- 5.19 Evidently this council is not in any meaningful way seeking to boost the supply of affordable housing despite being required to do so, and proactively, by the NPPF (2024). This will be of little comfort to the 748 households on the councils housing register in need of an affordable home, now.

Conclusions on Affordable Housing Needs in Lewes District

- 5.20 As set out within the Development Plan and its supporting housing evidence base, there is a pressing and ongoing need for new affordable homes in Lewes District.
- 5.21 The 2023 LHNA provides the most up to date assessment of affordable housing need in Lewes, and forms part of the Council’s evidence base to support the development

¹⁷ Paragraph: 024 Reference ID: 2a-024-20190220

¹⁸ Section 6 of this evidence demonstrates in the first monitoring period a shortfall of -85 affordable homes has already accrued against this target (See Figure 6.3).

of housing policies in the emerging Lewes District Local Plan. The assessment identifies an on-going need for 125 net affordable rented homes and 165 net affordable home ownership homes per annum, equal to 290 net affordable homes per annum, over the 20-year period from 2020 to 2040. This applies to the part of the district outside of the SDNP based on its share of population and dwellings.

Affordable Housing Delivery

Section 6

6.1 Figure 6.1 illustrates the gross delivery of affordable housing in Lewes District, excluding completions in the South Downs National Park (“SDNP”), area since 2010/11 which is the base date of the Lewes District Local Plan Part 1: Joint Core Strategy (2016).

Figure 6.1: Gross Additions to Affordable Housing Stock, 2010/11 to 2024/25

Monitoring Year	Total housing completions (Net)	Additions to AH Stock (Gross)	Gross AH additions as a %age of total completions
2010/11	161	46	29%
2011/12	249	93	37%
2012/13	220	62	28%
2013/14	113	24	21%
2014/15	277	59	21%
2015/16	286	22	8%
2016/17	204	22	11%
2017/18	341	76	22%
2018/19	281	30	11%
2019/20	242	66	27%
2020/21	272	72	26%
2021/22	318	62	19%
2022/23	536	235	44%
2023/24	516	249	48%
2024/25	233	40	17%
Total	4,249	1,158	27%
Ave Pa.	283	77	27%

Source: Lewes District Council Annual Monitoring Reports; MHCLG Live Table 122 (2024/25 total completions only) and Freedom of Information Response (2024/25 Additions to AH Stock only) (17 March 2020)

6.2 Figure 6.1 shows that on average between 2010/11 and 2024/25, Lewes District Council has added just 77 gross affordable dwellings per annum, equivalent to 27% of the total number of net housing completions.

- 6.3 It is important to note that the gross affordable completions figure does not consider any losses through demolitions nor through Right to Buy sales from existing Lewes District Council and Registered Provider affordable housing stock.
- 6.4 Unfortunately, Right to Buy data excluding the SNDP is not publicly available for the above period. The above figures are likely decrease if losses to existing stock through the Right to Buy and demolitions were to be accounted for. As such the 1,158 gross affordable housing completions figure for the period can only be seen as a maximum.

Affordable Housing Delivery in Lewes District Compared to Objectively Assessed Needs

- 6.5 When comparison is drawn between gross affordable housing delivery and the needs identified in the 2023 LHNA, it can be seen in Figure 6.2 that there has been an accumulated shortfall in the delivery of affordable housing of some -792 gross affordable homes against an identified need for 1,450 net dwellings over the same period.
- 6.6 This shortfall is likely to increase further if demolitions to existing stock over the period as well as losses through Lewes District Council and Registered Provided Right to Buy sales were to be accounted for.

Figure 6.2: Gross Affordable Housing Delivery Compared to affordable needs identified in the 2023 LHNA for Lewes District, 2020/21 to 2024/25

Monitoring Period	Additions to AH Stock (Gross)	2023 LHNA AH Needs Per Annum (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	72	290	-218	-218	25%
2021/22	62	290	-228	-446	21%
2022/23	235	290	-55	-501	81%
2023/24	249	290	-41	-542	86%
2024/25	40	290	-250	-792	14%
Total	658	1,450	-792	-792	45%
Ave. PA.	132	290	-158	-158	45%

Source: Lewes District Council Annual Monitoring Reports; and 2023 LHNA

- 6.9 As demonstrated by Figure 6.2, delivery of only 658 gross affordable homes over the period means that just 45% of identified affordable housing needs were met over the period. Put another way 55% households in need of an affordable home were let down by the councils in ability to deliver.

- 6.10 This poor rate of delivery is nothing short of a social disaster for those households who are in acute need and urgently need assistance with their housing.

Affordable Housing Delivery in Lewes District Against Corporate Targets

- 6.11 The Lewes Council Corporate Plan 2024-2028 (**CD14.1**) commits the council to deliver 200 new additional council houses and an additional 300 new affordable homes over the four-year period between 2024 and 2028, equivalent to an average of 125 new affordable homes per annum.

Figure 6.3: Gross Affordable Housing Delivery Compared to the Annualised Corporate Target, 2024/25

Monitoring Period	Additions to AH Stock (Gross)	Corporate Target (Per annum average)	Annual Shortfall
2024/25	40	125	-85
Total	40	125	-85

Source: Lewes District Council Annual Monitoring Reports; and Lewes Council Corporate Plan.

- 6.12 When comparison is drawn between gross affordable housing delivery and the councils corporate target averaged on a per annum basis, it can be seen in Figure 6.3 that in the 2024/25 monitoring period there has already been a shortfall of some -85 affordable homes.
- 6.13 Once again, this shortfall is likely to increase further if demolitions to existing stock over the period as well as losses through Lewes District Council and Registered Provided Right to Buy sales were to be accounted for.

Conclusions on Past Affordable Housing Delivery in Lewes

- 6.15 The above evidence demonstrates that across Lewes, the delivery of affordable housing has fallen persistently short of meeting identified needs.
- 6.16 It is clear that a 'step change' in affordable housing delivery is needed now in Lewes to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.17 Considering Lewes District Councils poor record of affordable housing delivery and the level of affordable housing needs identified, there can be no doubt that the provision of up to 60 new affordable dwellings should be afforded **very substantial weight** in the determination of this appeal.

Affordability Indicators

Section 7

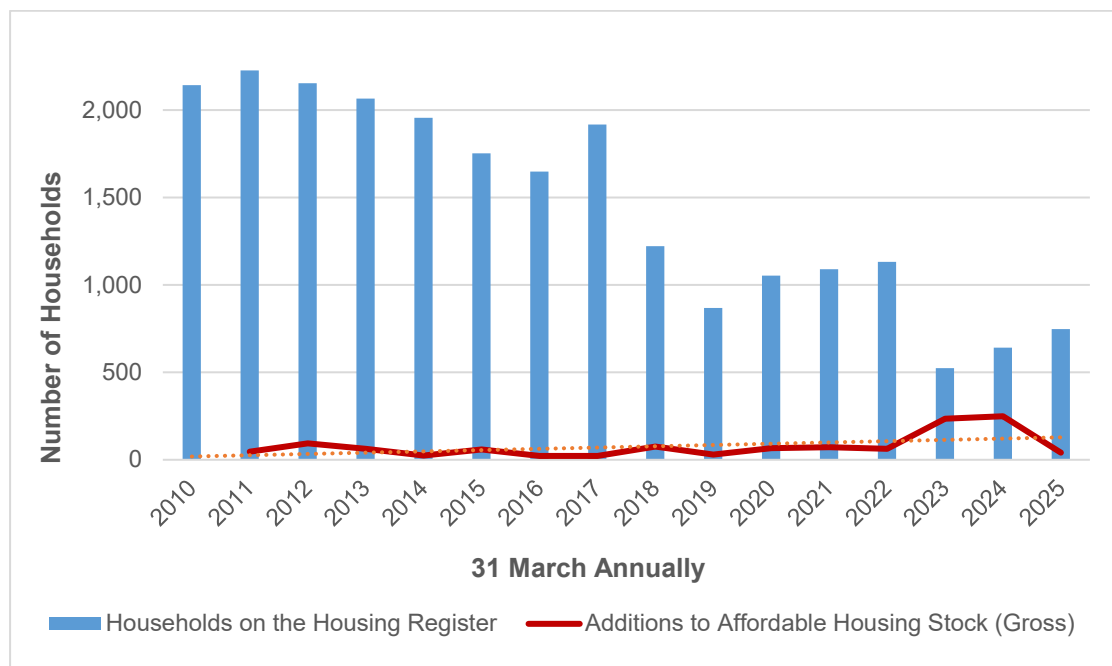
Introduction

- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 7.2 The Council's Freedom of Information response (**Appendix JS1**) confirms that on 31 March 2025 there were 748 households on the Housing Register. This represents a 17% increase in a single year from 641 households on 31 March 2024 (which itself was a 22% increase from 524 households on 31 March 2023).
- 7.3 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery in the corresponding monitoring year ending on 31 March across Lewes since the start of the Local Plan period in 2010.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Gross), 2010 to 2025



Source: MHCLG Open Data and Lewes District Council Annual Monitoring Reports.

- 7.4 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Lewes since 2010.
- 7.5 Footnote 4 of MHCLG¹⁹ Live Table 600 highlights that:
- “The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households housing registers, as it allowed local authorities to set their own qualification criteria.”*
- 7.6 Evidently the result of the Localism Act is that many local authorities, including Lewes, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.
- 7.7 Following the changes brought about by the Localism Act, Lewes published a revised Housing Allocations Scheme which received further revisions, which was most recently updated on 1 April 2026 (see **Appendix JS1**).
- 7.8 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 17% in the past 12-months, indicating a worsening of affordability across Lewes.
- 7.9 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.10 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.
- 7.11 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register, but who also cannot afford a market property and as such need affordable housing. It is those in this widening affordability gap who, I

¹⁹ Ministry of Housing, Communities and Local Government

suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.

- 7.12 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.
- 7.13 As set out at paragraph 1.1 of this proof of evidence, at the time of writing two FOI responses are awaited from the Council, including data from the Council's housing register. I reserve the right to update the inquiry, if and when this new data becomes available.

Temporary Accommodation

- 7.14 MHCLG statutory homelessness data highlights that on 31 March 2024, there were 78 households housed in temporary accommodation by the Council, with 53% (41 households) of these households having children.
- 7.15 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network, at significant cost to local taxpayers²⁰.
- 7.16 MHCLG data indicates that Lewes spent £995,000 on temporary accommodation between 1 April 2024 and 31 March 2025.
- 7.17 The "*Bleak Houses: Tackling the Crisis of Family Homelessness in England*" report published in August 2019 by the Children's Commissioner found that temporary accommodation presents serious risks to children's health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 7.18 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a "*significant impact on many aspects of their lives*".

²⁰ The cost of temporary accommodation is explored in detail at paragraphs 3.40 to 3.54 of this evidence.

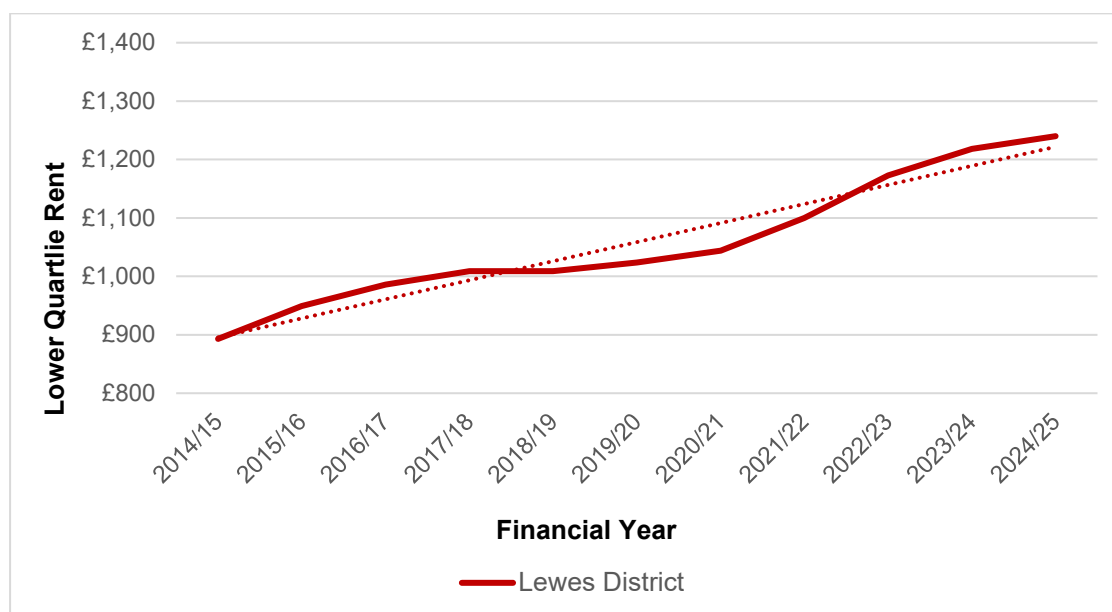
Homelessness

- 7.19 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 175 households in need of homelessness prevention duty²¹, and a further 149 households in need of relief duty²² from the Council.
- 7.20 It should be noted that the Private Rented Sector (“PRS”) is not a suitable substitute for affordable housing and does not have an equivalent role in meeting the housing needs of low-income families. It is highly pertinent that in the NPPF, PRS housing is not included within the Annex 2 definition of affordable housing.

Private Rental Market

- 7.21 Office for National Statistics (“ONS”) data (first produced in 2014/15) shows that average (mean) private rents in Lewes stood at £1,240 per calendar month (“pcm”) in 2024/25. This represents a 39% increase from 2014/15 where average private rents stood at £893 pcm.

Figure 7.2: Average (Mean) Private Sector Rents, 2014/15 to 2024/25



Source: PIPR.

- 7.22 It should also be noted that since the start of the 2023 LHNA period, average rents in Lewes have increased by 19% from £1,044 pcm in 2020/21 to £1,240 pcm in 2024/25.

²¹ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

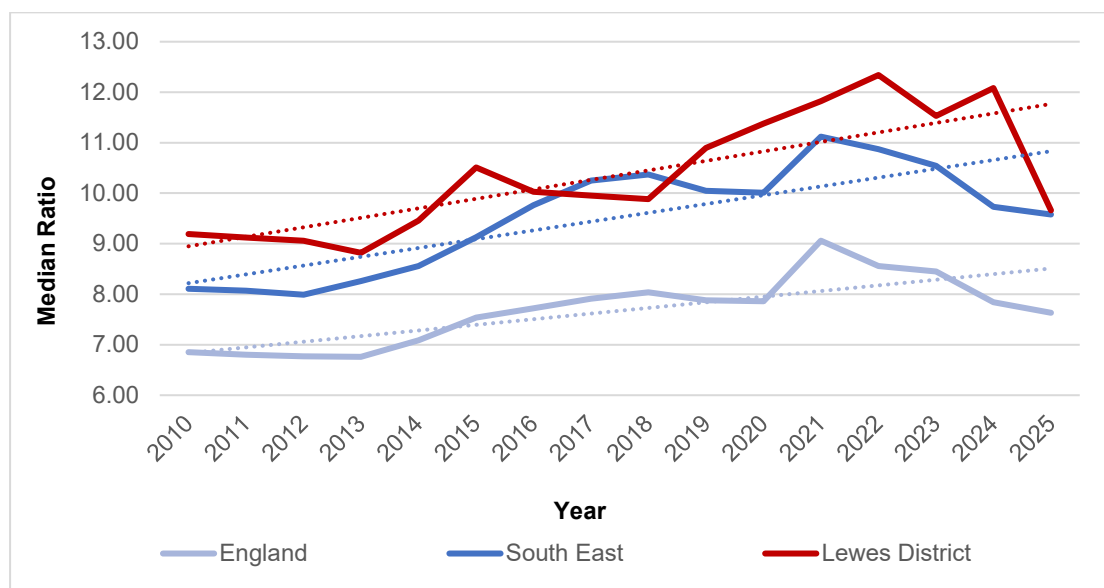
²² The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

- 7.23 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Lewes.

Median House Prices

- 7.24 The ratio of median house prices to median incomes in Lewes now stands at **9.66**. A ratio of 9.66 in 2025 stands substantially above the national median of 7.63 (+27%) and broadly in line with, although slightly above, the South East median of 9.58 (+1%).

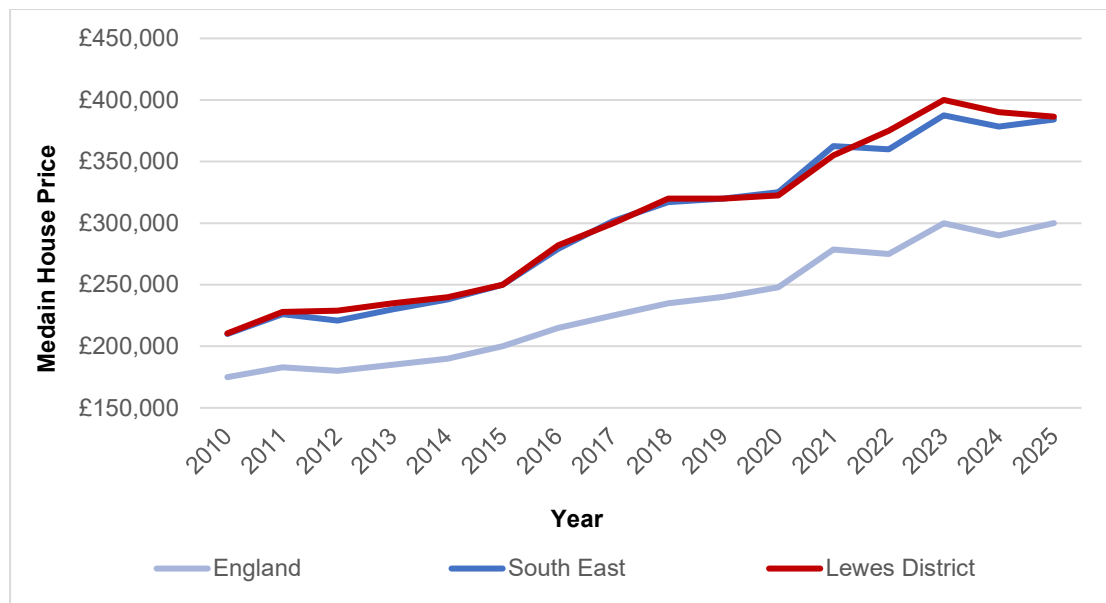
Figure 7.3: Median Workplace-Based Affordability Ratio comparison, 2020 to 2025



Source: ONS.

- 7.25 It is also worth noting that a figure of 8 times average incomes was described as a problem by the former Prime Minister in the foreword to the White Paper entitled 'Fixing our broken housing market'. Here, the affordability ratio is some 21% higher than that.
- 7.26 Figure 7.4 illustrates the median house sale prices for England, the South East, and Lewes District. It demonstrates that they have increased dramatically between the start of the Local Plan period in 2010 and 2024.

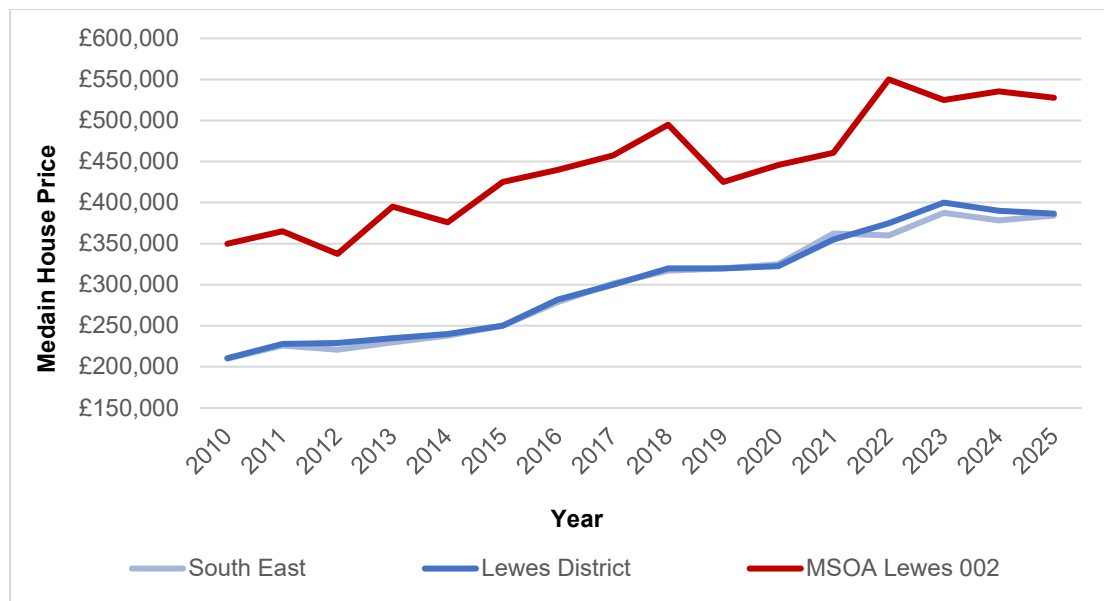
Figure 7.4: Median House Price Comparison, 2010 to 2025



Source: ONS.

- 7.27 The median house price across Lewes has risen by 84% from £210,500 in 2010 to £386,498 in 2025. This figure is some 29% higher than the national figure of £300,000, which has seen an increase of 71% over the same period and 1% higher than the South East figure of £384,000 which has seen an increase of 83% over the same period. It should also be noted that since the start of the 2023 LHNA period median house prices in Lewes have increased by 20% from £322,500 in 2020 to £386,498 in 2025.
- 7.28 Figure 7.5 below compares the median house sale prices in MSOA 'Lewes 002' with Lewes District and the South East. It demonstrates that they have increased dramatically between the start of the Local Plan period in 2010 and 2025.

Figure 7.5: Median House Price Comparison, 2010 to 2025



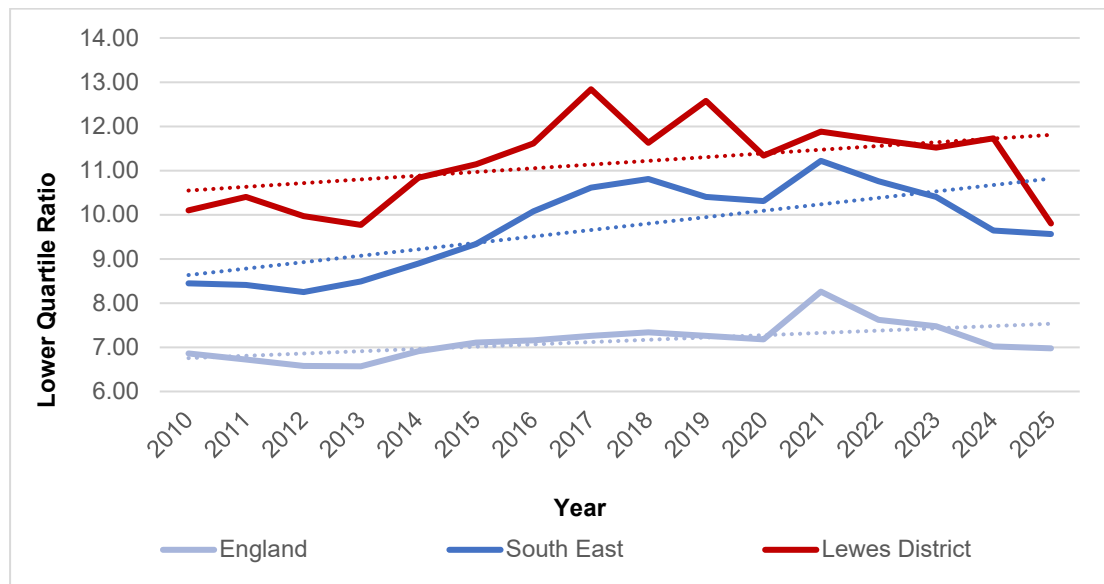
Source: ONS.

- 7.29 The median house price across MSOA 'Lewes 002' has risen by 51% from £350,000 in 2010 to £527,500 in 2025. This figure is 3% higher than the Lewes figure of £386,498, (which has seen an increase of 84% over the period) and 37% higher than the South East figure of £384,000 (which has seen an increase of 83% over the period).

Lower Quartile House Prices

- 7.30 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Lewes in 2025 stood at **9.80**.
- 7.31 This means that those on lower quartile incomes in Lewes, seeking to purchase a median priced property, now need to find almost 10 times their annual income to do so.
- 7.32 Once again, it remains the case that the ratio in Lewes stands substantially above the national average of 6.98 (+40%) and notably above the South East average of 9.56 (+3%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

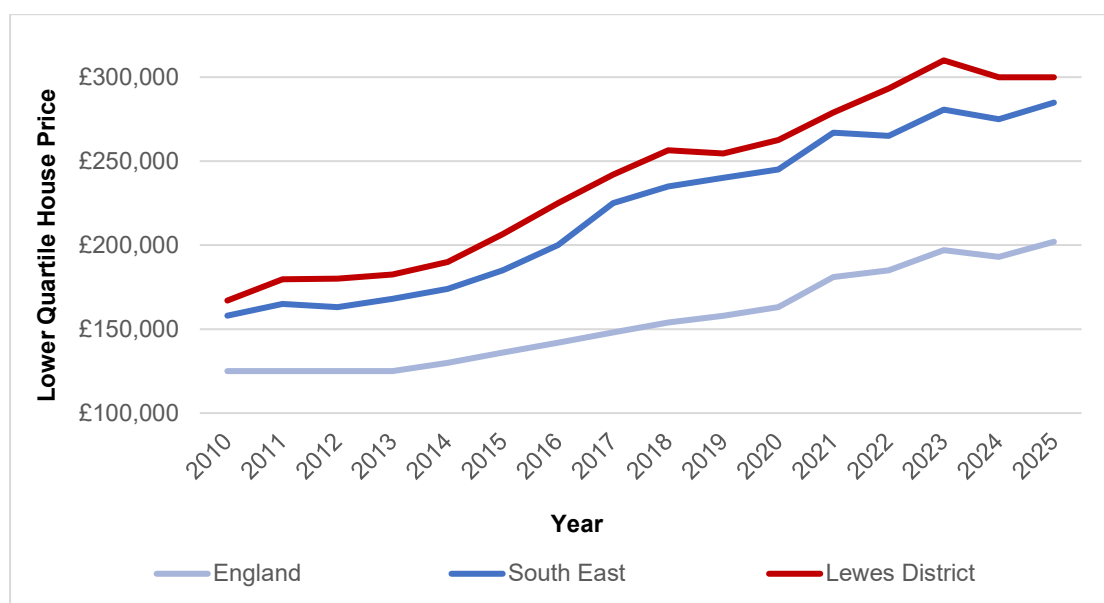
Figure 7.6: Lower Quartile Workplace-Based Affordability Ratio comparison, 2010 to 2025



Source: ONS.

- 7.33 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 118% higher than that.
- 7.34 Figure 7.7 illustrates the lower quartile house sale prices for England, the South East, and Lewes. It demonstrates that they have increased dramatically between the start of the Local Plan period in 2010 and 2025.

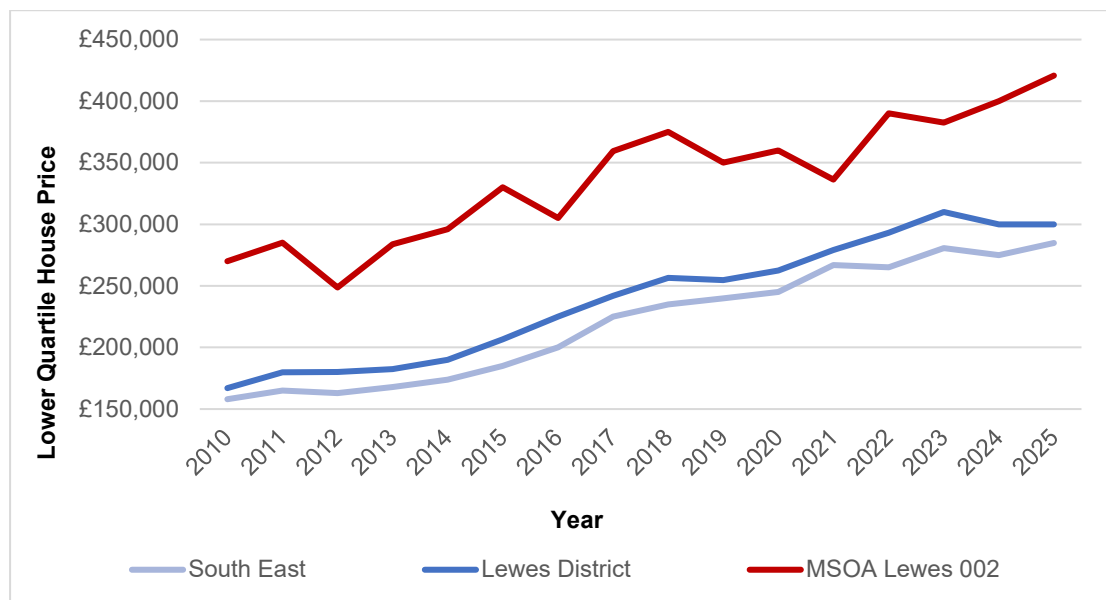
Figure 7.7: Lower Quartile House Prices, 2010 to 2025



Source: ONS.

- 7.35 The lower quartile house price across Lewes has risen by 80% from £167,000 in 2010 to £300,000 in 2025. This compares to an 80% increase across the South East and a national increase of 62% over the same period.
- 7.36 In 2025 lower quartile house prices in Lewes (£300,000) were 5% higher than across the South East (£284,838) and 49% higher than the national figure (£202,000). It should also be noted that since the start of the 2023 LHNA period lower quartile house prices in Lewes have increased by 14% from £262,500 in 2020 to £300,000 in 2025.
- 7.37 Figure 7.8 below compares the lower quartile house sale prices in MSOA 'Lewes 002' with Lewes District and the South East. Once again, it demonstrates that they have increased dramatically between the start of the Local Plan period in 2010 and 2025.

Figure 7.8: Lower Quartile House Price Comparison, 2010 to 2025



Source: ONS.

- 7.38 The lower quartile house price across MSOA 'Lewes 002' has risen by 56% from £270,000 in 2010 to £420,750 in 2025. This figure is 40% higher than the Lewes figure of £300,000, (which has seen an increase of 80% over the period) and 48% higher than the South East figure of £284,838 (which has also seen an increase of 80% over the period).
- 7.39 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (**CD10.13, p.17, [78-79]**) in January 2022. In considering the provision of affordable housing at the site and the weight to be

attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.

79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place substantial positive weight on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard” (my emphasis).

Summary and Conclusions

- 7.40 As demonstrated through the analysis in this section, affordability across Lewes has been, and continues to be, in crisis.
- 7.41 House prices and rent levels in both the median and lower quartile segments of the market are increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Lewes out of the reach of more and more people.
- 7.42 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Lewes, with a lower quartile house price to average income ratio of **9.80**.
- 7.43 Market signals indicate a worsening trend in affordability in Lewes and within Wivelsfield. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Future Supply of Affordable Housing

Section 8

Introduction

- 8.1 This section of the evidence considers the future supply of affordable housing across Lewes in comparison with identified needs.

Addressing the Shortfall in Affordable Housing Delivery

- 8.2 The 2023 LHNA identifies an objectively assessed need for 290 net affordable homes per annum between 2020 and 2040. Over the 20-year period this equates to a total need for 5,800 net affordable homes.
- 8.3 In the first five years of the 2023 LHNA period, the Council has overseen the delivery of 658 affordable homes against a net need of 1,450 affordable homes, which has resulted in a shortfall of -792 affordable homes.
- 8.4 I consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG²³ and endorsed at appeal.
- 8.5 The critical importance of understanding the ability of the Council to meet future need was considered in a recent appeal at Sondes Place Farm, Dorking where I provided affordable housing evidence.
- 8.6 The Inspector accepted the findings of the ‘future supply of affordable housing’ evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD10.14, p.16 [85-86]**):

“Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.

To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to

²³ Paragraph: 022 Reference ID: 68-031-20190722

be substantially below that level of delivery. This will mean the existing shortfall will only become worse.” (my emphasis).

- 8.7 The Inspector went on to outline the consequences of not providing sufficient affordable housing (paragraph 88):

“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development. In Mole Valley, the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 8.8 It is therefore imperative that the -792 dwelling affordable housing shortfall accumulated since 2020 is addressed as soon as possible and in any event within the next five years.
- 8.9 When the shortfall is factored into the 2023 LHNA identified need of 290 affordable homes per annum for the period 2020 and 2040, the number of affordable homes the Council will need to complete increases by 54% to 448 net affordable homes per annum over the period.
- 8.10 This would ensure that for the remainder of the LHNA period up to 2040 the annual affordable housing need reduces to 290 per annum to deal solely with newly arising needs. This is illustrated in Figures 8.1 and 8.2 below.

Figure 8.1: Annual Affordable Housing Need incorporating Backlog Needs since the 2020/21 base date of the 2023 LHNA

A	Affordable housing need per annum for the period 2020/21 to 2039/40 identified in the 2023 LHNA	290
B	Net Affordable housing need for the period 2020/21 to 2024/25 (A x 5)	1,450
C	Gross affordable housing completions for the period 2020/21 to 2024/25	658
D	Shortfall/backlog of affordable housing need for the period 2020/21 to 2024/25 (B – C)	792
E	Backlog affordable housing need per annum required over the period 2025/26 to 2029/30 (D/5)	158*
F	Full affordable housing need per annum for the period 2025/26 to 2029/30 (A + E)	448
G	Full affordable housing need for the period 2025/26 to 2029/30 (F x 5)	2,240

* Please note that figures account for rounding

- 8.11 Further indication of the severity of the situation can be seen in Figure 8.2 below which illustrates that the Council would need to deliver 2,240 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach (which seeks to address accumulated needs within 5 years along with ongoing need).

Figure 8.2: Annual Affordable Housing Need 2025/26 to 2029/30 incorporating Backlog Needs Accrued between 2020/21 and 2024/25 when applying the Sedgefield Approach

Monitoring Period	2023 LHNA Net Affordable Housing Need per annum	Net Affordable Housing Need per annum When Addressing Backlog Within Next Five Years
2025/26	290	448
2026/27	290	448
2027/28	290	448
2028/29	290	448
2029/30	290	448
Total	1,450	2,240

- 8.12 It is clear that the backlog of affordable housing needs within Lewes will continue to grow unless the Council takes urgent and drastic action to address needs and deliver more affordable homes.

The Future Supply of Affordable Housing

- 8.13 The Council has published its latest Five-Year Housing Land Supply Statement ("5YHLS") in May 2023 (**CD7.8**), covering the period 1 April 2023 to 31 March 2028.
- 8.14 The Council's supply as of 1 April 2023 is 1,904 dwellings. Table 4 in the 5YHLS Statement sets out that 169 of these dwellings are on small (minor) sites (<10 dwellings). Given that affordable housing is not sought on minor sites in Lewes, I have discounted 169 dwellings from the supply for the purposes of my analysis below.
- 8.15 If we were to generously to assume that the 1,735 dwellings included in the 5YHLS, not including small sites, will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (40%) as a proportion of overall housing completions, this is likely to deliver only 694 affordable dwellings over the period, equating to 139 affordable dwellings per annum.
- 8.16 This figure falls very substantially short of the 448 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach

and significantly short of the 290 net affordable housing needs per annum identified in the 2023 LHNA.

- 8.17 More realistically, if one were to assume that the past gross affordable housing provision of 27% is to be continued over the next five years, this is likely to deliver only 468 affordable dwellings over the period, equating to just 94 new affordable dwellings per annum.
- 8.18 As Figure 6.1 of this evidence highlights, affordable housing provision has slipped far below the policy compliant 40% since the start of the plan period in 2010/11 up to 2024/25. Average delivery on a per annum basis over the same period has been just 77 affordable homes.
- 8.19 Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

Summary and Conclusions

- 8.20 It is imperative that the -792 dwelling affordable housing shortfall accumulated since 2020/21 is addressed as soon as possible and in any event within the next five years.
- 8.21 When the shortfall is factored into the 2023 LHNA identified need of 290 affordable homes per annum for the period 2020 and 2040, the number of affordable homes the Council will need to complete increases by 54% to 448 net affordable homes per annum over the 2025/26 to 2029/30 five year period.
- 8.22 The above evidence demonstrates that Council is unlikely to be able to meet its affordable housing needs over the next five years. Generously assuming the sites in the 5YHLS (not including small sites) would provide policy compliant levels of affordable housing there is a possible supply of just 139 new affordable dwellings per annum. If we were to assume that the past gross affordable housing provision of 27% is to be continued over the next five years, this is likely to deliver a much lower affordable housing future supply of just 94 new affordable dwellings per annum.
- 8.23 Consequently, there is a substantial need for more affordable housing now. In light of the Council's poor record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 60 affordable dwellings on this site to address the district-wide needs of Lewes should be afforded **very substantial weight** in the determination of this appeal.

Council's Assessment of the Application

Section 9

Introduction

- 9.1 This section of the evidence considers the Council's Assessment of the appeal proposals during the course of the application and the appeal process.
- 9.2 The appeal has been made following the Council's failure to determine the application within the relevant timeframe.
- 9.3 There appears to be no consultation comments from the Council's housing team, nor a Committee Report for the application.

LPA Council Statement of Case

- 9.4 The Council's Statement of Case ("SoC") in respect of the appeal proposals can be viewed under **CD4.2**.
- 9.5 There is only one single reference to affordable housing in the Council's SoC; this is at paragraph 15 where the Council recognises the affordable housing proposals as a benefit of the appeal scheme.

Summary and Conclusions

- 9.6 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.
- 9.7 The acute level of affordable housing need in Lewes, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. Whilst I do not challenge the right of objectors to oppose unwelcome development, it is a stark aspect of my experience of almost all of the inquiries in which I have given evidence, that those in housing need never attend to explain exactly why they need additional housing and the consequences of not providing it.
- 9.8 In my opinion, the Council has thus far sought to downplay the provision of up to 60 affordable homes at the appeal site in its Statement of Case. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 10

Introduction

- 10.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 10.2 As set out in the previous chapter there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Lewes is no exception to this.
- 10.3 The appeal scheme will provide up to 60 affordable dwellings on site. The wider social and economic benefits of affordable housing per se are commonly recognised.
- 10.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 10.5 The offer meets the requirements of adopted Policy CP1 (40%) of the Lewes District Local Plan Part 1: Joint Core Strategy (2016). It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 10.6 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD10.15**) in September 2018 who was clear at paragraph 72 of their decision that:

“[I]n the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit” (my emphasis).

- 10.7 Similarly, as recognised in a recent appeal decision in at Coombebury Cottage, Dunsfold (**CD10.16, p.8, [48]**) *“the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs.”* The benefits of the proposed affordable homes at the appeal site should therefore be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.
- 10.8 The affordable housing benefits of the appeal scheme are therefore:
- Policy compliant offer of 40% (up to 60 dwellings) of the scheme provided as affordable housing;
 - A deliverable scheme which provides much needed affordable homes;
 - With the affordable homes managed by a Registered Provider;
 - Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and
 - Greater security of tenure than the private rented sector.
- 10.9 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.

Summary and Conclusions

- 10.10 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.
- 10.11 The acute level of affordable housing need in Lewes, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.
- 10.12 In my opinion, the Council have deliberately sought to downplay the provision of up to 60 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 11

- 11.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 11.2 Paragraph 61 of the NPPF sets out the Government's clear objective of *"significantly boosting the supply of homes"* before explaining that *"The overall aim should be to meet an area's identified housing need"*.
- 11.3 Furthermore, paragraph 62 requires that *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."* (My emphasis).
- 11.4 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, *"including those who require affordable housing"*.
- 11.5 A previous appeal that considered the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (**CD10.17**). In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:
- "The Council are of the view that the housing benefits of the scheme are 'generic' and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council's acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic."* (Paragraph 118)
- 11.6 I agree, the recipients of 60 homes here will not describe their needs as generic.

- 11.7 Considering the authority's past poor record of affordable housing delivery and the high number of households on the housing register, there can be no doubt in my mind that the provision of up to 60 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

- 11.8 The importance of affordable housing as a material consideration has been reflected in several Secretary of State ("SoS") and appeal decisions.
- 11.9 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. A collection of such SoS decisions can be viewed at **Appendix JS4**.

Appeal decision: Land to the South of Allington Road, Newick (29 April 2026, ref: 3370668)

- 11.10 The Inspector recognised that the scheme proposed a policy compliant level of affordable housing (40%) and that this would be secured by a S106 Agreement.
- 11.11 In discussing affordable housing, the Inspector made the following comments at paragraph 49: *"The proposal would contribute towards the provision of housing, including affordable housing and a good mix of unit sizes that would help the Council meet its identified need."*
- 11.12 The Inspector awarded substantial weight to affordable housing in the planning balance at paragraph 49.
- 11.13 Some of the key points I would highlight from these examples are that:
- Affordable housing is an important material consideration;
 - The importance of unmet need for affordable housing being met immediately;
 - Planning Inspectors and the Secretary of State have attached substantial weight and very substantial weight to the provision of affordable housing; and
 - Even where there is a five-year housing land supply the benefit of a scheme's provision of affordable housing can weigh heavily in favour of development.

Summary and Conclusion

- 11.14 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 11.15 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 11.16 Market signals indicate a worsening trend in affordability across Lewes and, by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes.
- 11.17 Against the scale of unmet need, the rising housing register and other affordability indicators there is no doubt in my mind that the provision of up to 60 affordable homes will make a substantial contribution. Considering all the evidence I consider that this contribution should be afforded **very substantial weight** in the determination of this appeal.

Appendix JS1

Freedom of Information Correspondence (17 and 24 April, 6
and 21 May 2026)

From: foi <foi@lewes-eastbourne.gov.uk>
Sent: 17 April 2026 10:37
To: Dan Austen-Fainman
Subject: EIR 27506
Attachments: EIR 27506 - Ditchling Parish.docx

Dear Mr. Austen-Fainman,

Information Request: EIR 27506

Thank you for your information request dated 16 March 2026 received in our office on the same day.

Request:

I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters Wivelsfield Parish, Ditchling Parish, and Westmeston Parish, as well as the Lewes District Council area.

I have reviewed your request and investigated whether there is any information which can be disclosed to you. Please find below the information the council holds, and which I am pleased to provide to you.

Please find an M.S Word document attached with the above requested information.

Please do take note of the following:

- **Planning policy only hold this information to year 14/15 on delivery of affordable housing.**
- **Planning policy only hold details of overall completions to year 07/08.**
- **From the year 20/21 Lewes District Council Planning Policy Team no longer collect monitoring data on housing delivery within the SDNP area of the district. Figures from 20/21 do not include delivery within the SDNP area of the District, parts of Ditchling Parish and Westmeston Parish fall within the SDNP.**

I trust that this deals with your enquiry to your satisfaction, but if you feel that **Lewes District** Council has misunderstood or not responded appropriately to your request, you have two courses of action:

- You can clarify the terms of your original request to allow this to be looked at again (if you expand your request this will be dealt with as a new request)
- All applicants have a 'right of review'. A review should be focused on the original request and should identify how the council has dealt incorrectly with your Information Request. Reviews must be made in writing (or e-mail) within 40 working days of receipt of this response and addressed to the Information Governance Reviews Officer, to the address below.

Information Governance Reviews Officer
Lewes District Council and Eastbourne Borough Council
Eastbourne Town Hall
Grove Road
Eastbourne
BN21 4UG
E-mail: foi.appeals@lewes-eastbourne.gov.uk

After the council's internal reviews procedure has been exhausted, a further review about the same Information Request can be directed to the Information Commissioner for adjudication. Full details will be provided should a review proceed to this stage.

Please note:

If you are considering re-using the information disclosed to you through this request, for any purpose outside of what could be considered for personal use, you are required under the Public Sector Re-use of Information Regulations 2015 to make an Application for Re-use to the organisation you have requested the information from. Applications for Re-Use should be directed to the address detailed in the footer below.

Please contact me again, quoting your reference number, if you require any further assistance with your current request and I will do my best to provide the relevant help and advice.

Kind Regards,

Linda Nzima

Information Governance Officer

Tel: +44(0)1273 471600

FOI@lewes-eastbourne.gov.uk

Lewes and Eastbourne Legal Services acting on behalf of Lewes District Council and Eastbourne Borough Council

Eastbourne Borough Council: Town Hall, Grove Road, Eastbourne BN21 4UG www.lewes-eastbourne.gov.uk. Text Relay 18001 01323 410000



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HOUSING REGISTER - Questions 1 to 11

	Lewes
1. The total number of households on the Council's Housing Register at 31 March 2025.	748
2. The average waiting times on 31 March 2025 for the following types of affordable property across the Authority:	We are unable to provide this information our current data is based around Banding and not property size.
1-bed affordable dwelling;	
2-bed affordable dwelling;	
3-bed affordable dwelling; and	
A 4+ bed affordable dwelling.	
3. The average waiting times on 31 March 2024 for the following types of affordable property across the Authority:	We are unable to provide this information our current data is based around Banding and not property size.
1-bed affordable dwelling;	
2-bed affordable dwelling;	
3-bed affordable dwelling; and	
A 4+ bed affordable dwelling.	
4. The total number of households on the Council's Housing Register at 31 March 2025 specifying the following locations as their preferred choice of location:	As we are undergoing a system change, we are unable currently to

	provide this detail.
Wivelsfield Parish	
Ditchling Parish	
Westmeston Parish	
5. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:	We are currently implementing a new policy that will go live on the 1 st April 26.
The date they occurred; What they entailed; and	
Copies of the respective documents	Available via our website after the 1 st April.
6. The total number of social housing dwelling stock on 31 March 2025 in the following locations:	
Wivelsfield Parish	
Ditchling Parish	
Westmeston Parish	
7. The number of social housing lettings in the period between 1 April 2024 and 31 March 2025; and between 1 April 2023 and 31 March 2024 in the following locations:	
• 1 April 2024 to 31 March 2025	
Wivelsfield Parish	3
Ditchling Parish	1
Westmeston Parish	0
• 1 April 2023 to 31 March 2024	
Wivelsfield Parish	1
Ditchling Parish	1
Westmeston Parish	0

8. The number of households housed in temporary accommodation within and outside the Lewes District Council region on the following dates:	
• 31 March 2024	
Households Housed within LPA	14
Households Housed outside LPA	44
Total Households	58
• 31 March 2025	
Households Housed within LPA	14
Households Housed outside LPA	34
Total Households	48
9. The amount of money spent on temporary accommodation per household within the Lewes District Council area over the following periods:	
• 1 April 2024 to 31 March 2025.	
10. The amount of money spent on temporary accommodation per household outside the Lewes District Council area over the following periods:	
• 1 April 2024 to 31 March 2025.	
Housing Completions	
11. The number of NET affordable housing completions in the Lewes District Council area broken down on a per annum basis for the period between 2000/01 and 2024/25.	
12. The number of NET housing completions in Wivelsfield Parish, Ditchling Parish, and Westmeston Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.	
13. The number of NET affordable housing completions in Wivelsfield Parish, Ditchling Parish, and Westmeston Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.	

Question 14.

	Number of Properties advertised	Average Bids per property
Type of affordable property		
Wivelsfield Parish		
1-bed affordable dwelling	0	
2-bed affordable dwelling	1	Not known
3-bed affordable dwelling	2	Not known

4+ bed affordable dwelling	0	
Ditchling Parish		
1-bed affordable dwelling	0	
2-bed affordable dwelling	0	
3-bed affordable dwelling	0	
4+ bed affordable dwelling	1	Not known
Westmeston Parish		
1-bed affordable dwelling	0	
2-bed affordable dwelling	0	
3-bed affordable dwelling	0	
4+ bed affordable dwelling	0	

Questions 12 to 15

	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17
Net Affordable Completions LDC								59	22	23
Net completions Wivelsfield, Ditchling and Westmeston Parish	47	69	9	49	37	73	3	1	35	41
Net Affordable Housing Completions Wivelsfield, Ditchling and Westmeston Parish							0	0	0	15

	18/19	19/20	20/21	20/21	21/22	22/23	23/24	24/25
Net Affordable Completions LDC	30	66	LDC no longer monitor delivery within the SDNP. Figures for following years are those for outside the SDNP only.	72	62	235	249	40
Net completions Wivelsfield, Ditchling and Westmeston Parish	76	70		57	17	5	24	8
Net Affordable Housing Completions Wivelsfield, Ditchling and Westmeston Parish	0	32		35	0	0	3	0

From: foi <foi@lewes-eastbourne.gov.uk>
Sent: 24 April 2026 12:10
To: Dan Austen-Fainman
Subject: EIR 27506

Dear Mr. Austen-Fainman,

Information Request: EIR 27506

Thank you for your follow up email on 17 April 2026.

- *The number of NET housing completions in the Lewes District Council area broken down on a per annum basis for the period between 2000/01 and 2024/25*

Planning policy holds limited information, for overall completions information is held up to year 07/08 and up to 14/15 on delivery of affordable housing.

From the year 20/21 Lewes District Council Planning Policy Team no longer collect monitoring data on housing delivery within the SDNP area of the district. Figures from 20/21 do not include delivery within the SDNP area of the District, parts of Ditchling Parish and Westmeston Parish fall within the SDNP.

- *For the data provided in response to questions 13 to 15, the 2017/18 monitoring year appears to be missing. Please could it be included?*

	17/18
Net Affordable Completions LDC	67
Net completions Wivelsfield, Ditchling and Westmeston Parish	109
Net Affordable Housing Completions Wivelsfield, Ditchling and Westmeston Parish	27

I trust that this deals with your enquiry to your satisfaction, but if you feel that **Lewes District Council** has misunderstood or not responded appropriately to your request, you have two courses of action:

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 Lewes District Council and Eastbourne Borough Council
 Eastbourne Town Hall
 Grove Road
 Eastbourne
 BN21 4UG
 E-mail: foi.appeals@lewes-eastbourne.gov.uk

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Kind Regards,

Linda Nzima

Information Governance Officer

Tel: +44(0)1273 471600

FOI@lewes-eastbourne.gov.uk

Lewes and Eastbourne Legal Services acting on behalf of Lewes District Council and Eastbourne Borough Council

Eastbourne Borough Council: Town Hall, Grove Road, Eastbourne BN21 4UG www.lewes-eastbourne.gov.uk. Text Relay 18001 01323 410000



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From: Dan Austen-Fainman
Sent: 06 May 2026 14:11
To: foi
Subject: RE: EIR 27506

Dear Ms Nzima,

Many thanks for your email and the additional data.

Apologies for not specifying, but would it be possible for completion figures provided in relation to questions 14 and 15 to be provided for each of the parishes separately, rather than as a combined figure? In effect to split questions 14 and 15 into three questions as below:

14. The number of NET housing completions in Wivelsfield Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
15. The number of NET housing completions in Ditchling Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
16. The number of NET housing completions in Westmeston Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
17. The number of NET affordable housing completions in Wivelsfield Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
18. The number of NET affordable housing completions in Ditchling Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
19. The number of NET affordable housing completions in Westmeston Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.

Kind regards,
Dan

Daniel Austen-Fainman LLB (Hons) MSc MRTPI
Senior Planner
Tetlow King Planning

Tetlow King

Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol,
BS16 5EL

E: dan.austen-fainman@tetlow-king.co.uk
T: 0117 9561916
M: 07517 106131
W: tetlow-king.co.uk



From: foi <foi@lewes-eastbourne.gov.uk>
Sent: 24 April 2026 12:10
To: Dan Austen-Fainman <dan.austen-fainman@tetlow-king.co.uk>
Subject: EIR 27506

Dear Mr. Austen-Fainman,

Information Request: EIR 27506

Thank you for your follow up email on 17 April 2026.

- *The number of NET housing completions in the Lewes District Council area broken down on a per annum basis for the period between 2000/01 and 2024/25*

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Kind Regards,

Linda Nzima

Information Governance Officer

Tel: +44(0)1273 471600

FOI@lewes-eastbourne.gov.uk

Lewes and Eastbourne Legal Services acting on behalf of Lewes District Council and Eastbourne Borough Council

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Leonie Stoate

From: Dan Austen-Fainman
Sent: 21 May 2026 17:27
To: foi
Subject: RE: EIR 28073
Attachments: EIR 27506 - Ditchling Parish.docx

Dear Ms Nzima,

Many thanks for the additional data provided.

In relation to questions 2 and 3 (attached), the response noted that data on waiting times was not held for different property sizes but was available by Housing Register Band. Would it be possible for this data to be provided in relation to questions 2 and 3 as revised below?

2. The average waiting times on 31 March 2025 for the following types of affordable property across the Authority:
 - a. Band A
 - b. Band B
 - c. Band C
3. The average waiting times on 31 March 2024 for the following types of affordable property across the Authority:
 - a. Band A
 - b. Band B
 - c. Band C

Kind regards,
Dan

Daniel Austen-Fainman LLB (Hons) MSc MRTPI
Senior Planner
Tetlow King Planning

Tetlow King

Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol,
BS16 5EL

E: dan.austen-fainman@tetlow-king.co.uk
T: 0117 9561916
M: 07517 106131
W: tetlow-king.co.uk



From: foi <foi@lewes-eastbourne.gov.uk>
Sent: 11 May 2026 11:24
To: Dan Austen-Fainman <dan.austen-fainman@tetlow-king.co.uk>
Subject: EIR 28073

Dear Mr. Austen-Fainman

Information Request: EIR 28073

Thank you for your follow up information request dated 6 May 2026 received in our office on the same day.

Request:

14. *The number of NET housing completions in Wivelsfield Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.*
15. *The number of NET housing completions in Ditchling Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.*
16. *The number of NET housing completions in Westmeston Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.*
17. *The number of NET affordable housing completions in Wivelsfield Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.*
18. *The number of NET affordable housing completions in Ditchling Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.*
19. *The number of NET affordable housing completions in Westmeston Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.*

As the questions have been refined, I have logged this as a new request with a new reference number. Your request now sits with the relevant officers.

I trust that this deals with your enquiry to your satisfaction, but if you feel that Lewes District Council has misunderstood or not responded appropriately to your request, you have two courses of action:

- You can clarify the terms of your original request to allow this to be looked at again (if you expand your request this will be dealt with as a new request)
- All applicants have a 'right of review'. A review should be focused on the original request and should identify how the council has dealt incorrectly with your Information Request. Reviews must be made in writing (or e-mail) within 40 working days of receipt of this response and addressed to the Information Governance Reviews Officer, to the address below.

Information Governance Reviews Officer
Lewes District Council and Eastbourne Borough Council
Eastbourne Town Hall
Grove Road
Eastbourne
BN21 4UG

E-mail: foi.appeals@lewes-eastbourne.gov.uk

Kind Regards,

Linda Nzima

Information Governance Officer

Tel: +44(0)1273 471600

FOI@lewes-eastbourne.gov.uk

Lewes and Eastbourne Legal Services acting on behalf of Lewes District Council and Eastbourne Borough Council



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Appendix JS2

Extracts from Planning Practice Guidance (March 2014,
Ongoing Updates)



Extracts from Planning Practice Guidance

Appendix JS5

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20241212	This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability. This paragraph sets out that <i>“an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need.”</i> This is because: <i>housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i> <i>people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.</i> <i>“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i>
Housing and Economic Needs Assessment	018 Reference ID 2a-01820190220	Sets out that <i>“all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework”</i> .
Housing and Economic Needs Assessment	019 Reference ID 2a-01920190220	States that <i>“strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)”</i> .
Housing and Economic Needs Assessment	020 Reference ID 2a-02020190220	The paragraph sets out that in order to calculate gross need for affordable housing, <i>“strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i> <i>the number of homeless households;</i>

		• <i>the number of those in priority need who are currently housed in temporary accommodation;</i> • <i>the number of households in over-crowded housing;</i> • <i>the number of concealed households;</i> • <i>the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> • <i>the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."</i>
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	The paragraph states that <i>"the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period"</i>. It also details that: <i>"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."</i>
Housing Supply and Delivery	022 Reference ID: 68-031-20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: <i>"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)..."</i>
Housing Needs of Different Groups	001 Reference ID: 67-001-20190722	Sets out the relationship between affordable housing need and overall housing need: <i>"This need [for specific groups of people] may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method."</i>

Appendix JS3

Independent News Article (June 2020)



Independent PremiumUK news

Council housing sell-off continues as government fails to replace most homes sold under Right to Buy

Home ownership has fallen since the policy was introduced and flats are ending up in the hands of private landlords, writes **Jon Stone**



Sunday 21 June 2020 09:18

Two-thirds of the council homes sold off under [Right to Buy](#) are still not being replaced by new [social housing](#) despite a promise by the government, official figures show.

[Housing](#) charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock.

Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show.

Under [Right to Buy](#), the government sells off council housing at discounts of up to £100,000 to tenants.

Despite pitching the policy as a way to get more people on the property ladder, overall home ownership has actually fallen significantly since it was introduced in the 1980s.

Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London.

Councils warned ministers when the policy was updated that the steep discounts meant the money would not be enough to replace homes one-to-one, and that the very existence of the policy undermined their ability to finance housebuilding by making it impossible to reliably borrow against future rents.

The government officially committed to replace the extra homes sold due to an increase in discounts in 2012-13, but housing charities say the affordable sector cannot afford to bleed stock at all. The government is still around 7,000 homes short of its own target, which covers construction up to the third quarter of 2016-17 because councils are given three years to replace the sold stock.

Jon Sparkes, chief executive at homelessness charity [Crisis](#), said: "These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this.

"People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.

"To address this, we need to see the government suspend Right to Buy going forward and prioritisation for social housing being given to people who are homeless so they are able to better access what is currently available. Alongside this, we also need commitment to build significantly more social homes in the coming years to keep in step with demand.

"Ending homelessness in the UK is completely within our grasp, but requires a rethink of existing policies that stand in the way."

In 2018 Theresa May announced that a long-standing borrowing cap preventing councils from building more homes would be lifting. A survey by the Local Government Association

conducted in March 2019 found that a startling 93 per cent of councils were planning to use the extra headroom.

The Scottish and Welsh governments have already ended Right To Buy, citing its effect on the council housing stock.

Commenting on the Right to Buy figures, Polly Neate, chief executive of the housing charity [Shelter](#), said: “The coronavirus pandemic has drummed into us the importance of having a safe home like nothing before. By the same token it’s made it crushingly clear that not enough people do – including the million-plus households stuck on social housing waiting lists. Many of whom are homeless or trapped in grossly overcrowded accommodation right now.

“Despite being desperately needed, our recent track record on building new social homes is atrocious. There was actually a net loss of 17,000 social homes last year, and as it stands Right to Buy isn’t helping. While some people have benefited from the scheme, the failure to replace the properties sold has deprived many others of a genuinely affordable social home.

“But the status quo can be changed. As the government plots its economic recovery from coronavirus, it could give councils the means they need to replace and build social housing. As well as helping to create jobs and get housebuilding going again, this would offer all those without one, their best shot at a safe home.”

Asked about the figures, a spokesperson for the Ministry of Housing, Communities, and Local Government said: “The government is committed to Right to Buy, which has helped nearly two million council tenants realise their dream of home ownership and get on the property ladder.

“Since 2010 we have delivered more homes for social rent – over 140,000 in total – compared to the number of homes sold under the Right to Buy scheme.”

The ministry’s statement is misleading, however, as the 140,000 figure refers to all social housebuilding rather than those homes built to replace housing sold under Right To Buy using receipts earmarked for this purpose.

Appendix JS4

Affordable Housing as a Separate Material Consideration



Affordable Housing as a Separate Material Consideration

Appendix JS4

- 1.1 Regarding the weight to be attached to the proposed affordable housing benefits at the appeal site, as I set out in my Affordable Housing Proof of Evidence, the need is acute, the benefits are considerable, and the weight in the planning balance should be **very substantial**. Affordable housing is a material benefit and should therefore be awarded its own weight in the planning balance.
- 1.2 Many appeal decisions issued by Inspectors and the Secretary of State ("SoS") have recognised affordable housing as an individual benefit and have specifically awarded affordable housing provision its own weight in the planning balance. Some examples are summarised below.

Appeal Ref.	Site Name	Decision Type	Decision	Date	Para Ref.	Weight to Affordable Housing	Paragraph Text
APP/R3650/W/23/3332590	Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold	Inspector	Allowed	08-May-24	48	Significant	"I note that the Inspector in the 'Knowle Lane appeal' appears to have combined the benefits of market and affordable housing delivery when making his decision. Nonetheless, based on the evidence before me, the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs. Accordingly, the proposed provision of affordable housing also carries its own significant weight in favour of the appeal development."
APP/F2360/W/22/3295498 and APP/F2360/W/22/3295502	Pickering's Farm Site, Flag Lane, Penwortham, Lancashire	SoS	Allowed	20-Nov-23	25	Significant	"For the reasons given at IR343 the Secretary of State agrees that the delivery of a total of some 1,100 homes in a mix of sizes is a significant benefit, to which he gives significant weight. <u>He further agrees that the delivery of affordable housing would be a benefit carrying significant weight.</u> "
APP/C2741/W/21/3282598	Land to the East of New Lane, Huntington, York	SoS	Allowed	17-Oct-23	44	Very significant	"He further agrees that <u>the provision of 30% affordable housing, of a tenure and size to be agreed, would also be a very significant benefit of the scheme (IR380).</u> "
APP/Q3115/W/22/3296251	Land off Papist Way, Cholsey, Oxfordshire	SoS	Dismissed	10-Oct-23	26	Significant	"For the reasons given at IR359 and IR390, the Secretary of State agrees that <u>the benefits of affordable housing which the proposal would provide would comply with SOLP policy H9 and should be afforded significant weight.</u> "
APP/C1570/W/21/3289755	Land East of Highwood Quarry, Park Road, Little Easton, Dunmow	SoS	Allowed	11-Sep-23	34	Great	"For the reasons given at IR535 he agrees that <u>the delivery of affordable housing is a benefit of great weight.</u> "

APP/L5240/W/ 22/3296317	103-111a High Street, Croydon	SoS	Dismissed	06-Apr-23	25	Significant	"For the reasons given at IR153 and IR168, the Secretary of State agrees with the Inspector that affordable housing delivery is a priority, and like the Inspector, <u>he affords the provision of affordable dwellings significant beneficial weight (IR153).</u> "
APP/C2741/W/ 21/3282969	Site to the West of The A1237 and South of North Lane, Huntington, York	SoS	Allowed	14-Dec-22	27	Significant	"For the reasons given at IR178 and IR196, <u>the Secretary of State agrees that delivery of 30% affordable housing would be a further social and economic benefit to which significant weight should be attached.</u> "
APP/M0655/W/ 17/3178530	Land at Peel Hall, Warrington	SoS	Allowed	09-Nov-21	24	Very substantial	" <u>He further agrees (IR524) that the provision of affordable housing attracts very substantial weight, for the reasons given.</u> "
APP/A2280/W/ 20/3259868	Land off Pump Lane, Rainham, Kent	SoS	Dismissed	03-Nov-21	33	Substantial	"...The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of that, <u>the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight.</u> "
APP/W1850/ W/20/3244410	Land North of Viaduct adj. Orchard Business Park, Ledbury	SoS	Allowed	15-Mar-21	27	Substantial	"For the reasons given in IR16.122-16.123, the <u>Secretary of State also gives substantial weight to the delivery of affordable housing.</u> "
APP/Y0435/W/ 17/3169314	Newport Road and Cranfield Road	SoS	Dismissed	25-Jun-20	32	Significant	"Weighing in favour of the proposal, the Secretary of State <u>affords the provision of affordable housing significant weight</u> and also affords the provision of market housing significant weight."
APP/E5330/W/ 19/3233519	Land at Love Lane, Woolwich	SoS	Dismissed	03-Jun-20	28	Substantial	"The Secretary of State considers that, in terms of benefits, <u>the provision of housing benefits and affordable housing benefits each carry substantial weight.</u> "
APP/Q3115/W/ 19/3230827	Oxford Brooks University, Wheatley Campus	SoS	Allowed	23-Apr-20	35	Very substantial	35 "...Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, <u>that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight.</u> " IR 13.111 " <u>The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS.</u> "
APP/G1630/W/ 18/3210903	Land at Fiddington, Ashchurch near Tewkesbury	SoS	Allowed	22-Jan-20	20	Substantial	"...The Secretary of State agrees with the Inspector, and further considers that the <u>provision of affordable housing in an area with a serious shortfall would be of significant benefit and attracts substantial weight in favour of the proposal.</u> "

APP/A0665/W/14/2212671	Darnhall School Lane	SoS	Dismissed	04-Nov-19	28	Substantial	<i>"The Secretary of State agrees that the social benefits of <u>the provision of affordable housing should be given substantial weight</u>, for the reasons set out at IR408-411."</i>
APP/P4605/W/18/3192918	Former North Worcestershire Golf Club, Hanging Land, Birmingham	SoS	Allowed	24-Jul-19	33	Significant	<i>30 "Weighing in favour the <u>Secretary of State considers that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.</u>"</i>
APP/E2001/W/18/3207411	Hutton Cranswick	Inspector	Dismissed	05-Jun-19	39	Significant	<i>"However, <u>aside from the provision of affordable housing (to which I attach significant weight)</u>, the provisions are essentially intended to mitigate the effect of the development-although they could be of some benefit to the wider public, and I have therefore given them very limited weight."</i>
APP/P0119/W/17/3191477	Coalpit Heath, South Gloucestershire	Inspector	Allowed	06-Sep-18	61	Substantial	<i>"There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing(CBH). <u>They are all important and substantial weight should be attached to each component</u> for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. <u>The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant –they would still comprise significant social benefits that merit substantial weight.</u>"</i>
APP/L3815/W/16/3165228	Land at the Corner of Oving Road and A27, Chichester	Inspector	Allowed	18-Aug-17	63	Substantial	<i>"Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. <u>Consequently I attach substantial weight to this element of the proposal.</u>"</i>
APP/P1425/W/15/3119171	Mitchelswood Farm, Newick, Lewes	SoS	Allowed	23-Nov-16	18	Significant	<i>"For the reasons given at IR196-201 the Secretary of State agrees that <u>the provision of 20 affordable homes is a tangible benefit of significant weight.</u>"</i>
APP/G1630/W/14/3001706	Cornerways, High Street, Twynning	Inspector	Allowed	13-Jul-15	63	Very substantial	<i>"...Table 7.16 of the Strategic Housing Market Assessment [SHMA] Update [CDA17] identifies that the net annual need for affordable housing in Tewkesbury is 587 dwellings. This is more than twice the equivalent figure for the neighbouring District of Wychavon, despite the fact that Tewkesbury's population is little more than two thirds of that in Wychavon. <u>The Inspector in the Wychavon appeal found that the provision of affordable housing in that case: "...is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission"; the Secretary of State agreed.</u> Given the much larger quantum of identified need in Tewkesbury and the magnitude of the accumulated shortfall in affordable housing delivery, <u>it would be appropriate to attribute very substantial weight to this important benefit of the proposal.</u>"</i>
APP/E2001/A/13/2200981 and	Brickyard Lane, Melton Park, East Riding	SoS	Dismissed	25-Jun-15	11	Substantial	<i>"However, he also agrees with the Inspector's conclusion that <u>substantial weight should attach to the proposals in proportion to the contribution they would make to the supply of affordable housing.</u>"</i>

APP/E2001/A/ 14/221394							
APP/K2420/A/ 13/2208318	Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire	SoS	Allowed	18-Nov-14	13 / IR 6.19	Substantial	13. "For the reasons given at IR11.20-IR11.23, the Secretary of State agrees with the Inspector's findings in relation to affordable housing, and with his conclusion at IR11.23 that the need for affordable housing is acute and warrants the provision offered by the appeal proposal." IR 6.19 "In those circumstances, there is no reason to depart from the statutory basis to providing for affordable housing set out in policy 15 of the Core Strategy. The policy takes account of the needs identified in the SHMA (2008) and was found to be sound by the Core Strategy Inspector. Hence, although <u>substantial weight should be given to the affordable housing</u> offered, that weight should not be overwhelming."
APP/H1840/A/ 13/2199085 and APP/H1840/A/ 13/2199426	Pulley Lane, Droitwich Spa	SoS	Allowed	02-Jul-14	23 / IR 8.126	Very significant	23. "For the reasons given at IR8.112-8.126, the Secretary of State agrees with the Inspector's conclusion at IR8.127 that the Council does not have a 5-year supply of housing land and the appeal scheme is necessary to meet the housing needs of the district, including the need for affordable housing." IR 8.126 "It seems to me that the Council has largely ignored the affordable housing need in its evidence. The poor delivery record of the Council has also been largely overlooked. The Council's planning balance is struck without any apparent consideration being given to one of the most important reasons why housing in Droitwich Spa is needed. From all evidence that is before me the provision of <u>affordable housing must attract very significant weight in any proper exercise of the planning balance.</u>[4.47]"