

TOWN AND COUNTRY PLANNING ACT 1990

**AFFORDABLE HOUSING STATEMENT OF COMMON
GROUND IN RESPECT OF AFFORDABLE HOUSING
NEEDS AND DELIVERY ACROSS THE LEWES
DISTRICT COUNCIL ADMINISTRATIVE AREA**

SECTION 78 APPEAL

**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

Taylor Wimpey UK Ltd

25-6-2026

PINS REF: 6005671

LPA REF: LW/24/0820

APPELLANT REF: 0216-02.M26.RPT

1.0 Affordable Housing

- 1.1 This Statement of Common Ground (SoCG) deals specifically with affordable housing, however, should be read in conjunction with the overarching Planning SoCG.
- 1.2 The appeal proposals seek outline planning permission for up to 150 dwellings, of which 40% are proposed as affordable homes equivalent to up to 60 affordable homes.
- 1.3 It is agreed the proposed development therefore complies with the requirements of Core Policy 1 (40%) of the adopted Lewes District Local Plan Part 1: Joint Core Strategy (2016) which seeks 40% affordable housing on site.
- 1.4 The affordable housing provision will be secured through a Section 106 Agreement with the precise size and tenure breakdown being agreed as part of subsequent Reserved Matters application(s).
- 1.5 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 national planning policy, including the National Planning Policy Framework (NPPF).

2.0 National Planning Policy and Guidance

- 2.1 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-taking processes.
- 2.2 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.”*
- 2.3 At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up to date Development Plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.

- 2.4 The December 2024 revisions to the NPPF expand the decision-taker's assessment under paragraph 11d to have *“particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination”*. In doing so, the NPPF now makes affordable housing a central part of applying the presumption to which the decision-taker must have particular regard.
- 2.5 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.”*
- 2.6 It should be stressed that paragraph 61 identifies the ‘overall aim’ is 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.”*
- 2.7 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...”*.
- 2.8 The NPPF places a core responsibility on all major developments (involving the provision of housing) to provide 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.”*
- 2.9 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 with 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).

Draft National Planning Policy Framework for Consultation (December 2025)

- 2.10 On 16 December 2025 the Ministry of Housing, Communities, and Local Government (MHCLG) opened a consultation on proposed changes to the planning system, including the NPPF. The consultation closed at 11:45 on 10 March 2026. The consultation draft of the revised NPPF is a material consideration but carries limited weight owing to the inherent uncertainty as to whether the consultation draft will be adopted in whole or in part.
- 2.11 The draft December 2025 NPPF places additional emphasis on the delivery of affordable housing, within the context of the wider proposed changes to the planning system which seek to make *“planning policy easier to use, underpin the development of faster and simpler Local Plans, and be more directive of decision-making in support of both appropriate housing and commercial development ...”*.
- 2.12 Draft Policy HO5 (meeting the needs of different groups) requires Development Plans to include policies that set requirements for the type and mix of affordable housing *“required to meet identified needs”*.
- 2.13 Draft Policy HO8 (providing affordable homes) establishes that development proposals are expected to *“meet or exceed up-to-date development plan requirements”* for the relevant mix of affordable housing tenures.

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. The PPG is divided into sections. Section 2a provides guidance on ‘Housing and Economic Needs Assessment’, section 67 on ‘Housing Needs of Different Groups’, and section 68 on ‘Housing Supply and Delivery’ and includes the following advice:

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-00620241212	This section sets out that assessments of housing need should include consideration 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 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 objectives 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>

Section	Paragraph	Commentary
Housing and Economic Needs Assessments	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 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>

Section	Paragraph	Commentary
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 requirement for the next 5 year period (the Sedgefield approach)....”</i>

3.0 Affordable Housing Delivery in Lewes District

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

Figure 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)

- 3.2 Between 2010/11 and 2024/25, a total of 4,249 dwellings were delivered in Lewes, equivalent to 238 per annum. Of these, 1,158 dwellings were affordable tenures, equivalent to 77 per annum. This equates to 27% gross affordable housing delivery.
- 3.3 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. As such the 1,158 gross affordable housing completions figure for the period is seen as a maximum.

4.0 Affordable Housing Need in Lewes District

- 4.1 The District Local Plan Part 1 does not identify an affordable housing target but instead relies on the findings of the most recent housing needs assessment.
- 4.2 The 2023 Lewes District Local Housing Needs Assessment (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 buy in Lewes District.
- 4.3 In setting out 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.
- 4.4 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.
- 4.5 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.

5.0 Affordable Housing Delivery Compared to Objectively Assessed Needs

- 5.1 When comparison is drawn between gross affordable housing delivery and the needs identified in the 2023 LHNA, it can be seen in Figure 2 below 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.

Figure 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

- 5.2 When comparison is drawn between gross affordable housing delivery and the needs identified in the 2023 LHNA, it can be seen in Figure 2 below 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.

6.0 Affordable Housing Delivery Compared to Corporate Targets

- 6.1 The Lewes Council Corporate Plan 2024-2028 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.
- 6.2 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 3 below that in the 2024/25 monitoring period there has been a shortfall of some -85 affordable homes.

Figure 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.

7.0 Affordability Indicators

7.1 The following affordability indicators are material considerations in this case.

Housing Register

7.2 The Council's Freedom of Information response (see Appendix JS1 of Mr Stacey's Affordable Housing Proof of Evidence) 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

7.3 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.

7.4 MHCLG data indicates that Lewes spent £995,000 on temporary accommodation between 1 April 2024 and 31 March 2025.

Homelessness

7.5 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

7.6 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

7.7 The ratio of median house prices to median incomes in Lewes stood at 9.66 in 2025.

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.

- 7.8 A median 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%).
- 7.9 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.
- 7.10 The median house price across MSOA 'Lewes 002' (within which the appeal site lies) 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, and 37% higher than the South East figure of £384,000.

Lower Quartile House Prices

- 7.11 The ratio of lower quartile house price to incomes in Lewes stood at 9.80 in 2025. The lower quartile ratio in Lewes stands substantially above the national average of 6.98 (+40%) and notably above the South East average of 9.56 (+3%).
- 7.12 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.
- 7.13 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).
- 7.14 The lower quartile house price across MSOA 'Lewes 002' (within which the appeal site lies) 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, and 48% higher than the South East figure of £284,838.

8.0 Matters in Agreement

- 8.1 It is agreed that there is an acute national housing crisis and that there is an on-going and pressing need for affordable housing in Lewes District.
- 8.2 It is agreed that the appeal site proposes to deliver 40% (60 affordable dwellings) of the total proposed number of homes as affordable homes which accords with the requirements of Core Policy 1 of the adopted Lewes District Local Plan Part 1: Joint Core Strategy (2016).

- 8.3 The parties agree that affordable housing can be secured by suitably worded planning obligations.
- 8.4 The parties agree that in the 15-years since the start of the District Plan Part 1 period in 2010/11 and 2024/25, the delivery of affordable housing in Lewes District, excluding completions in the South Downs National Park ("SDNP"), has totalled 77 gross affordable dwellings per annum, equivalent to 27% of the total number of net housing completions per annum (283 dwellings).
- 8.5 It is agreed that 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 in Lewes District.
- 8.6 The parties agree that the 2023 LHNA identifies a total net need for 290 new affordable homes per annum between 2020 and 2040 in Lewes District. This applies to the part of the district outside of the SDNP based on its share of population and dwellings.
- 8.7 It is agreed that when comparison is drawn between gross affordable housing delivery and the needs identified in the 2023 LHNA between 2020/21 and 2024/25, 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 affordable dwellings over the same period.
- 8.8 It is agreed that there has not been enough affordable homes built per year and there isn't sufficient affordable housing in Lewes District.
- 8.9 Due to the shortfall in delivery and current backlog of affordable housing, it is agreed that any calculations regarding the future supply of affordable housing should adopt the Sedgefield approach and seek to address the backlog within the next five years.
- 8.10 The parties agree that the provision of up to 60 much needed affordable dwellings at the appeal site accords with the sustainable development definition in NPPF and is a material consideration weighting in favour of this appeal, as a benefit that is likely to arise from the appeal proposal.
- 8.11 The parties agree that the weight to be given to the provision of affordable housing in the planning balance is at the top end of the decision makers scale.

9.0 Matters not in Agreement by the parties

- 9.1 None

Signed on behalf of the LPA:

Signed on behalf of the Appellant:



Signature:..... Signature:

Name:..... Name: James Stacey

Date:..... Date: 25 June 2026

On behalf of Lewes Planning Authority

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