

**Lewes District Council
South Downs National Park Authority**

Joint Core Strategy Background Paper

Justification for the Housing Strategy

May 2014



Lewes District Council



South Downs
National Park Authority

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1. INTRODUCTION

- 1.1 The purpose of this paper is to provide the technical evidence that supports the approach to housing delivery in Lewes District set out in Spatial Policies 1 and 2 of the Core Strategy - Proposed Submission Document.
- 1.2 Spatial Policy 1, Provision of Housing and Employment Land, identifies a minimum housing delivery target of 5,600 additional homes to be delivered across the district between 2010 and 2030. Spatial Policy 2, Distribution of Housing, then sets out the overall spatial strategy for future housing development in the district, as supported by the Sustainability Appraisal.
- 1.3 The paper demonstrates that the process of determining the Core Strategy's housing delivery target has followed national planning policy guidance for achieving sustainable development, together with good practice guidance in relation to technical studies such as Strategic Housing Land Availability Assessments and Strategic Housing Market Assessments.
- 1.4 It provides a detailed justification for the approach to housing delivery and concludes that this approach meets the tests of soundness set out in the National Planning Policy Framework (NPPF) for plan preparation, i.e.
 - The plan has been **positively prepared** and has sought to meet the objectively assessed needs for housing requirements as far as is consistent with the overall aim of achieving sustainable development within the district
 - The housing target and strategy set out in the plan is **justified** and represents the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
 - The housing spatial strategy is **effective** and deliverable over the plan period to 2030 and has addressed joint working on cross-boundary strategic priorities
 - The housing delivery strategy is **consistent with national policy**, and will provide for a significant boost in housing supply
- 1.5 This paper supersedes the two Housing Background Papers that were published in 2011 and 2013 in order to support earlier versions of the Core Strategy. Copies of all the Core Strategy background papers are available on the Lewes District Council web site at:
www.lewes.gov.uk/planning/backgroundreps.asp

2. BACKGROUND

- 2.1 The first Core Strategy – Proposed Submission Document was approved by the South Downs National Park Authority on 8th November 2012 and Lewes District Council on 5th December 2012. It was subsequently published for a 10 week representation period between January 2013 and March 2013, with the intention of formally submitting the document to the Secretary of State later that year.
- 2.2 However, after the representation period had ended, a number of significant issues arose which raised concerns about the progress and ultimate ‘soundness’ of the Core Strategy. These issues were:
- The formal revocation of the South East Plan
 - The completion of the Duty to Co-operate Housing Study for the Sussex Coast Housing Market Area and updated demographic projections for Lewes District based upon the results of the 2011 census
 - The publication of the government’s planning practice guidance, in particular the guidance on assessing the future need for housing
- 2.3 It is also evident that, since the removal of the regional spatial strategies, Planning Inspectors at examination are starting from the point that local plans should meet the full, objectively assessed housing needs of their areas. If a planning authority is not meeting its housing needs, then Inspectors are expecting a commitment from another authority (or authorities) that it will be able to meet the shortfall.
- 2.4 In the light of these significant changes, the District Council’s Cabinet on 18th November 2013 and the National Park Authority’s Planning Committee on 12th December 2013 agreed on a figure for the objectively assessed housing needs of the district and also a further programme of work in order to progress the Core Strategy towards formal submission.
- 2.5 The authorities agreed that the full, objectively assessed housing need of Lewes District over the Core Strategy period is **9,200 - 10,400** additional dwellings. This figure is significantly higher than the housing delivery target of 4,500 additional dwellings identified in the first Core Strategy - Proposed Submission Document approved in 2012. Accordingly, the main focus of the agreed work programme was a re-appraisal of the Core Strategy’s housing delivery target and strategy, including a further exploration of the longer term options for meeting the district’s housing needs over the plan period.
- 2.6 The outcomes of the above work are included in this background paper and support the Spatial Policies 1 and 2 of the Core Strategy – Proposed Submission Document, Focussed Amendments, approved by the South Downs National Park Authority on 10th April 2014 and Lewes District Council on 7th May 2014.

3. NATIONAL PLANNING POLICY

- 3.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It is intended to provide a framework:

'within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities' (NPPF paragraph 1)

- 3.2 NPPF paragraph 14, which sets out a 'presumption in favour of sustainable development', has been of fundamental importance in determining the housing delivery policies in the Core Strategy. It states that local planning authorities should positively seek opportunities to meet the development needs of their area and that Local Plans should meet 'objectively assessed needs', unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 3.3 Other sections of this background paper will demonstrate that there would be significant adverse impacts associated with a housing target of the scale required to meet the objectively assessed housing needs of the district in full, and that these impacts would be in conflict with the policies of the NPPF when taken as a whole.
- 3.4 NPPF paragraph 17 sets out the government's core planning principles, which have been a strong influence on the preparation of the Core Strategy and its policies for housing delivery.
- 3.5 Most of the core principles are reflected in the Core Strategy's eleven strategic objectives, which have shaped the spatial strategy and planning policies for the future development of the district. These seek to achieve a balance between accommodating the district's development needs, particularly for homes and jobs, and protecting its high quality natural environment, including the nationally designated landscape of the South Downs.
- 3.6 In terms of housing delivery, the most relevant policies of the NPPF are set out in paragraphs 47–55. Paragraph 47 states that, to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.
- 3.7 Other sections of this background paper will demonstrate that the housing delivery policies of the Core Strategy seek to significantly increase the supply of housing over the plan period and attempt to maximise housing delivery so far as is consistent with other key strategic objectives and development needs of the district.
- 3.8 The other significant area of national planning policy in terms of addressing housing requirements concerns the evidence base. NPPF paragraph 159

identifies the scope of the necessary assessments required to ensure that local planning authorities have a clear understanding of housing needs in their area. This includes:

- working with neighbouring authorities where housing market areas cross administrative boundaries
- identifying the scale and mix of housing and the range of tenures needed over the plan period
- establishing realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing

3.9 NPPF Paragraph 181 states that local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their local plans are submitted for examination.

3.10 The District Council and the National Park Authority have worked in partnership with other local authorities in the Sussex Coast Housing Market Area (HMA) to ensure a consistent and objective assessment of housing requirements in each authority and across the HMA, addressing the need and demand for both market and affordable housing for the period to 2030. They have also undertaken comprehensive Strategic Housing Land Availability Assessments with annual updates to inform future housing delivery. These studies are further discussed in subsequent sections of this background paper.

4. STRATEGIC CONTEXT FOR THE HOUSING STRATEGY

4.1 The early stages of preparing the Core Strategy involved developing, and consulting upon, a 'vision' for Lewes District as a whole and for the individual towns and the rural parishes within it. This approach is in accordance with the NPPF, which states that '*Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities*'.

4.2 The 'Vision for Lewes District' set out within Section 4 of the Core Strategy reflects the aims and objectives of the Lewes District Local Strategic Partnership, together with the priorities that communities identified for their areas through the Core Strategy consultation process. This vision, and the strategic objectives set out in Section 5 of the Core Strategy, therefore help to identify what is considered 'sustainable development' in Lewes District and provide the context against which the housing delivery target and spatial strategy have been derived.

4.3 The key elements of the overall vision for **Lewes District** can be summarised as follows:

- a district which is responsive to the challenges of climate change
- a conserved and enhanced South Downs National Park
- improved employment opportunities and a reduced need for out-commuting
- more sustainable communities
- an appropriate level of housing, particularly in respect of affordable homes

4.4 The vision for the individual towns and rural parishes identifies the following priorities:

Newhaven – a regenerated town with a strengthened economic base

Peacehaven/Telscombe – a more accessible and revitalised town

Seaford – a regenerated seafront and improved tourist offer

Lewes town – a county town which embraces the purposes of the National Park

The rural area of the Low Weald – attractive villages and countryside which retain their distinctive character and identity whilst accommodating the social and economic needs of their local communities

The rural area of the National Park – a protected and enhanced landscape with an important tourism and recreational role

4.5 The strategic objectives which support the above vision are:

1. To stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy, and ensuring that the economy is underpinned by a balanced sector profile.

2. To maintain and enhance the vitality and viability of the district's town centres, retail centres and local centres as hubs for shopping, business, entertainment, cultural and community life.
3. To deliver the homes and accommodation for the needs of the district and ensure the housing growth requirements are accommodated in the most sustainable way.
4. To take advantage of the richness and diversity of the district's natural and heritage assets to promote and achieve a sustainable tourism industry in and around the district.
5. To work with other agencies to improve the accessibility to key community services and facilities and to provide the new and upgraded infrastructure that is required to create and support sustainable communities.
6. To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.
7. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
8. To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.
9. To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, study in and visit the district.
10. To ensure that the district reduces causes of climate change, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments, and is proactive regarding climate change initiatives.
11. To reduce the district's vulnerability to the impacts of climate change, particularly by seeking to reduce the number of properties, community assets and infrastructure that are at an unacceptable risk of flooding, or coastal erosion.

4.6 The spatial strategy set out in Section 6 of the Core Strategy broadly reflects the vision and strategic objectives summarised above. The overall aim is to achieve a sustainable approach to accommodating growth over the plan period. Hence, the spatial strategy seeks to achieve a balance between accommodating the district's development needs, particularly for homes and jobs, with the need to protect and enhance the district's high quality environment, particularly the nationally designated landscape of the South Downs.

- 4.7 The Core Strategy's housing delivery target recognises and responds to the ongoing demand for housing arising from household growth at the national and sub-national level, which manifests as pressure for in-migration, as well as local housing needs. It also needs to be seen in relation to the ability of the district to develop its economic base and provide the job opportunities that will support the sustainable growth and overall prosperity of the area. These factors are regarded as the *drivers* for change and growth and are addressed in the following section of this background paper.
- 4.8 The housing delivery target also involves consideration of the district's *capacity* for development growth. This embraces both environmental capacities and the capacity of existing and planned infrastructure to serve such growth. These are addressed in subsequent sections of this background paper. Critical to balancing all these factors are the aspirations of communities for their local areas, as reflected in the vision set out in the Core Strategy.

5. HOUSING NEEDS AND DEMANDS

5.1 Establishing the need and demand for housing over the plan period, and the scale of housing supply necessary to meet it, is clearly an important factor in determining the housing delivery target for the district. This involves taking into account population and household projections based on demographic change and an understanding of the components of that change, including the impact of predicted migration. It is also necessary to consider how future changes to the local economy could influence housing requirements.

5.2 **Lewes District Strategic Housing Market Assessment (DTZ, 2008)** was commissioned by the District Council to provide part of the evidence base for the Core Strategy. The 2008 SHMA:

- defined the spatial extent of the district's housing market and identified wider relationships with sub-regional housing and labour market areas
- provided evidence of the demographic and economic drivers of the housing market
- provided evidence on the stock and supply of housing and the implications for affordability

5.3 However, the 2008 SHMA did not undertake any new work on the overall housing needs of the district because, at that time, the housing delivery target for Lewes District was being progressed through the preparation of the South East Plan.

5.4 **Lewes District Assessment of the Local Need for Housing (Nathaniel Lichfield & Partners, 2011)** was commissioned by the District Council and the National Park Authority to provide an assessment of the district's housing requirements based on up-to-date demographic and economic performance factors. This followed the government's announcement in July 2010 that it intended to abolish Regional Spatial Strategies through the enactment of the Localism Bill. The Assessment did not examine the capacity for housing growth in the district, or take into account the visions and aspirations of local communities.

5.5 The Assessment indicated a district housing requirement of between 425 – 452 dwellings per annum over the period 2010 – 2030, based on past demographic trends. This level of provision would broadly maintain a stable employment base. However, the study concluded that it would be reasonable to plan for a housing requirement of between 300 – 450 dwellings per annum. This level of housing growth would meet the majority of the projected population increase and maintain existing labour supply levels, with the potential for some modest employment growth to be supported by reduced out commuting.

5.6 **Housing Duty to Co-operate Study – Sussex Coast Housing Market Area (GL Hearn, May 2013)** was commissioned by the local authorities of Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing within the Sussex Coast Housing Market Area (HMA), together with the South Downs National Park Authority. The study draws together evidence from a range of studies to

provide an independent and consistent view of objectively assessed housing needs for each authority and across the HMA, addressing the need for both market and affordable housing.

- 5.7 The study also assesses residential land supply and capacity, including environmental, landscape and infrastructure constraints, and considers the balance between potential supply and demand for housing in each authority and across the HMA. Finally, it quantifies and considers the implications of a potential shortfall in housing provision across the HMA and how this might be addressed. The study was noted by the Coastal West Sussex Strategic Planning Board, who agreed that it could be used for discussions with adjoining authorities in respect of meeting housing needs.
- 5.8 In terms of Lewes District’s housing requirements, the Housing Study notes the findings of the Lewes District Assessment of the Local Need for Housing 2011 (as listed above) but does not consider that there is as much scope for a reduction in out-commuting as suggested by the earlier report. The Study’s objective assessment of housing need for the Sussex Coast HMA is set out in Table 1 below:

Table 1

	Low	High	Median
Arun	550	650	600
Adur	215	245	230
Chichester	480	590	535
Worthing	430	480	455
Brighton & Hove	800	1000	900
Lewes	425	450	440
HMA Total	2900	3415	3160

Source: Housing Duty to Co-operate Study – Sussex Coast HMA, GL Hearn 2013.

- 5.9 **Updated Demographic Projections for Sussex Coast HMA Authorities (GL Hearn, August 2013)** were commissioned by the authorities in the Sussex Coast HMA in order to take account of more up-to-date demographic information available from the results of the 2011 Census, which had not been issued by the ONS when the Housing Duty to Co-operate Study was being undertaken. The updated projections drew on ONS 2011-based interim Sub-National Population Projections and 2011- based CLG Household Projections.
- 5.10 Table 2 on the following pages identifies the different projection scenarios that have been used to help determine the objectively assessed housing needs for Lewes District. These were mainly based on either demographic trends or were linked to employment forecasts.

Table 2 – Summary of the various projections of housing need for Lewes District for the period 2011 – 2031

Projection	Population growth		Housing numbers		Employment growth		Explanation of the projection(s)
	Per annum	% change	Per annum	% change	Per annum	% change	
1. Sub National Population Projection	1,152	1.2	610	1.4	327	0.7	These projections calculate housing need by using the Governments estimations of what change there will be to the population of individual local authorities (as published by the Office for National Statistics (ONS)). These estimates form the basis for then calculating the number of new homes that will be required to support this population growth. The second projection differs from the first in that the first projection is considered to have over-estimated the level of migration expected to occur into the district. Therefore, projection 2 estimates a migration level that is considered to be more in line with recently observed trends.
2. Sub National Population Projection updated	791	0.8	464	1.1	148	0.3	
3. Ten year migration trends	653	0.7	409	0.9	79	0.2	These two projections are based on the recorded trends in migration over the past five and ten years. These trends are then projected forwards for the period between 2011 and 2031.
4. Five year migration trends	754	0.8	449	1.0	130	0.3	
A. Labour supply	1,222	1.3	636	1.5	369	0.8	Experian produce economic forecasts from a global level down to a local level (local authorities). Such a forecast is able to determine the number of additional jobs that will be created per annum in the local authority area. This figure is then used to determine the additional resident population that will be required to fill these jobs. These projections take into account existing commuting patterns (at present, Lewes District experiences a net level of out commuting) and is therefore influenced by projected job growth created in areas where people currently commute to, such as London. The difference between projection A and B is that projection A assumes the same commuting patterns will apply in the future, whereas projection B assumes that every additional working age resident will work in the district.
B. Labour demand	1,163	1.2	613	1.4	340	0.7	

Projection	Population growth		Housing numbers		Employment growth		Explanation of the projection(s)
	Per annum	% change	Per annum	% change	Per annum	% change	
C. Experian forecast updated	873	0.9	497	1.1	191	0.4	This projection is a more up to date economic led projection when compared to the two identified above. It is based on the Experian forecasts from Spring 2013. It is important to note that all 3 economic projections do not take into account local economic strategy initiatives or key development projects. However, they do take into account the Government's spending plans, recent economic performance and potential.
X. Zero net migration	-163	-0.2	84	0.2	-331	-0.7	This projection assumes that the number of people who each year move into the district to live is equal to the number of people who move from Lewes District to live elsewhere.
Y. Zero employment growth	492	0.5	345	0.8	0	0.0	This projection takes a starting point that there will be no increase in the number of jobs that are currently available in the district. The number of residents living in Lewes District and in turn the number of houses required to accommodate these residents is then established. This scenario factors in projected fertility, mortality and migration levels, as well as assuming the same levels of net out-commuting as currently experienced.

5.11 **Assessment of Housing Development Needs Study: Sussex Coast HMA (Draft) (GL Hearn, October 2013)** was commissioned by the authorities in the Sussex Coast HMA to revise the objective assessment of housing needs in the Housing Duty to Co-operate Study (May 2013) in the light of the demographic projections updated in August 2013, an up-to-date analysis of housing market indicators and signals, and the specific requirements of the draft planning practice guidance issued by the government in late August 2013.

5.12 In terms of the objectively assessed housing needs for Lewes District, the Draft Study considers the relevant evidence and addresses the implications of each of the specific 'tests' set out in the national planning practice guidance as follows:

The Starting Point – Demographic Requirements

5.13 The Sub-National Population Projection (Projection 2 in Table 2) for Lewes District indicates a requirement for 610 homes per annum. Adjusting this projection to take account of the latest demographic data and migration trends following publication of Census data (Projection 2 in Table 2) indicates a lower requirement for 464 homes per annum. This is considered to be a reasonable starting point to consider the district's housing requirements.

Is there evidence that household formation has been constrained? Do market signals indicate a need to increase housing supply in order to address affordability and/or high demand?

5.14 The market signals indicate that there is a reasonable level of market pressure in the Lewes District. Issues with lower quartile affordability in the district are considerably more acute than across East and West Sussex generally. Whilst current median prices are slightly below the West Sussex average, house price growth in the district during the "boom" period was very strong against comparator areas. Detailed discussion of the evidence for each of the indicators is set out below:

Affordability: Lower quartile affordability in Lewes District (10.06) is notably worse than the East Sussex (8.86) and West Sussex (9.10) averages. Affordability in the district has significantly worsened since 1997 (when the ratio was 3.48) and – with an increase of 143% - has worsened at a much faster rate than comparator areas over the corresponding period (East Sussex 117%; West Sussex 115%).

House Prices: During the pre-recession decade (1998-2007), median prices increased at a faster rate in Lewes District (22.6% p.a.) than the average across East and West Sussex. At the peak of the market, median prices in the district (£239,950) were above both the East Sussex and West Sussex average. However, since 2008, the district has actually seen a decline in prices (-1.3%) whilst all other comparator areas have experienced growth (generally around 5%+), suggesting a comparatively limited recovery in demand locally.

Current median house prices (£231,995) remain above the East Sussex average (£212,250) but are now below the West Sussex average (£238,000).

Rents: Median monthly private rental values in the district (£795 pcm) are slightly above averages for wider comparators such as West Sussex and the South East region. Rental price growth since 2011 (6.0%) has been broadly consistent with regional growth and above the rental growth seen across East Sussex.

Land Values: Based on land value data for Eastbourne – which is considered a reasonable comparator – residential land values in Lewes District in 2010 were estimated to be around £2m to £2.5m per hectare, slightly below the South East averages (£2.3m-£2.6m/ha). Nationally there has been little growth in land values since 2010. Land values in the Lewes/Eastbourne area grew by 109% between 2001 and 2007, significantly outpacing regional growth at 77%, but have fallen since 2008.

Overcrowding: There is no significant issue of overcrowding in Lewes District: 2011 Census data indicates that 2.9% of households (1,237) in the borough are overcrowded, significantly less than the proportions of overcrowding at regional and national level. In the decade to 2011, the number of overcrowded households increased by 21% (an additional 452 households) in Lewes, notably below the increases in overcrowding seen at regional and national level.

Rates of Delivery: Past delivery performance in Lewes District (2001-2013) has been positive compared to planned targets, with 2,840 completions against a requirement for 2,690 homes. However, housing stock growth in the district between 2001 and 2011 was on average 0.6% per annum, below the growth seen across the South East region (0.9%). Given the housing market signals at play in the district, this level of growth is slightly below what the market would be expected to deliver in the district if unconstrained, suggesting household formation is likely to have been suppressed somewhat over the past decade.

- 5.15 The affordability evidence coupled with the comparatively low housing growth rate over the past decade indicates a degree of household suppression may have occurred in the district. Comparison of actual household size in 2011 (2.31) with the size which would have been expected had historic headship and formation trends been maintained (2.27), indicates that there is likely to have been a notable degree of suppression in the district over the past decade, particularly compared to other areas in the Sussex Coast HMA.

Is there a need to increase housing supply in order to ensure delivery of the required number of affordable homes?

- 5.16 The 2008 SHMA indicated a net need for 260 affordable homes per annum in the district; meeting affordable housing needs is therefore likely to place some upside pressure on overall housing needs in Lewes.

Increase supply to ensure sufficient labour supply to support forecast economic growth?

5.17 The economic projections indicate that seeking to support and align housing with future economic growth is likely to generate upward pressure on housing need in the district. The economic-led scenarios in the updated demographic projections indicate a housing need ranging from 500 to 640 homes per annum, although the latter figure would represent a relatively high level of annual growth (1.5%).

Overall assessment of housing development needs

5.18 The Study concludes that an objective assessment of housing needs for Lewes District would fall between 460 – 520 dwellings per annum. The lower end of this range is consistent with meeting future demographic needs, whilst provision at the upper end would respond to the market signals and evidence of past household suppression in the district through allowing for future increased headship and household formation. It also recognises and responds to the upside pressure created by future economic growth (whilst acknowledging the uncertainty associated with such projections).

5.19 **Draft Lewes District Affordable Housing Needs Assessment 2013 – 2018** concluded that there is a need to build 389 additional affordable dwellings per year up to 2018, based upon the following evidence:

- An average increase of 549 additional households in assessed need is expected to join the housing register every year from 2013/14
- An average of 33 households, who would be assessed as in need, will choose not to join the housing register every year
- An average of 244 Council and Housing Association dwellings will become empty and re-let each year
- An average of 175 household will be removed from the register each year due to no longer being in housing need

5.20 In the light of the evidence studies listed above, Lewes District Council on 18th November 2013 and the National Park Authority on 12th December 2013 agreed¹ that the full, objectively assessed housing need for the district over the Core Strategy period 2010 – 2030 is:

9,200 - 10,400 net additional dwellings (equivalent of 460 – 520 dwellings per annum)

The capacity of the district to accommodate this level of housing need, as well as any shortfall in capacity in adjacent authorities, having due regard to sustainability considerations is discussed in the subsequent sections of this background paper.

¹ Lewes District Council Cabinet Minute 73.3, National Park Authority Planning Committee Minute 321

6. HOUSING LAND SUPPLY

Strategic Housing Land Availability Assessment

- 6.1 Strategic Housing Land Availability Assessments (SHLAAs) are used to identify and assess land with potential for housing development. The SHLAA process is intended to help establish realistic assumptions about the availability, suitability for housing, likely economic viability and overall deliverability of sites identified as having potential for housing over the plan period.
- 6.2 The Lewes District SHLAA was initially undertaken in 2010 by consultants Nathaniel Lichfield & Partners, who were commissioned by the District Council. It covered all potential sources of supply and was prepared in consultation with the development industry and key stakeholders in order to identify as many potential housing sites in the district as possible.
- 6.3 The 2010 SHLAA has subsequently been reviewed and updated annually by the District Council in partnership with the National Park Authority. The approach taken has followed the government good practice guidance 'Strategic Housing Land Availability Assessments' published in 2007, as outlined in the 'SHLAA Project Brief and Methodology' (Lewes District Council, September 2009).
- 6.4 Since the publication of the NPPF in 2012, the SHLAA approach has been amended to take account of the requirement for local planning authorities to:
- *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land*
 - *identify a supply of specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 (NPPF paragraph 47)*
- 6.5 Three SHLAA updates (2011, 2012 and 2013) have been undertaken to inform the evidence base of the Core Strategy in relation to the potential supply and delivery of housing over the plan period. The SHLAA only identifies and assesses sites that are capable of accommodating a minimum of 6 net additional dwellings. Potential sites have been assessed for their suitability for housing using the following criteria:
- Policy alignment
 - Physical constraints
 - Sustainability
 - Accessibility
 - Current use
 - Ownership

- 6.6 Sites that were assessed as suitable for housing were further evaluated in terms of availability and viability, and finally classified as either:
- Deliverable (suitable, available and achievable), or
 - Developable (suitable, but either the availability is specified for a future date/ currently unknown or the achievability of the site is unknown/ marginal).
- 6.7 The 2013 SHLAA informed the housing delivery target and planned distribution of housing set out in Spatial Policies 1 and 2 of the Core Strategy - Proposed Submission Document. It identifies 'deliverable' or 'developable' sites with a potential capacity to deliver 5,402 dwellings across the district by 2030.
- 6.8 Clearly, any theoretical capacity for housing growth has to be balanced against a range of other factors that are critical to achieving sustainable development, including the local vision for the area, economic factors, environmental constraints, and infrastructure capacity. The latter three factors are considered in turn in subsequent sections of this report. It is evident, however, that the SHLAA potential dwelling capacity falls significantly short of the district's objectively assessed housing need of 9,200 - 10,400 dwellings.
- 6.9 In view of this significant shortfall, further testing and evaluation of the sites assessed as not suitable for housing in the 2013 SHLAA was carried out in advance of the 2014 update, together with an examination of the implications of releasing such sites in order to help meet the district's objectively assessed housing needs.
- 6.10 The results of this study are set out in full in a separate background paper, 'Policy Constraints Report', but are summarised below.

Possible additional housing sites

- 6.11 The further testing and evaluation of SHLAA sites yielded only very small increases in potential housing land supply. The study recommends that a small number of sites assessed as not suitable for housing in the 2013 SHLAA should be re-classified as 'deliverable' or 'developable' in the next SHLAA update. These recommendations are reflected in the housing delivery target of the Core Strategy.

The implications of increasing housing land supply through the allocation of 2013 SHLAA sites assessed as not suitable for housing

- 6.12 The study also examined the extent to which it would be possible to meet the district's objectively assessed housing needs through discounting one or more of the physical or sustainability constraints used by the SHLAA to test the suitability of potential housing sites. The principal identified constraints were:
- Site access
 - The capacity of the local highway network

- Settlement pattern and proximity of services
- Flood risk
- Conservation of the landscape and natural beauty of the National Park
- Conservation of the landscape character of the Low Weald
- Protection of nature conservation assets
- Conservation of heritage assets

The application of these constraints to the assessment of individual sites was also reviewed in relation to the cumulative implications for individual settlement and the District as a whole through the Sustainability Appraisal process.

- 6.13 It was concluded that it would be theoretically possible to meet the district's objectively assessed housing need for 9,200 – 10,400 dwellings through the allocation of additional sites currently identified as not suitable for housing in the SHLAA. However, this level of housing provision could not be achieved without significant conflict with the principles of sustainable development set out in the NPPF.
- 6.14 For example, the study demonstrates that there is potential capacity in the SHLAA for the provision of a further 2,300 dwellings across the district, which would meet the lower end of the district's housing needs. However, this level of provision would cause unacceptable harm to the landscape of both the National Park and the Low Weald countryside. The government requires local planning authorities to give great weight to conserving the landscape and scenic beauty in National Parks (NPPF Paragraph 115), whilst recognition of the intrinsic character and beauty of the countryside is also one of the core land-use planning principles (NPPF Paragraph 17).
- 6.15 Alternatively, the study found that a different selection of sites currently identified as not suitable for housing in the SHLAA could provide the potential capacity for a further 2,200 dwellings across the district without causing harm to the landscape and scenic beauty of the National Park. However, the development of these alternative sites for housing would instead have unacceptable adverse impacts on all of the following factors:
- highway safety
 - the need to actively manage growth to make the fullest possible use of public transport, walking and cycling
 - the landscape character of the Low Weald countryside
 - the conservation of heritage assets
- 6.16 Other, alternative approaches to delivering a further 2,200 dwellings would imply selecting greenfield SHLAA sites that are currently identified as not suitable for housing because they are located in areas at risk from flooding. Such approaches would also have unacceptable adverse impacts on many of the factors identified in the above paragraph.
- 6.17 The study also demonstrates that it is theoretically possible to meet the upper end of the district's objectively assessed housing needs through the provision

of a further 3,700 dwellings on SHLAA sites currently identified as not suitable for housing. However, this level of housing provision could not be achieved without unacceptable adverse impacts on highway safety, the protected landscape of the National Park, the landscape character of the Low Weald countryside, and the need to actively manage patterns of growth to make the fullest possible use of sustainable modes of transport.

- 6.18 In the light of these findings, it is concluded that allocating sufficient sites to meet the district's objectively assessed housing needs would mean that the Core Strategy would be in substantial conflict with many of the government's core land-use planning principles, as set out in NPPF Paragraph 17.

Windfall sites

- 6.19 Windfalls are sites that have not been specifically identified in the plan preparation process and hence unexpectedly become available. NPPF Paragraph 48 states that local planning authorities may make an allowance for windfall sites in the five year supply of housing if they have compelling evidence that such sites have consistently become available in the local area and will continue to be a reliable source of supply. This windfall allowance should not include residential gardens.
- 6.20 Windfall or unidentified sites, particularly on small sites of five dwellings or less, have historically made a major contribution to housing completions in Lewes District. Such sites have consistently come forward for housing development in the past and are expected to continue to be a reliable source of housing supply over the plan period. It is therefore considered that the housing delivery target in the Core Strategy should make an allowance for completions on small windfall sites (with a capacity of 5 dwellings or less) beyond the first five years' supply of housing.
- 6.21 In order to establish an accurate and realistic future rate of housing delivery on small windfall sites, it has been necessary to calculate the proportion of net dwelling completions on windfall sites (excluding residential gardens) in relation to annual net dwelling completions. This information has been obtained from the annual Housing Land Availability monitoring documents since 2004/5.
- 6.22 Table 3 overleaf shows the number of net dwelling completions achieved on all sites since 2004/05 and indicates housing delivery rates in the years prior to, during, and emerging from the economic recession. It demonstrates that small windfall sites (excluding residential gardens) have delivered 368 net dwellings completions between 2004 and 2013, an average of 41 dwellings per annum.
- 6.23 However, the table also indicates that dwelling completions on small windfall sites account for a relatively high proportion of total dwelling completions during the years 2004/05 and 2005/06, compared with the rest of the period monitored. In order to avoid an unrealistically high windfall allowance over the plan period, these two years have therefore been excluded from the calculation of the district's projected rate of housing delivery on small windfall sites.

Table 3

Year	Net dwelling completions (large & small sites)	Total small site (5 units or less) net completions	Net windfall completions (excluding gardens)	Percentage of completions on windfall sites
2004/05	170	65	45	26.47
2005/06	265	85	65	24.53
2006/07	296	65	40	13.51
2007/08	415	88	61	14.70
2008/09	247	49	39	15.79
2009/10	175	61	39	22.28
2010/11	161	47	25	15.53
2011/12	257	45	23	8.95
2012/13	218	46	31	14.58
Total	2204	551	368	16.70
Past 7 years	1769	401	258	14.58

6.24 Between 2006 and 2013, small windfall sites (excluding residential gardens) delivered 258 net dwelling completions, an average of 37 dwellings per annum. This annual average number of dwelling completions has been projected forward to provide the windfall allowance of 518 net additional dwellings over the Core Strategy period.

6.25 It should be noted that the calculation of the windfall site allowance stops short of the full plan period in order to allow for small sites with planning permission at 2027/28 to be developed, thus avoiding duplication with dwelling completions on small windfall sites. Accordingly, over the remaining 14 year period, the windfall allowance is 518 dwellings.

6.26 This windfall allowance is included within the housing delivery target set out in Spatial Policies 1 and 2 of the Core Strategy – Proposed Submission Document. It also informs the housing trajectory that illustrates the rate of anticipated development over the plan period in Appendix 4 of the Proposed Submission Document.

Potential additional sources of supply

6.27 In view of the significant shortfall in housing land supply when compared with the objectively assessed housing needs of the district, an examination of the potential to release existing employment sites for housing development has also been undertaken.

6.28 It has been a long established policy in Lewes District to safeguard employment land and premises from alternative uses in order to retain and improve the range of available employment opportunities. There is an acknowledged need to achieve a better balance between homes and jobs in the district in order to reduce the need for out commuting, whilst at the same time recognising that the

opportunities for finding additional employment land are limited by the environmental constraints affecting large parts of the district.

- 6.29 This policy approach has been carried forward in Core Policy 4 of the Core Strategy, which seeks to safeguard employment sites from other competing uses in order to maintain an adequate supply of employment land, to encourage employment development, and to prevent a lack of land supply or choice of sites from becoming a barrier to economic growth. This approach reflects the vision and strategic objectives summarised in section 4 of this background paper.
- 6.30 The Lewes District Employment and Economic Land Assessment 2010 (EELA) and its 2012 update provide an assessment of the employment floorspace requirements for the district over the period to 2031. The EELA was carried out by Nathaniel Lichfield & Partners and assesses the district's future requirements for employment floorspace under a range of economic scenarios and approaches.
- 6.31 In order to ensure that the potential growth of the local economy is not constrained, the EELA recommends that the Core Strategy be guided by the following employment floorspace requirements:
- 14,000 sq.m. of office floorspace
 - 60,000 sq.m. of industrial floorspace.
- 6.32 Based on past demand and current provision, the EELA does not identify any quantitative need for new employment land allocations to meet these requirements. However, there is a qualitative need for a new site for office development in or near to Lewes town, whilst appropriate provision of small scale, flexible business units should be achieved in the district's other towns.
- 6.33 The EELA notes that attracting more business relocations from outside the district would be beneficial to the local economy but that this would require the provision of a better quality and choice of employment sites. It concludes that the competing effects of nearby employment centres suggest that greater emphasis should be given to encouraging the growth of indigenous firms.
- 6.34 The EELA included a detailed assessment of existing employment sites but failed to identify any sites that were clearly unsuited to continued employment use. The majority (94%) of the current supply of employment land was assessed as 'good' or 'average', and whilst some sites scored poorly due to factors such as poor access or physical appearance, most were still found to meeting local employment needs at some level, particularly in the rural areas.
- 6.35 The three lowest ranked employment allocations were assessed by the EELA as unlikely to deliver new employment space. However, all of these sites are in isolated, rural locations and the EELA concluded that none had any obvious potential for housing development or, indeed, other alternative uses. Overall, no existing employment sites were identified as possible candidates for release to other uses.

- 6.36 Accordingly, the EELA recommends that existing employment sites should be retained in order to help meet the district's future employment needs and that a very cautious approach should be taken to the loss of such sites to alternative uses. This reflects the very limited choice of potential new employment sites due to the environmental constraints affecting the district, in particular the large areas at risk of flooding or located within the South Downs National Park.
- 6.37 In view of this recommendation, and the Core Strategy's vision and strategic objectives related to the local economy, the District Council and the National Park Authority do not consider it appropriate to allow any further losses of employment sites in order to assist in reducing the identified shortfall in suitable housing sites. The Core Strategy does allocate two mixed use developments, incorporating both housing and employment development, on existing industrial sites at North Street, Lewes (Spatial Policy 3), and at Harbour Heights, Newhaven (Spatial Policy 6) but no further opportunities have been identified elsewhere.
- 6.38 The district's need for housing must be balanced with the needs of the business community and the creation of jobs through the delivery of business and industrial development, in accordance with the core planning principles set out in the NPPF. In the light of the evidence set out above, it is considered that the ability of Lewes District to meet its development needs for employment would be significantly undermined by the further release of existing employment sites for housing purposes. Accordingly, such sites should not be relied upon to help meet the district's shortfall in housing land supply.

7. ENVIRONMENTAL CONSTRAINTS

7.1 Environmental factors have been very influential in determining the appropriate level of housing growth in Lewes District. The Core Strategy vision highlights the aspiration to preserve the district's unique, distinctive and generally high quality environment, enhance its biodiversity, and retain the relative tranquillity of much of its area. It also prioritises the need to reduce the risk of flooding, which currently affects large parts of the district.

Landscape

7.2 The most significant environmental constraint on the capacity of the district to accommodate high levels of housing growth is the South Downs National Park. The National Park covers 56% of the district and has the highest status of protection in relation to landscape and scenic beauty (NPPF Paragraph 115). Great weight should also be given to the two statutory purposes of National Parks, which are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park
- To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public

7.3 The 'English national parks and the broads: UK government vision and circular 2010' (DEFRA 2013)² states that "The government recognises that the parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focussed on meeting affordable housing requirements, supporting local employment opportunities and key services" (Paragraph 78)

7.4 A further constraint to development is the Sussex Heritage Coast, which covers the whole coastline to the east of Seaford and south of the A259. It is the government's policy to maintain the character of this undeveloped coastal area, and protect and enhance its distinctive landscape (NPPF Paragraph 114).

7.5 These two nationally protected landscapes significantly limit the opportunities to find green field sites that are suitable for housing development, particularly around the towns of Lewes and Seaford.

7.6 The Core Strategy vision also aspires to retain, and where possible, enhance the attractive and distinctive character of the villages and countryside of the Low Weald, which extends northwards from the South Downs National Park. Whilst the Low Weald is not a nationally designated landscape, its gently undulating character, intimate scale and relative tranquillity make an important

² <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

contribution to the overall attractiveness of the district as a place to live, work and visit.

- 7.7 The planning system should recognise the intrinsic character and beauty of the countryside (NPPF Paragraph 17) and also protect and enhance valued landscapes (NPPF Paragraph 109). It is acknowledged that it is difficult to prescribe a “carrying capacity” of the landscape. However, the Landscape Capacity Study 2012, published as a Core Strategy background paper, seeks to identify where housing growth can be accommodated without unacceptable harm to the rural landscape of the district. It complements the South Downs Integrated Landscape Character Assessment (2011)³ and has been used to inform the housing delivery target and spatial strategy.

European wildlife sites

- 7.8 Another potential constraint to housing growth in the district is wildlife sites protected by the Habitats Regulations. There are two Special Areas of Conservation (SACs) within the district:
- Lewes Downs SAC, located between Lewes town and Ringmer village
 - Castle Hill SAC, located on the administrative border with Brighton & Hove City Council at the south-western edge of the district
- 7.9 An Appropriate Assessment Screening Opinion concluded that the existence of the Castle Hill SAC should not preclude any reasonable development growth options in Lewes District but that a further assessment was required to establish the potential impact of development options on the Lewes Downs SAC. The latter was due to the increase in nitrogen deposition levels that would be caused by additional traffic movements on the A26 and B2192 roads between Lewes town and Ringmer.
- 7.10 The results of the further assessment are set out in the Habitats Regulation Assessment Report 2013, published as a Core Strategy background paper. This report concludes that the levels of housing growth proposed in the Core Strategy should not have a serious adverse impact on the Lewes Downs SAC in relation to nitrogen deposition levels. However, significantly higher levels of growth in Lewes town or Ringmer may cause unacceptable harm to the nature conservation interest of the site (this has not yet been tested because the 2013 SHLAA demonstrated that such a scenario would not be deliverable).

Flood Risk

- 7.13 Future housing growth must also be considered within the context of flood risk, which affects significant parts of the district. Large areas within and around Lewes town and Newhaven are particularly vulnerable to both fluvial and tidal flooding, whilst parts of Seaford are at risk from coastal inundation from the

³ www.southdowns.gov.uk/planning/integrated-landscape-character-assessment

sea. This acts as a significant constraint to housing growth in these towns. In the rural area, parts of Ringmer, Plumpton Green and Barcombe Mills are at risk from fluvial flooding, as well as localised surface water drainage problems. The full information on flood risk that informed the spatial strategy for the district is contained in the Lewes District Strategic Flood Risk Assessment 2009 and the East Sussex Preliminary Flood Risk Assessment 2011⁴.

⁴ <http://www.eastsussex.gov.uk/environment/flooding/floodrisk.htm>

8. INFRASTRUCTURE CAPACITY

- 8.1 It is important to ensure that sufficient infrastructure is available to satisfactorily accommodate new development. A key constraint on housing growth in the district is the capacity of the local highway network to accommodate future traffic demands without an unacceptable deterioration in general operating or environmental conditions. This is particularly an issue in the coastal settlements of Newhaven, Peacehaven/Telscombe but also impacts upon the capacity of Wivelsfield Parish to accommodate further housing development.
- 8.2 The relevant advice of ESCC, as the local transport authority, is contained in the following Core Strategy Background Papers:
- Transport Position Statement 2011
 - ESCC Transport Advice Note, September 2012
- 8.3 The conclusions of both Background Papers have been agreed by the District Council and the National Park Authority and the implications in terms of housing growth are summarised below.

Newhaven and Peacehaven

- 8.4 A Newhaven Transport Study was commissioned in 2011 to examine the transport challenges and consequences arising from a range of development options in Newhaven and Peacehaven. The findings of this study, together with subsequent transport modelling work carried out by ESCC, form the basis of the advice provided by local transport authority in the two Background Papers listed above.
- 8.5 The significant conclusions from the above studies concern the capacity and operation of the A259, which provides the principal road link between the coastal settlements in the district. The A259 passes through the middle of Newhaven, where it forms a one-way ring road around the town centre, and through Peacehaven and Telscombe Cliffs, where it provides access and on-street parking for a wide range of local shops and services.
- 8.6 Current traffic demands on the Newhaven town centre one-way system and also on the A259 to the west of Peacehaven mean that there is only limited capacity on these parts of the highway network to accommodate an increase in demands arising from future housing development in either Newhaven or Peacehaven/Telscombe. Establishing the additional transport demands that can be accommodated on these sections of the A259 has therefore been critical to determining the amount of housing growth that can be delivered in each town.
- 8.7 In exploring the potential level of housing growth that would be acceptable in Newhaven and Peacehaven/Telscombe, consideration was given to the amount of already committed development in these settlements and the scope for creating additional capacity at critical junctions, other online improvements, and effective measures to maximise sustainable transport use, particularly bus

use. Over and above existing commitments, the maximum levels of acceptable housing growth in Newhaven and Peacehaven/Telscombe in highway terms were identified in the ESCC Transport Advice Note, September 2012.

- 8.8 This was a determining factor in the planned housing growth of 780 net additional dwellings in Newhaven and 220 net additional dwellings in Peacehaven/Telscombe in the first Core Strategy Proposed Submission Document published in 2013. ESCC has identified the transport mitigation measures, including critical junction improvements and bus service enhancements, necessary to deliver these planned levels of housing growth, which it considers are realistic and achievable.
- 8.9 The housing delivery target of 780 dwellings for Newhaven largely reflects the findings of the 2013 SHLAA in respect of developable or deliverable sites. However, the SHLAA identifies the potential for 660 additional dwellings on sites within Peacehaven/Telscombe, which represents an increase of 440 dwellings above the 220 additional dwellings considered achievable in this location by ESCC in September 2012.
- 8.10 A number of longer term options have therefore been explored to determine whether the capacity constraints on the A259 could be overcome by strategic infrastructure improvements that could potentially facilitate a greater level of housing growth in Peacehaven and Telscombe. These options are summarised below.
- 8.11 A major constraint to traffic flows on the A259 west of Peacehaven occurs at its junction with the B2123 (Rottingdean crossroads), where long queues of slow moving traffic are often experienced during peak periods. This junction is located within Brighton & Hove City, a unitary authority with its own transport responsibilities.
- 8.12 The Brighton & Hove Local Transport Plan 2011 identifies the A259/B2123 junction as one of the city's worst locations in terms of traffic congestion and delays. However, the City Council has no proposals to improve the layout and operation of this junction. Queuing and delays on its approaches will therefore continue to be a feature, unless further substantial modal use shifts from car to bus can be achieved in the future.
- 8.13 The possibility of constructing a new road to the north of Peacehaven and Rottingdean in order to relieve the A259 corridor has been explored jointly by the District Council, the National Park Authority, ESCC and Brighton & Hove City Council. However, it has been agreed by all the authorities that this is not a realistic or sustainable solution for the following reasons:
- The new road would have an unacceptable impact upon the natural beauty, wildlife and cultural heritage of the South Downs National Park
 - The provision of additional road capacity would encourage people to transfer from other modes of transport to the car, in conflict with air quality and other sustainability objectives shared by all four local authorities

- There could be a transfer of existing traffic from the A27 trunk road to the new road, resulting in adverse environmental impacts on the coastal communities
- Public sector funding for such a scheme is not available and, due to the topography of the South Downs, the cost of construction would exceed the amount that could be raised through development contributions

8.14 The possibility of constructing a new road around the south-western edge of Newhaven in order to relieve pressure on the critical junctions around the town centre ring road has also been explored. This option was proposed as part of an overall transport strategy for the town set out in Annex C of the 'Physical Development Vision for Newhaven', a report commissioned by the Newhaven Strategic Network in 2008.

8.15 This road proposal was subsequently found to be unviable due to the difficulties of achieving the necessary land acquisition and the high costs of construction. This means that the overall scheme could not be delivered without significant levels of public sector funding. Furthermore, the road proposal would not by itself resolve the issue of limited capacity on the A259 to the west of Peacehaven.

8.16 It is therefore concluded that the only option for unlocking further housing growth potential in Peacehaven, over and above the 220 dwellings identified in the first Core Strategy Proposed Submission Document, lies in the promotion of effective enhancements to existing bus services and infrastructure along the A259 corridor in order to increase the share of total person demands by bus for the whole coastal area.

8.17 ESCC is not convinced that achieving the necessary higher levels of bus patronage is possible. However, as stated in the ESCC Transport Advice Note, September 2012, the local transport authority is prepared to reconsider this view if the promoters of potential housing sites in Newhaven or Peacehaven are able to provide compelling evidence to demonstrate that such levels are achievable.

8.18 Since the ESCC Transport Advice Note was published in September 2012, additional housing completions and new housing commitments in Peacehaven and Telscombe have reduced the maximum level of housing growth in these settlements that ESCC considers acceptable in highway terms.

8.19 Currently (at May 2014), ESCC advises that the maximum acceptable level of housing growth in these settlements in highway terms is **140** dwellings, over and above existing completions and commitments. This number of dwellings is in addition to the planned level of housing growth in Newhaven and is similarly dependent upon the transport mitigation measures identified in the Transport Advice Note, September 2012.

Wivelsfield

- 8.20 Options to accommodate housing growth of up to 700 dwellings in the parish of Wivelsfield in the north-west of district have been explored with ESCC in order to assess the potential impact of this level of development on the local highway network. Following an assessment of these options, the local transport authority has advised that “any new development in this area would lead to additional traffic on the B2112 through Ditchling. No significant increase would be acceptable” (Transport Position Statement 2011).
- 8.21 This represents a significant constraint on development in the village of Wivelsfield Green, due to its rural location and lack of available opportunities to enhance public transport provision. It also limits opportunities for housing growth elsewhere in Wivelsfield Parish, e.g. on the edges of the towns of Haywards Heath and Burgess Hill.
- 8.22 ESCC further advises that, in order to address this issue, any significant development in this part of the district should be conditional upon the implementation of effective measures to change the balance of attractiveness between the B2112 (in East Sussex) and the A273/A23 (in West Sussex), such that north/south traffic movements through the parishes of Wivelsfield and Ditchling favour using the A273/A23. There are no obvious solutions to this problem, although the completion of the Haywards Heath Southern Relief Road (due in 2015) may help to achieve such a re-balance in the northern part of Wivelsfield Parish.

Elsewhere in the district

- 8.23 Aside from the A259 and B2112 highway issues, the Infrastructure Delivery Plan has not identified any other “showstoppers” in terms of infrastructure capacity constraints. However, in certain locations new development will need to be phased in order to ensure that the infrastructure required to support it can be delivered in a timely manner. The future provision of infrastructure will also require further investigation in respect of individual settlements and sites as part of the work on Part 2 of the Lewes District Local Plan: Site Allocations and Development Management Policies DPD or the South Downs National Park Local Plan.

9. HOUSING TARGET

- 9.1 When work on the preparation of the Core Strategy commenced, the policies of the South East Plan identified the scale and distribution of housing that would need to be provided in the district during the period 2006 – 2026.⁵ As the preparation of the Core Strategy progressed, however, it became evident that there were uncertainties about whether the regional spatial strategies would remain part of the development plan. Lewes District Council and the National Park Authority therefore took the decision to review the appropriateness of the housing target for the district set out in the South East Plan prior to its formal revocation.
- 9.2 This review was based on the Lewes District Assessment of the Local Need for Housing (2011), which recommended that it would be reasonable to plan for a housing requirement of between 300 – 450 dwellings per year. The capacity of the district to accommodate this level of housing growth was then assessed in relation to a number of factors that were considered critical to achieving sustainable development. These factors, together with the associated core land-use planning principles set out NPPF Paragraph 17, are set out below:

Sustainability considerations	NPPF reference
<i>Compatibility with the vision and strategic objectives</i>	<i>Empowering local people to shape their surroundings and realise a positive vision for the future of their area</i>
<i>Accordance with the settlement pattern and spatial strategy</i>	<i>Taking account of the different roles and character of different areas, promoting the vitality of urban areas, and focussing significant development in sustainable locations</i>
<i>The protection of European nature conservation sites</i>	<i>Conserving and enhancing the natural environment and reducing pollution</i>
<i>Conservation of the landscape and scenic beauty of the National Park</i>	<i>Development allocations should prefer land of lesser environmental value (National Parks, the Broads and AONBs have the highest status of protection in relation to landscape and scenic beauty)</i>
<i>Minimising vulnerability to flood risk and coastal erosion</i>	<i>Supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change</i>
<i>Capacity of critical infrastructure</i>	<i>Delivering sufficient community facilities and services to meet local needs, and enhancing and improving places in which people live their lives</i>

- 9.3 There are significant constraints on the capacity of the district to accommodate high levels of housing growth, particularly in terms of its environmental

⁵ The South East Plan identified a target of 4,400 net additional dwellings for Lewes District (the equivalent of 220 dwellings per year). This target recognised the significant constraints to development within the district.

characteristics, such as the South Downs National Park and areas at risk of fluvial and tidal flooding. Despite these constraints, the District Council and the National Park Authority looked beyond the level of housing provision set out in the South East Plan and made every attempt to rigorously investigate the potential for the district's identified housing requirements to be met.

- 9.4 At the Emerging Core Strategy stage, consideration was given to the options of meeting both the lower and upper range of the housing requirement identified in the Lewes District Assessment of the Local Need for Housing (2011), i.e. 300 additional dwellings per year and 450 additional dwellings per year. However, the Sustainability Appraisal process clearly demonstrated that there would be significant long-term environmental costs associated with both housing target options (Emerging Core Strategy Sustainability Appraisal, September 2011).
- 9.5 One of the spatial options subsequently examined in order to increase housing provision in the district was the potential for a new, free-standing settlement in the countryside. This option was suggested by a number of respondents to the Emerging Core Strategy consultation to help contribute towards reducing the shortfall in the housing land supply required to meet the district's housing needs. However, the study to investigate this option, New Settlement Scoping Report (2012), concluded that there was no realistic potential for delivering such a settlement during the plan period.
- 9.6 Following the completion of the Duty to Co-operate Housing Study for the Sussex Coast Housing Market Area and the updated demographic projections based on the results of the 2011 Census, the District Council and the National Park Authority sought to give further consideration to all potential sources of housing land supply and to explore alternative options for meeting the district's objectively assessed housing needs. These needs were agreed to be 9,200 - 10,400 additional dwellings (i.e. 460 – 520 additional dwellings per year) over the plan period, as outlined earlier in this background paper.
- 9.7 Whilst the results of this further work indicated that there is only limited capacity from other potential sources of housing land supply, consideration was nevertheless given to the options of meeting both the lower and upper range of the objectively assessed housing needs of the district. These options, together with other housing target options, were assessed through the Sustainability Appraisal process in order to help identify the beneficial and adverse outcomes and enable comparisons to be drawn between them (Proposed Submission Core Strategy Sustainability Appraisal, May 2014).
- 9.8 The Sustainability Appraisal concludes that Option A, the delivery of 5,600 additional dwellings, would be the most sustainable housing target over the Core Strategy period. The assessment of the other options against the Sustainability Appraisal Framework demonstrates that there would be significant environmental costs and some economic costs associated with higher levels of housing growth. It is therefore concluded that the positive benefits in terms of additional housing delivery to meet the housing needs arising over the plan period would be outweighed by the negative impacts associated with loss of environmental assets and potential job growth.

- 9.9 Accordingly, a target of **5,600 net additional dwellings** over the Core Strategy period 2010 – 2030, as set out in Spatial Policy 1 of the Proposed Submission Document, is considered to be the most sustainable housing delivery target for Lewes District, given the aim to protect and enhance the area’s high quality natural and built environment and to support the transition to a low carbon future. This target is considered to be realistic and achievable, taking into account the 2013 SHLAA findings in respect of the potential deliverability of further housing growth in the district.
- 9.10 It is acknowledged that this target falls short of meeting the district’s predicted level of housing need over the plan period. However, it reflects the aim of focussing as much growth as possible in the most sustainable locations, in accordance with the vision and strategic objectives of the Core Strategy, and the findings of the evidence base. The levels of housing growth in individual settlements are identified in Spatial Policy 2 of the Proposed Submission Document and are considered to be deliverable without compromising valued environmental assets or infrastructure capacity constraints.
- 9.11 The housing delivery target of 5,600 dwellings is identified as a minimum in the Core Strategy and equates to an average of 280 additional dwellings per annum. This is much higher than the average rate of housing completions achieved in the district over the last 13 years, a timescale that includes both a period of buoyancy in the housing market and, more recently, the ‘credit crunch’ and subsequent downturn in the housing market.
- 9.12 Table 4 provides an indication of the level of new housing that the local market can sustain. It also illustrates the cyclical nature of housing construction and how it reflects more general national economic cycles.

Table 4 – Net housing completions since 2000

Year	Total number of housing completions (net)	Completions within the National Park (net)	Completions outside the National Park (net)	Proportion of completions within the National Park (%)
2000/01	173	56	117	32.4
2001/02	245	19	226	7.8
2002/03	318	48	270	15.0
2003/04	142	41	101	28.9
2004/05	170	36	134	21.2
2005/06	265	56	209	21.1
2006/07	296	48	248	16.2
2007/08	416	112	304	26.9
2008/09	257	14	243	5.4
2009/10	175	22	153	12.6
2010/11	161	12	149	7.4
2011/12	249	42	187	17.7
2012/13	218	23	195	10.5
Average p/a	237	41	197	17.3

- 9.13 The average housing completion rate since 2000 is 237 dwellings per annum, although recent completion rates have generally been much lower, reflecting the impact of the economic recession. The recession stalled the development of a number of large housing sites in the district, as some developers struggled to secure equity and others went bankrupt. National economic prospects now look more favourable, however, and market signals indicate some optimism that a sustained period of housing market growth is possible. The location of the district in the south east of England suggests that the local housing market will keep pace with national forecasts.
- 9.14 In accordance with the emphasis in the NPPF on positive plan making, the housing delivery target is based primarily on identified sources of housing land supply, including strategic site allocations, a broad location, and other sites identified in the 2013 SHLAA. The latter will be allocated in the Site Allocations and Development Management Policies DPD, the South Downs National Park Local Plan or Neighbourhood Plans. The housing delivery target does, however, also include an allowance for development on small windfall sites (518 additional dwellings) as explained in more detail in section 6 of this background paper.
- 9.15 The plan period of the Core Strategy runs from 2010 to 2030. In the period up to 31st March 2013, 628 net additional dwellings have already been completed. There is also a significant amount of housing development already committed, including:
- dwellings under construction but not yet completed
 - dwellings with planning permission but not yet under construction
 - dwellings granted consent subject to the completion of a Section 106 legal agreement
 - sites allocated in the adopted Lewes District Local Plan 2003 that are currently unimplemented but still considered deliverable
- 9.16 The above commitments amount to 1,428 additional dwellings. This figure includes a 35% discount applied to small sites yielding 5 dwellings or less, an adjustment which is considered necessary because the annual monitoring of completions shows that a proportion of these sites remain undeveloped when the planning permission expires. Appendix A of this background paper explains the reason for this approach in more detail.
- 9.17 The expected rate of housing delivery over the plan period is illustrated through the 'housing trajectory' contained in Appendix B of this background paper. This shows the housing development that has been built since 2010 and the level of development that is anticipated over the remainder of the plan period. The housing trajectory will be monitored and updated on an annual basis through the District Council's annual Authority Monitoring Report (AMR) and also through further reviews of the Strategic Housing Land Availability Assessment (SHLAA).
- 9.18 The housing trajectory demonstrates that there is sufficient overall capacity within the district to meet the planned housing growth of 5,600 dwellings over

the period 2010-2030. Housing delivery over the first five years of the plan period remains below the average house construction rates achieved over the last 13 years, reflecting the impact of the economic recession and the time required for a market recovery. However, delivery rates from 2015 to 2020 are anticipated to increase rapidly as market buoyancy returns and construction begins on the strategic site allocations. Beyond 2020, delivery is expected to reduce to an average of 267 dwellings per annum

- 9.19 The housing trajectory also demonstrates that there will be a sufficient five-year supply of housing land to meet the Core Strategy housing target from the anticipated point of adoption in early 2015. There remains a risk that the slow recovery of the national economy may continue to impact upon the construction industry and the housing market. However, house prices and land values in the district remain relatively buoyant, indicating that site viability issues may generally become less significant in the near future.
- 9.20 The housing land supply position will be monitored through regular updates of the SHLAA and maintaining continuous dialogue with infrastructure providers, particularly ESCC, to ensure that necessary services and facilities can be delivered in a timely fashion to support new housing development.

10. SPATIAL DISTRIBUTION OF HOUSING PROVISION

- 10.1 In terms of spatial distribution, the strategy for housing delivery seeks to focus the majority of new residential development within the most sustainable settlements, based upon their accessibility and the range of employment opportunities, services and facilities they offer. This approach seeks to promote the vitality of the town centres and facilitate the fullest possible use of public transport, walking and cycling, thereby helping to reduce the need to travel by car and hence the rise in carbon emissions . It is also cost efficient in terms of maximising the use of existing infrastructure and reducing the need for new provision.
- 10.2 A settlement hierarchy was prepared to identify the most sustainable settlements in and around the edge of the district. This hierarchy was informed by the Lewes District Rural Settlement Study 2012 and is set out in Table 2 of the Core Strategy – Proposed Submission Document.
- 10.3 In terms of accommodating housing growth, the towns of Seaford, Lewes, Newhaven, and Peacehaven/Telscombe are identified as the most sustainable settlements in the district. However, the larger towns of Haywards Heath and Burgess Hill, which are located in Mid Sussex District but have developed up to the administrative boundary with Lewes District, also score as high or higher in terms of their accessibility and the range of employment, services and facilities offered.
- 10.4 Whilst the above towns represent the most sustainable locations for housing growth, a need has also been identified for further housing provision in the district's villages in order to support thriving rural communities in accordance with NPPF Paragraphs 17 and 55. The settlement hierarchy in the Rural Settlement Study defines an appropriate level of growth for the larger villages, reflecting their accessibility, the range of available services, historic growth levels and local housing needs, as follows:

Rural Service Centres (100+ dwellings): Ringmer and Newick

Service Villages (30-100 dwellings): Barcombe Cross, Ditchling, Firle, Glynde, Plumpton Green, and Wivelsfield Green

Local Village (10-30 dwellings): Broyleside, Cooksbridge, Chailey North, Chailey South, Falmer, Kingston, Piddinghoe, Rodmell, South Street (Chailey), and South Heighton

- 10.5 Importantly, accessibility and service provision is taken only as a starting point in determining the spatial distribution of housing provision, as some towns and many of the villages do not have the capacity to accommodate the levels of growth suggested by this approach. In all cases, valuable environmental and heritage assets have also been taken into account, together with critical infrastructure capacity. The findings of the 2013 SHLAA have also been used to determine the realistic capacity of individual settlements to deliver housing growth.

- 10.6 Table 5 of the Core Strategy illustrates the spatial distribution of the district's housing delivery target of a 5,600 additional dwellings, reflecting the findings of the 2013 SHLAA in terms of the potential capacity for housing growth in individual settlements. It demonstrates that a significant proportion (86%) of this growth will be delivered in or on the edges of the towns, including the edge of Haywards Heath and Burgess Hill in Mid Sussex District, with the remainder occurring within the district's villages.
- 10.7 Table 5 of the Core Strategy illustrates that over 2,000 dwellings have already been built or are currently committed for development. Strategic site allocations are proposed to secure the delivery of a further 565 dwellings in locations in Lewes town and the edge of Haywards Heath. Further capacity is identified for an additional 2,535 dwellings that will be delivered through subsequent allocations in the Site Allocations and Development Management Policies DPD, or in neighbourhood plans. An allowance has also been made for 518 dwellings to come forward on small 'windfall' sites during the plan period.
- 10.8 The planned level of housing growth in individual settlements, over and above existing completions and commitments, is explained in more detail below.

Edge of Haywards Heath

- 10.9 The Core Strategy makes provision for a strategic site allocation of 175 dwellings on the edge of Haywards Heath in Wivelsfield Parish (Spatial Policy 4). All the other possible options for further housing growth in this location have been discounted on the grounds of landscape impact or access constraints.
- 10.10 In respect of landscape considerations, the Landscape Capacity Study (2012) concludes that there is only scope for limited development in the vicinity of Greenhill Way/Ridgway and the A272, immediately adjacent to the urban edge of Haywards Heath. Elsewhere, extensive areas of woodland and visually prominent hillsides, often with wide-ranging views towards the South Downs, limits the capacity of the landscape to accommodate further housing growth.
- 10.11 This conclusion is supported by the findings of the feasibility study⁶ commissioned in 2005 by Mid Sussex District Council to examine the potential for a strategic development of up to 1,000 dwellings on land around Haywards Heath. This study assessed the broad sweep of countryside to the south-east of the town (mainly within Lewes District) but found that the majority of this area is unsuitable for a major urban extension due to harmful impacts on the landscape and ecological assets.

⁶ <http://www.midsussex.gov.uk/8302.htm>

- 10.12 In respect of access constraints, direct vehicular access between land within Lewes District and Haywards Heath can only be achieved via Greenhill Way/Ridge Way, which provides access to the strategic site allocation in the Core Strategy. Elsewhere, vehicular access to other potential development sites in this location would only be possible if land within Mid Sussex District becomes available for development. However, the Submission Mid Sussex District Plan 2013 does not allocate any sites for housing adjacent to the administrative boundary with Lewes District, reflecting the conclusions of the feasibility study referred to above.
- 10.13 As a consequence of the above considerations, no opportunities have been identified to bring forward additional housing sites beyond the strategic site allocation at Greenhill Way/Ridge Way.

Seaford

- 10.14 The Core Strategy makes provision in Seaford for the planned growth of 170 dwellings to be delivered through subsequent allocations in the Site Allocations and Development Management Policies DPD. Whilst Seaford is the largest town in the district, there are only very limited opportunities for outward expansion due to the town's location between the sea and the protected landscapes of the National Park and Heritage Coast.
- 10.15 The National Park boundary is very tightly defined around the built up area of Seaford and, whilst National Park designation does not necessarily preclude development, the open, expansive character of the rolling chalk downland that surrounds the town provides little scope to accommodate additional housing development. Much of this large-scale, elevated landscape is exposed to long distance views and the general absence of hedgerows and woodland means that any development has the potential to be highly visible.
- 10.16 This downland landscape falls within the 'Ouse to Eastbourne Open Downs Character Area' as defined in the South Downs Integrated Landscape Character Assessment (2011)⁷. It is the only National Park character area that meets the sea and the exceptional qualities of the Downs and coastal landscape extending east from Seaford have been recognised by their definition as Heritage Coast. The open, uninterrupted skylines and rolling topography of the National Park in this location makes the landscape particularly vulnerable to harm through inappropriate development.
- 10.17 The only extensive undeveloped areas not within the National Park or the Heritage Coast are a caravan and camping site located on the western edge of Seaford between the A259 and the sea, and the 'Old Brickfield' Site of Nature Conservation Importance located on the town's seafront. However, both areas of land are identified by the Environment Agency as at risk from inundation by the sea and are therefore unsuitable for housing development.

⁷ www.southdowns.gov.uk/planning/integrated-landscape-character-assessment

10.18 As consequence of the above considerations, no opportunities have been identified for large-scale housing allocations around the edge of Seaford.

Lewes town

10.19 The Core Strategy makes provision in Lewes town for a strategic site allocation of 390 dwellings (Spatial Policy 3), together with the planned growth of another 260 dwellings to be delivered through subsequent allocations in the Lewes Neighbourhood Plan or the South Downs National Park Local Plan. The level of housing growth in the town is principally constrained by its location within the National Park but also by its built heritage and historic form, the functional floodplain of the River Ouse, and the Lewes Downs Special Area of Conservation (see Section 8 of this report).

10.20 The 2013 SHLAA identified very little potential for the further growth of Lewes town. Whilst National Park designation does not necessarily preclude development, the open, elevated landscape of rolling chalk downland to the east and west of the town is frequently exposed to panoramic views and any large-scale development would have the potential to be extremely visible across a wide area. The open, exposed character of the Downs in this location means that there are few opportunities to mitigate development with screening, making this landscape type highly visually sensitive.

10.21 To the north and south of Lewes town, the Ouse valley widens out to form an extensive area of drained pastures and seasonally flooded water meadows. The South Downs Integrated Landscape Character Assessment (2011) identifies that this flat, open and undeveloped landscape is highly visually sensitive to any further expansion of development on the slopes above the floodplain, due to far-reaching views from the surrounding downland. Housing development in such a location would also harm the increasingly tranquil and pastoral character of the Ouse Valley as it extends beyond the built-up area of the town.

10.23 As consequence of the above considerations, no opportunities have been identified for large-scale housing allocations around the edge of Lewes town.

Newhaven

10.24 The Core Strategy makes provision in Newhaven for the planned growth of 830 dwellings to be delivered through subsequent allocations in the Newhaven Neighbourhood Plan or the Site Allocations and Development Management Policies DPD. A broad location for the delivery of the majority of this housing is identified on predominantly greenfield land at Harbour Heights, (Spatial Policy 6). There is also a significant outstanding commitment of 783 dwellings in Newhaven, reflecting the ongoing impacts of the current economic recession and time needed for full market recovery.

10.25 Further opportunities for housing growth in Newhaven are limited by the transport capacity constraints on the A259 identified in the Transport Position Statement 2011 and the ESCC Transport Advice Note, September 2012.

These capacity problems affect the Newhaven town centre one-way system and the A259 to the west of Peacehaven, as discussed in section 8 of this background paper. No realistic or achievable solutions have yet been identified to overcome this fundamental constraint to the growth of the town.

- 10.26 Other constraining factors on further development in Newhaven are the National Park, which tightly envelopes the built-up edge of the town to the north and east, and the extensive areas at risk of fluvial and tidal flooding along the Ouse valley.

Peacehaven/Telscombe

- 10.27 The Core Strategy makes provision in Peacehaven/Telscombe for the planned growth of 140 dwellings to be delivered through subsequent allocations in the Peacehaven Neighbourhood Plan or the Site Allocations and Development Management Policies DPD. However, a further 520 dwellings will also be delivered in these settlements, subject to the identification and provision of a co-ordinated package of multi-modal transport measures required to mitigate the impact on the A259 to the satisfaction of ESCC, as the local transport authority.

- 10.28 This approach reflects the conclusions of the ESCC Transport Advice Note, September 2012, as discussed in relation to Newhaven and more fully in section 8 of this background paper. No other infrastructure capacity constraints to housing growth have been identified in Peacehaven and Telscombe. However, the location of the urban area between the sea and the National Park limits the physical opportunities for an outward expansion of development, particularly as the South Downs in this location shares the same landscape characteristics as the open, rolling downland around the towns of Lewes and Seaford.

Edge of Burgess Hill

- 10.29 The Core Strategy makes provision on the edge of Burgess Hill (in Wivelsfield Parish) for the planned growth of 100 dwellings to be delivered through subsequent allocations in the Site Allocations and Development Management Policies DPD. Further housing growth on the edge of Burgess Hill is significantly constrained by transport considerations and the Ditchling Common SSSI. The latter covers 64 ha of the district immediately adjacent to the administrative boundary with Mid Sussex District; much of the site is managed as a country park by ESCC.
- 10.30 In respect of transport constraints, ESCC advises that any new development in this area would lead to additional traffic on the B2112 through Ditchling and that no significant increase would be acceptable. ESCC further advises that, in order to address this issue, any significant development in this part of the district should be conditional on the implementation of effective measures to change the balance of attractiveness between the A273/A23 (in West Sussex) and the B2112 (in East Sussex), such that north/south traffic movements favour using the A273/A23 (see Transport Position Statement 2011).

- 10.31 There are no obvious solutions to this problem. A feasibility study⁸ was carried out for Mid Sussex District Council in 2005 to examine the potential for a strategic development of up to 5,000 dwellings on land around Burgess Hill. This study similarly concluded that the option of developing sites around the eastern edge of the town would require associated improvements in the local transport network, including an eastern spine road to improve accessibility and relieve traffic congestion in the town centre. Such an option would have supported further housing growth on adjacent land in Lewes District but has not been pursued in the Submission Mid Sussex District Plan 2013.
- 10.32 As a consequence of the above considerations, no opportunities have been identified for large-scale housing allocations on the edge of Burgess Hill.

Rural Service Centres

- 10.33 The Core Strategy makes provision for the planned growth of the villages classified as 'rural service centres' as follows:
- 10.34 **Ringmer/Broyleside:** 220 dwellings to be delivered through subsequent allocations in the Ringmer Neighbourhood Plan. However, within this level of growth, the Core Strategy includes a contingency strategic site allocation of 110 dwellings in the event that the Neighbourhood Plan is not made in time and/or does not allocate sufficient sites to deliver 110 additional dwellings by April 2019 (Spatial Policy 5).
- 10.35 The main constraint to the outward expansion of Ringmer is the boundary of the National Park, which is drawn tightly around the southern and western edges of the built up area. Outside of the National Park, the 2013 SHLAA identifies capacity in the village for a further 380 additional dwellings above the planned growth of 210 dwellings. However, this level of growth would result in substantial harm to the rural character and setting of Ringmer, in conflict with the vision and strategic objectives of the Core Strategy.
- 10.36 **Newick:** 100 dwellings to be delivered through subsequent allocations in the Newick Neighbourhood Plan or the Site Allocations and Development Management Policies DPD. The main constraints to the outward expansion of the village are the need to preserve the character and appearance of Newick Conservation Area to the south-east, and the existing blocks of woodland and steeply sloping topography to the north, which limit opportunities for further housing development.
- 10.37 The 2013 SHLAA identifies capacity in Newick for a further 100 additional dwellings above the planned growth of 100 dwellings. However, this level of growth would result in substantial harm to the rural character and setting of the village, in conflict with the vision and strategic objectives of the Core Strategy.

⁸ <http://www.midsussex.gov.uk/8302.htm>

Service Villages

- 10.38 The Core Strategy makes provision for the planned growth of the villages classified as 'service villages' as follows:
- 10.39 **Barcombe Cross:** 30 dwellings to be delivered through subsequent allocations in the Site Allocations and Development Management Policies DPD. The ridge-top location of the village, which offers extensive views north and eastwards across the countryside of the Low Weald, limits opportunities for further housing growth in the village without substantial harm to its rural character and landscape setting.
- 10.40 **Ditchling:** 15 dwellings to be delivered through subsequent allocations in the Ditchling Neighbourhood Plan or the South Downs National Park Local Plan. The village is located at the foot of the steep northern scarp of the Downs and further housing growth cannot be accommodated without significant harm to the landscape, natural beauty and cultural heritage of the National Park.
- 10.41 **Plumpton Green:** 50 dwellings to be delivered through subsequent allocations in the Plumpton Neighbourhood Plan or the Site Allocations and Development Management Policies DPD. The main constraints to the expansion of Plumpton Green are the flood risk associated with Mill Stream, which runs through the middle of the village, and landscape considerations in relation to the countryside to the south-east of the village, which is relatively exposed and open to long views to the South Downs.
- 10.42 The 2013 SHLAA identifies capacity in Plumpton Green for a further 80 additional dwellings above the planned growth of 50 dwellings. However, this level of growth is above the appropriate development limit for the village identified in the Rural Settlement Study and would result in substantial harm to its rural character and identity, in conflict with the vision and strategic objectives of the Core Strategy.
- 10.43 **Wivelsfield Green:** 30 dwellings to be delivered through subsequent allocations in the Wivelsfield Neighbourhood Plan or the Site Allocations and Development Management Policies DPD. The overriding constraint to further growth in the village relates to the local highway capacity, as set out more fully in section 8 of this background paper.
- 10.44 Whilst the 2013 SHLAA identifies capacity in Wivelsfield Green for a further 550 additional dwellings above the planned growth of 30 dwellings, this level of growth would not be acceptable to ESCC, as the local highway authority. It would also be substantially above the appropriate development limit for the village identified in the Rural Settlement Study and result in harm to its rural character and identity, in conflict with the vision and strategic objectives of the Core Strategy.
- 10.45 **Firle and Glynde:** No further growth is planned in these villages due to their very sensitive landscape setting within the National Park. Further housing development cannot be accommodated in these villages without significant

harm to the landscape, natural beauty and cultural heritage of the National Park.

Local Villages

- 10.46 The Core Strategy makes provision for the planned growth of the villages classified as 'local villages' as follows:
- 10.47 **Cooksbridge:** 30 dwellings to be delivered through subsequent allocations in the Hamsey (Parish) Neighbourhood Plan or the Site Allocations and Development Management Policies DPD. The outward growth of the village is constrained to the south by the boundary of the National Park. The 2013 SHLAA identifies capacity for a further 35 additional dwellings above the planned growth of 30 dwellings. However, this level of growth is above the appropriate development limit for the village identified in the Rural Settlement Study and would result in substantial harm to its rural character and identity, in conflict with the vision and strategic objectives of the Core Strategy.
- 10.48 **North Chailey:** 30 dwellings to be delivered through subsequent allocations in the Site Allocations and Development Management Policies DPD. Further housing growth would be above the appropriate development limit for the village identified in the Rural Settlement Study and would result in harm to its rural character and identity, in conflict with the vision and strategic objectives of the Core Strategy.
- 10.49 **South Chailey:** 10 dwellings to be delivered through subsequent allocations in the Site Allocations and Development Management Policies DPD. Further housing growth in the South Chailey is constrained by the extensive tracts of woodland to the east of the village and by its location on a low ridge, which offers extensive views southwards across the Low Weald towards the South Downs.
- 10.50 **Falmer, Kingston, Piddinghoe, and Rodmell:** No further growth is planned in these villages due to their very sensitive landscape setting within the National Park. Further housing development cannot be accommodated in these villages without significant harm to the landscape, natural beauty and cultural heritage of the National Park.
- 10.51 **South Street (Chailey):** No further growth is planned in this village due to the lack of suitable housing sites being identified in the 2013 SHLAA.

The Strategic Site Allocations

- 10.52 The strategic site allocations at Haywards Heath, Lewes town and Ringmer are large sites (with a capacity in excess of 100 dwellings) with no significant development constraints. They are therefore considered capable of being delivered within a five-year time frame. The allocation of these sites will help to ensure that a sufficient supply of housing land is available during the early part of the plan period, prior to the delivery of housing on the sites allocated in

Part 2 of the Lewes District Local Plan: Site Allocations and Development Management Policies DPD.

- 10.53 Alternative options for strategic site allocations were also considered at Lewes town, Newhaven, Peacehaven, Burgess Hill, and Ringmer. These sites were assessed through the Sustainability Appraisal process to help identify the potential for beneficial or adverse outcomes and to enable a comparison of all the options to be made. However, it was concluded that the alternative sites were either less sustainable compared with the strategic site allocations identified in the Core Strategy, or not considered capable of being delivered within the early part of the plan period due to potential land ownership or infrastructure difficulties.
- 10.54 The strategic site allocation at **Greenhill Way, Haywards Heath**, scored positively against the Sustainability Appraisal objectives despite being on greenfield land in close proximity to ancient woodland. Whilst a large number of representations during public consultation objected to the allocation, the site is located on the edge of a large town in close proximity to a wide range of services and facilities. Outline planning permission was granted on appeal for 62 dwellings on part of the site in January 2014 (Ref. LW/13/0744/OUT) after the Inspector concluded that the site is in an accessible and sustainable location in transport terms.
- 10.55 The strategic site allocation at **North Street/Eastgate, Lewes**, was assessed against a range of alternative land use options, as follows:
- retain for employment use
 - utilise for flood storage and other low key uses
 - restore part of the flood plain and allow flood resistant and flood resilient development in areas of lower flood risk
- 10.56 The majority of consultation respondents, including Lewes Town Council, supported the preferred option for a mixed development on this 9 ha site. Whilst all the alternative options for the site scored positively against the Sustainability Appraisal objectives, the mixed-use option, including the development of around 390 dwellings, achieved the highest beneficial outcomes. This option promotes the effective use of a brownfield site by maximising the opportunity to deliver additional housing in Lewes town, retaining the site's important economic role and also delivering improved flood defences in a vulnerable area of the town.
- 10.57 The contingency strategic site allocation at **Bishops Lane, Ringmer**, was assessed against three alternative site options in the village, although it is acknowledged that the emerging Neighbourhood Plan is expected to identify sites for the delivery of the 220 additional dwellings planned for the village in the Core Strategy. The majority of representations received during public consultation objected to housing development on all of the four site options. However, there was considerable local concern that alternatives to the Bishops Lane site would compromise the green gap between Ringmer village and Broyleside. The Bishops Lane site achieved the highest beneficial

impacts in terms of the Sustainability Framework objectives, largely due to its good level of accessibility to local facilities and public transport services compared with the alternative sites.

- 10.58 It should be acknowledged that the some of the alternative options for strategic site allocations across the district may still come forward for housing development at a later date in the plan period. The Core Strategy - Proposed Submission Document allocates sites that are considered to be the most sustainable development options and can deliver housing in the early part of the plan period. The other housing site options considered through the Sustainability Appraisal process could possibly be allocated in future in Part 2 of the Lewes District Local Plan (the Site Allocations and Development Management Policies DPD), the South Downs National Park Local Plan, or Neighbourhood Plans.

11. CONCLUSIONS

- 11.1 This paper demonstrates that the District Council and the National Park Authority have an up to date, proportionate and robust evidence base and can demonstrate a clear understanding of the district's housing needs. It is concluded that an appropriate overall target for net additional housing in the district over the Core Strategy period from 2010 to 2030 should be 5,600 dwellings, or an average of 280 dwellings per year.
- 11.2 Within Lewes District, it is evident that environmental designations, particularly the South Downs National Park, and the capacity of critical infrastructure are significant constraints to the identification and delivery of sustainable sites for new housing. Consequently, the full, objectively assessed housing needs of the district cannot be accommodated in the area without unduly compromising the vision and strategic objectives of the Core Strategy, which have been developed in consultation with the local community and its representatives.
- 11.3 Nevertheless, the Core Strategy has sought to maximise housing delivery so far as is consistent with other key strategic priorities and development needs of the district and will increase the supply of housing delivered in the district over the plan period in comparison with the average rate of housing completions over the previous decade. It is considered that this approach accords with government planning guidance for achieving 'sustainable development' as set out at paragraphs 14 and 47 of the NPPF.
- 11.4 The fact that the Core Strategy housing delivery target is less than the objectively assessed housing needs of the district means that there is a 'duty to co-operate' with Lewes District's neighbouring authorities to address this issue. The District Council and the National Park Authority have been actively engaged with their neighbouring authorities throughout the preparation of the Core Strategy to address a range of strategic planning issues and whether a shortfall in the district's planned housing provision could be met elsewhere.
- 11.5 The district's strategic housing market area and travel to work area extends westwards to incorporate the City of Brighton & Hove and parts of Adur and Worthing Districts, eastwards to Wealden District, and northwards to Mid Sussex and Crawley Districts. All these areas face similar challenges in meeting their own housing requirements. Approaches have been made to other neighbouring authorities to explore their potential for meeting the district's shortfall in housing land supply but, at this stage, no scope has been identified for this.
- 11.6 It is clear through the findings of the Duty to Co-operate Housing Study 2013 that the Lewes District shortfall in housing cannot be met elsewhere within the Sussex Coast Housing Market Area. However, this Study identifies a number of longer term strategic development options, some of which are at a sub-regional level, which could help meet housing requirements.
- 11.7 Many of these options will need to be considered through working in partnership with other local authorities and agencies. In this regard a

Memorandum of Understanding (MoU) has been produced and signed up to by the authorities within the Sussex Coast Housing Market Area (Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing), as well as the Northern West Sussex authorities (Crawley, Horsham and Mid Sussex). This MoU commits the authorities to work together looking at longer-term solutions for housing delivery.

APPENDIX A: Rationale for the small site supply discount

Within the towns of Lewes, Peacehaven/Telscombe, Seaford and Newhaven, the small site (5 units or less) supply figure makes up between 10 and 50 percent of the settlement's total housing supply. In the smaller rural parishes, such as Barcombe and Rodmell, small sites predominantly comprise 100% of the supply.

When establishing the District Council's five year supply, it cannot be assumed that all small sites will planning permission will be developed. In reality, a proportion of planning consents on small housing sites expire without being implemented. Accordingly, the actual build-out rate of small sites has been assessed from past year's construction records. This build-out rate can then be translated to a percentage discount that can be applied to all planning permissions, thus ensuring that the five year supply is as accurate as possible.

The table below shows the net number of dwellings granted permission each year across the district, followed by the number of dwellings on sites either built out or expired, as at 1 April 2011. At the point of undertaking this analysis a number of sites were either under construction or not started but still had an extant permission. Consequently, the rows highlighted in blue are indicative figures and will need annually updating to monitor the position over a longer time-frame. At this point it is anticipated that the percentage of small housing sites not built out, for the years highlighted in blue, will decrease slightly.

Year	Granted	Built	Expired	% Not built
2004/05	276	187	89	32
2005/06	102	68	34	33
2006/07	96	66	30	31
2007/08	131	82	49	37
2008/09	92	53	39	42
2009/10	55	23	32	58

In the light of the above evidence, a discount of 35% has been applied to the small site supply.

Commitments

Table 5 of the Core Strategy Proposed Submission Document, *Planned levels of housing growth by settlement*, sets out the number of net dwelling completions and commitments as at 1 April 2013, as well as the planned level of growth on strategic allocations and sites to be subsequently allocated.

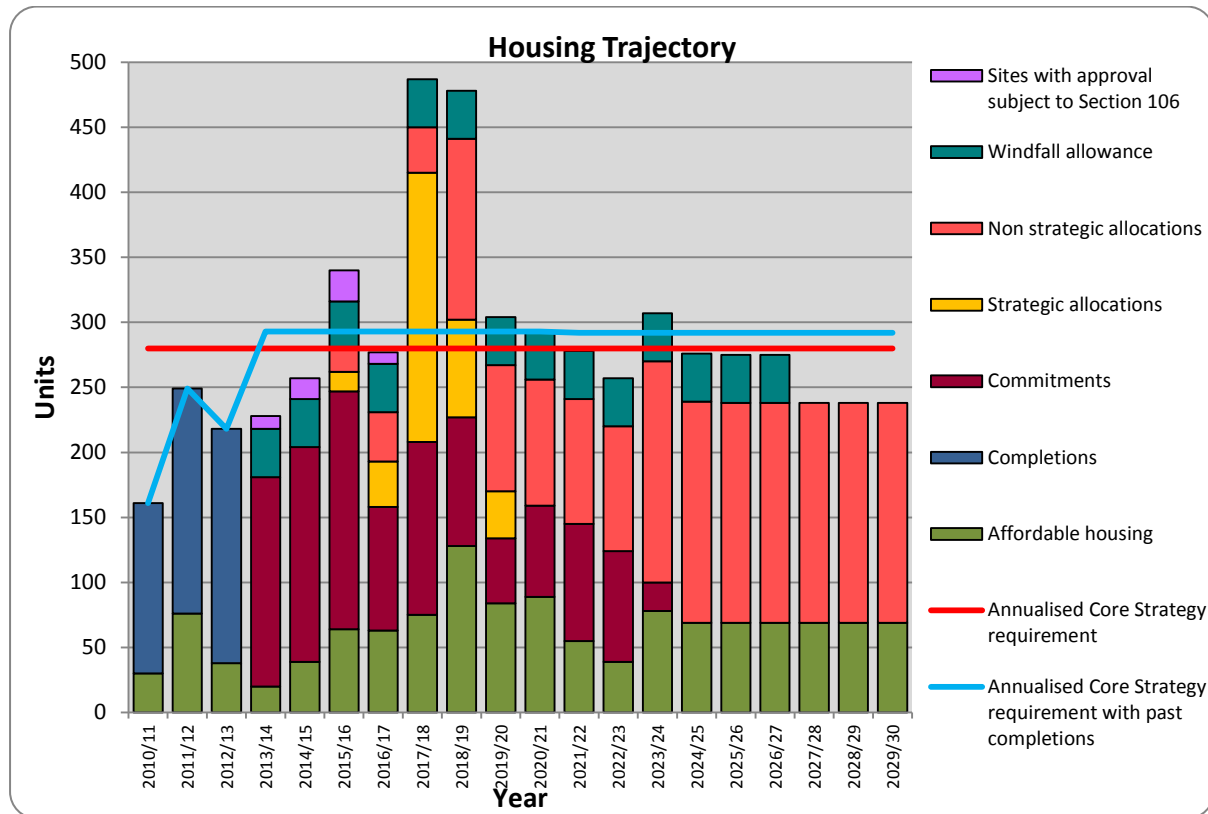
Commitments are sites where the principle of development has been established through the planning process. They include large and small sites with planning permission (with a percentage discount applied to the small sites with permission), existing 2003 Local Plan allocations (identified as 'deliverable' or 'developable' within the 2013 SHLAA), and development proposals approved subject to the completion of Section 106 legal agreements.

Completions and commitments are shown by settlement rather than parish area. Outside of the immediate settlement areas, or within settlements not listed in the table, they are included within the *All other settlements and areas* category.

To ensure a consistent approach, as employed in establishing an accurate housing supply figure on small sites, a 35% discount is applied to small sites with planning permission.

APPENDIX B: Housing Trajectory 2013

The Housing Trajectory indicates the anticipated delivery of market and affordable housing in the district over the Core Strategy Plan period (2010/11 - 2029/30). The trajectory consists of several elements: Completions (first three years of the Plan); commitments; strategic and non-strategic allocations; and windfall allowance. The graph below indicates the anticipated delivery of these elements.



Completions

Between 1 April 2010 and 1 April 2013 a total of 628 net units were completed on large and small⁹ sites (annualised average of 209 completions) resulting in a residual requirement of 4,972 net units to 2030. Taking into account past completions the residual annualised housing figure increases from 280 to 293 units from 2013/14.

Commitments

Commitments in the housing trajectory consist of large and small sites with planning permission as at 1 April 2013 and existing unimplemented housing allocations from the 2003 Local District Local Plan (LDLP) which are considered to be either deliverable or developable.

Phasing of large site commitments has been informed by the 2013 Strategic Housing Land Availability Assessment (SHLAA), in terms of notional start dates, in combination with discussions with developers and agents of the relevant sites.

⁹ Small sites are 5 or less units

Small site commitments, totalling 125 net units (with 35% discount¹⁰), have been divided evenly across the first 5 years of the plan from adoption (2013/14).

Large and small commitments contribute 1,351 net units to the 5,600 housing requirement figure.

Strategic and non-strategic allocations

The housing trajectory includes the two strategic site allocations; North Street Quarter and adjacent Eastgate area (Lewes) and Land at Greenhill Way/ Ridge Way (Haywards Heath, within Wivelsfield Parish). The anticipated phasing of these sites has been informed by the proponents and, in the case of Land at Greenhill Way/ Ridge Way, the supporting documents to the planning application of phase 1.

The projected non-strategic allocations element of the trajectory reflects the levels of planned growth for each settlement as set out in Table 5 of the Core Strategy. The majority of the non-strategic allocations are phased for the medium and long term part of the plan as it is anticipated that the two strategic site allocations and sites with outstanding planning permission would be built out in the short term.

Non-strategic sites will be allocated through the Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document, anticipated to be adopted in late 2015/16. As such, the majority of completions from non-strategic allocations would be expected to come forward from 2018.

Strategic and non-strategic allocations contribute 3,100 net units.

Windfall sites

An allowance of 37 net completions is included within the housing trajectory for a period of 14 years, 2013/14 to 2026/27 resulting in a total contribution of 518 net units within the plan period. The justification for this windfall allowance is provided in section 6 of this background paper.

Sites subject to Section 106

As at the 1 April 2013 a number of residential planning applications had resolution for approval subject to Section 106 agreement sign off. These applications contribute 77 net units and are anticipated to come forward within 5 years from adoption.

Affordable Housing Delivery

The anticipated delivery of affordable housing has been calculated for each of the above elements and grouped under one category of 'Affordable Housing' for the purposes of the trajectory graph.

¹⁰ Small site commitments include a 35% discount to allow for non-implementation. See section 9 of this background paper for explanation.

Sites with extant planning permission, or where the principle of development has been accepted (sites with resolution for approval subject to Section 106 and LDLP allocations), have an agreed level of affordable housing provision, determined against existing 2003 LDLP policies. Beyond these commitments the Core Strategy Core Policy 1 – Affordable Housing sets out the target level of affordable housing on a sliding scale as either a percentage or quota of the total amount of housing proposed.

Core Policy 1 will be applicable to the future development of strategic and non-strategic allocations. As the non-strategic sites have yet to be allocated, it is difficult to set out the exact delivery of affordable housing at this stage. As such, for the purposes of the trajectory a minimum percentage of 29% is calculated against the non-strategic housing element. The 29% represents the lowest proportion of affordable housing that is achievable from the emerging Core Strategy Policy which would apply to non-strategic allocations¹¹. The eventual proportion of affordable housing delivered on non-strategic sites will depend on the level of housing permitted.

¹¹ Non-strategic sites will be a minimum of 6 units. The smallest proportion of affordable housing from the relevant Policy threshold, 5 -7 units, provides 2 affordable units. 7 divided by 2= 29%.