

**LDC HOUSING WORKING PARTY  
TASK NO. 6  
THE EVIDENCE BASE TO SUPPORT HOUSING PLANNING POLICY  
DEVELOPMENT AND SITE SPECIFIC PROPOSALS**

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## **Background**

1. The Lewes District Local Plan was adopted in March 2003 and remains the statutory development plan (with the East Sussex Structure Plan) for the District. However, this Plan pre-dates the arrival of the new spatial planning system in 2004. This introduced a new two-tier development plan system, with Regional Spatial Strategies at regional scale and Local Development Frameworks (LDF's) at local scale.
2. This new system emphasises the need to connect traditional land use planning with various other decision-making processes which affect development. There is also increased emphasis on development delivery, and a need for Local Planning Authorities to provide a comprehensive evidence base over and above the requirements of the pre-2004 planning system.
3. We are currently working on Lewes's LDF, particularly its Core Strategy, and gathering the evidence base which is required. In regard to housing the requirements of new national Planning Policy Statements (particularly PPS3 – Housing ), are significant.

## **Planning Policy Statement 3**

4. This PPS requires that local authorities deliver housing and identify a sufficient supply of housing land to meet local needs and demands for a 15 year period.
5. There are two critical pieces of evidence which PPS3 requires that LPA's have to produce. The first is a Strategic Housing Land Availability Assessment (SHLAA), and the second is a Strategic Housing Market Assessment (SHMA). Together they provide evidence on the level of need and demand for housing and the opportunities that exist to meet it.

## **SHLAA**

6. The primary roles of the SHLAA are to: identify sites with potential for housing; assess their housing potential; and assess when they are realistically likely to be developed.
7. In Lewes District, the planning policy team have brought together information about available sites from a variety of sources. For example, some housing sites are those allocated in the Local Plan,

others have planning permission, and others have been put forward by site owners and developers or identified through 'open house' exercises conducted in 2004.

8. The planning policy team currently has a list of some 155 potential sites to examine. PPS3 requires that these sites are assessed for their availability, suitability and achievability. The process of site assessment was begun by the planning policy team in Autumn 2007. This assessment has involved officers visiting sites, and a desk exercise to examine a variety of constraints, such as;
  - policy - like a site being outside the defined built up area;,
  - physical - such as being in areas at risk of flooding; and
  - sustainability - like proximity to public services and transport.
  - Site potential and infrastructure needs have also been assessed.
9. There remains a significant amount of analysis to be done. This will involve consultation with stakeholders and interested parties over the next 12 months. Resources are not sufficient in-house to complete the SHLAA tasks within the LDF time limitations ( in common with many local authorities), and it is likely that Lewes will follow the approach of other East Sussex District Council's in employing consultants to progress the SHLAA to publication.
10. When complete, the SHLAA will be an essential and informative piece of evidence which can be used to assist with housing site selection to meet Lewes District's housing requirements to 2026 through the LDF. Government guidance is that housing sites of strategic importance should be shown in a Council's Core Strategy, and tested through public examination. The timetable for this process will be discussed with Government later this year

## SHMA

11. The SHMA purposes are: to estimate need and demand in terms of affordable and market housing; determine how this need and demand varies across the plan area (eg. between urban and rural areas); and to consider future trends and the accommodation requirements of specific groups such as the homeless, older people, and first time buyers.
12. The Council commissioned consultants DTZ in 2007 to provide an SHMA for our District. This was published in July 2008, the findings will shortly be placed on the Council's website. The HMA identified 3 main issues to be addressed in the LDF plan period; the volume of housing to be developed; the tenure and type of open market housing to be provided; and the level and type of affordable housing to be provided.

13. In summary, the main conclusions of the SHMA by the consultants (which are subject to site analysis and further consideration) are as follows;
- Lewes District has achieved a level of development consistent with the Structure Plan and draft South East Plan requirements, and this needs to be maintained in the future
  - There are significant opportunities for development around the waterfront in Newhaven, but there are high infrastructure costs which may delay development and /or reduce the contribution to affordable housing provision
  - There are 2 major sites in Peacehaven with potential, but these have constraints for different reasons
  - Sites that might have been available in Seaford may not be available if affected by South Downs National Park designation
  - Significant sites in Lewes town may be constrained by the flood plain. This may increase development costs with an affect on contributions to affordable housing
  - The government may increase the housing requirement for Lewes District through the South East Plan process.
14. DTZ therefore suggest that to secure housing delivery for the LDF period, Lewes has a case to argue that it should be permitted to allow for some housing on windfall sites. To make this case it should review land in other uses ( such as employment land) that could be released for housing. The Council should recognise the constraints on bringing forward major housing sites, and seek practical support from organisations such as SEEDA and Communities England.
15. In regard to this point officers are considering the requirements of an Employment Land Review, although it is currently not anticipated that the Council will have to rely heavily on unexpected 'windfall' development coming forward to meet its housing land targets in the South East Plan.
16. DTZ take the view that in order to provide housing to the level required by the emerging South East Plan, the Council should also develop proposals for land releases in the north of the District. The development of housing in the north of the District could, DTZ suggest, contribute to sustainable development around Burgess Hill.
17. Three sub-markets are identified in the District (the coastal belt, Lewes town and the rural areas). It may therefore be sensible to seek, through policy, to encourage greater variety of affordable housing provision (in terms of dwelling type and size) based at this level, or individual settlement level. DTZ make recommendations for tenure mix and dwelling type of affordable homes in these sub-markets.

18. It is argued by DTZ that developers should be left to determine the mix and type of market housing. However, the mix of market housing can be influenced by site allocation and policies on design and density.
19. The SHMA concludes that there is limited scope for more housing to contribute to economic development in the District because of its location near to centres of growth beyond the District boundaries. Thus, DTZ argue that the creation of jobs, beyond the northern boundary of the District, such as around Crawley – Gatwick, may lead to the need for further housing in the north of our District. This raises the question of whether more emphasis should be given to the development of new housing, including affordable housing, in the north of the District. Again further assessment will be needed.
20. The implications of DTZ's conclusions are being considered, housing options for the Council being very much dependent on detailed assessment of all potential housing sites through the SHLAA process.

### **Other Sources of Evidence**

21. Housing Services officers are considering what an update to the Housing Needs Survey 2005 may take in the light of recent government guidance. It is anticipated that outcomes from this will be available in 2009 and will provide supporting information about affordable housing mix and tenure needs across the District. In turn this will help shape policies in the LDF Core Strategy.
22. It is vital that decisions about where to allocate housing land, and how this should be phased, are based on realistic assessments of infrastructure provision. Equally, delivery of sufficient new housing will mean that new infrastructure needs have to be identified and funded.
23. Part of the evidence base to our housing policies will therefore include the development of an Implementation Plan for the LDF Core Strategy by the policy team based on the sites selected from the SHLAA process. This will involve liaison with stakeholders internally and externally including those on the Local Strategic Partnership.
24. The BBP Consultants Newhaven Master Plan study should be completed by Christmas 2008 and should provide a vision for the regeneration of the town, including the scope for future housing given various constraints eg. flood risk.
25. In addition to the above, there is a significant amount of historic information available on file about housing site availability and constraints which informed the development of the adopted Lewes District Local Plan.
26. Accordingly, in view of all of the above work now under way, and the emerging sources of information, it is not recommended that any

further research on housing needs to be commenced at the present time.

### **Recommendation**

- That the Housing Working Group notes on-going progress on the evidence base for the development of housing policies, and the conclusions of the published SHMA.

Stephen Walker,  
Planning Policy Manager  
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