

Dear Sir/ Madam

LEWES LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on the Phase 2 regulation 18 consultation on the Lewes Local Plan.
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Draft National Planning Policy Framework

3. The Council will need to give consideration to the new NPPF when it is published later this year as, based on the timetable for the preparation of this plan it may well have been published prior to the regulation 19 consultation and submission of the Lewes Local Plan for examination. HBF recognise this will have no weight until it is formally adopted but once adopted the Council will need to give weight to this iteration of the Framework.
4. On the basis of paragraph 4 and 8 in Annex A of the draft NPPF this local plan, which the Council propose to submit under the current plan making process, will be examined under the NPPF24. However, it is also notable that in relation to decision making Annex A also states that from the date the new NPPF is published local plan policies that are "*...any way inconsistent with national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework*". Therefore, should this new iteration of the NPPF be adopted unchanged the Council will need to have regard to national policies for decision making given that any inconsistency would effectively render many of the development management policies proposed in this consultation that are not consistent with the new Framework redundant as soon as the local plan is adopted.
5. It is clear from the draft NPPF and the decision to establish national decision making policies that the Government are seeking to limit the number of development management policies in local plans that look to gold plate policies and go beyond national standards which place significant burdens on applicants as well as their own officers. As such, when the final version of the NPPF is published any policies which are inconsistent with the new framework should be deleted in order to avoid unnecessary and length discussions on an application by application basis as to the weight that should be attached to the policies in the adopted local plan.

SDS1: Spatial Strategy

Housing needs and requirement

6. HBF does not consider the proposed spatial strategy which delivers only 57% of the Council’s housing needs for the area outside of the national park to be sound. This is a significant shortfall and seemingly takes no account the fact that delivery in the part of Lewes covered by the national park will be significantly constrained and that neighbouring areas such as Brighton and Eastbourne are also highly constrained and will fail to meet needs. If those areas of Lewes, or indeed East Sussex as a whole, do not increase the supply of development sites, the shortfalls in housing needs will grow leading to worsening affordability and an inability for many of those working in the area to actually live there.

LPA	Housing Needs (dpa)	Proposed Supply (dpa)	Shortfall (dpa)
Lewes (outside of NP)	682	390	292
Wealden	1,457	977	480
Rother	912	495	417
Eastbourne	714	301	413
Hastings	697	187	510
East Sussex	4,462	2,350	2,112

7. As can be seen from the table above the shortfall across East Sussex based on those plans that are currently being prepared is significant at over 2,000 homes every year. Over the period 2025/26 to 2041/42 this will be a total shortfall of over 35,000 homes. This is not sustainable and will lead to significant shortfalls in both market and affordable housing, placing increasing pressure on housing markets that are already under significant stress. This can be seen in the affordability of housing across the region set out in the table below.

LPA	Median Affordability Ratio 2024	Median affordability ratio 5 year average
Lewes	12.02	11.68
Wealden	11.47	12.38
Rother	11.07	12.36
Eastbourne	8.48	9.09
Hastings	8.29	9.99

8. What is evident is that across East Sussex house prices far exceed local salaries, meaning that housing in the area is unaffordable for those people who live and work in the area. Even those areas in the county that are more affordable, Eastbourne and Hastings, still see average house prices of 8 times salaries. It is also notable that these two areas are the most constrained with tight boundaries to the urban edge meaning development opportunities are far more limited. Without a significant boost to the supply of housing this situation will not improve

and only likely to get worse. HBF therefore does not consider this to be a sustainable strategy and may in fact lead to the exact opposite of the Council's stated intentions to reduce dependency the car as people will not be able to live and work in the Borough. This will lead to people who work in Lewes, or districts such as Eastbourne with tightly drawn administrative boundaries, having to travel outside the County as they will not be able to afford to live close to where they work.

9. This does not appear to have been considered by the Council in the interim Sustainability Appraisal (SA), which considers its preferred approach to be the most sustainable with regard to the transport and air quality topic in the SA framework. If fewer homes are built in Lewes, then there is the very real risk of increasing traffic as people travel from further afield to access employment opportunities in vital services. The SA considers matters solely in relation to those living in the area accessing services but takes no account of where people who work in the area are likely to live if housing needs are not met.
10. The significant boost to housing supply from meeting housing needs would also ensure that more affordable housing is provided to meet the significant need for such homes in Lewes. The latest Local Housing Needs Assessment notes that there is a need for 233 affordable homes per annum, around 33% of the standard method figure for the area but circa 60% of the housing requirement the Council is proposing. This is a significant shortfall in what is a very unaffordable area for many households. Rather than addressing waiting lists for new homes, the proposed strategy will see these increase over the plan period. When combined with shortfalls in neighbouring areas rather than seek to address the existing housing crisis Lewes and the approach being taken by other councils in East Sussex will exacerbate the issue.
11. The Council therefore needs to reconsider its strategy and consider how it can increase housing supply in order to meet needs in full or indeed go beyond given the fact that Brighton, Eastbourne and Hastings are too constrained to relatively meet their own housing needs in full. HBF cannot recommend sites that will meet these needs, but reconsideration must be given to increasing growth in all settlement tiers. In particular the Council should give consideration to growth in tier 3 and 4 settlements especially where there are opportunities for development to consolidate and expand existing services. For example, it is noted that Plumpton Green, despite it having a station with good access to Lewes, Burgess Hill and London, is only expected, based on the settlement housing trajectory published by the Council, to see 153 homes delivered over the plan period. Given that the clear direction of travel by Government in the latest NPPF consultation to locate more development around train stations it is clearly a retrograde step for a local plan such as this to seek to limit development at such locations.
12. The Council should also consider whether further urban extensions to those settlements that are directly adjacent to the district, such as Burgess Hill or Haywards Heath, are possible. These are both significant settlements with good services and transport connections and all opportunities for further expansion must be considered. Any consideration of development in this area should also be made in a policies off approach. On the basis of paragraph 5.2.59 of the SA the Council having seemingly discarding options for further development on the basis of maintaining local green gaps. This is not a sound approach to considering develop options given that settlement gaps have no basis in national planning policy outside of policy on Green Belt. As such maintaining a gap

between Burgess Hill and Haywards Heath – as set out in SGG4 – should not be a consideration as to whether development in that area is appropriate – especially given the significant shortfalls in housing delivery across the area.

Plan period

13. The Council are proposing that the plan period starts in 2020 and ends in 2042. Firstly, in order to be consistent with how the standard method is assessed the start date of the plan should be brought forward to 2026 – the year in which the plan is expected to be submitted for examination. As the Council will be aware the standard method is calculated on the basis of the most up to date evidence relating to housing stock and affordability and that the affordability ratio is applied to take account of any past under delivery of housing. As such it is inconsistent with the approach to assessing housing need to include housing delivery prior to the point needs are assessed. Secondly, the plan period should be extended by at least a year in order to be consistent with paragraph 22 of the NPPF which states “*strategic policies should look ahead over a minimum 15 year period from adoption*”. In our extensive experience of the plan making process, it takes a minimum of one year from the point of submission to adoption. If the plan is submitted towards the end of this year the plan is unlikely to be adopted until the start of 2028 at the earliest. This will leave the plan which looks ahead for 14 years not the 15 required by the NPPF. Therefore, in order for the plan to be consistent with national policy the plan period must be amended to run from 2026 to 2043

Housing trajectory

14. In appendix 1 the Council have included a five year housing land supply trajectory for the first five years from the adoption of the plan and state that a full trajectory has been provided in the evidence base. The Council will need to provide a full trajectory in the plan if it is to be consistent with paragraph 78 of the NPPF which states “*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period*”. In addition, the trajectory must be annualised establishing how many homes are expected to be built in each year of the plan period. At present the trajectory in the evidence base only provides this in five year tranches which is not helpful in understanding when each site is expected to come forward and the rate of delivery of these sites on a year by year basis. This more detailed trajectory will need to be provided as part of the evidence supporting the local plan on submission.

SDS5: Small Development Sites

15. HBF welcomes the decision to allocate further small sites in response to paragraph 73 of the NPPF. On the basis of the Small Site Topic Paper, it would appear that the Council intend to allocate small sites with a total capacity to deliver 374 homes across the plan period. This is nearly 300 homes short of what would be required by national policy based on the proposed requirement and substantially short of what would be required if the council were to meet needs in full. The Council must do more to identify small sites to ensure the requirements of paragraph 73 are met. In assessing sites in future, the Council will also need to discount assessment relating to strategic gaps as these are not national policy and should not be used to restrict development.

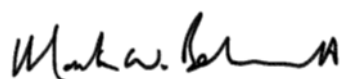
SDS6 Strategic Green Gaps

16. HBF does not support the use of strategic gaps in local plans that seek to maintain the separation of settlements. The Council suggest that these are necessary to maintain the character of settlements and protect the countryside. However, outside of Green Belt maintaining the separation settlements have no basis in national policy outside of Green Belt. As such it is not consistent with national policy to include a policy specific looking to maintain the separation of settlements and determine the suitable of development on such criteria. In addition to this the intentions of this policy, alongside settlement boundaries, are said to be required to focus growth within settlement boundaries. However, one of the key problems with this local plan is that it is not able to meet its development needs within settlement boundaries and as such must look at delivering more development on the edge of its settlements do not seek to neuter these with additional designations.
17. As set out earlier the Council must also not apply these designations as part of its site selection criteria. Given that national policy only seeks to maintain the separation of settlement as part of Green Belt policy it is not appropriate to apply it in other situations, especially where there is a massive shortfall in housing supply against assessed needs. HBF recognise that there may be constraints to development in these locations but the need to maintain the gap between settlements is not one of them.
18. While it is recognised that within each of the gaps there may be important landscapes or valued agricultural land decision as to development in and around these areas can be dealt with through specific development management policies and not through blanket protections that prevent development adjacency to key settlements in or adjacent to Lewes. The HBF therefore recommends that SDS6, and each the proposed green gap designations are deleted.

Future Engagement

19. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider housebuilding industry.
20. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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