

Lewes district Five Year Housing Land Supply Position as at 1 April 2016

1. Paragraph 47 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) to *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.*
2. The purpose of this note is to update the Council's five year housing land supply position to reflect the position as at 1st April 2016. This note concludes that the Council is able to demonstrate a five year supply of deliverable housing land, equivalent to 5.62 years.
3. The Council's five year housing land supply position is calculated against the now adopted¹ Joint Core Strategy (JCS) housing requirement figure of 6,900 net additional dwellings and applies the 5% buffer, as required by paragraph 47 of the NPPF, and the Liverpool Approach² to meeting any shortfall accumulated in the early part of the Plan.
4. In updating the housing land supply position the Council has considered the outcomes of relevant planning appeal decisions, the NPPF, the publication and subsequent updates of Government's National Planning Policy Guidance (PPG), the current status of the Lewes District Council (LDC) and South Downs National Park Authority (SDNPA) Joint Core Strategy (JCS), recent case law and legal advice.

Joint Core Strategy and Housing Requirement Figure

5. As at 1 April 2016 the Council had received the Inspector's Final Report on the LDC and SDNPA Joint Core Strategy (JCS) finding the JCS, including the minimum housing requirement figure of 6,900 net additional dwellings, sound³ recognising that the agreed Objectively Assessed Housing Need figure (OAN), even at the lowest end, could not be met within the district without unacceptable impacts. As such, the 1 April 2016 housing supply position is calculated against the 6,900 housing requirement figure.
6. Spatial Policies 1 and 2 of the JCS set out the district's housing requirement of minimum 6,900 net additional dwellings (345dpa), for the district over the Plan period. A proportion of the 6,900 has already been met through completions since April 2010. The remainder will be met through commitments⁴; an allowance for unidentified small-scale windfall sites; rural exception sites; and planned housing site allocations through Local Plan Part 2 or Neighbourhood Plans.

Housing Land Supply

Commitments

Sites with planning permission

¹ The LDC and SDNPA Joint Core Strategy was adopted by both Authorities on 11th May 2016 and 23rd June respectively.

² The 'Liverpool Approach' spreads any shortfall over the remainder of the Plan period, whereas the 'Sedgefield Approach' seeks to meet the shortfall in the next five years.

³ Inspector's Final Report on the Joint Core Strategy <http://www.lewes.gov.uk/planning/22277.asp>

⁴ Sites with planning permission, sites with resolution to approve subject to Section 106 legal agreement, JCS Strategic Site Allocations (including unimplemented 2003 LDLP allocations) and neighbourhood plan allocations.

7. Large and small sites benefitting from planning permission, as at 1st April 2016, which are expected to contribute to completions within the next five years, are included in the five year housing land supply calculation.
8. As at 1st April 2016 a total of 1,277 net units on large sites (6 net units or more) had extant planning permission. Discussions with relevant parties (such as Development Management Case Officers, site proponent/developers), on these sites, on a site by site basis, have helped feed into determining a site's delivery and contribution to the five year supply. This approach is taken with all large sites.
9. Where sites have been brought forward from the previous housing land supply position the Council has sought to ensure timings of delivery remain realistic and reasonable. Previous advice from developers and officers and/or relevant information obtained through the SHELAA process, is compared to the current position. This has enabled the Council to consider if and why there might have been a possible delay in a site's commencement or completion and, if necessary, modify the forthcoming five year delivery trajectory. The comparison between housing land supply updates also helps assess and moderate delivery timeframes anticipated by developers/ proponents for extant and future sites. The above helps to ensure that anticipated delivery is reasonable and realistic. The results of these considerations are reflected within the updated housing trajectory (Appendix 1).
10. The Council takes a site by site approach to considering a site's deliverability rather than applying a flat percentage discount to the total number of units with planning permission on large sites. This approach is considered to provide a more accurate position. As such, of the 1,277 net units with planning permission on large sites 1,026 net units are expected to be delivered within the next five years and are therefore included in the five year housing land supply calculation.
11. Small sites (5 net units or less) provide a consistent source of supply within the district. This source of supply is expected to continue to contribute to the district's delivery of housing over the Plan period. However, it is recognised that a proportion of small site approvals have not been implemented in the past. To reflect this going forward, a percentage discount (25%) is applied to the total number of units on permitted small sites. The percentage discount was calculated by looking at which small sites with planning permission were delivered to determine the proportion of non-implemented approvals.
12. As at 1st April 2016 201 net units had extant planning permission. With the application of the 25% discount this leaves 151 net units to be included in the five year housing land supply calculation (Appendix 2).

Year	Granted	Built	Expired	% Built	% Not Built
2004/05	92	74	18	80.43%	19.6
2005/06	84	64	20	76.19%	23.8
2006/07	98	71	27	72.45%	27.6
2007/08	124	82	42	66.13%	33.9
2008/09	75	53	22	70.67%	29.3
2009/10	50	36	14	72.00%	28.0
2010/11	66	57	9	86.36%	13.8

2011/12	61	46	15	75.41%	24.59
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Sites with Resolution to Approve Subject to S106

13. As at 1st April 2016 four large sites, totalling 131 units, had been granted a resolution to approve subject to the signing of a section 106 legal agreement. Of the 131 units, 32 units are considered deliverable within the next five years and as such are included in the five year housing supply calculation. As with the large sites with planning permission each of the sites within this category are considered on a site by site basis as to their anticipated delivery.

Housing site allocations and deliverable sites

14. In addition to the above, in line with footnote 11 of the NPPF, the five year housing supply calculation contains sites which are considered deliverable and therefore capable of contributing to the Council's five year housing supply. This includes JCS strategic housing site allocations, totalling 704 units⁵; unimplemented 2003 Local Plan allocations, totalling 114 units; neighbourhood plan allocations, totalling 81 units; and sites considered to be deliverable in the SHELAA or which have since progressed through the planning process.

Additional Buffer

15. Paragraph 47 of the NPPF states that LPAs must include an additional 5% buffer against their housing requirements to ensure choice and competition in the market for land. This additional percentage buffer increases to 20% where LPAs have a record of persistent under delivery of housing.
16. A 5% buffer is applied in the district's five year supply calculation as it is considered that there has not been a persistent under delivery against the South East Plan (SEP) target (*see table below*). The JCS Inspector was also satisfied in his Final Report that the 5% buffer was consistent with national policy and guidance.

Year	Net completions	Annualised SEP Target	Annualised Target with completions
2006/ 07	296	220	220
2007/ 08	416	220	216
2008/ 09	257	220	205
2009/ 10	175	220	202
2010/ 11	161	220	204
2011/ 12	247	220	206
2012/ 13	220	220	203
2013/ 14	113	220	202
2014/ 15	276	220	210
2015/ 16	286	220	203
Total	2,447	2,220	-

⁵ Land north of Bishop's Lane, Ringmer (SP6) is included in sites with planning permission.

Windfall allowance

17. Paragraph 48 of the NPPF allows LPAs to include an allowance for windfalls in the five year supply so long as it can be demonstrated that windfalls have been, and will continue to be, a reliable source of supply. It also states that any allowance should be realistic having regard to the Strategic Housing and Economic Land Availability Assessment (SHELAA), historic windfall and expected future trends, and should not include residential gardens.
18. As stated above in paragraph 11 above small site completions have provided a consistent source of windfall supply and completions in the district and are anticipated to continue to be reliable source of supply. This position was strongly supported by the JCS Inspector who considered that within the district, based on past performance and the strength of the local housing market, windfalls are very likely to be a continual source of supply.
19. To determine the appropriate level of the windfall contribution to the five year supply an assessment of past completions on small sites was undertaken, see table below. The windfall contribution of 50dpa is based on the level of small site completions within the five year period prior to the economic downturn, 2004/05 to 2008/09. This reflects a period of housing growth within the district that is more typical of the district's overall performance and potential.

Year	Total small site net completions	Net windfall exc. garden land	Percentage of small site completions on windfall excl garden land sites
2004/05	65	45	26.47
2005/06	85	65	24.53
2006/07	65	40	13.51
2007/08	88	61	14.70
2008/09	49	39	15.18
2009/10	62	39	22.29
2010/11	47	25	15.53
2011/12	45	23	9.31
2012/13	46	31	14.22
2013/14	44	30	26.55
2014/15	65	51	17.83
Total completions since 04/05	661	449	17.35
Completions in 5 year period pre-recession	352	250	17.82

20. The table below sets out the five year housing land supply calculation as at 1st April 2016.

Table 4		Units
A	Core Strategy housing requirement figure <i>(Core Strategy figure annualised)</i>	6,900 <i>(345)</i>
B	Net Completions (2010/11 to 2015/16)	1306
C	Residual Requirement <i>(Residual annualised)</i>	5,597 <i>(399.8)</i>
D	Residual 5 year requirement <i>(399.8 x 5)</i>	1,998
E	NPPF 5% buffer <i>(0.05 x 1,998)</i>	99.9
F	Total 5 year requirement figure <i>(Annualised over 5 years)</i>	2,098 <i>(419.8)</i>
G	Commitments	2,360
	<i>Large and small sites with planning permission</i>	<i>1,177</i>
	<i>Sites subject to Section 106</i>	<i>32</i>
	<i>Unimplemented Local Plan Allocations</i>	<i>114</i>
	<i>Core Strategy strategic site allocations</i>	<i>704</i>
	<i>Neighbourhood Plan allocations</i>	<i>81</i>
	<i>Windfall allowance</i>	<i>145</i>
	<i>Deliverable SHLAA sites</i>	<i>107</i>
H	Supply	
	Years	5.62

Appendix 1 – Updated five year housing trajectory

Sites with Planning Permission							
Site address	Site/ application reference	16/17	17/18	18/19	19/20	20/21	Total units within 5 years
Former Roche Site, Bell Lane, Lewes	SDNP/12/00920	-	-	-	-	-	0
Tudor Manor Hotel, Eastbourne Road, Seaford	LW/07/1584		7				7
The Old Rectory, Heighton Road, South Heighton	LW/11/1078				11		11
1 - 10 Talland Parade, Seaford	LW/11/1321		10				10
16 & 16A South Coast Road, Peacehaven	LW/09/1093		8				8
34 - 40 High Street, Seaford	LW/12/0020			5			5
Land at the end of Timberyard Lane, Lewes	LW/11/1285/NP	13					13
Falcon Wharf, Railway Lane, Lewes	SDNP/12/00184/FUL	7					7
Eastside, The Drove, Newhaven	LW/11/0634			50	50	50	150
6 Steyne Road, Seaford	LW/12/0693				6		6
11A Newhaven Square, Newhaven	LW/13/0023	-	-	-	-	-	0
E O Culverwell Ltd Site B Malling Works, Lewes	SDNP/13/04847/FUL	12					12
Land north of 56 Keymer Avenue, Peacehaven	LW/13/0686	-	-	-	-	-	0
8 North Street, Lewes	SDNP/14/03118/DCO UPN	-	-	-	-	-	0
Lewes House site, Friars Walk, Lewes	SDNP/14/01199/FUL			10	15		25
Mardon, Claremont Road, Seaford	LW/10/0359	-	-	-	-	-	0
Land on the north side of Arundel Road, Peacehaven	LW/13/0644	21					21
11 High Street, Lewes	SDNP/14/05146/FUL		7				7
Land at North Common Road, Wivelsfield	LW/15/0752		25	50			75
Peacehaven Police Station, 264 South Coast Road, Peacehaven	LW/13/0747					9	9
Searchlight workshops, Newhaven	LW/14/0707	13					13
Harbourside Inn, Fort Road, Newhaven	LW/13/0769	11					11
Newhaven Fire Station	LW/14/0899			7			7
Boathouse Organic Farm shop, Uckfield Road, Ringmer	LW/14/0830		10				10
184 South Coast Road, Peacehaven	LW/15/0023	10					10
Land off Ridge Way, Wivelsfield	LW/15/0060		30	32			62
The Bridge Inn, High Street,	LW/15/0500	6					6

Newhaven							
Covers Yard, Hamsey	LW/14/0943			10	15		25
2 South Coast Road, Peacehaven	LW/15/0850		13				13
Gradwell End, Mill Lane, Chailey	LW/13/0620			40			40
Former Central Garage, Sutton Park Road, Seaford	LW/14/0150		20	18			38
Land at Medway Gardens, Wivelsfield	LW/14/0350	27					27
Former Parker Pen site, Newhaven	LW/14/0188					50	50
Old House Depository, Seaford	LW/12/0857		20	15			35
Former Hamsey Brickworks, Hamsey	LW/14/0712				20	29	49
Cricketfield Smallholding, Newick	LW/14/0924		30				30
Old shipyard, Robinson Road Newhaven	LW/14/0686	-	-	-	-	-	0
North of Bishop's Lane, Ringmer	LW/14/0127		25	50	35		110
Old Forge Pine, Lewes Road, Ringmer	RES5 / LW/15/0318			10	11		21
Garage Block, East Balcombe Road, Peacehaven	LW/15/0998	6					6
Land at South Downs Road, Lewes	SDNP/15/01303/FULL		9	35	35		79
5 Kendal Court, Newhaven	LW/15/0511	9					9
1 to 3 Kendal Court, Railway Road, Newhaven	LW/16/0025	9					9
Total		169	239	282	198	138	1026

Sites with resolution for approval subject to S106							
Site address	Site/ application reference	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	Units within five years
Land at Valley Road	LW/12/0850	-	-	-	-	-	0
Marco Trailers	LW/14/0564	-	-	-	-	-	0
1 South Coast Road	LW/15/0462			11	15		26
Grassmere Court, Grassmere Avenue	LW/15/0999		6				6
Total		0	6	11	15	0	32

Unimplemented 2003 Local Plan Allocations							
Site address	Site/ application reference	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	Units within five years
Newhaven Marina, Fort Road,	LW/07/1475 / NH6					50	50
Caburn Field	RG1				20	20	40
South of Valley Road	NH4				9	15	24

Total		0	0	0	29	85	114
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Deliverable sites							
Site address	Site/ application reference	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	Units within five years
Police Station, South Road	51NH				10		10
Newlands Primary School	28SF					50	50
Magistrates Court Car Park, Court Road	31LW / SDNP/16/01618/FUL				9		9
Elm Court, Blatchington Road	25SF / LW/15/0946					9	9
Kings Head pub	26CH / LW/16/0283				15		15
Former Roche site, Bell Lane	01PP		14				14
Total		0	14	0	34	59	107

Neighbourhood Plan housing allocations							
Site address	Site/ application reference	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	Units within five years
Land east of Telephone Exchange	HO3				15	15	30
Diplocks Yard, Bishops Lane	RES4 / LW/15/0747				12		12
Old Forge Pine, Lewes Road ⁶	RES5 / LW/15/0318	-	-	-	-	-	0
Sunnymede Garden, Norlington Lane	RES8 / LW/15/0490				9		9
Mischiefs Farm /Careys Cowshed, Broyle Lane ⁷	RES9 / LW/15/0173	-	-	-	-	-	0
Lower Lodge Farm, Loughton Road	RES11 / LW/15/0542			15	15		30
Total		0	0	30	36	15	81

Joint Core Strategy housing site allocations							
Site address	Site/ application reference	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	Units within five years
North Street,	SDNP/15/01146/FUL		80	150	126	59	415
North of Bishop's Lane ⁵	LW/14/0217	-	-	-	-	-	0
Remainder of Greenhill Way	SP5		20	50	43		113
Lower Hoddern Farm	SP8				63	63	126
Land at Harbour Heights	SP7					50	50
Total		0	100	200	232	172	704

⁶ See table of 'Sites with Planning Permission'

⁷ Included in Ringmer small sites with planning permission

Appendix 2 – Small sites with planning permission as at 1 April 2016

Parish/ Town	Small sites
Lewes	25
Newhaven	24
Peacehaven	28
Seaford	38
Barcombe	5
Beddingham	0
Chailey	6
Ditchling	7
East Chiltington	2
Falmer	0
Firle	2
Glynde	1
Hamsey	6
Iford	0
Kingston	7
Newick	3
Piddinghoe	0
Plumpton	6
Ringmer	11
Rodmell	2
St Ann Without	0
St John Without	0
Southease	0
South Heighton	1
Streat	1
Tarring Neville	0
Telscombe	22
Westmeston	2
Wivelsfield	2
Total	201