



# Eastbourne LDF

Local Development Framework  
Evidence Document

## Strategic Housing Land Availability Assessment 2008

Method of Approach  
October 2008



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# Eastbourne Local Development Framework: **Strategic Housing Land Availability Assessment: Method of Approach 2008**

## Consultation Paper

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1	Introduction	2
	<b>Context</b>	<b>2</b>
	<b>Purpose of the Assessment</b>	<b>3</b>
	<b>Stakeholder Involvement</b>	<b>3</b>
	<b>The Process of Completing Eastbourne's SHLAA</b>	<b>4</b>
2	Methodology	7
	<b>Determining the Sources of Information for Sites</b>	<b>7</b>
	<b>Determining which Sites and Areas will be Surveyed</b>	<b>9</b>
	<b>Carrying out the Survey</b>	<b>10</b>
	<b>Assessing whether Sites are Likely to be Developed</b>	<b>10</b>
	<b>Type of Development and Neighbourhood Areas</b>	<b>15</b>
	<b>Estimating the Housing Potential of Each Site</b>	<b>16</b>
	<b>Considering Windfall Developments</b>	<b>22</b>
	<b>The Summary Assessment</b>	<b>24</b>
3	Consultation Plan	26
■	Appendices	
A	Example of Assessment Matrix	28
B	Neighbourhood Residential Density Maps	30
C	Eastbourne Urban Built Form Types	45
■	Tables	
	Table 2.1 - SHLAA Development Type Categories	8
	Table 2.2 - SHLAA Assessment Matrix	11
	Table 2.3 - Constraint Analysis	12
	Table 2.4 - Example of an urban character area in Eastbourne	18
	Table 2.5 - Types of Sites Identified in Neighbourhood Delivery Analysis	24

# 1 Introduction

## Context

### What is the purpose of this report?

- 1.1** The purpose of this report is to inform key stakeholders<sup>(i)</sup> of the methodology and assumptions employed to assess the potential for future housing development in Eastbourne. A six-week consultation period from 29 October 2008 to 10 December 2008 will enable key stakeholders to comment on the approach used to prepare the Strategic Housing Land Availability Assessment.

### How do we meet our housing targets?

- 1.2** The Strategic Housing Land Availability Assessment (SHLAA) will provide vital evidence for Eastbourne's emerging Local Development Framework (LDF). It assesses whether there are sufficient sites with housing development potential to meet Eastbourne's housing needs over the next twenty years. Eastbourne Borough Council is required to deliver 4,800 new dwellings during the period 2006-2026 in line with the emerging South East Plan (the latest version of which is the Government Response to the Panel Report, July 2008).

### What does Government require us to do?

- 1.3** Ensuring that land availability does not constrain the delivery of new homes is one of the Government's highest priorities, and is now a national policy in Planning Policy Statement 3 (PPS3): Housing (DCLG, 2006). PPS3 also reflects the Government's commitment to the findings of the Barker Review of Housing Supply on the need for a more responsive approach to land supply at a local level. Provision of a supply of development-ready housing sites is also a requirement of the East Sussex Local Area Agreement on National Indicator 159.
- 1.4** From 1 April 2007 PPS3 requires Local Planning Authorities such as Eastbourne to:
- i. allocate sufficient development-ready housing sites to meet targets for the first five years of the plan period, and ensure year-on-year there is sufficient housing land available for a five year period;
  - ii. identify specific developable sites for years 6-10 of the plan period, and ideally for years 11-15, to ensure an annual five year supply can be maintained;

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i Including Government Office for the South East (GOSE), the House Builders Federation, the Housing Corporation and Registered Social Landlords



- iii. indicate broad locations for future housing growth where it is not possible to allocate specific sites for years 11-15 of the plan;
- iv. not include an allowance for windfalls in the first ten years of the plan unless justifiable local circumstances prevent the allocation of sufficient sites.

**1.5** Each site must be assessed to indicate their development potential for housing in order to meet the criteria set out in Planning Inspectorate Guidance which requires that they must be 'deliverable', 'suitable' and 'developable' during the plan period.

**1.6** The final summary report will assess whether there may be circumstances particular to Eastbourne that would justify the inclusion of windfall sites during the first ten years of the plan.

## **Purpose of the Assessment**

**1.7** The purpose of the SHLAA is not to allocate sites, but to identify sites with housing potential, and to assess the potential of them being developed within the plan period (2006-2026). This assessment is important to the making of plans in which larger sites would be subsequently allocated, such as the LDF Core Strategy or a Site Allocations Development Plan Document (DPD). All the sites reviewed in this report therefore still need to follow the normal procedures in obtaining planning permission.

**1.8** When completed the assessment will:

- identify the options available to meet any shortfall in the provision of new housing sites;
- identify the actions required (including investment in infrastructure) to enable the development of sites previously considered not suitable for development; and
- ascertain whether existing planning policy should be reviewed to enable the development of certain sites

**1.9** Eastbourne's SHLAA will be reviewed and updated as part of the preparation of the Annual Monitoring Report. This SHLAA provides comprehensive, detailed information and a full re-survey will only be required if in any year a five-year supply cannot be demonstrated or when the rate of housing delivery is so reduced that it compromises future targets.

## **Stakeholder Involvement**

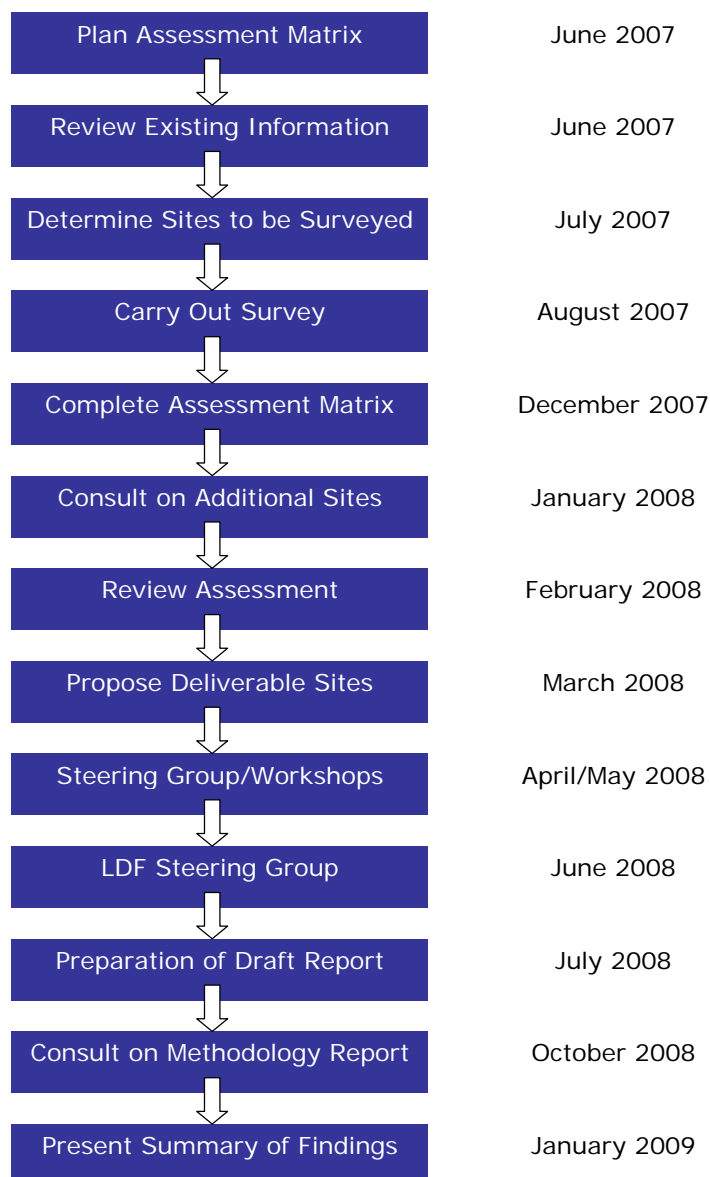
**1.10** The views of internal and external stakeholders have been sought throughout the preparation of this document by the following means:

- representations made on the LDF Core Strategy Preferred Options Report (January 2007) in which the deliverability of previously proposed or allocated housing land and additional new sites proposed by landowners were considered;
- a Landowners and Agents Workshop held in August 2007 at which land in the Borough with the potential for housing development was discussed as part of the preparation of a Housing Spatial Strategy Background Paper for the LDF Core Strategy;
- involvement of the Environment Agency in the production of the Eastbourne and Wealden Strategic Flood Risk Assessment, the identification of potential housing development land outside flood risk zones, and consultation on Flood Risk Assessments for individual development proposals;
- specific targeted consultation aimed at local landowners, developers, agents and architects along with statutory organisations that have an interest in land for development inviting them to propose potential housing sites to the Council in January and February 2008. This was also advertised in the local press and the Council's website. Approximately 30 sites were submitted for the Council's consideration;
- in house consultation with various departments within Eastbourne Borough Council such as the Development Control Team, the Housing Department and the Economic Development Team who have been involved in the assessment of existing employment sites for potential residential development.

## The Process of Completing Eastbourne's SHLAA

- 1.11** Work began in June 2007 following new guidance related to PPS3 produced by the Department for Communities and Local Government (DCLG) which set out the framework and information required for a SHLAA. Guidance on site deliverability from the Planning Inspectorate and the Planning Advisory Service helped with the formation of an assessment framework (Chapter 2). Procedure and dates for the production of the various stages of Eastbourne SHLAA are presented in Picture 1.1.
- 1.12** A series of questions were devised to create an assessment matrix. The questions related to the size and existing use of the site, the character of the area, deliverability and sustainability considerations, and site constraints. The questions are looked at in more detail in Chapter 2. Once the matrix was created the number of potential development sites to be assessed were evaluated. This involved reviewing a number of documents which are outlined in Chapter 2, to determine which sites were available for development and had housing potential. A list of potential development sites was then produced and were fed into the assessment matrix. Each individual site was surveyed during the summer and latter part of 2007. Completion of the matrix for each site concluded the first stage of the in-house assessment.

Picture 1.1 Process Map



- 1.13** To ensure the study was as comprehensive as possible a formal 6-week consultation took place in January and February 2008. Landowners, developers agents and architects identified in Eastbourne's Development Control database and others operating in the local area, along with key statutory stakeholders identified on Eastbourne's Local Development Framework mailing list and those

general consulted on Planning Policy documents were invited to suggest potential sites. Approximately 100 letters were sent out to stakeholders, although the general public was also made aware of the targeted consultation through an advertisement in the local paper and on the Council's website. The suggested sites were considered and added to the assessment matrix as appropriate. Some previously identified sites were re-reviewed as a result of the consultation. All the potentially deliverable sites were fine-tuned and presented to the Council's SHLAA Steering Group. Following consultation and verification of the methodology the Council will shortly contact all landowners, agents and representatives who submitted site suggestions to inform them of the assessment results for each individual site. A summary report on the findings will be published by the end of the current year to allow public consultation to take place early in 2009.



## 2 Methodology

**2.1** This section examines in detail the methodology used and assumptions made in relation to the preparation of the Eastbourne SHLAA. The methodology used for the report can be broken down into three stages: identification of potential sites; use of the assessment matrix to survey the sites; and thirdly an estimation of the housing potential of each site.

### Determining the Sources of Information for Sites

**2.2** The initial step in the identification of potential sites was to examine all the available existing information. This entailed a detailed desktop review. Sources included a range of reports produced by the Council as well as reports and data bases produced by other organisations. These included:

- the housing allocations in the Eastbourne Borough Plan (2001-2011)
- sites granted planning permission by the Council where construction has not yet started
- sites that have been the subject of pre-application discussion between Development Control Officers and developers or agents
- advice from the Council's Housing Department on housing development opportunities
- Eastbourne Housing Potential (draft) 2005
- Eastbourne Urban Capacity Studies (2001 and 2003) (both of which provided evidence for the Eastbourne Borough Plan 2001-2011)
- Eastbourne Empty Properties Register (July 2007) (to identify long-term vacant units)
- English House Condition Survey (July 2006) (used to identify individual buildings)
- National Land Use Database (September 2007) (to identify land and/or buildings, and any constraints to development)
- Register of Surplus Public Sector Land (July 2007) (to identify buildings)
- Eastbourne and South Wealden Employment Land Review (draft) 2008 (to identify surplus employment buildings and/or land)
- Eastbourne Draft Open Space Assessment (2005) (to identify poor quality, redundant and/or low value areas of open and amenity space)
- databases of commercial property (estate agents and property agents)

- the Valuation Office database (to identify vacant buildings)
- Ordnance Survey maps and aerial photographs

**2.3** The desktop review involved looking at reports to identify sites that had already been developed, and previously identified sites which still had development potential. A number of Eastbourne's existing Borough Plan housing allocations remain undeveloped and it was important to look again at these sites to determine whether in light of changing policy considerations they are still suitable for residential development. In light of the current economic climate it was also appropriate to look at sites with planning permission which have not yet been completed as permissions could lapse. When looking at previous Urban Housing Potential and Capacity Studies, it was essential to look at reasons why previously identified sites had not come forward for development to inform decisions on newly identified sites. When considering the development potential of sites, key officers from the Development Control, Housing Department and Economic Development Department were consulted through steering groups, workshops and informal communication.

**2.4** The desktop review provided the Council with a range of opportunities categorised as follows:

Table 2.1 SHLAA Development Type Categories

<b>A - Allocated Site</b> (a site currently allocated in the Eastbourne Borough Plan 2001-2011)	
AN	Existing housing allocations outside the functional floodplain and high risk flood zones that have not yet come forward for development.
AX	Existing housing allocations within or surrounded by functional floodplain and high risk flood zones that have not yet come forward for development.
<i>It is important to look at existing housing allocations in the light of evolving national policy, and to identify reasons for existing housing allocations not having been built. The growth in importance of flood risk and climate change is likely to have a significant impact of the deliverability of a number of existing housing allocations.</i>	
<b>B - Unallocated Brownfield Site</b> (previously used land with housing development potential)	
BA	Newly identified small-scale brownfield sites (not been previously identified by the Council as having housing development potential)
BC	Brownfield sites previously identified in Urban Housing Potential or Urban Capacity Studies
BR	Large scale redevelopment opportunities (including large scale redevelopment of previous residential, employment or other uses)
<i>There are a number of brownfield development opportunities across the Borough. It is essential that sites previously identified in housing capacity studies and new redevelopment opportunities are assessed. Such sites might include housing density intensification through the development of garden space, or redevelopment of garden space, or redevelopment of derelict sites, garages courts and/or car parking space.</i>	

<b>C - Commitment Site</b> (unimplemented or part-implemented planning permissions where there is a potential net gain or loss in the number of residential units)	
CC	Existing residential commitments where work on the site has commenced
CN	Existing residential commitments where work on the site has not yet commenced and planning permission has not lapsed
<i>It is important to distinguish between commencements and non-commencements because commencements are likely to be completed in the near future whilst non-commencements may not be built and the planning permission may lapse.</i>	
<b>EX - Urban Extension Site</b> (large-scale or small incremental sites that would extend the boundary of the built-up area)	
<i>Extension of the built-up area boundary is limited by a multiplicity of factors including flood risk, the Area of Outstanding Natural Beauty (likely to become a National Park within the life of the plan), the Council's biodiversity responsibility and other environmental constraints.</i>	
<b>O - Open Space Conversion Site</b> (the conversion of redundant or low value areas of open/amenity space to residential development)	
OA	Allotment land
OM	Amenity Areas
ON	Natural Areas
OP	Play Areas
<i>Areas of open and/or amenity space have only been considered where they scored poorly in an Open Space Assessment (Draft) 2005 in terms of their value and quality and/or where they are felt to be redundant.</i>	
<b>X - Employment Site</b> (land allocated for employment use that may be suitable for housing)	
XE	Sites previously allocated for employment use that may be suitable for housing
XS	Sites presently in employment/commercial use considered suitable for change of use to housing
<i>It is also important to consider any potential for viable change of use from employment to residential especially in the predominantly residential areas of Eastbourne. The Employment Land Review (Draft) 2008 indicates that there are opportunities for small scale change of use, where the provision of employment land can be located elsewhere in the Borough.</i>	

## Determining which Sites and Areas will be Surveyed

- 2.5** Consideration was given to whether the search for potential sites should be restricted to the Borough or extended into the 'Eastbourne and South Wealden Housing Market Area'. It was decided appropriate that the land beyond the Borough Council's administrative boundary should be dealt with separately in the Wealden District Council SHLAA. However the Council will liaise with Wealden on any proposed sites put forward within the 'Eastbourne and South Wealden Housing Market Area'.

- 2.6** All the sites identified in the desktop review were surveyed using the assessment matrix illustrated in Table 2.2. to fully understand the context of each site and any physical constraints to development. A site survey was completed for all sites regardless of the site size and unit potential of the site. At the site survey stage some sites not previously identified were discovered and added to the list. Because of the physical and environmental constraints on greenfield land in Eastbourne the bulk of housing land for the next twenty years is likely to be made up of small sites. Therefore the assessment set no size thresholds and considered all development opportunities regardless of size.

### Carrying out the Survey

- 2.7** The survey recorded the following information:
- site size;
  - site boundary;
  - current land use(s);
  - surrounding land uses;
  - environment and built character of the surrounding area;
  - initial assessment of physical constraints (i.e. access, steep slopes, danger of flooding, significant natural features);
  - sites details provided by landowners and developers;
  - development progress where applicable;
  - suitability of the site for mixed-use development or housing-only development;
  - measures required to overcome any environmental constraints to development;
- 2.8** Each site was then assessed in detail using the assessment matrix. Details of the process are explained more fully in the following section.

### Assessing whether Sites are Likely to be Developed

- 2.9** A spreadsheet based on the assessment matrix was created. The assessment considered availability, achievability, and suitability in accordance with Planning Inspectorate (2007) SHLAA (DCLG, 2007) and the Planning Advisory Service (2008) guidance. It also determined the sustainability of the site, and any constraints to development together with suggested measures to overcome them. The following table sets out the questions that were developed for the matrix:

Table 2.2 SHLAA Assessment Matrix

Assessment Questions	Explanation/Considerations
(i) Is the site an allocation in the Eastbourne Borough Plan (2001-2011)?	Has the site already been established through the planning system and is it supported by the Council for development?
(ii) Are there any legal ownership problems with the site?	<ul style="list-style-type: none"> <li>• multiple ownership</li> <li>• access land is not likely to be sold</li> <li>• tenancies</li> <li>• covenants</li> <li>• operational requirements of the landowners</li> </ul>
(iii) Is there sufficient evidence to suggest the site will come forward?	Is the site ready and available for development?
(iv) Does the site contribute towards the creation of sustainable, mixed `communities?	Will the site be in a sustainable location, be able to provide affordable housing and be accessible to a range of facilities on foot or by bicycle?
(v) Have circumstances changed on the site which may affect its suitability?	Has the site lost its environmental value, become contaminated, or is it located within an area of high flood risk?
(vi) Has Government guidance changed, which may affect the suitability of the site?	New national planning policy on location of development for biodiversity, flood risk, landscape character etc.
(vii) Are there constraints which can be mitigated/overcome?	Please refer to table of constraints below.
(viii) Are there any potential adverse impacts on the environmental and residential amenity?	<ul style="list-style-type: none"> <li>• affect on valued landscape and conservation features;</li> <li>• environmental conditions which could be experienced by neighbouring and prospective residents.</li> </ul>
(ix) Do current market conditions suggest the site is achievable?	<ul style="list-style-type: none"> <li>• has economic viability testing of existing, proposed and alternative uses in terms of land values been undertaken?</li> <li>• attractiveness of the locality;</li> <li>• level of potential market demand;</li> <li>• projected rate of sales.</li> </ul>
(x) Is infrastructure in place, proposed or prioritised within the next twenty years?	Is supporting infrastructure such as sewerage, water supply, schools etc. sufficient or is new infrastructure needed. Will this be developed in time for the development and who will deliver it?
(xi) Are there cost factors associated with making the site achievable? To include:	<ul style="list-style-type: none"> <li>• site preparation costs;</li> <li>• exception works necessary e.g. deep-piled foundations;</li> <li>• relevant planning obligations e.g. open space requirements, affordable housing;</li> <li>• prospect of funding or investment.</li> </ul>



**2.10** The assessment also helps to identify if there are any constraints to housing development. It considers the action(s) required to remove these constraints. These considerations are listed below.

Table 2.3 Constraint Analysis

Constraint	Explanation/Considerations
A. Is the site within a known flood risk area?	If the site is within an area of high flood risk then residential development will not be acceptable. The Council has commissioned consultants to review these areas in line with the requirements of PPS25: Development and Flood Risk (2008).
B. Is the site in close proximity to the floodplain?	A consequence of Climate Change could be the expansion of the flood risk areas, affecting sites which are currently just outside the existing flood zones. This will be guided by the requirements of PPS25: Development and Flood Risk (2008).
C. Are there any environmental or conservation designations on or near the site?	<p>These will need to be protected and include:</p> <ul style="list-style-type: none"> <li>• Sites of Special Scientific Interest;</li> <li>• Areas of Outstanding Natural Beauty;</li> <li>• Sites of Nature Conservation Interest;</li> <li>• Environmentally Sensitive Areas;</li> <li>• Archaeologically Sensitive Areas;</li> <li>• Conservation Areas.</li> </ul> <p>This will be guided by PPS7: Sustainable Development in rural areas (2004) and the South Downs Planning Guidance (2008)</p>
D. Are there any future environmental designations planned?	Consideration of the impact of National Park status on South Downs and Local Nature Reserve status on Eastbourne Park.
E. How accessible are services and facilities?	Whether the site is in close proximity to local services and facilities that are required by residents. This will be graded poor, fair, good and excellent.
F. Water quality and groundwater constraints	Using information on Source Protection Zones and groundwater vulnerability in consultation with the Environment Agency and South East Water.
G. Measures Needed To Bring Forward Sites	Taking into consideration the constraints to development on a site, what are the options in order to bring forward the site for development? This would consider:

Constraint	Explanation/Considerations
	<ul style="list-style-type: none"> <li>• Relocation of existing land use in a suitable alternative location;</li> <li>• Provision of new access routes or link roads along with general improvements to the transport infrastructure;</li> <li>• Access improvements to sites which may involve the demolition or redevelopment of properties.</li> </ul>

**2.11** The application of assessment questions using the assessment matrix on example sites can be found in Appendix A.

### Timeframe for delivery

**2.12** The assessment also provided an indication of the likely timeframe for the delivery of each site, which will help to sustain the rolling 5-year supply of housing land required by PPS3 (this assessment can be viewed in the summary report of findings). Knowing when each site can be expected to come forward, whether in the first 5 years of the plan period, years 6-10, 11-15, or 16-20, will enable the Council to create a housing trajectory to outline or 'graph' the projected rate of housing delivery to 2026.

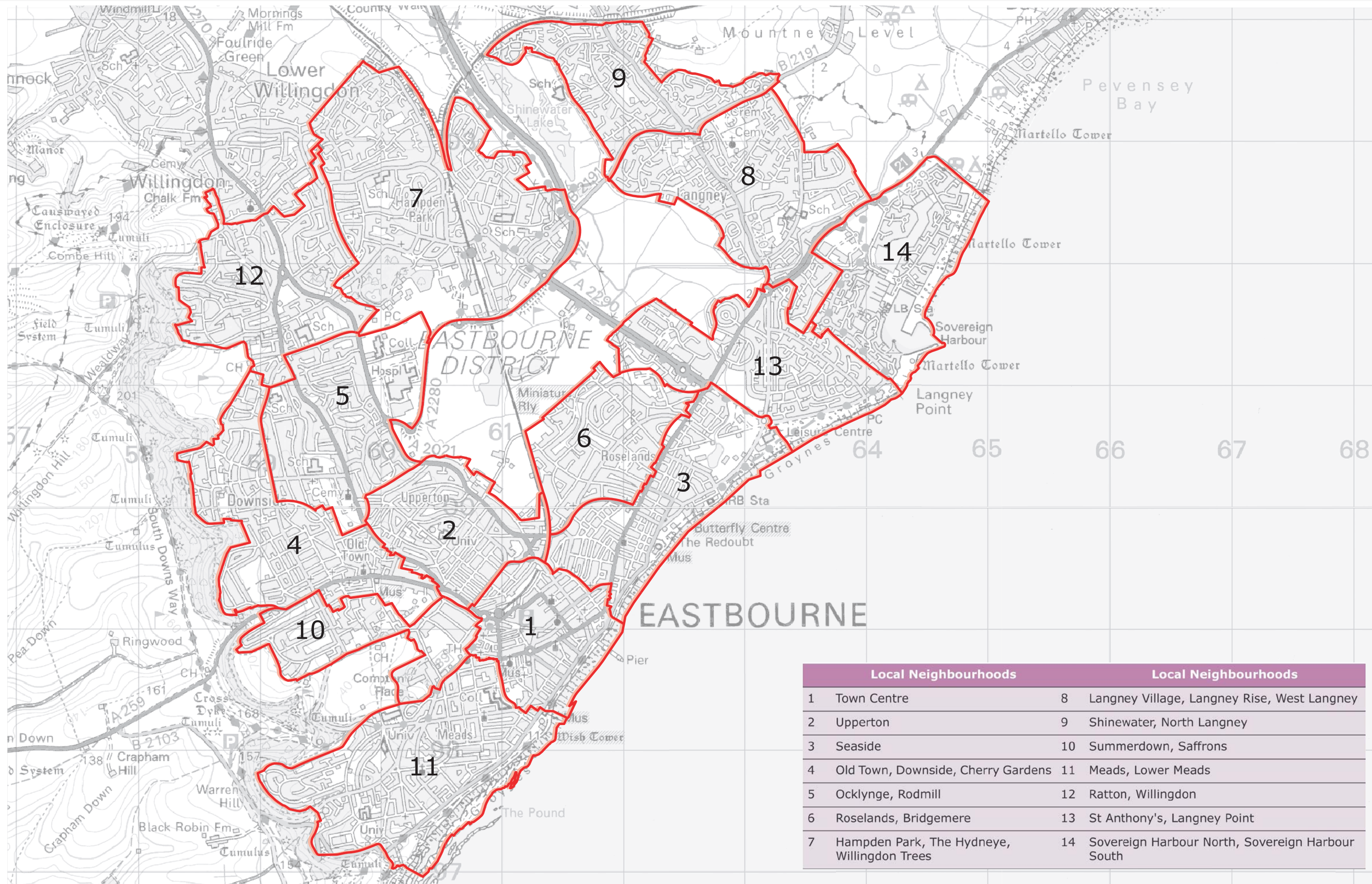
### How different types of sites have been assessed

**2.13** A general consideration on any potential development site was the impact on residential amenity in terms of overdevelopment and potential overlooking of properties. Access to the site in terms of the need for suitable new roads was also a consideration along with a set of other criteria which related to the existing land uses of the site. These are further discussed below:

#### (i) Former Employment Sites

**2.14** Some existing employment sites were included in the assessment, principally light industrial or other business class uses surrounded by or in close proximity to residential areas and not in designated industrial estates or retail centres. Suitability for housing development depends on whether the site's current use is redundant or can be relocated to a more suitable site (such as an industrial estate). The Council's Economic Development Team helped assess these sites to safeguard vital employment providers in particular neighbourhoods. General residential amenity considerations were also appraised for each of these sites.





Local Neighbourhoods		Local Neighbourhoods	
1	Town Centre	8	Langney Village, Langney Rise, West Langney
2	Upperton	9	Shinewater, North Langney
3	Seaside	10	Summerdown, Saffrons
4	Old Town, Downside, Cherry Gardens	11	Meads, Lower Meads
5	Ocklynge, Rodmill	12	Ratton, Willingdon
6	Roselands, Bridgemere	13	St Anthony's, Langney Point
7	Hampden Park, The Hydneye, Willingdon Trees	14	Sovereign Harbour North, Sovereign Harbour South





## **(ii) Other Brownfield Sites**

**2.15** Other brownfield sites with an existing use were similarly assessed on the assumption that if the existing use was redundant or could be suitably relocated the site may have potential for housing development. Consideration was also given to the wider community benefits provided by the existing use. Many of these sites were identified by landowners or in pre-application discussions with planners.

## **(iii) Sites at Risk of Flooding**

**2.16** Housing development is classified as a 'more vulnerable' land use in the policy document Planning Policy 25 (PPS25): Development and Flood Risk, and is therefore not appropriate in certain areas. Flood Zones 1 and 2 have low and medium probabilities respectively of flood risk which means housing is allowed on them. Flood Zone 3A requires an additional test known as an 'exception test' (discussed in Chapter 5 of this report), whilst Flood Zone 3B (functional floodplain) has the most severe risk of flooding within which housing development is not permitted. The flood risk potential of each site was identified using the Eastbourne and Wealden Flood Risk Assessment Level 1 Report.

## **(iv) Open and Amenity Space**

**2.17** Open and Amenity Space of poor quality and of low value to the community was added to the list of potential housing development sites. Current site use was a major consideration in the assessment of these sites. Loss of residential amenity was also a key consideration. There must be suitable alternative areas of open or amenity space accessible to the community. The sites must not contain important biodiversity or archaeology, in particular trees with Tree Preservation Orders, and any development must generally improve the appearance and character of the area.

## **(v) Garages, Car Parks and Garden Space**

**2.18** A number of planning applications have come forward recently on redundant car parks which identified the development potential of such sites. Redevelopment of existing garage courts or open car parks will depend upon the site being redundant or there being an oversupply of car parking in the area. The impact of on-street parking on the quality and appearance of the area following the loss of such sites was considered. The character of the local area was also considered as part of the assessment of garden sites.

## Type of Development and Neighbourhood Areas

### Type of Development

**2.19** In order to classify the type of development sites that were put forward for development a 'Current Use' was recorded on the assessment matrix. This categorised all of the potential development sites into the following land uses:

- Employment (an existing employment use);
- Residential;
- General Brownfield (a brownfield use that is not necessarily an employment use e.g. community facility);
- Church;
- Car Park (independent car park or shared car park as part of residential area);
- Garages (individual garages or garage courts);
- Greenfield (future greenfield urban extensions to the built up area boundary)
- Amenity/Open Space (designated open space, or grassed/planted areas surrounding sites);
- Garden Space (garden space within the curtilage of a property).

**2.20** The categorisation of land uses allows the Council choices in terms of the type of development that could be brought forward for development and the impact that this will have on Eastbourne's expected housing delivery. However, this categorisation is purely an administrative tool and the Council will have the opportunity on 10 December 2008 to decide which categories it wishes to pursue in order to meet its housing requirements. This will then be subject to wider consultation at the beginning of 2009.

### Neighbourhood Analysis

**2.21** The LDF Core Strategy is organised by neighbourhood. In all, 14 neighbourhoods have been identified and numbered 1 to 14. Further details on the identification of the neighbourhoods and their boundaries can be found in Background Paper 13: Neighbourhoods. It was necessary to record the neighbourhood in which each potential site is located. Where a site lies outside the built up area, i.e. on a greenfield site, it was assigned the number 0 (zero). The 14 neighbourhoods are a refined amalgamation of the 29 Local Neighbourhoods that were initially presented in the Core Strategy Preferred Options Report (2006) and are presented on the following map..



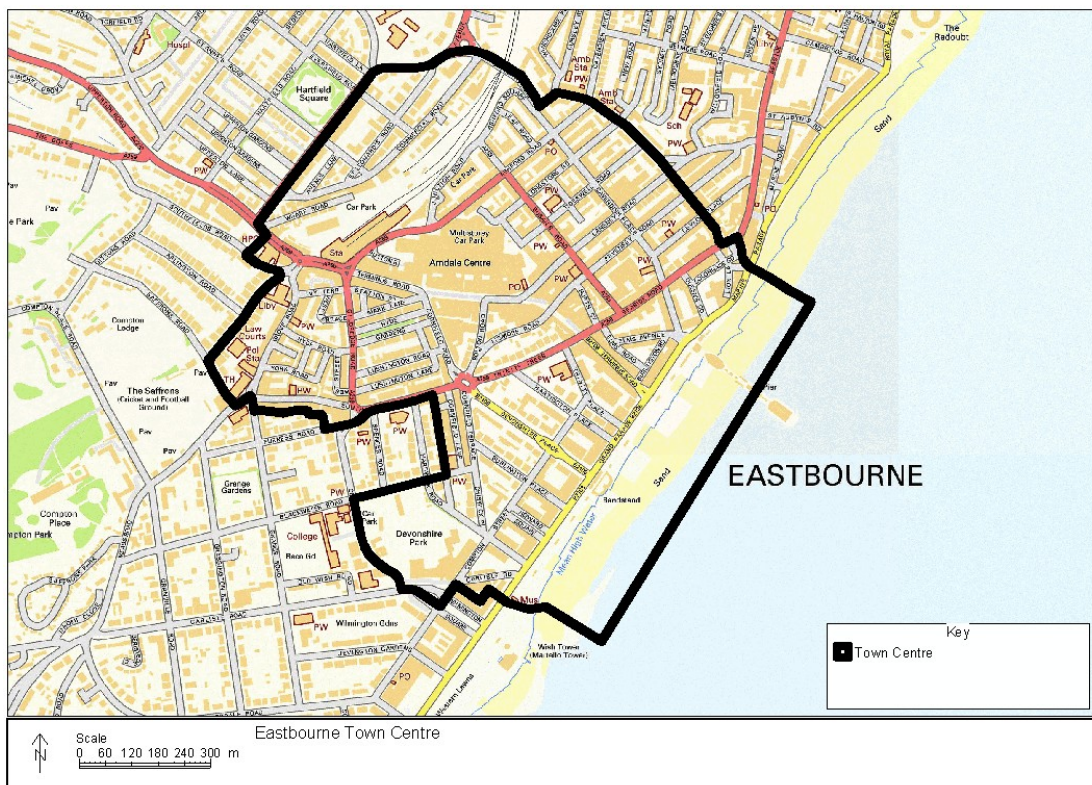
## Estimating the Housing Potential of Each Site

**2.22** The purpose of this report is to establish the baseline figure for residential capacity to be used in order to inform the total number of residential units that can be delivered on development sites and the subsequent choices that may be required to meet any shortfalls.

### Stage 1 - Assessment Based on Average Densities the Borough

**2.23** Estimating the housing potential for each site initially assumed that an average density of 40 dwellings per hectare could be achieved on all sites except for Town Centre sites where the density of 50 dwellings per hectare could be used. A map showing the boundary of the Town Centre can be found in the figure below. This average density figure is required in the emerging South East Plan and in Planning Policy Statement 3 (PPS3): Housing. Some higher densities were also assumed for sites where pre-application discussions and negotiations with Development Control officers had taken place and higher densities agreed.

Map 2.1 Town Centre



### Major Greenfield sites outside existing neighbourhoods

**2.24** Major greenfield sites which are outside Eastbourne's 14 neighbourhoods are also included in this stage, with the assumption that 40 dwellings per hectare will be the average density for new build residential development schemes.



## Stage 2 - Detailed Assessment of Residential Densities based on Neighbourhoods

- 2.25** Initial calculations of the baseline capacity through Stage 1 indicate a shortfall of housing land to meet the requirements of the South East Plan from year 10 to 20. Therefore a more refined approach was taken based on the average prevailing densities for each neighbourhood. Potential housing can then be calculated according to the average densities in each of the neighbourhoods based on samples of typical sections of built form along a street or a group of houses forming part of a 'development' excluding roads (refer to maps in Appendix B). The character areas that were selected reflected the characteristic type of urban built form found in each neighbourhood.<sup>(ii)</sup> Approximately 2 to 5 areas were selected for each neighbourhood depending on the variety of urban built form in the local area. The residential densities of these areas could then be used to arrive at a potential neighbourhood residential density.
- 2.26** The figure below illustrates an example of one of the types of urban built form (Early 20th Century semi-detached medium density perimeter development) that is found in Neighbourhood 4, Eastbourne. A total of 54 areas have been assessed across the Borough and these can be found in Appendix C.

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ii Neighbourhood boundaries were based originally on characteristic areas used for earlier housing potential studies.

Table 2.4 Example of an urban character area in Eastbourne

<p><b>Urban Built Form Type:</b></p>	<p>Early 20th Century Semi-Detached Medium Density Perimeter Development</p>
	
<p><b>Location:</b></p> <p>Crunden Road/Coombe Road, Cherry Gardens, Neighbourhood 4</p>	<p><b>Site Layout:</b></p> <p>Dimensions: 53m x 90m Area: 0.48 ha</p>
<p><b>Description:</b></p> <p>Comprises primarily of semi-detached 3 bedroom houses, in a perimeter style development focused along the streets. Buildings are two storey. Similar style of development found in entire Cherry Gardens area of Neighbourhood 4.</p>	<p><b>Residential Density:</b></p> <p>Units: 21 Units / ha: 43 Habitable Rooms: 5 per units (average) Total Habitable Rooms: 105 Habitable Rooms / ha: 219</p>

### Categorisation of Urban Built Form

**2.27** In order to categorise all of the various types of urban built form in the Borough the following descriptions were used:

## a) Residential Development Pattern

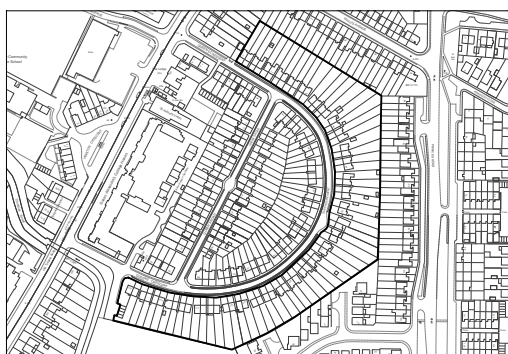
**Street** - Residential units organised in a regular linear pattern along a street or pathway.



**Perimeter** - Residential units organised around the perimeter of the site boundary, with gardens facing into the centre.



**Crescent** - Residential units form an arc shape, following the curve of a road or pathway.



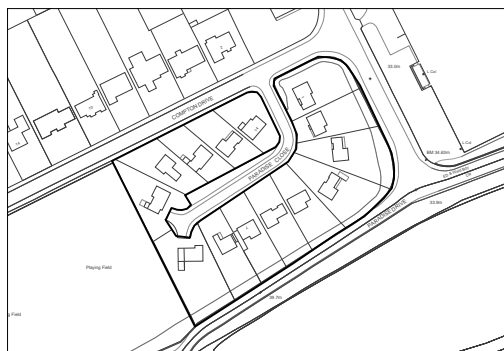
**Court** - Residential units are organised around the perimeter of the site boundary with a large internal space forming a courtyard.



**General Development** - Residential units are organised in an irregular pattern within the site area normally due to infill developments occurring.



**Cul-de-sac** - Residential units are arranged regularly surrounding the shape of the no through road.





## b) Residential Density

- 2.28** The urban built form types have been categorised into three residential density sizes. When calculating residential density the site boundaries discounted roads, but counted areas of garden space. A residential development area was categorised as low density if it had a density of less than 30 dwellings per hectare, medium density for between 30 and 70 dwellings per hectare and high density for 70 dwellings per hectare or above.
- 2.29** An alternative method of measuring density is calculating the number of habitable rooms per hectare for each of the character areas. A habitable room is defined as 'a room occupied or designed for occupancy by one or more persons for study, living, sleeping and eating.' For the purposes of residential density calculations this does not include kitchens, bathrooms, WCs or circulation space. In order to work out the number of habitable rooms within each property either planning applications for the original development or estate agents descriptions of properties for sale or rent were used. This gave a good indication of the number of habitable rooms within the whole site area.

## c) Type of Residential Units

- 2.30** This categorises the type of residential units found within each site area into:
- detached houses;
  - semi-detached houses;
  - terraced houses;
  - flats/maisonettes;
  - mixed (a combination of the above types within the boundary of a site area)

## d) Style of Residential Units

- 2.31** The following categories classify the age and style of the properties within the boundary of the site areas:
- Classical development - properties built in the classical style. A number of these properties have been converted into individual flats on separate floors.
  - 19th Century housing - Victorian housing typically with small back gardens, which were often yards
  - 19th Century villas - large semi-detached housing set in open grounds.
  - 19th Century Workers houses - set of small terraced properties typical of central locations.
  - Early 20th Century - residential properties built between 1900 - 1940s.
  - Post-war development - residential properties built after 1945 and before 1960.



- Post 1960s development - residential properties built between 1960-1990.
- 20th Century municipal schemes - housing that was provided by the local authority.
- Late 20th Century housing - residential properties built in the 1990s.
- Mixed 20th Century housing - an area urban built form that contains a mixture of residential styles and ages.
- 21st Century housing - residential properties built at the beginning of this century.

### Residential Densities for Eastbourne's Neighbourhoods

**2.32** The following table presents the resulting density for each of Eastbourne's 14 Neighbourhoods.

Neighbourhood	Range in Residential Densities (dwellings per hectare)	Average Residential Density (dwellings per hectare)	Range in Residential Densities (habitable rooms per hectare)	Average Residential Density (habitable rooms per hectare)
1	107 - 180	140	320 - 537	461
2	103 - 131	117	308 - 394	351
3	63 - 160	105	318 - 480	397
4	31 - 112	64	154 - 447	261
5	18 - 30	24	90 - 151	129
6	27 - 35	32	136 - 169	157
7	19 - 61	39	113 - 243	161
8	30 - 70	50	133 - 281	205
9	33 - 62	49	167 - 250	215
10	8 - 53	24	56 - 214	114
11	13 - 127	65	77 - 508	275
12	15 - 23	20	102 - 143	127
13	23 - 32	29	114 - 164	144
14	34 - 110	74	195 - 440	311

### Major Greenfield sites outside existing neighbourhoods

**2.33** For Stage 2, the residential density of greenfield sites outside the existing neighbourhoods have been calculated using the average residential density (dwellings per hectare) of the neighbourhood that adjoins or is nearest to the greenfield site.

### **Stage 3 - Detailed Assessment of Residential Densities based on Local Areas of Built Form**

- 2.34** Stage 2 reveals a wide range of densities within each neighbourhood as well as a continued shortfall in housing potential beyond year 10 of the plan period. Therefore, a further stage in refining the housing capacity baseline examined in detail the local residential densities on a site by site basis. The residential potential was based on a detailed consideration of neighbouring built form and the character of the immediate surrounding area. This stage involved building on template 'urban built form types' developed in Stage 2 but then applying them across the Borough on a site by site rather than neighbourhood basis. This was undertaken by matching residential areas with the various development types listed in Appendix C on a site by site basis across the Borough.
- 2.35 Major Greenfield sites outside existing neighbourhoods**
- 2.36** For Stage 3, the appropriate residential density of greenfield sites outside the existing neighbourhoods have been calculated using the immediate surrounding areas built form adjoining the greenfield site and matching that up to one of the 54 character areas assessed as part of Stage 2.

### **Considering Windfall Developments**

- 2.37** Planning Policy Statement 3 (PPS3) allows Local Authorities in the last 10 years of the plan period to include windfall sites in its expected housing delivery over the plan period (2006-2026). A windfall site is defined as a site that has not been previously identified or allocated for development through the planning system. Where there are justifiable circumstances, windfall sites could be included in expected housing delivery during the whole planning period, but only when all other methods of securing additional housing units have been explored (para. 59, PPS3: Housing)
- 2.38** The Council has relied heavily on windfall sites in the last three years of housing delivery due to the Eastbourne Borough Plan (2001-2011) housing allocations not coming forward for development due to multiple constraints on the land. In the last 3 years windfall sites have accounted for 40% of total housing delivery over that period, with 100% of housing delivery being on windfall sites in the 2006/2007 monitoring year.
- 2.39** The purpose of this section is to identify the most appropriate methodology for considering how many windfall sites might come forward for development in the last 10 years of the plan period. There are three scenarios which have been explored which are described below:

### **Scenario 1 - Calculating Projected Conversions and Redevelopments which have not been considered in the SHLAA**

**2.40** It is difficult as part of the SHLAA to assess the likely development potential of residential buildings being converted into smaller units and large scale redevelopments which may involve a number of existing residential properties. Therefore, an estimate of likely windfall could be to use historical trend data to assess the number of 'conversions' and 'redevelopments' which have come forward for development in the last 5 years. An annual average for these two types of development could then be calculated and used to estimate the windfall potential carried forward to cover the last 10 years of the plan period.

### **Scenario 2 - Discounting small sites delivered in the last 10 years of the plan period, and using windfall projections for delivery**

**2.41** This scenario splits the estimated housing potential on windfall sites into 'small' (sites capable of delivering 1-4 units) and 'large' (sites capable of delivering 5 or more units) sites.

**2.42** For large sites it uses the same assumptions as Scenario 1 in that windfall sites will be calculated using the last 5 year trend data for 'conversions' and 'redevelopments', but uses a different assumption for small sites. As it is difficult to estimate the potential development on small sites during the last 10 years of the plan period, small sites which are estimated to be delivered in the last 10 years of the plan period have been discounted, and a windfall figure using trend data will be calculated. This takes into account the additional two types of residential development termed 'change of use' and 'new build' which have been assessed in the SHLAA for the first 10 years of the plan period. Again here, trend data for the last 5 years has been used to estimate the likely annual rate of developments on small sites to be carried forward to cover the last 10 years of the plan period.

### **Scenario 3 - Delivery of sites in addition to those identified in the Urban Housing Potential**

**2.43** This scenario compares the number of residential developments which have come forward in the last 5 years to the number of sites that were originally identified in the Council's Urban Housing Potential Survey (2005). This will give the Council an understanding of the number of residential sites developed and completed that come through the planning system above and beyond those identified through planning policy. This will identify on average the likely number of units which will come forward as windfall developments annually in the last 10 years of the plan period.

**2.44** A detailed assessment of windfall potential will be outlined in the summary report of findings.

- 2.45** Scenario 2 is the Council's recommended approach to calculating the expected windfall delivery rate in the last 10 years of the plan period in line with current best practice and recommendations from the Planning Inspectorate. However, Scenario 3 reinforces the role that windfalls make in providing Eastbourne's housing supply in a densely built up Borough.

## The Summary Assessment

- 2.46** A summary report on the findings and on Eastbourne's expected housing delivery to 2026 will be published by the end of 2008 to allow for a full consultation to take place in early 2009.

## Neighbourhood Delivery

- 2.47** In order to make informed strategic choices the amount of potential residential development within each neighbourhood will be sub-divided into the following categories:

Table 2.5 Types of Sites Identified in Neighbourhood Delivery Analysis

	Explanation
Allocations Brought Forward	These are sites that are currently allocated for residential development in the Eastbourne Borough Plan (2001-2011) and are suitable and available for development in the next 20 years (2006-2026).
Planning Permissions Granted	This is broken down into work that has commenced on site and existing commitments where development has not yet commenced. It also gives an indication when the commitments are due to be delivered by the means of when the planning permission will lapse. Therefore it is only an indication of when the site is likely to be developed. The Annual Monitoring Report will indicate how many residential units are completed every year.
Sites with Development Potential	These sites are new sites that have been identified through the in-house assessment and through consultation on potential residential sites. They are broken down further into brownfield and greenfield sites and by the year they are expected to be delivered.
Number of Small Sites and Respective Units	Due to the majority of the sites appropriate for development being relatively small in their capacity for residential units, the number of units and number of sites that are termed 'small' (4 residential units or less) has been calculated for each neighbourhood.
Number of Units on Exception Test Sites	Planning Policy Statement 25 (PPS25): Development and Flood Risk, states that residential proposals for sites that are within Tidal or Fluvial Flood Zone 3A (which is indicated in the Eastbourne Borough Council and Wealden District Council Strategic Flood Risk Assessment Level 1 Report, May 2008) need to be tested further for flood risk through the exception test. This is being undertaken as part of the Level 2 Report, where a number of neighbourhoods in Eastbourne will be tested so that appropriate mitigation measures if any can be identified. The test will look at a number

Explanation
of sustainability considerations and the hazard and means of access associated with the potential breach of flood defences. The option to take forward exception sites will be assessed as part of section on 'Choices Available to Meet the Supply of Housing', contained within the summary report on findings. The exception test will be complete by the time the final summary report is published.

## Strategic Choices

**2.48** The Council will need to make strategic choices on the types of site that will be brought forward for residential development in the next twenty years. In order to do this the summary assessment will be present the impact of discounting certain types of potential development from housing delivery rates. The following table outlines the type of analysis that will be undertaken on housing delivery rates. From this we will be able to identify the spatial implication for each neighbourhood across Eastbourne and give a clear picture of the spatial vision and broad locations for growth.

	Total Net Units
<b>Total Housing Potential</b>	x units
Without the Development of Greenfield Urban Extension Sites	- a units
Without the Development of Exception Test Sites in Flood Risk Areas	- b units
Without the Development of Employment Sites	- c units
Without the Development of Amenity/Open Spaces	- d units
Without the Development of Car Parks or Garage Courts	- e units
Without the Development of Garden Space	- f units
Without the Inclusion of Windfall Development	- g units
<b>Total Shortfall</b>	y units



### 3 Consultation Plan

- 3.1** Stakeholders are asked to comment on the approach to the Eastbourne Strategic Housing Land Availability Assessment (SHLAA) set out in this draft Methodology Report. A number of consultation questions have been established below which we would like to hear back on along with any other general comments. Landowners and agents who submitted site suggestions will then be advised of the assessment results for their sites, as well as a list of sites assessed as deliverable within the period 2006- 2026.
- 3.2** A summary report on the findings and on Eastbourne's expected housing delivery to 2026 will be published by the end of 2008 to allow a full public consultation to take place early in 2009.

#### Consultation Questions

- 3.3** Along with general comments on this report, the Council would like to hear back from stakeholders on the following questions.

#### Consultation Questions

1. Do you think that the Council has considered all possible types of development site in its SHLAA methodology?
2. Do you think that the Council has undertaken a comprehensive analysis of the housing potential that is deliverable and developable?
3. Do you think that the Council has considered all the appropriate constraints that could affect potential development?
4. Do you agree with the assumptions used for residential capacity?
5. Do you agree with the Council's recommended approach to calculating potential windfall development?
6. Any other general comments?

- 3.4** The consultation period runs from Wednesday 29 October to Wednesday 3 December 2008. If you have any comments or responses to the consultation questions please complete the accompanying consultation response form and forward to:

**Craig Steenhoff  
Planning Policy Officer**

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