# **Lewes District Council**

# **Strategic Housing and Economic Land Availability Assessment (SHELAA)**

# **MAIN REPORT**

September 2018



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## 1. Introduction

- 1.1 The SHELAA has been an important piece of evidence in the preparation of the Local Plan Part 1: Joint Core Strategy, particularly in establishing the housing capacity of the district and inputting into the five year supply of deliverable housing land. Lewes District Council (the Council) is now preparing Local Plan Part 2: Site Allocations and Development Management policies Development Plan Document (LPP2). LPP2 will cover the areas of the district which fall outside the South Downs National Park (the Park).
- 1.2 As LPP2 only consider allocations and development management policies in the areas outside the Park the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) now only assesses sites that fall outside the Park.
- 1.3 The South Downs National Park Authority (SDNPA) has produced and published a Park-wide SHLAA¹ which forms part of the evidence base for its own emerging Park-wide Local Plan. Further information on the Park-wide Local Plan and supporting documents can be found on the Park's Planning Policy webpage². Any new sites or information on existing SHELAA sites within the Park is passed to the SDNPA.
- 1.4 The SHELAA is a key source of information and data in the preparation of the Council's Brownfield Land Register (BLR), as required by Government<sup>3</sup>. Part 1 of the Council's BLR is available to view on the BLR webpage.
- 1.5 The SHELAA report provides a brief introduction to the SHELAA and policy background, a summary of the findings of this SHELAA update and housing trajectory. Section 2 below, outlines any recent relevant changes in national planning policy and practice guidance and highlights any implications on this SHELAA update.
- 1.6 The SHELAA can be viewed at the Planning Offices at Southover House, Southover Road, Lewes, BN7 1AB and on the Council's SHELAA webpage<sup>4</sup>.
- 1.7 It is important to reiterate at this stage that:

The SHELAA does not allocate land for development and is not a statement of Council policy. It also does not outweigh or alter any existing policies or designations.

Town and Country Planning (Brownfield Land Register) Regulations 2017 and Town and Country Planning (Permission in Principle) Order 2017.

<sup>1</sup> http://www.southdowns.gov.uk/planning/planning-policy/national-park-local-plan/evidence-and-supporting-documents/strategic-housing-land-availability-assessment-shlaa/

www.southdowns.gov.uk/planning/planning-policy

<sup>&</sup>lt;sup>4</sup> https://www.lewes-eastbourne.gov.uk/planning-policy/strategic-housing-and-economic-land-availability-assessment/

- It highlights the potential of land within the areas of the district outside the Park for residential development;
- The SHELAA is not, and is not intended to be, a proxy for site allocations in Local Plan Part 2; and
- The SHELAA assessment uses an agreed, objective and consistent methodology which seeks to capture information on constraints as they exist at a particular point in time.

# **Purpose of Study**

- 1.8 An assessment of housing land availability is required by the 2018 revised National Planning Policy Framework (NPPF) in order to "have a clear understanding of the land availability in their area [...] and identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability" (para 67, NPPF). The SHELAA is therefore a key evidence report in the development of planning policies in the district and in developing LPP2. However, the evidence base consists of several additional documents that should be considered collectively when making policy decisions.
- 1.9 The purpose of the SHELAA is to:
  - Identify sites with potential for housing or economic development;
  - Assess their housing potential or consider economic role;
  - Assess their suitability for housing or economic use and likelihood of delivery; and
  - Consider potential for mixed use development.

This SHELAA has a focus on housing land potential and supply. Sites which are assessed include those that have been submitted for consideration or the Council is aware are potentially available for housing (i.e. vacant sites or emerging neighbourhood plans). In the case of employment sites, those that have been assessed within the Employment and Economic Land Assessment (EELA) and concluded to be of low quality for economic use by have been included in the SHELAA. This is to capture sites that may have potential for alternative uses. This SHELAA does not assess all identified employment sites in the district.

- 1.10 Sites assessed to be suitable are identified as either:
  - Deliverable (Suitable, Available and Achievable); or
  - Developable (Suitable but either the availability is specified for a future date or is currently unknown, or the achievability of the site is unknown/marginal).
- 1.11 The Assessment update has taken a consistent approach to that followed in the initial SHLAA methodology, updated to reflect recent national policy and guidance, including;

- Reviewing the sources of sites to determine if any new sites are to be included;
- Gathering up-to-date information through a desktop surveys and evidence gathering from key consultees such as the East Sussex County Council (ESCC) highways authority and Environment Agency (EA) where relevant;
- Surveying new and amended sites;
- Assessing the Deliverability and Developability of sites;
- Establishing an indicative housing trajectory; and
- Updating site assessments to reflect their economic/ employment status and contribution to the district's employment land supply.
- 1.12 The Assessment is updated on an annual basis in order to reflect any change of circumstance with individual sites (i.e. previously identified constraints to the delivery of a site have been removed). The housing trajectory is also updated to reflect any changes. The last published update was August 2017.
- 1.13 Proponents and interested parties of existing assessed sites also had the opportunity to comment on information presented in the August 2017 SHELAA report and provide updated site information in response to a site's assessment. Outcomes of ongoing discussions with proponents of sites being promoted through the Local Plan process are also reflected in the SHELAA update.
- 1.14 In addition to the amendments made to existing sites, a number of new sites were submitted to the Council to be assessed. Those sites submitted by 31 March 2018 are included in this update. New sites also include, where possible, those identified as potential housing allocation options in emerging and made (adopted) Neighbourhood Plans.
- 1.15 At the time of preparing this update Ringmer, Wivelsfield, Newick, Hamsey, Plumpton and Ditchling, Streat & Westmeston have made (adopted) neighbourhood plans. Newhaven and Seaford have reached the stage of identifying their preferred housing sites. This update has therefore, where possible, assessed sites which have been considered through neighbourhood plans within the district.
- 1.16 Appendix 2 provides a site assessment summary table with final assessment conclusions and rationales, incorporating any new sites or amendments to sites.
- 1.17 With regards to the five housing land supply, the SHELAA helps demonstrate a supply of deliverable sites, (NPPF, paragraph 73). Sufficient developable sites should also be identified for years 6-10 to ensure a rolling five year supply. The Council's latest published five year housing land supply position can be found in Appendix 3. The South Downs National Park Authority (SDNPA) set out their five year supply position in their 2016 Annual Monitoring Report (AMR).

# **Key findings of 2018 Assessment update**

- 1.18 16 new sites were submitted to this update. A further five sites came forward as approved residential planning applications.
- 1.19 Nine new sites, including the five with planning permission, were concluded to be Deliverable (Suitable, Available and Achievable).. A further four sites were concluded to be Not Deliverable or Developable (not suitable for housing). Three of the 16 new sites were filtered at the initial stages as they failed one or more of the three initial filter criteria.
- 1.20 Approximately 25 amendments to existing SHELAA sites were made to reflect the current position in light of changed circumstances or additional information gathered.
- 1.21 A number of changes were made to sites with extant planning permission to reflect any completions, commencements or lapsed planning permissions.
- 1.22 In summary, 111 sites, totalling 4,213 units (with double-counting removed), were concluded to be either Deliverable or Developable. Of these, 50 sites (2,409 total net units) have extant planning permission or are housing allocations within the adopted Joint Core Strategy or made neighbourhood plans.

# 2. Background Information

2. The following section outlines the relevant planning policy context and summarises the key pieces of local evidence that have informed the SHELAA site appraisals in this update. The latter half of this section provides the Council's latest published housing land supply position as at 1 April 2018.

# **Policy Context**

# **National Planning Policy**

- 2.1. The National Planning Policy Framework (NPPF) outlines Central Government's policies for plan- making and decision-making with the overarching aim of shifting power to local planning authorities and local communities. In August 2018 Government published a revised NPPF which replaces the March 2012 NPPF.
- 2.2. The NPPF outlines the common theme, or "golden thread", of a *Presumption in favour of sustainable development* for plan-making and decision making<sup>5</sup>. Local Plans should "positively seek opportunities to meet development needs, and be sufficiently flexible to adapt to rapid change" and "as a minimum, provide for objectively assessed needs". For decision-taking local planning authorities should approve development proposals that conform with an up-to-date development plan without delay and grant planning permission where there are no relevant development plan policies, or policies which are most important for determining that application are out-of-date.
- 2.3. The revised NPPF (paragraph 67) maintains the need for the preparation of a strategic housing land availability assessment in order for local planning authorities to understand the availability of potentially suitable land for housing. The SHELAA therefore remains a key piece of evidence in the preparation of planning policy documents, such as the Joint Core Strategy and Local Plan Part 2 (LPP2).
- 2.4. In March 2014 Government published the National Planning Practice Guidance (PPG) which provides guidance on undertaking land assessments within the Housing and Economic Land Availability Assessment section.
- 2.5. Whilst the PPG sets out a similar methodology to that previously outlined in the 2007 guidance, the PPG suggests a site size of five or more units. To date, the Council's land Assessments have applied a threshold of six or more units. This update continues to use this

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<sup>&</sup>lt;sup>5</sup> Paragraph 11-14 of the 2017 Revised NPPF

- threshold as it is consistent with the Council's established monitoring framework and the minimum site size for the emerging LPP2.
- 2.6. In line with the PPG this update incorporates an increased emphasis on economic land by drawing out, from the assessment of suitability of sites for housing, whether other mixed use opportunities might exist.

#### **Evidence Base**

- 2.7. The SHELAA forms part of the evidence base for planning policy documents, including the Joint Core Strategy. There are a number of evidence base documents that also help to inform policy formulation, particularly the consideration of strategies for the planning of new housing. Such documents include Strategic Transport Studies, the Landscape Capacity Study, Sustainability Appraisal and the Infrastructure Delivery Plan. It is for this reason why the findings of the SHELAA need to be tempered against the findings of other evidence base documents when considering future housing potential. For example, the SHELAA only assesses individual sites, where as transport and infrastructure studies may consider the cumulative impact of potential developments. Hence, although one particular settlement may seem to have significant potential for housing growth, based solely on SHELAA findings, other evidence may paint a different picture of how much of that potential is suitable and deliverable.
- 2.8. In light of the above, it is important to note that other evidence base documents need to be considered alongside the SHELAA. In some cases the evidence base documents prepared and held by the Council have been utilised in helping come to conclusions on SHELAA sites.
- 2.9. With regard to assessing land for economic and employment purposes the Council, in 2010, commissioned consultants to undertake an Economic and Employment Land Assessment (EELA). This was then updated in 2012<sup>6</sup>. The aims of this study were to assess future demand and supply for employment land and assess the suitability of sites, whether existing, permitted or proposed, for employment uses. A further focused update was undertaken in 2017 to inform the Council's consideration of implementing Article 4 Directions to strengthen the economic role of Newhaven and wider area.
- 2.10. Section 5 of the 2010 EELA reviewed existing employment sites and allocations against a set of criteria including: access, accessibility, site size and characteristics, potential onsite and offsite constraints and market factors. Sites were ranked as Good, Average or Low quality. Sites which were ranked Low<sup>7</sup> were put forward to be considered within the SHELAA. Other sites considered through the EELA have also

<sup>&</sup>lt;sup>6</sup> The 2012 update was undertaken in light of a weaker than expected recovery from recession and poorer economic outlook.

<sup>&</sup>lt;sup>7</sup> Excluding ELW2 Land south of Pinwell Road due to known unavailability.

been assessed through the SHELAA where they have been formally submitted to the Council to be assessed.

Joint Core Strategy (Local Plan Part 1)

- 2.11. The Council and SDNPA submitted the Joint Core Strategy and background evidence base to the Secretary of State for Examination in Public in September 2014. The initial Examination Hearings were held over a two week period from the 20<sup>th</sup> January 2015. Following the Examination Hearings the Inspector wrote to the Council and SDNPA with his Initial Findings.
- 2.12. The key conclusions of Inspector's Initial Findings Letter were:
  - LDC and SDNPA have met all statutory and legal requirements;
  - OAN figures, even at the lowest end of the range, cannot be met without unacceptable impact that would be contrary to the NPPF and PPG:
  - OAN is correctly identified at the higher end of the range;
  - Planned Housing provision figure must increase to minimum 6,900 net units from 5,790 units;
  - Additional allocations at Old Malling Farm (Lewes) and Lower Hoddern Farm (Peacehaven) should be made and greater certainty should be given to other proposed strategic sites at North of Bishops Lane (Ringmer) and Land at Harbour Heights (Newhaven) by full allocation; and
  - Windfall allowance can be increased and rural exceptions allowance applied.
- 2.13. The Council and SDNPA agreed the schedule of proposed modifications<sup>8</sup>, which were subject to an eight week consultation and submitted to the Inspector for consideration. Additional hearing sessions were held on the 16<sup>th</sup> and 17<sup>th</sup> December 2015 and the Inspector's Final Report received on 22<sup>nd</sup> March 2016, concluding the Plan sound subject to his recommended main modifications.
- 2.14. The relevant key points from the Inspector's Final Report were:
  - Housing requirement figure increased to a minimum 6,900 net additional dwellings, but no requirement to revisit settlement figures (this can be done through Local Plan Part 2);
  - The Council is able to demonstrate a five year housing land supply, as at 1 October 2015, concluding that a 5% buffer and the Liverpool Approach is appropriate;
  - Increased housing figure, from 200 to 240 dwellings, for Old Malling Farm, Lewes Strategic Site (SP4);
  - The duty to co-operated has been met; and

<sup>&</sup>lt;sup>8</sup> LDC Cabinet: 6 July, SDNPA Committee; 8 July and LDC Full Council; 16 July 2015.

The Plan is legally compliant.

Local Plan Part 2: Site Allocations and Development Management Policies

- 2.15. Local Plan Part 2 (LPP2) will set out the non-strategic site allocations for various land uses and provide detailed development management policies. As set out in the introductory paragraphs (1.1 and 1.2) Part 2 will only cover those areas outside the Park. The SDNPA, as the local planning authority for the national park area, will allocate land and produce relevant development management policies in its forthcoming South Downs Local Plan. The SDNPA submitted its draft park-wide Local Plan in May 2018. The SDNPA's SHLAA would have helped inform its emerging Local Plan.
- 2.16. Where neighbourhood plans bring forward site allocations they will take precedence once they are 'made', so long as they are in conformity with the JCS. Neighbourhood Plan policies cannot supersede strategic level policies in the JCS. The Council will continue to work with Parish and Town Councils where they propose to allocate sites in a neighbourhood plan.
- 2.17. The Issues and Options stage on LPP2 was undertaken in the form of Topic Papers in November 2013. A further more detailed Regulation 18 consultation was undertaken in November 2017. Representations from these consultations which provided relevant up-to-date information on SHELAA sites, or put forward new potential housing sites, were fed into subsequent SHELAA updates. The next stage of LPP2 will be the Pre-Submission document anticipated for publication in Autumn 2018 and will set out proposed site allocations and development management policies.
- 2.18. Further information can be found on the <u>LPP2 webpage</u> of the District Council's website<sup>9</sup>.

<sup>&</sup>lt;sup>9</sup> https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/

# 3. Assessment updates

#### New SHELAA sites

- 3.1 New sites can be submitted to the SHELAA at any point using the site submission form available on the SHELAA webpage. Sites submitted up to the 31 March 2018, have been included in this update. The majority of new sites have been received as formal site submissions through the rolling call for sites or from representations received to the Council's recent draft LPP2 consultation. 16 new sites have been assessed as part of the 2018 update. With all new sites, relevant information provided by site proponents or known constraints relevant to the assessment of sites, were fed into the assessment.
- 3.2 Consistent with previous Assessments, a number of initial filters were applied to the new list of sites. Consequently, three sites were filtered as they failed the proximity threshold.
- 3.3 Out of the remaining 13 assessed sites: nine sites, including five with extant planning permission, were concluded to be Deliverable (suitable, available and achievable). The remaining four sites were found to be Not Deliverable or Developable Not Suitable.
- 3.4 The table below summarises the above information by both the number of sites assessed and potential dwelling yield. The figures reflect any changes in capacity made in the assessment of the site.

Table 1: Outcomes of new sites

Total Sites assessed		Deliverable	sites	Developable	e sites	Not Delive Developab	
Number of	Dwelling	Number	Dwelling	Number of	Dwelling	Number	Dwelling
sites	Yield	of sites	Yield	sites	Yield	of sites	Yield
13	629	9	244	0	0	4	385

3.5 Within the 13 newly assessed sites are the four additional large sites with extant planning permission, totalling 47 net units.

Amendments to existing assessed housing sites

3.6 The SHELAA is a 'living' document which allows for the conclusion of existing SHELAA sites to be reconsidered in light of new or updated information submitted to, or acquired by, the Council from site proponents or relevant stakeholders. This information may be a factual update on the recent progress of a site with extant planning permission

- or reflecting additional work undertaken by proponents of a site to resolve previously identified constraints.
- 3.7 The yield capacities of 11 Deliverable or Developable sites have been amended to reflect the most up to date information. The site assessment conclusions of approximately 16 sites were amended in the update. This includes sites which were previously under construction but are now complete.
- 3.8 3 sites are now concluded to be Not Deliverable or Developable as they are no longer considered available, achievable or suitable for potential residential development.
- 3.9 Four sites previously concluded Developable due to concerns over availability or achievability are now concluded to be Deliverable as previous delivery and/ or ownership issues have been resolved.
- 3.10 The site rationales of six sites with extant planning permission have been amended to reflect any commencements or completions in the last year, or progress of planning applications.
- 3.11 Any amendments, and reasons for the above amendments, are reflected in the Site Assessment Summary table, Appendix 2. Any changes are also illustrated in the revised accompanying maps, Appendix 4.
- 3.12 The tables below show the updated summary figures for all sites assessed outside the Park. The first table provides summary figures by Deliverability/ Developability. The third table separates the figures into each individual parish and removes any double counting of capacity figures.

Table 2: Summary of sites by Deliverability/ Developability

Table 2: Su	Table 2: Summary of sites by Deliverability/ Developability								
Sites assessed		Deliverable	sites	Developable	sites	Not Delive	rable or		
						Developat	ole		
Number	Dwelling	Number of	Dwelling	Number of	Number of Dwelling		Dwelling		
of sites	Yield	sites	Yield	sites	Yield	of sites	Yield		
359	359         19573         89         4641         32         898         99         13855								
The residua	l 185 are tho	se sites which	were filtered						

Table 3: Number of Deliverable/ Developable sites/ units by parish

	Sites Ass	essed	Deliverab	Deliverable		Developable		Not Deliverable or Developable	
Parish/ Town	Number	Yield	Number	Yield	Number	Yield	Number	Yield	
Newhaven	69	3178	22	1771	4	266	16	1120	
Seaford	31	423	11	288	7	98	4	37	
Peacehaven & Telscombe	69	2133	6	531	4	287	22	1294	
Barcombe	10	248	3	45	1	7	4	196	
Chailey	28	459	7	143	2	35	8	251	
Ditchling	8	2250	0	0	0	0	5	2250	
Falmer	1	30	0	0	0	0	1	30	
Hamsey	14	364	2	76	0	0	3	252	
Newick	27	626	11	382	3	24	5	214	
Plumpton	24	5688	7	153	1	19	12	5512	
Ringmer	45	1808	13	883	5	46	8	829	
South Heighton	1	11	0	0	1	11	0	0	
Wivelsfield	32	2355	7	369	4	105	11	1870	
Total	359	19573	89	4641	32	898	99	13855	

3.13 The table below looks at the figures in the above table and adjusts them to remove issues of double counting where site boundaries overlap or sites are duplicated.

Table 4: Deliverable/ Developable sites/ units by Parish with double counting resolved.

	Sites Ass	essed	Deliverab	Deliverable		Developable		Not Deliverable or Developable	
Parish/ Town	Number	Yield	Number	Yield	Number	Yield	Number	Yield	
Newhaven	65	2443	19	1056	4	266	15	1100	
Seaford	31	423	11	288	7	98	4	37	
Peacehaven & Telscombe	69	2133	6	531	4	217	22	737	
Barcombe	8	232	2	35	1	7	3	190	
Chailey	26	424	6	123	1	20	8	251	
Ditchling	8	1775	0	0	0	0	5	1775	
Falmer	1	30	0	0	0	0	1	30	
Hamsey	13	299	2	76	0	0	2	187	
Newick	23	458	7	214	3	24	5	214	
Plumpton	23	5564	7	153	1	19	12	5388	
Ringmer	37	1480	8	595	5	46	7	789	
South Heighton	1	11	0	0	1	11	0	0	
Wivelsfield	26	1595	6	329	4	105	6	1150	

Total	331	16867	74	3400	37	813	90	11848

3.14 The below summary table has been produced which extracts those sites with extant planning permission (as at 1 April 2018) and housing allocations within sites the Joint Core Strategy<sup>10</sup> and made neighbourhood plans. Whilst permitted sites are a key source of sites for the purposes of the SHELAA, by removing these figures a clearer picture of the capacity of the district above those sites which already benefit from planning permission and/ or allocation can be given.

Table 5: Summary of Deliverable/ Developable SHELAA sites excluding sites with extant

planning permission and strategic site allocations

	Sites with permission strategic of allocations	n / or NP	Deliverable SHLAA sites minus PP & allocations		SHLAA s	Developable SHLAA sites minus PP	
Parish/ Town	Number	Yield	Number	Yield	Number	Yield	
Newhaven	14	1089	8	126	1	107	
Seaford	4	58	8	260	6	68	
Peacehaven & Telscombe	3	485	3	46	4	217	
Barcombe	0	0	2	35	1	7	
Chailey	1	12	5	111	1	20	
Ditchling	0	0	0	0	0	0	
Falmer	0	0	0	0	0	0	
Hamsey	2	76	0	0	0	0	
Newick	3	73	4	116	3	24	
Plumpton	4	68	3	85	1	19	
Ringmer	14	292	4	351	1	6	
South Heighton	1	11	0	0	0	0	
Wivelsfield	4	220	1	101	4	105	
Total	50	2384	38	1231	22	573	

<sup>&</sup>lt;sup>10</sup> North Street Quarter, Lewes (SP3), Old Malling Farm, Lewes (SP4), Land at Harbour Heights, Newhaven (SP7), Lower Hoddern Farm, Peacehaven (SP8), Land north of Bishops Lane, Ringmer (SP6), and Greenhill Way, Wivelsfield (SP5).

# **Emerging Neighbourhood Plan housing sites**

- 3.15 In addition to the sites submitted to the 2018 update the Council is aware that there a number of sites currently being considered as potential housing allocations by two emerging draft neighbourhood plans: Seaford and Newhaven.
- 3.16 To date, Newhaven and Seaford have undertaken their Regulation 14 consultations, and Seaford its Regulation 14 consultation in May and October 2017 respectively.
- 3.17 At the time of carrying out the 2018 SHELAA update the housing site allocations within emerging neighbourhood plan where still being finalised. Therefore, not all neighbourhood plan housing sites appear within this update. Table 6 below contains the draft housing site allocations from the last published emerging Seaford and Newhaven neighbourhood plans.

Table 6: Emerging Seaford and Newhaven neighbourhood plans potential housing sites as at April 2018

		Res Units
	Seaford (October 2017 Regulation 14 document)	1100 Olino
SEA15 i.	Dane Valley Project Area	100
SEA15 ii.	Jermyn Ford, 10 Claremont Road	20
SEA15 iii.	10 Homefield Place	19
SEA15 iv.	Brooklyn Hyundai, Claremont Road	13
SEA15 v.	Holmes Lodge, 72 Claremont Road	12
SEA15 vi.	Station Approach/ Dane Road	12
SEA15 iiv.	Seven Sisters pub, Alfriston Road	9
SEA15 iiiv.	Old House Depository, Claremont Road	35
SEA15 ix.	Elm Court, Blatchington Road	9
	Total	229
	Newhaven (May 2017 Regulation 14 document)	
H2	Seahaven Caravans	22
H3	Newhaven Police Station	18
H4	Reprodux House	80
H5	Bevan Funnel	80
H6	Eastside North (former Asda)	65
H7	Robinson Road depot	40
H8	Lower Place Car Park	24
H9	Former Co-op	74
H10	Former LDC offices	8
H11	Former Grays Primary School	30
H12	Old Constitutional Club	5
	Total	446

## **Employment and Economic Land**

- 3.18 Lewes District Council commissioned consultants to undertake an Employment and Economic Land Assessment (EELA) in 2010. This study was partially updated in 2012. The EELA identified a modest quantitative need for land for offices and qualitative need for industrial land in or near Lewes Town.
- 3.19 Spatial Policy 1 of the JCS sets out a need for 74,000sqm of employment floorspace (B1, B2 and B8), 60,000sqm of which will be industrial (B1c, B2 and B8) and 14,000sqm will be offices (B1a). Whilst the majority of this need can be met through current commitments part of the need identified by the EELA is for qualitative premises<sup>11</sup>. The JCS therefore sets a positive and flexible approach to providing employment floorspace.
- 3.20 A number of sites included in the Assessment are either unimplemented employment allocations in the 2003 Lewes District Local Plan (LDLP) or are existing employment sites. Whilst the Assessment has primarily considered sites for potential housing, the site rationales draw out the findings of the EELA and other evidence to indicate where employment land is making, or could make, a contribution to the district's employment needs. However, it will be for Local Plan Part 2, or neighbourhood plans, to consider future employment site allocations, including the retention of existing employment allocations. Core Policy 4 of the JCS sets a presumption for safeguarding employment sites from competing uses unless there are demonstrable economic viability or environmental amenity reasons for not doing so.
- 3.21 Since the JCS's adoption the Newhaven Enterprise Zone (EZ) was established. The EZ is formed of eight sites located across the town (see figure 2 below) and has been operational since 1 April 2017. The objective of the EZ is to safeguard existing employment space from inappropriate residential development, enhance existing commercial floorspace and support the delivery of dormant sites.
- 3.22 Following the above, the Council has sought to implement an Article 4 Direction to withdraw specified permitted development rights (PDR) (i.e. change of use). As such, in 2017 a focused update to the Employment Land Review has been undertaken for the town of Newhaven<sup>12</sup>. The purpose of the update was to inform the Council's approach to employment land within the town and review evidence in

<sup>&</sup>lt;sup>11</sup> SP1 is based on the position as at 1 April 2015.

<sup>&</sup>lt;sup>12</sup> Newhaven Employment Land Review 2017. Lichfields Consultants

- respect of identifying potentially suitable sites where the application of Article 4 Directions might be appropriate.
- 3.23 The ELR update assessed 13 employment sites, including the 8 parcels which form the Newhaven EZ concluding a moderate to strong case for removing PDR for change of use between office and industrial to residential (figure 3). As such, eight sites, both within and outside the Newhaven EZ, are subject to the removal of PDR which will be implemented from 5 November 2018.

## Existing employment site allocations

- 3.24 A number of unimplemented 2003 LDLP employment site allocations have been assessed through the various iterations of the SHELAA. Sites were either submitted to the Council to be assessed for potential housing, or were included as they were considered to be 'Low' quality in the 2010 EELA and therefore may be better suited for alternative uses. Table 7 below sets out the 'saved' 2003 LDLP employment site allocations, outside the Park, that score 'Low' within the EELA.
- 3.25 Out of the unimplemented site allocations four sites (BG1, CH1, HY1 and NH21) are in existing, active, use but allocated for employment land should they become available for redevelopment. However, two of these sites have come forward, at least in part, for other uses. Part of NH21: Railway Quay has been developed as an education facility and HY1: Hamsey Brickworks (SHELAA ref 05HY) planning permission for a mixed residential and industrial use. The remaining sites are in active employment use and anticipated to remain so in the immediate future.
- 3.26 Two vacant employment allocations (PT5 and NH10) have been either now developed as residential, or permitted for mixed residential and employment uses. PT5 (SHELAA ref 34PT) is now developed whilst NH10 (SHELAA ref 19NH) is to start imminently.
- 3.27 The remaining unimplemented employment allocations are in active employment use, or still considered suitable for employment use. These employment allocations are therefore retained as part of the Joint Core Strategy to be reviewed through LPP2 or neighbourhood plans.

Table 7: 'Saved' 2003 LDLP employment site allocations outside the National Park

Parish	LDLP reference	Site Allocation name	Allocated use	SHELAA ref.
Newhaven	NH10	Eastside Business Area	B1 and B8	19NH / 20NH
Newhaven	NH21	Railway Quay	Res, B1, D2, A3, Factory outlet	10NH
Peacehaven	PT5	Business Development	B1	34PT
Glynde	BG1	Balcombe Pit	B2 and B2	04GL
Chailey	CH1	Chailey Brickworks	B1 and B2	19CH
Hamsey	HY1	Hamsey Brickworks	B1, B2 and B8	05HY
Newick	NW2	Woodgate dairy	B1, B2 and B8	14NW

## Existing employment sites

- 3.28 The 2017 SHELAA included a number of sites currently in employment use. The 2018 update includes a further three sites in employment or mixed use. Two sites have come into the SHELAA as planning permissions for residential redevelopment, the third site is currently vacant mixed agricultural/ employment land.
- 3.29 Whilst the SHELAA might conclude current employment sites as suitable for potential housing, consideration will need to be given to the retention, relocation or incorporation of the existing employment uses in any future allocation/ redevelopment proposal. This is in line with JCS Core Policy 4 which looks to safeguard existing employment sites, unless there are demonstrable economic or environmental reasons not to. Table 8 below sets out the sites in existing employment use which have been included in the 2018 SHELAA update.

Table 8: Sites assessed in the SHELAA that are in existing employment use, outside the National Park

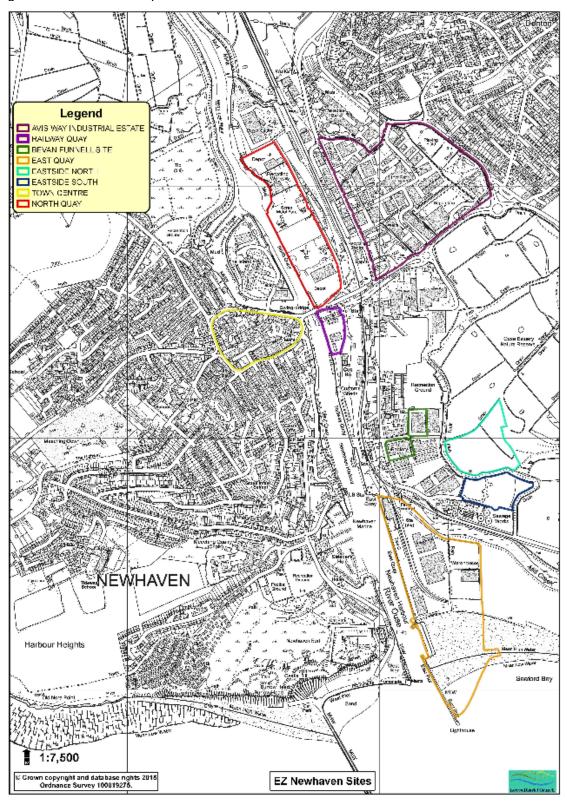
Parish	Site Address	SHELAA Reference	EELA Reference
Newhaven	Quarry Industrial Estate, Quarry Road (part of larger assessed site)	38NH & 42NH	ELW34
Newhaven	Seahaven Caravan site, Railway Road	02NH	n/a
Newhaven	Old Shipyard, Robinson Road	16NH & 39NH	ELW33b
Newhaven	Railway Quay	10NH	ELW6
Newhaven	Eastside land (larger site)	20NH	ELW3
Newhaven	Lewes District Council offices, Fort	40NH	n/a

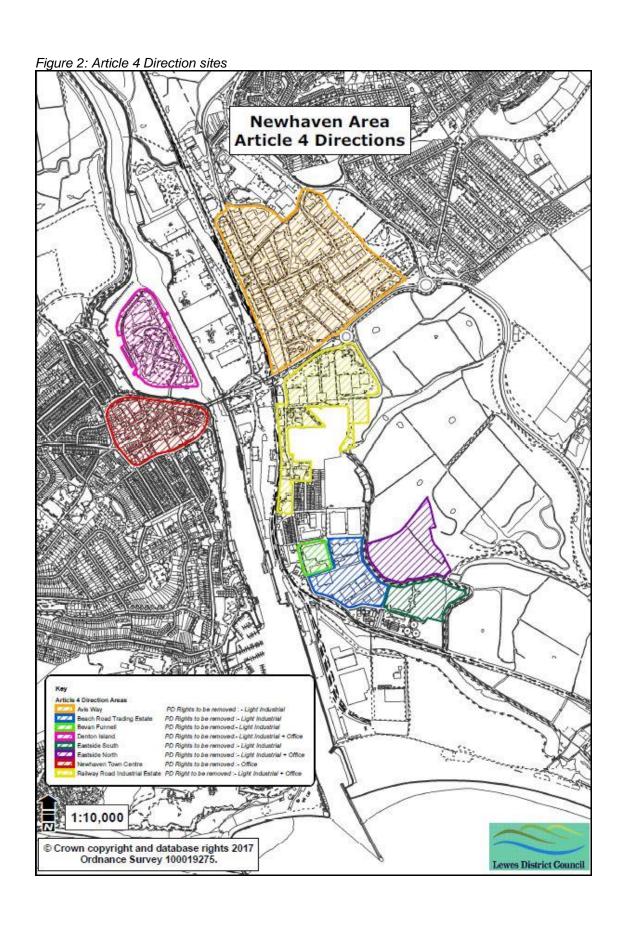
	Road		
Newhaven	Former Parker Pen site, Railway Road	46NH	ELW28
Newhaven	Royal Mail Depot, North Lane	54NH	n/a
Newhaven	Units 1 to 3 Kendal Court, Railway Road	42PP	n/a
Newhaven	5 Kendal Court,	51PP	n/a
Newhaven	Units 1 to 3 Kendal Court, Railway Road (ground floor)	52PP	n/a
Newhaven	Unit 1, Newhaven Workshop, Beach Road	65NH	n/a
Newhaven	Marco Trailers. Railway Road	55PP	n/a
Newhaven	Unit 5, North Lane	56PP	n/a
Chailey	Chailey Brickworks	19CH	ELW13
Hamsey	Former Hamsey Brickworks	05HY	ELW15
Hamsey	Covers Yard, Cooksbridge Road	10HY	n/a
Newick	R & K Autos, Church Road	17NW	n/a
Ringmer	Land at Diplocks Yard, The Kiln	02RG	n/a
Ringmer	The Kennels, Laughton Road	07RG	n/a
Ringmer	Busy Bee garage site, Lewes Road	15RG	n/a
Ringmer	Land at The Forge, Bishops Lane	20RG	n/a
Ringmer	Avery Nursery, Uckfield Road	43RG	n/a
Seaford	Former Central Garage site, Stafford Road	13SF	n/a
Seaford	6 Steyne Road	18SF	n/a
Seaford	Land rear of Chichester Road	29SF	n/a
Seaford	Sutton Park Garage, Alfriston Road	48PP	n/a

- 3.30 Out of the above 26 sites 16 sites are currently being promoted for residential or mixed use developments through planning applications or as allocations through the Joint Core Strategy or 'made' neighbourhood plans. The use of permitted development for the change of use (Office to Residential) has resulted in a loss of employment land on three sites in Newhaven (42PP, 51PP and 52PP).
- 3.31 Of the above sites currently in employment use, but not subject to a planning application, three sites were assessed in the 2010 EELA; Railway Quay, Newhaven (10NH); Quarry Industrial Estate, Newhaven (38NH); and Chailey Brickworks, South Chailey (19CH). The EELA concluded potential uses of B1/B2 and B8. Other sites were too small to be assessed as part of the EELA or already subject to a planning application altering the use. The SHELAA assessed the sites as either Not Deliverable or Developable Not Available, or Deliverable as it forms part of a strategic, mixed-use, allocation within the Joint Core Strategy.

- 3.32 A number of employment sites within the SHELAA have been further assessed, at least in part, within the 2017 Newhaven ELR: 10NH; 20NH; 65NH; 16NH; and 46NH. The sites were assessed to understand their existing and potential future economic role and significance in the local and wider area. The assessment concluded a mix of results. However, only two of these five sites (16NH and 46NH) are not included within the Newhaven EZ and Article 4 Direction suggesting that the remaining sites have an important economic role and should be safeguarded. It should be noted that 16NH and 46NH both have extant planning permission for residential use and therefore attract lower scores against their potential for economic development.
- 3.33 All five sites in Ringmer are allocations in the Ringmer Neighbourhood Plan (RNP). The RNP looks to: retain 07RG and 14RG for employment use; allocate 02RG for mixed employment and residential development; and identifies 15RG and 20RG for solely residential use. Planning applications for 02RG and 20RG have been submitted proposing mixed use or residential use respectively. 20RG is under construction.
- 3.34 Work on the emerging Local Plan Part 2 will need to consider Joint Core Strategy and Neighbourhood Plan policies when considering sites for future residential and employment allocation.
- 3.35 Furthermore, in 2016 the Newhaven Enterprise Zone (EZ) was established. The EZ is formed of eight sites located across the town (see figure 2 below) and has been operational since 1 April 2017. The objective of the EZ is to safeguard existing employment space from inappropriate residential development, enhance existing commercial floorspace and support the delivery of dormant sites.
- 3.36 Following the above, the Council has sought to implement an Article 4
  Direction to withdraw specified permitted development rights (PDR)
  (i.e. change of use). As such, in 2017 a focused update to the
  Employment Land Review was undertaken for the town of Newhaven.
  The purpose of the update was to inform the Council's approach to
  employment land within the town and review the evidence in respect of
  identifying potentially suitable sites where the application of Article 4
  Directions might be appropriate.
- 3.37 The ELR update assessed 13 employment sites, including the eight parcels which form the Newhaven EZ, concluding a moderate to strong case for removing PDR for change of use between office and industrial to residential (figure 2). As such, eight sites, both within and outside the Newhaven EZ, are subject to the removal of PDR which will be implemented from 5 November 2018.

Figure 1: Newhaven Enterprise Zone sites





# 4. Housing Trajectory

- 4.1. This section contains the updated housing trajectory. Table 9 below contains all Deliverable and Developable SHELAA sites assessed to date, including planning approvals of six or more dwellings and reflecting the amendments outlined above. The status of sites with extant planning permission is taken as at the 1 April 2018.
- 4.2. Where appropriate the notional start date of sites has been amended to reflect the forthcoming monitoring year and changes to timetables for production of development plans relevant to Lewes District. A plan-led housing trajectory is included in Appendix 1, see also paragraph 5.4. Below are the assumptions applied to the housing trajectory:
  - a) Where a site has planning consent, and identified as Deliverable, a notional start date of 2018 is given as it is considered that the site is immediately available for development, or is under construction. Deliverable sites which have a capacity of more than 100 units have a notional start date of 2019, unless it has extant planning permission and therefore assumed to come forward earlier, or recent discussions with proponents and infrastructure providers indicate alternative dates. The notional start date of 2019 allows approximately a year for the necessary planning consents to be obtained before any completions are made. An exception to this is if specific phasing has been identified by the site promoter.

Slightly earlier notional start dates are considered for Deliverable sites below 100 units as it is anticipated that planning permissions for smaller sites could come forward sooner. However, any site specific information will be used to ensure this is reasonable and make adjustments as necessary.

- b) Build out rates are kept inline with the initial SHELAA trajectory:
  - A site of less than 200 dwellings would take one developer one year to build each 40 dwellings;
  - A site of between 200 and 400 dwellings would take two developers one year to build each 80 dwellings; and
  - A site of 400 dwelling or more would take three or more developers one year to build each 120 dwellings.
     This will result in the capacity of some sites is spread across different five year tranches.
- c) Any specific information regarding the phasing of sites, or other information which may impact the phasing of sites, submitted by the promoter of the site is also taken into consideration.
- 4.3. Table 10 provides a summary of the Deliverable and Developable sites, by parish, taking into account the SHELAA housing trajectory and

removing the duplications as a consequence of overlapping site boundaries.

Table 9: Housing trajectory

Site ref	Location	Potential Capacity	Build rate (per	Notional start	April 2018 – March	April 2023 – March	April 2028 – March
0054			annum)	date	2023	2028	2030
03BA	Hillside Nurseries, High Street, Barcombe	6	6	2018	10		
05BA	Land adjacent to High Street	25	25	2018	25		
07BA	Land north of High Street	10	10	2018	10		
08BA	Land at Bridgelands	7	7	2023		7	
05CH	Land fronting Mill Lane, South Chailey	10	10	2018	10		
08CH	Land at Layden Hall, East Grinstead Road	6	6	2018	6		
12CH	Land at Newick/North Chailey	20	20	2023		20	
15CH	Land at Glendene Farm, Station Road, North Chailey	10	10	2018	10		
16CH	Land at Oxbottom Lane,	20	20	2018	20		
20CH	Land south of Fairseat House, Station Road	15	15	2023		15	
21CH	Land south of Fairseat House and west of Oxbottom Lane.	30	30	2018	30		
26CH	Kings Head, East Grinstead Road, North Chailey	12	12	2018	12		
27CH	Land west of A275 (South Road)	55	55	2018	55		
05HY	Old Hamsey Brickworks	49	49	2018	49		
10HY	Covers yard, west of A275	27	27	2018	27		
02NH	Seahaven Caravans, Railway Road, Newhaven.	22	22	2018	22		
16NH	The Old Shipyard, Robinson Road, Newhaven	66	40	2023		66	
17NH	Land to west of St Lukes Court, Church Hill, Newhaven	12	12	2018	12		
19NH	Land at Eastside, Newhaven, South of the Drove.	190	40	2018	120	70	
20NH	Eastside land, Newhaven	190	40	2018	120	70	
27NH	Site 4 – on Crest Road and Fairholme Road, Denton	8	8	2018	8		
31NH	The Marina (phase 3 of LDLP NH6)	100	40	2019	40	60	

32NH	West of Meeching Quarry	125	40	2019	125		
34NH	Land south of Valley Road	24	24	2018	24		
35NH	South of Valley Road	85	40	2023		85	
38NH	Land at Harbour Heights, Meeching Quarry and west of Meeching Quarry	400	80	2020	240	160	
39NH	Robinson Road Depot, Robinson Road	80	40	2023		80	
40NH	LDC Offices at Fort Road	6	6	2018	6		
42NH	South of Harbour Heights, W. Meeching Quarry and south part of quarry	400	80	2020	240	160	
46NH	Parker Pen site, Railway Road	145	50	2019	145		
48NH	Land at Railway Quay	25	25	2023		25	
51NH	Newhaven Police Station, South Road	10	10	2018	10		
52NH	Newhaven Fire Station, Fort Road	7	7	2018	7		
54NH	Royal Mail Delivery Depot	10	10	2023		10	
55NH	Former Grays Infant School, Western Road	27	27	2018	27		
60NH	Harbourside Inn, Fort Road	5	5	2018	5		
64NH	Unit 1, Newhaven Workshop	25	25	2018	25		
65NH	Bevan Funnel, Beach Road Industrial Estate	35	35	2018	35		
03NW	Land off Allington Road, Newick	30	30	2018	30		
07NW	Land south of Alexander Mead, Newick	7	7	2018	7		
08NW	25 Newick Hill & other land adjacent to Cricketfields, Newick	5	5	2018	5		
11NW	Land to east of the telephone exchange, Goldbridge Road, Newick	30	30	2018	30		
13NW	Land at Rathenny, Allington Road	30	30	2018	30		
16NW	Land south of Allington Road	50	50	2018	50		
17NW	P&K Autos / 15 Church Road	6	6	2028			6
19NW	Land west of The Pines, 95 Allington Road	8	8	2023		8	
20NW	Land rear or 45 Allington Road	23	23	2018	23		
21NW	Land rear of 45 & 55 Allington Road	50	50	2018	50		

22NW	Land east of Oakside, Goldbridge Road	38	38	2018	38		
24NW	Land at 104 Allington Road	10	10	2023		10	
26NW	Land at Mitchelswood Farm, Allington Road	50	50	2018	50		
27NW	Land at Woods Fruit Farm, Goldbridge Road	69	30	2018	69		
04PL	Land east of The Rectory, Station Road	20	20	2018	20		
05PL	Land east of Oakfield House Station Road	20	20	2018	20		
10PL	Land east of Nolands Farm	30	15	2018	30		
13PL	Land north east of Wells Close	12	12	2018	12		
14PL	Land south of Riddens Lane	16	16	2018	16		
16PL	Land between West Gate and Chapel Road	40	40	2018	40		
19PL	Land south of Inholmes Farm, Station Road	19	19	2023		19	
20PL	Land north of the Police Station	15	15	2018	15		
03PP	Land at 11A Newhaven Square, Newhaven	8	8	2023		8	
18PP	The Old Rectory, Heighton Road, South Heighton	11	11	2023		11	
34PP	1 to 10 Talland Parade, Seaford	10	10	2018	10		
54PP	Rear of 1 Denton Drive, Newhaven	9	9	2018	9		
55PP	Marco Trailers, Newhaven	10	10	2018	10		
56PP	Unit 5, North Lane, Newhaven	13	13	2018	13		
57PP	35 Telscombe Road, Peacehaven	6	6	2018	6		
58PP	Sutton Leaze, Seaford	9	9	2018	9		
06PT	Valley Road, Peacehaven	113	40	2023		113	
19PT	Motel, 1 South Coast Road	26	26	2018	26		
20PT	Land north and south of Valley Road	158	40	2023		158	
24PT	Land at Lower Hoddern Farm, off Pelham Rise, East Peacehaven	450	60	2019	120	330	
39PT	Land adjacent to Cliff Park Close	10	10	2023		10	
45PT	Piddinghoe Avenue Car Park	6	6	2018	6		
47PT	Land at Cornwall Avenue	14	14	2018	14		
62PT	Land between 328 & 338 South Coast Road	6	6	2023		6	

64PT	Land at 264 South Coast Road	29	29	2018	29		
01RG	Land at Boyle Gate Farm	70	40	2018	70		
02RG	Diplocks Yard, Bishops Lane	12	12	2018	12		
03RG	Land north of Bishops Lane, Ringmer	110	40	2019	110		
04RG	Land east of Chamberlain's Lane	54	40	2018	54		
06RG	Caburn Field, Anchor Field	40	40	2018	40		
14RG	Land rear of Westbourne, Lewes Road (C1 Site)	12	12	2022		12	
15RG	Busy Bee garage, Lewes Road	8	8	2022		8	
16RG	Farthings, North Road C3	6	6	2022		6	
19RG	East of Chapters, Bishops Lane Site B	6	6	2018	6		
20RG	Land at the Forge, Lewes Road	20	20	2018	20		
21RG	Land east of Diplocks Industrial Estate, Bishops Lane	75	40	2018	75		
23RG	Land north of Potters Field, Bishops Lane	71	40	2018	71		
25RG	Land east of Norlington Lane, Bishops Lane, Ringmer	64	40	2018	64		
26RG	Fingerpost Farm, The Broyle, Ringmer	100	40	2019	100		
28RG	Land west of Kerridge, Bishops Lane	7	7	2018	7		
31RG	Land at Lower Lodge Farm, Laughton Road	50	50	2018	50		
32RG	Land at Broyle Close (Parcels A,B & C)	6	6	2018	6		
33RG	Land South and East of Elphick Road	40	40	2018	40		
35RG	Neaves Paddock, Laughton Road	6	6	2018	6		
36RG	Springett Avenue Shopping Precinct	14	14	2023		14	
37RG	Land west of Lower Lodge Farm, Laughton Road	30	30	2018	30		
38RG	Land south of Upper Broyle Farm, Broyle Lane	6	6	2022		6	
40RG	Boathouse Organic Farm, Uckfield Road	11	11	2018	11		
41RG	Sunnymede Garden, Norlington Lane	9	9	2018	9		
44RG	Land west of Broyle Lane	6	6	2018	6		
45RG	Land at Caburn and south of Anchor Field	96	40	2019	80	16	

Totals (resolving the double counting issue)						1549	6
	To	3669	1864	6			
32WV	Land south of Blackmores	40	40	2018	40		
29WV	Land at Eastern Road	50	40	2023		50	
27WV	Land south of Asylum Wood	35	35	2023		35	
24WV	Land opposite the War Memorial, Green Road	10	10	2023		10	
23WV	Land west of Slugwash Lane	10	10	2023		10	
20WV	Springfield Industrial Estate, B2112	30	30	2018	30		
18WV	Land at The Nuggets, Valebridge Road	14	14	2018	14		_
14WV	Land east of B2112 (Ditchling Road)	95	40	2018	95		
09WV	Land at North Common Road	21	40	2018	21		
VW80	The Homestead, Homestead Lane, Burgess Hill	55	40	2018	55		
02WV	Land at Greenhill Way/Ridge Way	114	40	2018	114		
29SF	Land rear of Chichester Road	10	10	2023		10	
28SF	Newlands Manor School, Eastbourne Road	183	40	2019	120	63	
27SF	Seaford Constitutional Club, Crouch Lane	19	19	2023		19	
26SF	Land at East Albany Road/ Sutton Drove	12	12	2018	12		
25SF	Elm Court, Blatchington Road, Seaford	9	9	2018	9		
24SF	Station Approach, Dane Road, Seaford	10	10	2023		10	
22SF	Land at Florence House, Southdown Road	10	10	2018	10		
21SF	51 – 53 Blatchington Road, Seaford	9	9	2018	9		
20SF	Holmes Lodge, 72 Clarence Road, Seaford	12	12	2023		12	
18SF	6 Steyne Road	6	6	2018	6		
08SF	Land north of Crown Hill	7	7	2023		7	
05SF	East Street Car Park	10	10	2023		10	
04SF	Gas works site, Blatchington Road	30	30	2023		30	
01SF	Land to the south of Chyngton Way, Seaford	40	40	2018	40		

Table 10: Housing trajectory summary by Parish, with double counting resolved

	April 2018 - March 2023	April 2023 - March 2028	April 2028 - March 2030
Parish/ Town	Yield	Yield	Yield
Newhaven	758	564	0
Seaford	225	161	0
Peacehaven	201	547	0
Barcombe	35	7	0
Chailey	123	20	0
Ditchling	0	0	0
Falmer	0	0	0
Hamsey	76	0	0
Newick	214	18	6
Plumpton	153	19	0
Ringmer	544	97	0
South Heighton	0	11	0
Wivelsfield	329	105	0
Total	2658	1549	6

4.4. To supplement the above housing trajectory a plan led trajectory has been prepared. In addition to the assumptions identified in paragraph 5.2, the plan led trajectory reflects the need for certain sites to be allocated within a site allocations development plan document (Local Plan Part 2)<sup>13</sup>. Therefore a notional start date of 2020 is given as the earliest start date to allow for planning consents to be obtained, unless a specific phasing has been identified by the site promoter. The plan led trajectory can be found in Appendix 1.

<sup>&</sup>lt;sup>13</sup> Adoption of Local Plan Part 2 document is anticipated to be Summer 2019.

## 5. Conclusions

- 5.1. The purpose of this Strategic Housing and Economic Land Assessment (SHELAA) was to assess any new site submissions and review and update the status of existing sites to reflect relevant new information gathered or provided on existing sites. The last update was undertaken in 2017. Therefore, this 2018 update includes submissions from up to April 2018 plus additional sites, or information relevant to the assessment of sites, submitted as part of the Draft Local Plan Part 2 consultation undertaken between November 2017 and January 2018.
- 5.2. The 2018 SHELAA update has only assessed and published conclusions on sites which are located <u>outside</u> the South Downs National Park (Park). The South Downs National Park Authority (SDNPA) has produced two Park-wide SHLAAs, the most recent being December 2016.
- 5.3. The 2018 update has assessed 16 new submitted sites. Three sites were filtered at the initial stage and a further five sites had planning permission as at 1 April 2018. Amendments to approximately 16 existing SHELAA site conclusions were also made. The number of new sites to be assessed was very similar to last year's, indicating a plateauing in the district's capacity of sites considered potentially suitable for housing.
- 5.4. The 2018 update identified a wide range of potential housing sites considered to be Deliverable or Developable. The update shows that there are 111 sites with a potential capacity to deliver 4,213 dwellings, of which 3,400 dwellings are identified as Deliverable: suitable for housing, available within the next five years and achievable. These figures are taken from Table 5 which resolves the issue of double counting.
- 5.5. The 4,213 figure includes sites with extant planning permission and those which are now housing allocations within the Joint Core Strategy and 'made' neighbourhood plans. With these removed, the residual capacity of Deliverable and Developable sites is 1,804 units, less than half of the base potential capacity of 4,213 dwellings. Furthermore, it should be remembered that the 1,804 is also a figure unconstrained by planning policies and other considerations such as infrastructure capacity so the actual figure that may be considered acceptable if considered through the planning application process may be lower.
- 5.6. In comparing the 2017 and 2018 figures, where double counting has been removed, the number of Deliverable and Developable dwellings has changed very little.

- 5.7. The SHELAA housing trajectory, with double counting removed, suggests that 2,658 units could be delivered within the next five years, 1,549 units in years 5 to 10 and 6 units beyond year 2028/29. Within the plan-led housing trajectory the total number of potential units on sites considered to be deliverable in the next five years is slightly lower at 2,638.
- 5.8. A number of sites within the SHELAA are existing 'saved' employment allocations or employment land. The majority of these sites are in active employment use and therefore safeguarded by Core Policy 4 of the Core Strategy. Therefore, whilst a site assessment may conclude a site to be suitable for housing this may not be its most appropriate use, given the evidenced need to safeguard employment land in the district as identified in JCS Spatial Policy 1 and Core Policy 4.
- 5.9. Spatial Policy 1 of the JCS sets out a need for 74,000sqm of employment floorspace to be delivered between 2012 and 2030. The Council will continue to monitor and resist the loss of allocated and existing employment land to mixed or non-employment uses, to ensure that employment needs continue to be met. Core Policy 4 sets out clear guidance on the district's employment land safeguarding requirements. In Newhaven, the Newhaven Enterprise Zones and implementation of Article 4 Directions are additional tools available to the Council to safeguard employment land. Retained 'saved' employment site allocations are also important in ensuring employment needs are met. However, monitoring will also help ensure that employment sites are not safeguarded from competing uses, such as housing, unnecessarily.
- 5.10. The conclusions from this update will continue to inform emerging planning policy and site allocations. The SHELAA will continue to be monitored and updated on a regular basis to ensure it reflects any changes and maintains an up-to-date housing and economic land availability position for the district.
- 5.11. This SHELAA did not assess new sites which fell within the South Downs National Park. The Council will continue to work and cooperate with the SDNPA, as well as other relevant local planning authorities, when subsequent housing and economic land assessments are being prepared and updated.

# 6. Appendices

6.1 The appendices can be found in the separate 2018 SHELAA Appendices document.