

Lewes District Council

Land Availability Assessment (LAA)

Appendix 2 - Methodology

February 2022

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Introduction

- 1.1. The Council are required to monitor the progress of housing completions, and under paragraph 74 of the National Planning Policy Framework 2021 (NPPF)¹ are required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted policies, or against their local housing need where the strategic policies are more than five years old.
- 1.2. This document sets out Lewes District Council's (LDC) methodology for undertaking a Land Availability Assessment (LAA) for housing, economic development and other types of land use. LDC is not the planning authority for the area that falls under the remit of the South Downs National Park planning authority. The PPG² identifies that the area selected for the assessment should be the plan making area. Therefore, the area covered by the LAA is the administrative boundaries of Lewes District, excluding the area of the district within the SDNP, as the South Downs National Park Authority (SDNPA) is responsible for all planning matters (both plan-making and decision-taking) within its area.
- 1.3. The LAA is a purely technical exercise intended to inform the Local Plan. It examines the extent to which potential sites are suitable, available and achievable over the plan period in a (local planning) "policy off" approach. The assessment questions are factual and physical in nature and no scores or rating for sites are given.
- 1.4. The assessment of sites for the Local Plan will be conducted using a site assessment methodology, which will consider local plan policy aspects, such as a site's relation to the settlement hierarchy, its effect on local wildlife/landscape designations and its impact on the built heritage of the area.
- 1.5. **The LAA does not allocate land for development or determine whether a site will be allocated for development. The inclusion of sites within the LAA should not be taken to imply that the sites will be allocated for housing or looked upon favourably when determining planning applications.** The decision to allocate will be

¹ [National Planning Policy Framework](#)

² PPG – Housing and economic land availability assessment - Paragraph: 006 Reference ID: 3-006-20190722

made through the emerging Local Plan Document. The LAA will be updated as part of the supporting evidence base for the Local Plan.

- 1.6. LDC last published a Strategic Housing and Employment Land Availability Assessment (SHELAA) in September 2018. Since the publication of that report, national planning policy and guidance has been updated and the Council are in the early stages of preparing a new Local Plan. The SHELAA Methodology was prepared in 2009 and therefore it is considered necessary to update the methodology in line with current national policy and guidance.
- 1.7. Whilst the focus of the LAA is housing and employment land potential and supply, the scope of the assessment for 2021 has been widened to include other land to support future development, such as land for renewable energy generation or green infrastructure, and therefore the assessment has been renamed the Land Availability Assessment.
- 1.8. This document sets out the methodology of the assessments; a separate report will present the findings of the LAA.

2. Housing Requirement and role of the LAA

- 2.1. The Lewes Local Plan Part 1: Joint Core Strategy with South Downs National Park (SDNP) (LPP1) was adopted on 11th May 2016 after being found sound at Examination in Public. LPP1 contains the vision and strategic policies for the whole District including the SDNP and sets a district-wide housing requirement of 345 homes per year in Spatial Policies 1 and 2. However, as a result of a legal challenge, the housing requirement in LPP1 was disaggregated to provide a net housing requirement of 275 homes per year outside of the SDNP over the period to 2030.
- 2.2. Since the adoption of the LPP1, the Government has made changes to the planning system and published revisions to National Planning Policy Framework (NPPF) and Planning Practice Guidance. Most significantly, the Government introduced a new standard method for calculating local housing need and has instructed local planning authorities to identify a five-year supply of housing land sufficient to meet this housing need when their adopted strategic policies are more than five years old.
- 2.3. As a result of LPP1 reaching its fifth anniversary of adoption in May 2021, the District's five-year housing land supply will be calculated against the local housing need figure, as calculated by the standard method, rather than against the figures in LPP1 Spatial Policies 1 and 2.
- 2.4. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. Under the standard method, the local housing need for the whole of Lewes District at 11th May 2021 is 782 homes per year.
- 2.5. However, approximately half of the area of Lewes District is in the SDNP, which is a separate planning authority to the district council. Planning Practice Guidance states that where strategic policy-making authorities do not align with local authority boundaries, an alternative approach to identifying local housing need will have to be used, and such authorities may identify a housing need figure using a method determined locally.
- 2.6. The council has published its 'Approach to Local Housing Need for Lewes district outside the SDNP for the purposes of the Five-Year Housing Land Supply (May 2021)'. This sets out a locally derived method for calculating local housing need for the plan area (i.e. Lewes district outside of the SDNP) on the basis of how the total number of dwellings in the District is

split between inside and outside the National Park. This results in a locally derived housing need figure of 602 homes per year, 12040 dwellings over the 20-year plan period.

3. National Planning Policy Context

3.1. This section briefly outlines the national planning policy context which informs the approach taken to the LAA. This is set out in the National Planning Policy Framework (NPPF) (2021) and Planning Policy Guidance (PPG).

National Planning Policy Framework

3.2. The requirement to undertake the LAA is set out in paragraph 68 of the NPPF. Paragraph 68 requires that planning authorities should have a clear understanding of the land available in their area through the preparation of a land availability assessment. This will enable the authority to identify a sufficient supply and mix of sites taking account of their availability, suitability and likely economic viability.

3.3. In addition, the NPPF also sets out the difference between the meanings of 'deliverable' and 'developable' in the context of the assessment.

Planning Practice Guidance

3.4. PPG³ sets out the purpose of the assessment and identifies the content of the assessment. The guidance sets out that the assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

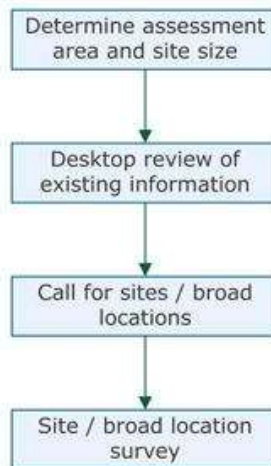
3.5. The LAA aims to provide specific 'deliverable' sites for years one to five of the plan period; and specific, 'developable' sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan.

3.6. The guidance identifies a process covering 5 main stages that should be followed to achieve a robust assessment. The PPG methodology is shown in Figure 1 below.

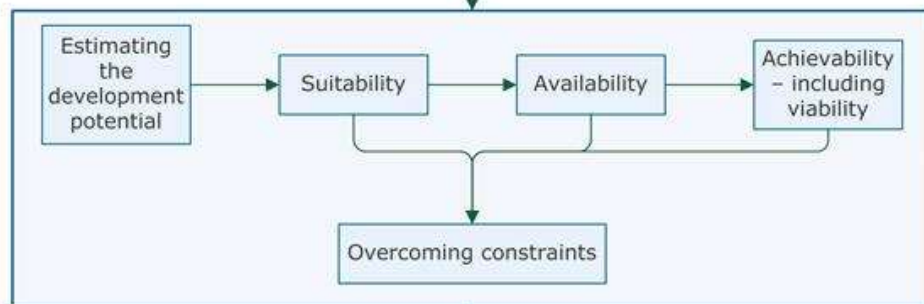
³ [PPG](#) - Housing and economic land availability assessment

Figure 1 – Housing and economic land availability assessment flowchart⁴

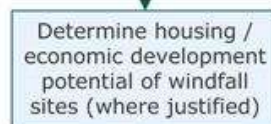
Stage 1- Site / broad location identification



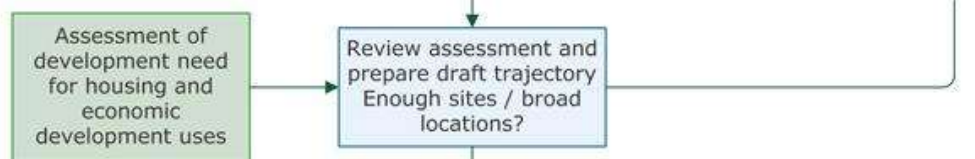
Stage 2 - Site / broad location assessment



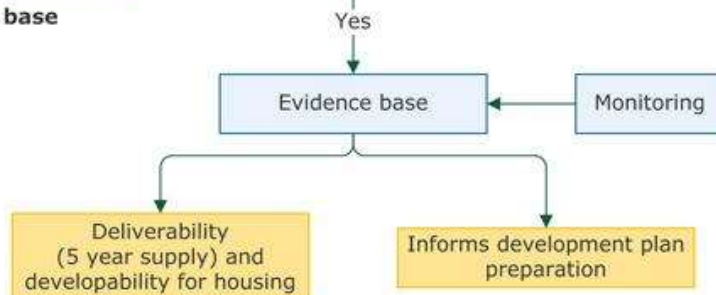
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



⁴ PPG – Housing and economic land availability assessment - Paragraph: 005 Reference ID: 3-005-20190722

4. Stage 1: Site and Broad Location Identification

Task 1 - Determine Assessment Area and Site Size Threshold

- 4.1. The PPG⁵ identifies that the area selected for the assessment should be the plan making area. Therefore the area covered by the LAA is the administrative boundaries of Lewes District, excluding the area of the district within the SDNP, as the South Downs National Park Authority (SDNPA) is responsible for all planning matters (both plan-making and decision-taking) within its area. A map of the Lewes District and the South Downs National Park area is available in Appendix 1.
- 4.2. The council is preparing a Local Plan for the area which LDC is the planning authority. While it is reasonable to only assess sites within its own boundary, the council will assess cross boundary sites in liaison with the relevant neighbouring authority to consider a joint assessment of the site, if possible, through the duty to cooperate process.
- 4.3. In terms of site size, the PPG⁶ recommends that it may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floorspace) and above.
- 4.4. The approach in the previous SHELAA's was to exclude any sites yielding less than 6 residential units. This was to ensure the assessment was manageable, practical and strategic given the size of the District. However, to align the assessment with the national policy, all new sites capable of accommodating 5 or more dwellings, or economic development on sites of 0.25ha (or 500 square metres of floorspace) will be included in the assessment.
- 4.5. Any sites in the previous SHELAA that were excluded at this stage on size criteria and would now be included and will be reassessed.
- 4.6. Sites submitted for renewable energy generation or green infrastructure of any size will be assessed against the same criteria as housing or

⁵ PPG – Housing and economic land availability assessment - Paragraph: 006 Reference ID: 3-006-20190722

⁶ PPG – Housing and economic land availability assessment - Paragraph: 009 Reference ID: 3-009-20190722

employment uses as set out in Appendix 2. In addition, for energy generation it will be necessary to consider grid/system capacity, and access to natural resource, such as solar gain for solar farms, or access to water source for considering hydro power.

Task 2 - Call for sites

4.7. A call for sites was carried out between 28th September and 18 December 2020. The call for sites is an opportunity for landowners, site promoters and interested parties to submit land for consideration through the LAA. The call for sites is aimed at as wide an audience as practical, so that those not normally involved in property development have the opportunity to contribute. The type of information sought in the call for sites included the following:

- site location, details, site ownership and any legal issues
- suggested potential type of development, economic viability information
- the scale of development; and
- constraints to development.

4.8. The LAA is a live document which will be updated regularly through the Local Plan process. Where necessary a further Call for Sites will be made to attract new sites or updated information. Any new sites submitted will be assessed as part of the LAA update.

Task 3 – Desktop Review of Existing Information

4.9. All available sources of data will be used to identify and assess potential new sites. A list of data sources is provided in Table 1 below:

Table 1 – Type of data sources to identify sites

Type of Site	Potential Data Source
Existing housing and economic development allocations not yet with planning permission	<ul style="list-style-type: none"> • LPP1 and LPP2 • Neighbourhood plans • Planning application records
Planning permission for housing and economic development that are unimplemented or under construction	<ul style="list-style-type: none"> • Planning application records

	<ul style="list-style-type: none"> • Commencement and completion records
Planning application that have been refused or withdrawn	<ul style="list-style-type: none"> • Planning application records
Land in Local Authority Ownership	<ul style="list-style-type: none"> • Local Authority records
Surplus and likely to become surplus public sector land	<ul style="list-style-type: none"> • National register of public sector land • Engagement with public sector bodies
Sites with permission in principle, and identified brownfield land	<ul style="list-style-type: none"> • Planning application records • Brownfield land registers • National Land Use Database
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	<ul style="list-style-type: none"> • Local authority empty property register • English Housing Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) • Valuation Office database • Active engagement with sector • Brownfield land registers
Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks).	<ul style="list-style-type: none"> • Ordnance Survey maps • Aerial photography • Planning application records • Site surveys
Business requirements and aspirations	<ul style="list-style-type: none"> • Enquiries received by local planning authority • Active engagement with sector

<p>Sites in rural locations</p> <p>Large scale redevelopment and redesign of existing residential or economic areas</p> <p>Sites in adjoining villages and rural exceptions sites</p> <p>Potential urban extensions and new free-standing settlements</p>	<ul style="list-style-type: none"> • LPP1 and LPP2 • Neighbourhood plans • Planning application records • Ordnance Survey maps • Aerial photography • Site surveys
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Task 4 - Site / broad location survey

4.10. The PPG is clear that the LAA should identify as many sites as possible in order to provide a complete audit of the available land. The process of the assessment will provide the information to enable an identification of sites and locations that are most suitable for the level of development required.

4.11. Sites with identified constraints need to be included in the assessment for the sake of comprehensiveness; an important part of the desktop review is to identify sites and their constraints rather than simply to rule out sites outright which are known to have constraints. The LAA is a 'policy off' assessment, constraints and the site selection process, to be undertaken, as part of the emerging Local Plan process will determine which sites are required to deliver its spatial strategy.

4.12. Once a comprehensive list of sites and broad locations has been derived from data sources and the call for sites, the sites can be assessed against national policies and designations to establish whether the sites have a reasonable potential for development and should be included in a more detailed survey. The purpose of this is to:

- ratify inconsistent information gathered through the call for sites and desk assessment
- get an up to date view on development progress (where sites have planning permission)
- obtain a better understanding of what type and scale of development may be appropriate
- gain a more detailed understanding of deliverability, any barriers and how they could be overcome; and
- identify further sites with potential for development that were not identified through data sources or the call for sites.

4.13. At this stage, there may be some sites, where it is clear that they will not be suitable for development, when taking into account national policy and designations, it will not be appropriate to carry out these more detailed assessments. The initial surveys need to be proportionate, with a more detailed assessment being made at Stage 2.

4.14. There may be sites that either have planning permission or have otherwise been visited by the team, for example to monitor commencements and completions, and therefore a site survey may not be required where information on the site is known. However, all other sites will be surveyed as part of the LAA process which will aid the assessment of the site and consideration of its deliverability. During the site survey the following information can be recorded (or checked if they were previously identified through the data sources and call for sites):

- site size, boundaries, and location
- current land use and character
- land uses and character of surrounding area
- physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities)
- potential environmental constraints
- potential heritage/historical environment constraints
- landscape character and visual amenity constraints
- consistency with the development plan’s policies
- proximity to services and other infrastructure, such as public transport
- where relevant, development progress (e.g. ground works completed, number of units started, number of units completed); and
- initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

4.15. Table 2 below sets out which sites will be excluded and the reasons why they are excluded from the assessment.

Table 2 – Exclusions

Proposed Excluded Area	Reason
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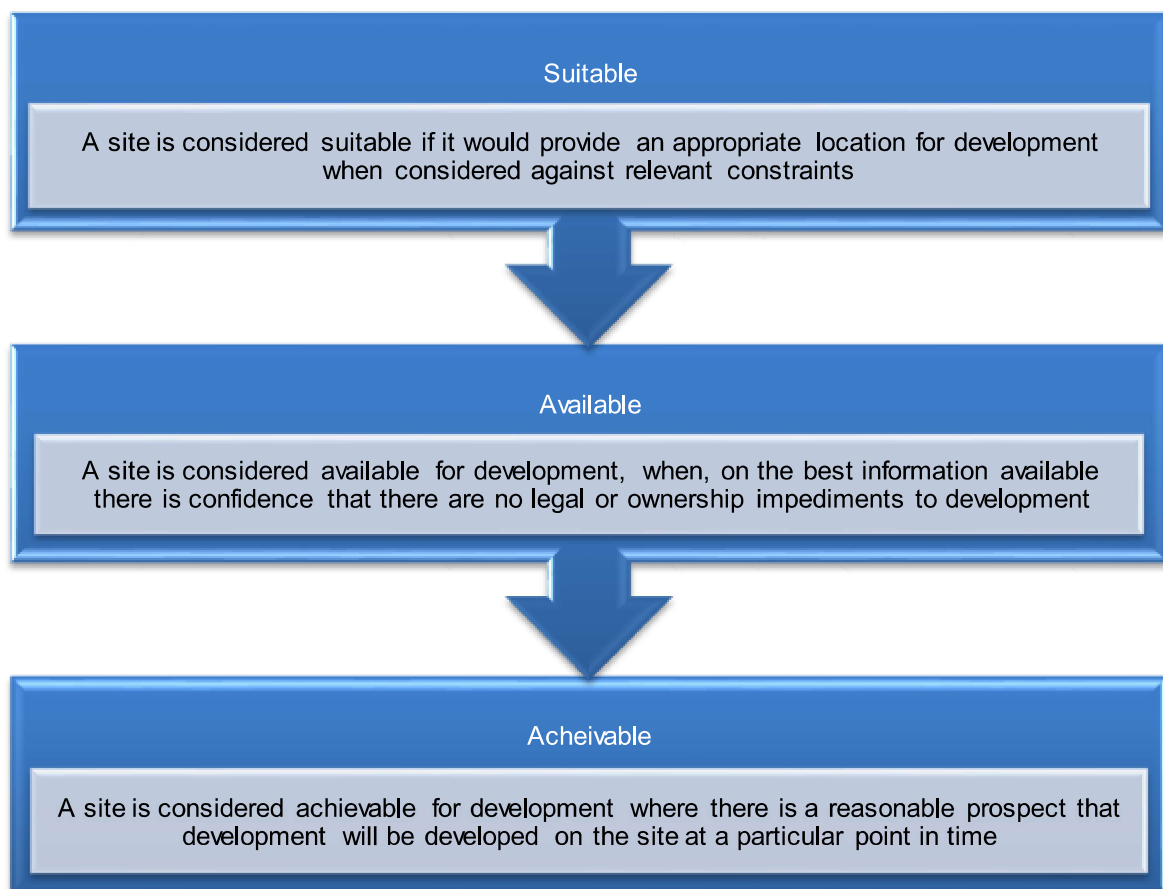
<p>Sites yielding less than five dwellings or under 0.25h/500m² of economic floorspace</p>	<ul style="list-style-type: none"> • Threshold in accordance with the PPG and will ensure that the Assessment is manageable, practicable and strategic. • Identified based on plot area and yield estimates. • This is likely to include sites such as empty/ derelict homes and conversions which would be more appropriately included under windfall sites (Stage 4).
<p>Sites within National/ International Designations: Sites of Special Scientific Interest (SSSI), Special Area of Conservation (SACs), Special Protection Areas (SPA), Ramsar sites (wetlands of international importance). Scheduled Ancient Monuments, Historic Battlefields, Registered Park & Garden, National Nature Reserves, Ancient Woodland.</p>	<ul style="list-style-type: none"> • These are nationally and internationally significant and important sites which are protected by law. • Any sites adjacent to such designations will be carefully considered in the Stage 2 assessments. • Where only part of a site falls within such designations a judgement will be made whether to include the site and/or whether to reduce the developable area.

4.16. As part of the initial assessment, constraints may be identified that could impact on whether the site is deliverable but that do not necessarily rule a site out completely. Instead of eliminating any sites based on high level assessment, the general approach of the LAA will be to progress these sites through to the Stage 2 assessment but to identify the site as potentially suitable, available or achievable. Sites that have policy constraints will not be excluded from the assessment for the sake of comprehensiveness, but these constraints will be clearly assessed, including where they severely restrict development. An important part of the assessment is to test again the appropriateness of other previously defined constraints, rather than simply to accept them.

5. Stage 2: Site/broad location assessment

5.1. The LAA will assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered 'deliverable' within the next five years, or 'developable' over a longer period.

5.2. In relation to sites submitted through the 'call for sites', once an assessment has taken place the owner or land promoter will be advised of the assessment outcomes.



Assessing Suitability

5.3. A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.

5.4. To ensure consistency the sites will be assessed using the criteria identified in Appendix 2. The criteria informing the suitability assessment will include:

- national policy
- local policy (the development plan) including relevant ‘made’ neighbourhood plans
- appropriateness and likely market attractiveness for the type of development proposed
- contribution to regeneration priority areas
- the effect upon landscapes including landscape features, nature and heritage conservation
- a high-level assessment of accessibility, highways infrastructure and impact on strategic road network
- flood risk
- biodiversity and ecological sensitivity
- contamination
- a high-level assessment of environmental conditions/amenities of future residents
- a high-level assessment of the potential vulnerability of a site to climate change risk over the whole lifetime.

5.5. The Council has declared a climate emergency and addressing climate change is on the core land use planning principles that the NPPF expects to underpin plan making. The Council’s corporate plan sets out the desire to put sustainability at the heart of the local planning process. The site assessments will allow for a high-level assessment of a site’s ability for development to constitute sustainable development and therefore its suitability for development. Within a local policy context, a site will be considered against the Renewable Energy and Low Carbon Energy Study and the Energy opportunities Map so options for growth can consider the best opportunities for carbon reduction technologies.

5.6. The PPG⁷ states sites can be assessed against the adopted development plan (which includes any ‘made’ neighbourhood plans); however, the assessment will need to take account of how up to date the plan policies are. Given the Lewes Local Plan Part 1 is five years old in May 2021 sites will not be considered in relation to Spatial Policy 1 and 2, other

⁷ PPG – Housing and economic land availability assessment - Paragraph: 018 Reference ID: 3-018-20190722

policies may be considered, and this will be set out in the site assessment. Equally, relevant neighbourhood plan policies will be considered in the site assessment.

5.7. As part of the assessment of the sites input from specialist officers will be sought. The following officers will be asked to provide technical expertise:

- ESCC Highways
- ESCC Lead Local Flood Authority.
- ESCC Archaeologist
- ESCC or LDC Ecologist
- SDNPA where the site is within the ‘setting’ of the National Park, which will be considered on a site by site basis.

5.8. In addition, Parish and Town Councils will be provided with details of sites. Factual information provided by Parish and Town Councils that is relevant to the assessment criteria will be considered as part of the site assessment. Since the assessment is a technical study which forms part of the council’s evidence base, this engagement with Parish and Town councils was not a public consultation but an ask of them to provide any locally held factual information they may have.

5.9. The findings of the suitability assessment will be categorised as set out in Table 3 below. Sites with no identified constraints are assessed as being ‘suitable’. Sites with constraints that can be overcome with additional work are assessed as ‘potentially suitable’. Sites with substantial constraints which are likely to act as ‘showstoppers’ to development are assessed as ‘not suitable’.

Table 3 – RAG Suitability Assessment

Suitability Assessment	Description
Suitable (Green)	<ul style="list-style-type: none"> • The site offers a suitable location for the identified type of development and there are no known constraints at the time of the assessment
Potentially suitable (Amber)	<ul style="list-style-type: none"> • The site offers a potentially suitable location for development however further information, investigation or work is required. Potential constraints should be highlighted in the assessment for clarity.

Not suitable (Red)	<ul style="list-style-type: none"> • The site is not a suitable location for development
Unknown (Grey)	<ul style="list-style-type: none"> • Insufficient information available or additional evidence/work is required to complete the assessment

Assessing availability

- 5.10. A site can be considered available for development when, on the best information available and there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.
- 5.11. When submitting sites to the Council for consideration in the LAA, landowners or promoters are asked to include details of the ownership of the site and whether there are any known constraints to development. They are also asked to provide details of when they anticipate that the site could be available for the commencement of development.
- 5.12. Sites that meet the definition of deliverable as set out in the NPPF should be considered available unless evidence indicates otherwise. The NPPF definition states that sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years. Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 5.13. Through the assessment the Council will make a judgement based on the information submitted and that available otherwise to them, as to whether the site is available and when it may be able to deliver development as set out in Table 4. There may be complexities with some sites, such as multiple owners or existing tenancies which means the site will be considered as potentially available. Further information and/or assessment may be sought if sites are otherwise suitable and achievable and selected as part of the new local plan.

Table 4 – RAG Availability Assessment

Availability Assessment	Description
Available	<ul style="list-style-type: none"> • Landowner confirmed availability and there are no known legal or ownership issues • Sites with planning permission (including major development with detailed permission unless there is evidence otherwise)
Potentially Available	<ul style="list-style-type: none"> • The land is in multiple ownership and may have assembly issues • The land accommodates an existing use which would require relocation, for which arrangements are not in place • The land is subject to legal issues, preventing the site being available in the short term
Not Available	<ul style="list-style-type: none"> • Landowner(s) have expressed an intention to not develop the site, or no contact with landowner
Unknown	<ul style="list-style-type: none"> • Insufficient information as to the land owner intentions at that time

Assessing Achievability

5.14. A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and will be influenced by the following:

- **Market factors** – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, location attractiveness and market demand.
- **Cost factors** – such as site preparation linked to physical constraints, any exceptional works necessary, relevant planning standards/ obligations.

- **Delivery factors** – including the developer’s phasing, realistic build-out rates and the size, capacity and number of developers in charge of the site.

5.15. As part of the Local Plan process, the Council will undertake a viability assessment of the whole plan that will take account of all relevant national and local policies and standards which could impact on the viability of a site, such as the Council’s Community Infrastructure Levy, nationally or locally set affordable housing contributions, or other planning obligations. The purpose of the ‘whole plan’ viability assessment is to ensure that policies are realistic and that the cumulative cost of relevant policies will not undermine deliverability of the plan.

5.16. The achievability assessment findings will be categorised as shown in Table 5. The assessment is based on a balanced judgement of the site values against the development costs. Where values are likely to exceed the cost of development then the site will be categorised as achievable at this stage. Where the judgement is finely balanced, the site will be assessed as potentially achievable.

5.17. Sites where it is considered that the value of the site will not exceed the development costs the site will be assessed as ‘unlikely to be achievable’. This may be due to constraints such as extraordinary requirements for access or infrastructure or may be due to expected lower sales values in a particular location. This is a high-level judgement, and the site owner may be able to demonstrate that a site is at least potentially achievable.

5.18. Sites with an existing consent where there is no evidence of recent activity, or sites that have had multiple applications over several years without any commencement, will be carefully assessed to ensure they are achievable. Although these sites could still come forward, this will ensure a cautious approach to estimating the overall supply.

Table 5 – RAG Achievability Assessment

Achievability Assessment	Description
Achievable	<ul style="list-style-type: none"> • The site appears to have a realistic prospect of achievability
Potentially Achievable	<ul style="list-style-type: none"> • The sites appear to be potentially achievable

Unlikely to be Achievable	<ul style="list-style-type: none"> • The site appears not to have a realistic prospect of achievability
Unknown	<ul style="list-style-type: none"> • Insufficient information available or additional evidence/work is required to complete the assessment

Calculating the development potential

- 5.19. PPG⁸ confirms that the estimation of the development potential of sites will be guided by the existing local plan policy. When assessing the development potential, the most efficient use of land should be sought and consideration will be given to landowners estimates, densities of nearby sites with planning permission and the pattern of development in the area.
- 5.20. LPP1 Core Policy 2 sets out housing densities appropriate to towns (47 to 57 dwellings per hectare) and rural (20 to 30 dwellings per hectare) areas of the District. This will be used as a starting point of the assessment of the development potential, along with consideration of the specific character and context of the site.
- 5.21. Specific regard will be had to paragraph 125 of the NPPF, which sets out that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 5.22. In terms of employment uses, unless a site owner/promoter has provided a floorspace estimate, a 40% of gross site area to net floorspace ratio assumption will be applied. This means that 40% of the site area will be allocated for the building, whilst the rest of the site will be used for associated works, car parking, landscaping etc.
- 5.23. The level of development potential will be justified within the assessment of the site. The development potential provided in the assessment is indicative only and they are not binding on any decision the Council may make in the future. Any specific site and the assumptions made on densities should not be considered as agreed.

⁸ PPG – Housing and economic land availability assessment - Paragraph: 016 Reference ID: 3-016-20190722

6. Stage 3: Windfall Assessment

- 6.1. As set out in paragraph 71 of the NPPF, a windfall allowance may be justified in the anticipated supply if there is compelling evidence this will provide a reliable source of supply. Paragraph 71 states that any allowance should be realistic, having regard to the LAA, historic windfall delivery rates and expected future trends.
- 6.2. Windfall is defined in the NPPF Appendix 2 Glossary as 'sites not specifically identified in the development plan'. This definition would include all sites that are not allocated within a local plan (including neighbourhood plan).
- 6.3. In accordance with national guidance, the LAA applies a size threshold of 5 or more dwellings, and therefore does not assess small sites capable of delivering below this threshold. Historically small site completions have provided a consistent source of windfall supply and completions in the District and are anticipated to continue to be reliable source of supply.
- 6.4. In addition, changes to permitted development such as conversion of agricultural buildings, offices and retail space to residential dwellings have provided a further source of windfall supply. Consideration will also need to be given to the proposed permitted development of Class E to residential and the potential this could provide.
- 6.5. As part of the new local plan the council will undertake an up to date windfall study which will aim to provide a robust windfall allowance for the period of the new local plan. This will consider historic windfall delivery rates over an extended period, at least 10 years, and assess trends such as permitted development rights for change of use to residential.

7. Stage 4: Assessment review

Deliverable, developable and the housing trajectory

- 7.1. The assessment of suitability, availability, achievability and the constraints to development can be used to assess the timescale for the delivery of development on the site which will allow for the production of an indicative housing trajectory. This will set out how much housing land can be provided in the District and at what point in the plan period.
- 7.2. Sites that are considered suitable, available and achievable will then be categorised as either 'deliverable' or 'developable'. 'Deliverable' sites are those that would be expected to come forward in the first five years of the plan, and 'developable' sites are those that could come forward after year six.
- 7.3. In terms of the housing trajectory, where a site has planning consent and is identified as 'Deliverable', a notional start date of two years from consent is given, unless recent discussions with proponents or infrastructure providers indicate alternative dates. An exception to this is if specific phasing has been identified by the site promoter. Sites with outline consent will be given a notional start date of three years from consent to allow for submission of reserved matters unless discussions with proponents indicates otherwise.
- 7.4. For 'Developable' sites, a judgement will be made on when a site might be expected to come forward in the plan process, taking into account site owners/promoters timescale indications. The judgement will be informed by the scale and complexity of the scheme.
- 7.5. Build out rates, from commencement, will be assumed as below, unless evidence suggests otherwise or as advised by the site owner:
- 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.

- 7.6. 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 and included in the assessment.
- 7.7. All sites that are assessed as deliverable or developable through the Stage 2 assessments will form a pool of sites which can be considered as potentially appropriate to take forward to local plan allocation.
- 7.8. When preparing the new Local Plan, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, the Council will revisit any sites discounted through the stage 1 assessment, consider changing assumptions about development capacity of particular sites or may consider carrying out a further call for sites.
- 7.9. If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the Council will have to demonstrate the reasons why as part of the plan examination.

8. Stage 5: Evidence base

8.1. The PPG sets out the standard outputs which are expected to be produced following the assessment:

- a list of all sites or broad locations considered, cross-referenced to their locations on maps
- an assessment of each site or broad location, including
- where these have been discounted, evidence justifying reasons given
- where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when
- an indicative trajectory of anticipated development based on the evidence available.

8.2. The LAA Report containing the above will be made publicly available on our [website](#)

8.3. The LAA is an iterative process, and as a result the LAA report will be updated regularly throughout the process of preparing the Local Plan to take account of new and updated information.

8.4. Following the initial assessment of sites submitted, the LAA will be published and site owners and/or promoters will be invited to update any information or submit evidence to overcome issues identified. Site owners and/or promoters are encouraged to submit additional sites, or updated information on submitted sites as necessary throughout the process.

8.5. For further information on the LAA, to update information or submit a site you can contact the Planning Policy Team by email: ldf@lewes.gov.uk, or submit sites online via our [website](#)⁹

Monitoring

8.6. The Council monitor planning permissions, commencements and completions for housing and employment floorspace on an annual basis. The housing trajectory will be at least annually reviewed as part of the Council's five-year supply evidence. The LAA assessment will be

⁹ <https://www.lewes-eastbourne.gov.uk/planning-policy/strategic-housing-and-economic-land-availability-assessment/>

reviewed and published yearly, the methodology for the assessment will be updated only when national or local policy changes requires such.

8.7. Monitoring and review of the LAA and housing trajectory will highlight whether;

- Sites under-construction have now been developed, or which stages have been developed
- Sites with planning permission are under construction and the level of progress
- Applications have been submitted or approved on identified areas
- Previous constraints have been overcome providing further developable/deliverable land
- Constraints have emerged which result in land being no longer available, and how these can be resolved
- Windfall development is coming forward as expected, and whether any allowance will need adjusting.

Appendices

Appendix 1: Map of Lewes District and South Downs National Park



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Appendix 2: Site assessment criteria

Criteria	Factor	Questions to consider in assessing site
Suitability Assessment	-	-
Policy Restrictions	National policy constraints	Consideration against the National Planning Policy Framework.
	Local policy constraints	<p>Distance from nearest planning boundary?</p> <p>Distance from nearest amenities or services?</p> <p>Would development of the site result in the loss of an existing use?</p> <p>If the site is within the setting of the South Downs National Park can development be sensitively located and designed to avoid adverse impacts on the landscape, environment, wildlife and cultural heritage?</p> <p>Is the site within 7km of the Ashdown Forest?</p> <p>Are there any Neighbourhood Plan policies of relevance?</p> <p>What are the risks or potential vulnerabilities of the site to climate change over its lifetime?</p> <p>What, if any, potential is identified for the site in the Energy Opportunities Map?</p>
	Market attractiveness	Is there a demand for the type of development in this location?

Criteria	Factor	Questions to consider in assessing site
	Contribution to regeneration priority areas	Is the site within a regeneration priority area?
	Current use/surrounding uses	Would the identified type of development be compatible with existing adjacent/nearby uses?
	Environmental Constraints	Are there any Tree Preservation Orders, protected hedgerows or woodland designations on the site? Are there any Scheduled Monuments, Registered Park and Garden, Listed Buildings or Conservation areas nearby, or is the site within an Archaeological Notification Area? If so, is there potential for harm to their significance?
	Site typology	Is the site previously developed land?
Physical Site Issues	Highways infrastructure	Is there capacity in the surrounding highway network capable of supporting the identified type and amount of development?
	Site access	Is there appropriate existing access, or is creation of a new access possible?
	Contaminated land	Is there any known contamination?
	Topographical constraints	How will the topography of the site influence the intended

Criteria	Factor	Questions to consider in assessing site
		development or density potential?
	Utilities	Are there existing utilities in close proximity?
	Flooding	Is the site at risk of flooding?
	Landscape Sensitivity	Can the intended use/density of use be accommodated in landscape terms?
	Biodiversity/ecological sensitivity	Are there known protected species, or priority habitats on site or nearby?
Locational Suitability of Residential Development	Public transport accessibility	Is the site within walking distance of bus stops (up to 400m desirable and 800m maximum)? What are no. and frequency of services? Is the site within 15-20 minutes walking or cycling distance of a train station (approximately 1.6km).
	Other sustainable transport opportunities	Does the site have pedestrian linkages or cycle path/network connections?
	Access to local shops and services	Where, and what is, the nearest village centre? What services does it provide? What local shops/services are available within a 15-20 minute walking/cycling route (approximately 1.6km)
	Residential amenity	Does the site adjoin existing residential uses? Would the identified use be compatible with existing neighbouring uses?

Criteria	Factor	Questions to consider in assessing site
Suitability Conclusion	Suitable	<ul style="list-style-type: none"> The site offers a suitable location for development and there are no known constraints at the time of the assessment
	Potentially Suitable	<ul style="list-style-type: none"> The site offers a potentially suitable location for development however further information, investigation or work is required. Potential constraints should be highlighted in the assessment for clarity.
	Unsuitable	<ul style="list-style-type: none"> The site is not a suitable location for development
	Unknown	<ul style="list-style-type: none"> Insufficient information available or additional evidence/work is required to complete the assessment
Availability Assessment	-	-
Ownership/use	Single/multiple ownership	<p>Are there any known legal or ownership constraints?</p> <p>Are there any ransom strips</p>
	Indication of intention to develop received	Is there a house builder in place?
	Current use of the site	Are there any leaseholders/tenants requiring relocation?
	Available	<ul style="list-style-type: none"> Landowner confirmed availability and there are no

Criteria	Factor	Questions to consider in assessing site
Availability Conclusion		<p>known legal or ownership issues</p> <ul style="list-style-type: none"> • Sites with planning permission (inc major development with detailed permission unless there is evidence otherwise)
	Potentially Available	<ul style="list-style-type: none"> • The land is in multiple ownership and may have assembly issues • The land accommodates an existing use which would require relocation, for which arrangements are not in place • The land is subject to legal issues, preventing the site being available in the short term
	Not Available	<ul style="list-style-type: none"> • Landowner(s) have expressed an intention to not develop the site, or no contact with landowner
	Unknown	<ul style="list-style-type: none"> • Insufficient information as to the land owner intentions at that time
Achievability Assessment	-	-
Cost/delivery factors	Sales value	Are sales values/returns sufficient to cover costs of intended development?
	Abnormal costs	Are there additional costs in association with access or highway infrastructure,

Criteria	Factor	Questions to consider in assessing site
		contamination, topography or land stability costs?
	Market factors	<p>Is there market demand for the intended use?</p> <p>What is the economic viability of the existing, proposed or alternative use?</p> <p>What is the land value of alternative uses?</p>
Achievability Assessment	Achievable	<ul style="list-style-type: none"> The site appears to have a realistic prospect of achievability
	Potentially Achievable	<ul style="list-style-type: none"> The sites appears to be potentially achievable
	Unlikely to be Achievable	<ul style="list-style-type: none"> The site appears not to have a realistic prospect of achievability
	Unknown	<ul style="list-style-type: none"> Insufficient information available or additional evidence/work is required to complete the assessment