

Land Availability Assessment

WINDFALL ASSESSMENT















OCTOBER 2022



EASTBOURNE LAND AVAILAILITY ASSESSMENT 2022

WINDFALL ASSESSMENT

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EXECUTIVE SUMMARY

- i. The National Planning Policy Framework (NPPF) (2021) permits the inclusion of a windfall allowance in the anticipated supply where there is compelling evidence that such sites have and will continue to form a reliable source of supply (para 71).
- ii. The Windfall Assessment has been prepared to provide compelling evidence for an appropriate justification for the inclusion of an allowance for the future windfall delivery of new homes on unidentified sites in the housing trajectory for the Eastbourne Local Plan, alongside the Eastbourne Land Availability Assessment (LAA).
- iii. Windfall allowance is usually based on site size, but the LAA applies no size threshold to the identification of sites which means potential sites are considered regardless of size and should lead to a more robust assessment.
- iv. However, sites that will be identified in the LAA will predominantly be either new build sites or sites where a redevelopment would take place. This means that new homes that come forward through changes of use (the change of a non-residential use to residential) or conversion (a change in the number of residential units within an existing residential building including the creation of new dwellings through upward extensions) are unlikely to be identified.
- v. Therefore, the approach to assessing windfall allowance on unidentified sites is based on past trends of housing delivery through Change of Use and Conversion sites, going back as far as 2006 to take into account economic cycles, which are then adjusted to take into account changes to national policy, guidance and legislation, including changes to permitted development rights, that may impact trends going forward.
- vi. A total of 3,389 new homes have been delivered in Eastbourne since 2006 at an average of 212 homes per year. However, over the past five years, 814 new homes have been built at an average of 162 homes per year, despite the application of the NPPF's presumption in favour of sustainable development.
- vii. Between 2006 and 2022, 1,610 new homes were delivered via Conversions and Changes of Use. However, the time period over which past trends have been assessed not only includes a significant period of economic depression, but also significant changes to national policy and a national pandemic. Changes to national policy has allowed increased flexibility that have encouraged new homes to be delivered through a variety of sources. There has also been the introduction of a raft of changes to permitted development rights that take is a more lenient stance regarding change of use from commercial to residential that are intended to increase housing delivery. These changes, particularly more recent extension of permitted development, are expected to have an impact on trends going forward.

Executive Summary P a g e | i

- viii. The amalgamation of a number of uses into a single Class E use, and a permitted development right to change use from class E to residential, is expected to have some impact on housing delivery. It is considered that this is most likely to have the effect of increase housing delivery via change of use from retail.
- ix. Although office use is now also part of Class E, there has been a permitted development right for change of use from office to residential for some time now, and this means that the majority of the available and 'convertible' stock has been exhausted, and past trends of office to residential change of use are unlikely to sustain.
- x. There have also been new permitted development rights to encourage the upward extension of buildings to create new homes. This was taking place prior to the introduction of the permitted development right, but this change is expected to result in an increase in housing delivery by this method. However, the complexities involved with this type of development suggest that any increase will be modest.
- xi. It is anticipated that windfall on unidentified sites (i.e., through change of use and conversion) will contribute a total of 1,260 net additional homes over the period 2025 to 2039, at an average of 90 new homes per year. A windfall allowance for unidentified sites will not be included within years 1 to 3 to avoid double counting within extant permissions.
- xii. It is considered that the highest windfall delivery from unidentified sites will be in the Town Centre, which is anticipated to take 630 new homes through change of use and conversion, which represents 50% of the total allowance. This is consistent with the aims behind the changes to permitted development rights, particularly the introduction of a right to change use from class E to residential to support housing delivery and bring more residential use into high streets and town centres, boosting footfall and creating additional demand.

TABLE OF CONTENTS

Ex	ecutive Summary	ii
Ι.	Introduction	I
В	Sackground to Permitted Development	2
2.	Methodology	3
3.	Assessment of Housing Delivery since 2006	5
Н	Housing Delivery by Type of Development	6
Н	Housing Delivery by Neighbourhood	7
Р	Permissions for new homes	8
C	Conclusions from overall housing delivery since 2006	10
4.	Analysis of Conversions and Changes of Use	11
N	New homes via Conversions and Changes of Use by Year	11
N	New homes by Conversions and Changes of Use by Yield and Type	13
N	New homes by Conversions and Change of Use by neighbourhood	14
A	Analysis of Changes of Use	16
	Previous uses	16
	Permitted Development	18
A	Analysis of Conversions	20
C	Conclusions on Conversions and Changes of Use	22
5.	Impacts of Changes on Future trends	25
C	Covid-19	25
C	Class E to Residential	26
	Office to Residential	28
	Retail to Residential	30
	Light Industrial to Residential	32
	Storage and Distribution to Residential	32
L	Jpward Extensions	33
C	Conclusions on Impacts of Policy Changes	36
6.	Conclusions	37

Windfall Allowance 2024-2039	37
Changes of Use	38
Conversions	
By Location	41
Appendices	
Appendix I – Map of Neighbourhoods	43
Appendix 2 – Completions Data	43

I. INTRODUCTION

- 1.1 This Windfall Assessment has been prepared to provide compelling evidence for an appropriate justification for the inclusion of an allowance for the future windfall delivery of new homes on unidentified sites in the housing trajectory for the Eastbourne Local Plan, alongside the Eastbourne Land Availability Assessment (LAA).
- 1.2 The National Planning Policy Framework (2021) [NPPF] permits the inclusion of a windfall allowance in the anticipated supply where there is compelling evidence that such sites have and will continue to form a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends¹.
- 1.3 Windfall sites are defined in the NPPF² as being: *sites not specifically identified in the development plan*.
- 1.4 The definition of windfall sites has changed since the original 2012 version of the NPPF, which defined windfall sites as: sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.
- 1.5 The Eastbourne LAA applies no size threshold to the identification of sites, but there are sites that it is not possible to identify in advance of them becoming known to the planning system, particularly those involving conversion and change of use. Therefore, sites involving conversion or change of use are unidentified. For the purposes of this windfall assessment, 'windfall' is defined as being the delivery of homes on sites that have not been identified in advance through the LAA process.
- 1.6 The NPPF expects local planning authorities to support the development of windfall sites through their policies and decisions giving great weight to the benefits of using suitable sites within existing settlements for homes (para 69).
- 1.7 This Windfall Assessment seeks to:
 - Define and justify 'windfall' for the Eastbourne context
 - Analyse past delivery rates of new homes
 - Identify windfall trends based on rates of previous delivery
 - Consider impacts of changes to national policy, guidance and regulations and how these will impact windfall trends going forward

Introduction Page | I

¹ NPPF (2021), Para 71

² NPPF (2021), Annex 2: Glossary

Identify a future allowance for windfall housing delivery on unidentified sites

Background to Permitted Development

- 1.8 Changes to permitted development rights over recent years have had an impact on housing delivery and are expected to have an impact in future, so will need to be given careful consideration in this windfall assessment.
- 1.9 Permitted development rights (PDRs) are a national grant of planning permission made through the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO), which allow certain building works and changes of use to be carried out without having to make a planning application. Before some PDRs can be used, 'prior approval' must be obtained from the local planning authority in relation to specified aspects of the development.
- 1.10 Since 2013, there have been a number of changes to PDRs with the intention to support growth and increase the speed of housing delivery by making it easier to change use from commercial buildings. This included a temporary PDR (later made permanent) for change of use from office to residential in 2013, subject to prior approval from the local planning authority. Between 2014 and 2019, additional PDRs were introduced allowing changes of use of retail, light industry and storage & distribution to residential, subject to prior approval.
- 1.11 A raft of further changes were made to PDRs in 2020 relating to housing, including a right to add additional storeys to existing properties to create new dwellings, and amended regulations to ensure that new homes developed through permitted development rights provide adequate natural light for the occupants and meet the nationally described minimum space standards.
- 1.12 Permitted development rights and their impact on housing delivery is referenced and analysed throughout this report.

2 | Page Introduction

2. METHODOLOGY

- 2.1 Planning Practice Guidance (PPG) suggests that Housing and Economic Land Availability Assessments consider sites capable of delivering five or more dwellings. Therefore, usual practice is for windfall assessments to be based on past delivery rates on small sites with a yield of less than five homes.
- 2.2 However in Eastbourne, the majority of new homes are delivered on small sites providing less than five dwellings, and it is expected that this will continue into the future. On this basis, the LAA does not apply a site size threshold, which means potential sites are considered regardless of size and should lead to a more robust assessment.
- 2.3 However, it is not considered that the LAA can be completely comprehensive in identifying all sites that might come forward in future. The sites that will be identified in the LAA will predominantly be either new build sites or sites where a redevelopment would take place.
- 2.4 The potential supply of sites includes buildings currently in non-residential use, or buildings currently in residential use where the number of homes accommodated can be increased. There is consequently a potential supply of housing land where release for housing development tends to be determined primarily by buildings becoming available through the discontinuation of other uses, which are less obviously identifiable in advance of these sites becoming known to the planning system. Where this occurs, such sites can achieve planning permission and be implemented relatively quickly, including through the use of permitted development change of use rights.
- 2.5 All development sites that have been completed since 2006 and that have delivered net additional dwellings have been categorised as being either:
 - New Build the development of an empty, vacant or unused previously developed site, or a greenfield site
 - Redevelopment the demolition of an existing building and provision of new development in its place
 - Change of use the change of a non-residential use to residential use within an existing building
 - Conversion a change in the number of residential units within an existing residential building (including the creation of new dwellings through upward or sideward extensions).
- 2.5 Since 2006, 48% of new homes delivered have been through conversions and changes of use, and it is considered that this will continue to be a reliable source of supply in the future.

Methodology Page | 3

- 2.6 Therefore, it is considered appropriate that the approach to assessing windfall on unidentified sites is based on the type of development, rather than size of development. The future windfall allowance will be identified based on past trends of housing delivery through Change of use and Conversion sites (including planning permissions and permitted development), going back as far as 2006 to take into account economic cycles.
- 2.7 In order to avoid double counting of sites through the site identification and assessment process in the LAA and the windfall assessment, any site identified in Stage 1 of the LAA that is expected to provide new homes through Change of Use or Conversion is excluded from further assessment. This will ensure that these new homes are not counted twice.
- 2.8 The first step is to identify and assess the amount, type and location of housing delivery. This will be based on data between 2006 as the start of the Core Strategy plan period, up to 31st March 2022, which is the most recent data currently available.
- 2.9 Following this, a more detailed analysis is undertaken on new homes delivered via conversion and change of use, including amount, type and location of new homes, but also what type of change of use or conversion has taken place. This will allow the identification of past rates of delivery from these methods and be used to calculate a baseline allowance based on past trends, including broad location (neighbourhood) where new homes are expected to be delivered via these methods.
- 2.10 Finally, consideration is given to how other factors such as how changes to national policy, guidance and regulations may impact these trends in future, and if these trends can be sustained over a longer timeframe. This will enable justified adjustments to be made to the past trends in order to provide a windfall allowance for the plan period.
- 2.11 A windfall allowance will not be included within years 1 to 3 to avoid double counting within extant permissions.

4 | P a g e Methodology

3. ASSESSMENT OF HOUSING DELIVERY SINCE 2006

- 3.1 The Eastbourne Core Strategy Local Plan, which was adopted in 2013, seeks to provide 5,022 net additional homes between 2006 and 2027, at an average of 240 new homes per year.
- 3.2 Between 1st April 2006 and 31st March 2022, a total of 3,389 net additional homes were delivered in Eastbourne. This is 451 dwellings fewer than the Core Strategy target trajectory for the end of 2021/22.
- 3.3 This equates to an average of 212 new homes being delivered per year over the plan period. However, this record is influenced by high levels of delivery in the early years of the plan, particularly as a result of the completion of significant development sites at Sovereign Harbour, as illustrated in Figure 1.

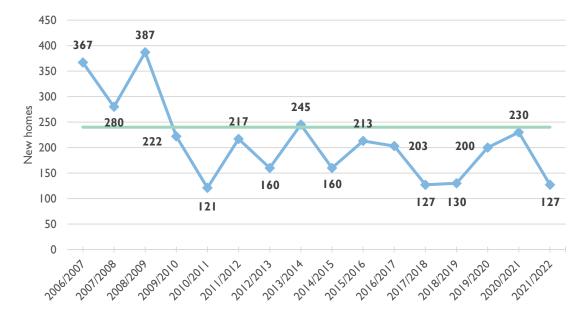


Figure 1 - Net Additional Homes delivered against Local Plan target

3.4 The delivery of new homes reduced significantly as a result of the recession in around 2010, with a low of 121 net additional homes delivered in 2010/11. Since then, annual delivery has fluctuated, reaching a high of 245 new homes in 2013/14. In the last five years, 814 new homes have been built at an average of 162 homes per year. This is despite the Core Strategy reaching the fifth anniversary of adoption in 2018, resulting in the absence of a five-year housing land supply and the application of the NPPF's presumption in favour of sustainable development.

Local Plan Target

Net Additional Homes

3.5 Housing delivery in Eastbourne has been reliant on small sites, with large sites being very limited in the borough. The 3,389 net additional homes since 2006 were delivered across 716 sites, with 555 sites (78%) delivering less than five units each. A further 95 sites accommodated between five and nine units, which means that 91% of development sites delivered less than 10 new homes. Just 66 sites delivered more than 10 homes, 51 of which were between 10 and 24 units. Just four were large sites that delivered in excess of 100 homes.

Housing Delivery by Type of Development

- 3.6 As described in para 2.5, development sites that deliver net additional dwellings have been categorised as either New Build, Redevelopment, Conversion or Change of Use.
- 3.7 Over the plan period, New Build developments have contributed greatest proportion of new homes (29%). Changes of Use delivered 26% of new homes, whilst Redevelopments provided 23% and Conversions 22%. Figure 2 shows that the majority of the homes provided via New Build were delivered early in the plan period, particularly due to the completion of final phases of development at Sovereign Harbour.

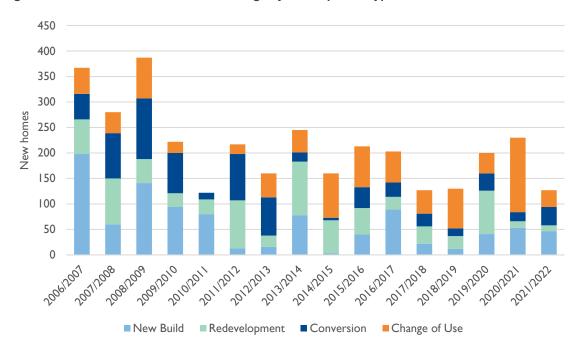


Figure 2 - Number of Net Additional Dwellings by Development Type and Year

3.8 Of the 716 sites that delivered net additional dwellings between 2006 and 2022, 17% were New Build development sites and 12% were Redevelopment sites, whilst 32% were Change of Use sites and 39% were Conversion sites. The percentage of sites that were Change of Use or Conversion (71%) is significantly higher than the proportion of homes delivered via these methods (48%), which

- indicates that on average Change of Use and Conversion development sites generally have lower yields than New Build and Redevelopments.
- 3.9 The number of homes delivered via New Build developments and Conversions has been on an overall downward trend over the period between 2006 and 2022, whilst the proportion of homes delivered as Changes of Use has been increasing.
- 3.10 Figure 3 illustrates that over the last eight years there has been a strong trend towards changes of use, which has delivered 41% of homes over this period at an average of 71 homes per year. This trend has been particularly influenced by the changes to Permitted Development rights that have allowed offices to be converted to residential without the need for planning permission.

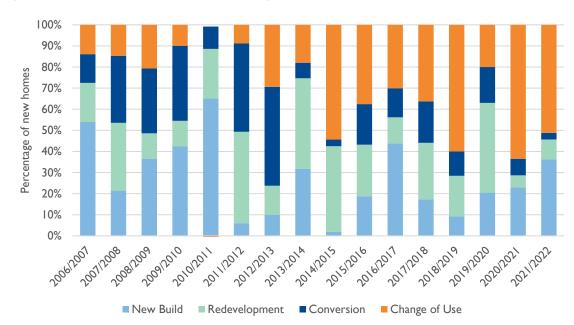


Figure 3 - Proportion of Net Additional Dwellings by Development Type and Year

Housing Delivery by Neighbourhood

- 3.11 Housing completions since 2006 have been recorded by neighbourhood. A map of the Neighbourhoods is provided in Appendix 1.
- 3.12 As shown in Figure 4, the Town Centre neighbourhood has delivered the highest number of new homes since 2006 (973 net additional units), with the majority of these (84%) coming through Changes of Use and Conversion. The Town Centre has delivered a consistent number of homes every year, with an average of 61 net additional dwellings per year between 2006 and 2022.

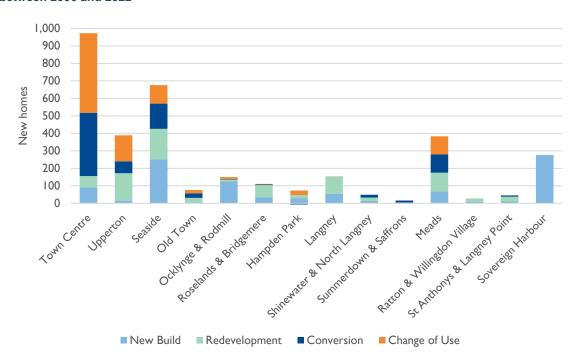


Figure 4 – Total Number of Net Additional Dwellings by Development Type and Neighbourhood between 2006 and 2022

- 3.13 After the Town Centre, Seaside has delivered the next highest number of homes with 676 net additional dwellings, but a greater proportion of New Build and Redevelopments compared to the Town Centre. Other neighbourhoods that have seen high rates of delivery include Upperton (389); Meads (383); and Sovereign Harbour (276). All of the new homes delivered in Sovereign Harbour have been via New Build.
- 3.14 The Town Centre has also had the most individual development sites with 275 sites. 38% of the total number of sites across the town were in the Town Centre. Seaside and Upperton had the next most sites, with 17% and 11% respectively. The other 11 neighbourhoods contained 246 sites between them.

Permissions for new homes

3.15 Since 2006, planning consent has been granted for a net addition of 4,821 dwellings on 999 sites, at an average of 301 per year. The number of new homes granted permission and the number of sites per year this applies to is shown in Table 1.

Table 1 - Numbers of new homes granted permission per year

Year	Net additional units	Number of sites
2006/07	460	85
2007/08	260	52
2008/09	232	75
2009/10	548	82
2010/11	296	42
2011/12	162	41
2012/13	251	59
2013/14	196	61
2014/15	375	69
2015/16	241	63
2016/17	297	77
2017/18	361	69
2018/19	193	64
2019/20	348	63
2020/21	307	52
2021/22	294	45
Total	4,821	999
Annual Average	301.3	62.4

- 3.16 Of these 999 sites granted permission, 69% would accommodate less than five homes, and 82% would provide less than 10 dwellings. 100 sites would accommodate ten or more homes, with just four sites taking 100 homes or more.
- 3.17 When comparing the permission granted against the number of homes that have been delivered over the same period, it suggests that around 30% of permitted homes are not being built out. However, it should be noted that some of these sites will have been granted multiple permissions.
- 3.18 Investigation through the Housing Delivery Test Action Plan³ has identified that the reasons for this mainly relate to the fact that the majority of development sites in Eastbourne are small sites. This means that delivery relies upon local builders and small development companies, who must use different business models that are less resilient compared to larger developers.
- 3.19 This is exacerbated by a fall in the number of local builders operating over recent years and a shortage of construction workers, and the viability challenges resulting from lower sales values in Eastbourne compared to other local areas,

³ Eastbourne Housing Delivery Test Action Plan 2022 (July 2022)

the impact of existing use values on sites that are predominantly previously developed, and the higher likelihood of abnormal costs relating to remediation and greater difficulties in design and construction compared to larger, undeveloped sites.

Conclusions from overall housing delivery since 2006

- 3.20 3,389 new homes have been delivered in Eastbourne since 2006 at an average of 212 homes per year. However, this disguises the fact that delivery was significantly higher in the first few years as the major development of Sovereign Harbour was being completed. In the last five years, 814 new homes have been built at an average of 162 homes per year.
- 3.21 The application of the NPPF's presumption in favour of sustainable development since 2018 has not resulted in a significant increase in the number of homes being delivered, as it may have done in other areas where there are fewer constraints affecting land availability. This further emphasises that there is a lack of available land to develop in Eastbourne, and it is not local plan policy that is preventing sites from coming forward.
- 3.22 It is also clear that permissions are being granted for housing development, and a proportion of the sites granted permission are not being built out. Where this is the case, and they have not been granted a subsequent permission, these sites will be included in the LAA.
- 3.23 Overall, the Town Centre has delivered the highest number of new homes, and these have mainly come through conversions and changes of use. This would be expected as the town centre would be a location where there is a concentration of non-residential uses.
- 3.24 Generally, it is the neighbourhoods immediately surrounding the Town Centre Upperton, Seaside and Meads that have seen the next highest rates of housing delivery, suggesting greater opportunities in these areas. Neighbourhoods on the edges of the town, such as Shinewater & North Langney and Ratton & Willingdon Village have seen very few new homes delivered, indicating a lack of suitable sites for development in these suburban locations.

4. ANALYSIS OF CONVERSIONS AND CHANGES OF USE

4.1 As identified in the Methodology, the starting point for assessing windfall allowance is past trends of housing delivery through Changes of use and Conversion. Therefore, it is necessary to undertake a detailed analysis of past conversions and changes of use in order to identify how many new homes may be delivered through these means in future. Full data for housing completions by conversion and change of use is provided in Appendix 2.

New homes via Conversions and Changes of Use by Year

4.2 Over the period between 2006 and 2022, a total of 1,610 homes have been delivered in Eastbourne through conversions or changes of use (Table 2). This represents 47.5% of the total net additional homes that have been delivered over this period.

Table 2 - Net Additional Homes through Changes of Use and Conversion by Year (2006-2022)

Year	Conversion	Change of Use (CoU)	Total CoU & Conversion	% of Total New Homes	
2006/2007	50	51	101	27.5%	
2007/2008	89	41	130	46.4%	
2008/2009	119	80	199	51.4%	
2009/2010	79	22	101	45.5%	
2010/2011	13	0	12	9.9%	
2011/2012	91	19	110	50.7%	
2012/2013	75	47	122	76.3%	
2013/2014	4 18		62	25.3%	
2014/2015	5	87	92	57.5%	
2015/2016	41	80	121	56.8%	
2016/2017	28	61	89	43.8%	
2017/2018	25 46		71	55.9%	
2018/2019	15	78	93	71.5%	
2019/2020	34	40	74	37.0%	
2020/2021	18	146	164	71.3%	
2021/2022	4	65	69	54.3%	
Total	704	906	1,610	47.5%	
Annual Average	44.0	56.6	100.6	-	

4.3 Between 2006 and 2022, there was an average of 57 net additional units per year provided through change of use, and 44 net additional units per year delivered through conversion. However, as described previously, there has been a more recent trend of more homes being delivered via changes of use, and fewer homes being delivered through conversions.

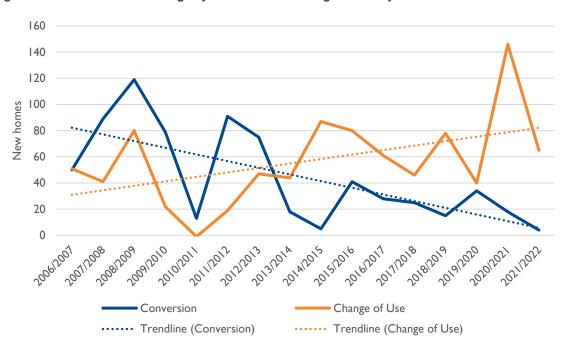


Figure 5 - Net Additional Dwellings by Conversion & Change of Use by Year

- 4.4 Over the last five years, conversions and changes of use have provided 58% of the total net additional homes that have been delivered. Changes of use have delivered an increased average of 75 homes per year, but conversions have delivered a reduced average of just 19 homes per year, which emphases the trends identified and is clearly illustrated in Figure 5.
- 4.5 The 1,610 homes delivered via conversion or change of use were across 508 individual sites as shown in Table 3. Overall, there was an average of 17 Conversion development sites and 14 Change of Use development sites completed per year; however, following the trends previously identified, in the most recent five-year period there was an average of 17 Change of Use sites and 11 Conversion sites per year.

Table 3 - Conversion and Change of Use Completed Development Sites (2006-2022)

Year	Conversion	Change of Use (CoU)	Total CoU & Conversion	% of Total Sites	
2006/2007	20	12	32	74.4%	
2007/2008	29	11	40	58.8%	
2008/2009	34	8	42	75.0%	
2009/2010	28	14	42	76.4%	
2010/2011	6	0	6	42.9%	
2011/2012	20	5	25	67.6%	
2012/2013	18	12	30	75.0%	
2013/2014	15 16		31	73.8%	
2014/2015	12	24	36	76.6%	
2015/2016	23	20	43	79.6%	
2016/2017	17	20	37	84.1%	
2017/2018	13	16	29	69.0%	
2018/2019	9	28	37	68.5%	
2019/2020	18	18 15 33		67.3%	
2020/2021	8	17	25	65.8%	
2021/2022	9	11	20	60.6%	
Total	279	229	508	70.9%	
Annual Average	17.4	14.3	31.8	-	

New homes by Conversions and Changes of Use by Yield and Type

4.6 Following a similar pattern to overall housing delivery across all sites, the majority (82%) of Conversions and Changes of Use deliver less than 5 net additional dwellings (Table 4). Conversions particularly tend to deliver fewer new homes per development.

Table 4 - Yield of Conversion and Change of Use sites

Development Sites	Conversion	Change of Use	Total
Less than 5 dwellings	240	180	420
Between 5 and 9 dwellings	32	27	59
Between 10 and 24 dwellings	6	19	25
Between 25 and 49 dwellings	0	2	2
50 dwellings or more	1	1	2
TOTAL	279	229	508

4.7 The majority of new homes delivered via conversions and changes of use were flats. Figure 6 shows that, of the 1,610 homes delivered via conversion or change of use, 55% were 1-bedroom flats and 34% were 2-bedroom flats. There were a small number of houses delivered, usually via changes back from uses such as tourist accommodation in buildings that were originally built as dwellings.

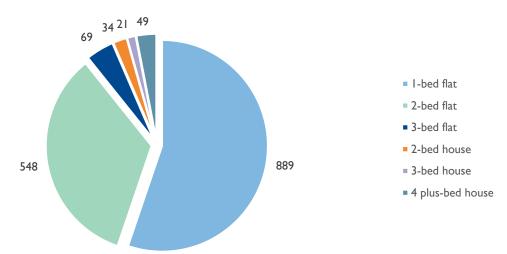


Figure 6 - Types of Dwelling delivered via Conversion and Change of Use

New homes by Conversions and Change of Use by neighbourhood

- 4.8 It is predominantly four neighbourhoods in Eastbourne that have delivered new homes via conversions and changes of use. These are the Town Centre, and the three neighbourhoods immediately adjacent to the Town Centre: Upperton, Seaside and Meads (Figure 7). However, the Town Centre has delivered more new homes through conversion and change of use than its three neighbouring areas combined.
- 4.9 Within the Town Centre, Seaside and Meads, the majority of new homes have been delivered via conversions and changes of use. 84% of the total dwellings delivered in the Town Centre have been through conversion and change of use as shown in Table 5.
- 4.10 There are generally very few changes of use or conversions outside of the Town Centre and those neighbourhoods immediately adjacent to it (Upperton, Seaside and Meads).
- 4.11 Changes of use are particularly focused around the Town Centre and its adjacent areas, although there are other neighbourhoods that have some new homes delivered through conversions including Old Town, Shinewater & North Langney and Summerdown & Saffrons.

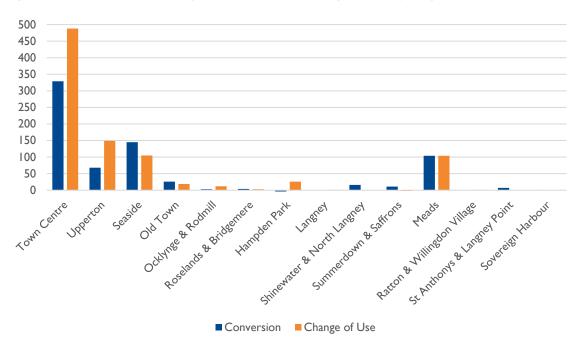


Figure 7 - Net Additional Dwellings by Conversion & Change of Use by Neighbourhood

Table 5 - Net Additional Homes through Changes of Use and Conversion by Neighbourhood (2006-2022)

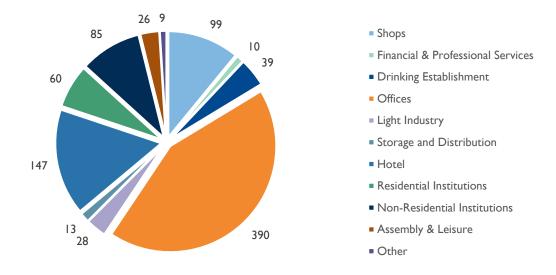
Neighbourhood	Conversion	Change of Use (CoU)	Total Conversio n & COU	Annual Average	% of Total New Homes
Town Centre	329	488	817	51.1	84.0%
Upperton	68	149	217	13.6	55.8%
Seaside	145	105	250	15.6	37.0%
Old Town	26	19	45	2.8	59.2%
Ocklynge & Rodmill	3	12	15	0.9	10.0%
Roselands & Bridgemere	4	3	7	0.4	6.3%
Hampden Park	0	18	18	1.1	27.7%
Langney	0	1	1	0.1	0.6%
Shinewater & North Langney	16	0	16	1.0	32.7%
Summerdown & Saffrons	11	0	11	0.6	64.3%
Meads	104	104	208	13.0	54.3%
Ratton & Willingdon Village	0	1	1	0.1	3.6%
St Anthony's & Langney Point	7	0	7	0.4	15.6%
Sovereign Harbour	0	0	0	0.0	0.0%
TOTAL	704	906	1,610	100.6	47.5%

Analysis of Changes of Use

Previous uses

4.12 Since 2006, changes of use from offices have delivered the highest number of new homes (390), representing 43% of the dwellings created from changes of use. Changes of use from tourist accommodation contributed 147 homes (15%) and retail to residential created 99 homes (11%).

Figure 8 - Number of homes created by previous use



- 4.13 In the early part of the plan period, homes delivered through changes of use tended to be more regularly from uses such as tourist accommodation and non-residential institutions, with few changes of use from shops and offices.
- 4.14 However, the pattern of uses changing to residential altered after the recession in 2009/2010, and since 2013 a greater proportion of new homes have been delivered via changes from office and retail uses, as shown in Figure 9. This is likely to have been impacted by the introduction of the NPPF in 2012, which identified that local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate⁴.

⁴ NPPF (2012), para 51

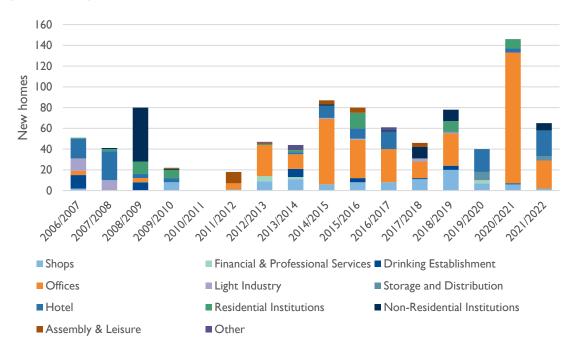


Figure 9 - Changes of Use - Previous Use by Year

Table 6 - New homes created by change of use by previous use and period

Previous Use	2006 - 2013		2014 - 2022		Total 2006 - 2022	
	New Homes	Annual Average	New Homes	Annual Average	New Homes	Annual Average
Shops	31	3.9	68	8.5	99	6.2
Financial & Prof Services	7	0.9	3	0.4	10	0.6
Drinking Establishment	29	3.6	10	1.3	39	2.4
Offices	58	7.3	332	41.5	390	24.4
Light Industry	22	2.8	6	0.8	28	1.8
Storage and Distribution	0	0.0	13	1.6	13	0.8
Hotel	57	7.1	90	11.3	147	9.2
Residential Institutions	26	3.3	34	4.3	60	3.8
Non-Residential Institutions	54	6.8	31	3.9	85	5.3
Assembly & Leisure	13	1.6	13	1.6	26	1.6
Other	6	0.8	3	0.4	9	0.6
TOTAL	303	37.9	603	75.4	906	56.6

4.15 Within the Town Centre, new homes through changes of use have come from a variety of uses, but particularly office, retail and tourist accommodation. However, Figure 10 shows that within other neighbourhoods, there is generally a narrower range of previous uses. In Upperton, the majority of changes of use have been from offices, whilst in Seaside it has mainly been from retail and hotels. In Meads,

there was a change of use of a former hospital, which contributed a significant number of dwellings from that one site.

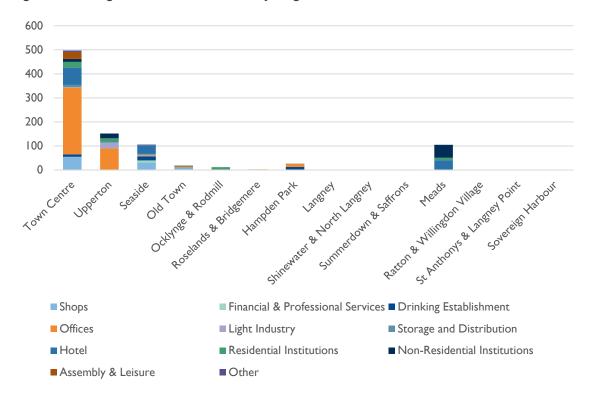


Figure 10 - Changes of Use - Previous Use by Neighbourhood

Permitted Development

- 4.16 Over recent years permitted development rights have been expanded to increase the range of uses that can change to residential without the need for planning permission (although the developer must first obtain 'prior approval' from the local planning authority).
- 4.17 These changes, originally introduced as a temporary measure in 2013 and expanded since, have had a significant impact on encouraging the delivery of new homes through changes of use. Since April 2014, 603 new homes have been delivered through changes of use at an average of 75 homes per year. Prior to the changes to permitted development rights, the average annual delivery via change of use was 38 homes per year. 48% of homes delivered through changes of use since April 2014 have come through permitted development.
- 4.18 Permitted development rights have particularly encouraged changes of use from office, and the majority of new homes delivered by permitted development have come from a former office use. Of the 390 homes created by a change from office use since 2006, 332 (85%) have been delivered since April 2014. Similarly, 68% of homes created via change of use from retail have been delivered since April 2014.

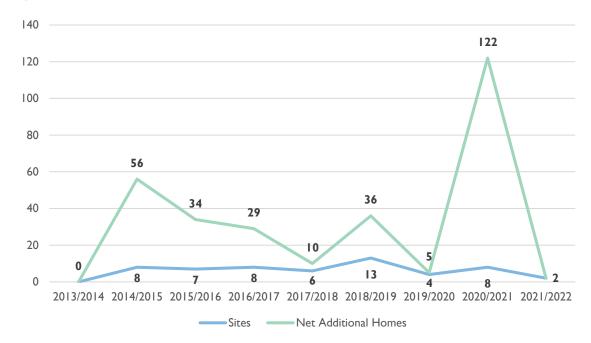


Figure 11 - Number of Sites and Homes delivered via Permitted Development by Year

4.19 2020/21 saw the completion of a particularly large office-to-residential change of use, creating 73 new homes, which had a significant contribution to the 122 new homes created through permitted development changes of use in the year (Figure 12).

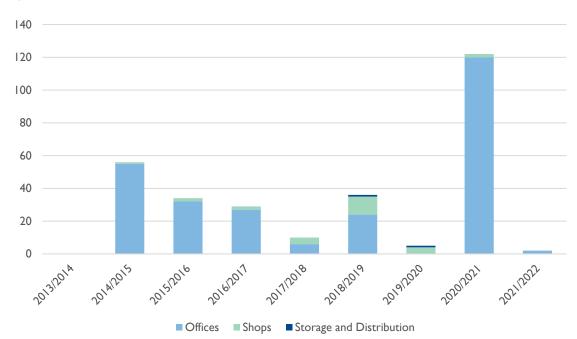


Figure 12 - Homes delivered via Permitted Development by Type and Year

4.20 As the majority of the new homes from permitted development have come from a former office or retail, and the majority of these uses in Eastbourne are located within the Town Centre, it is unsurprising that the Town Centre has delivered the

highest number of new homes through permitted development. Upperton and Seaside have also seen some new homes delivered through permitted development – Upperton from former offices uses and Seaside predominantly from former retail uses – but there are eight neighbourhoods where no new homes have been created via permitted development.

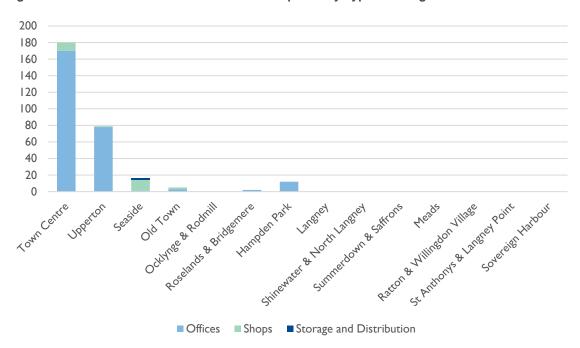


Figure 13 - Homes delivered via Permitted Development by Type and Neighbourhood

Analysis of Conversions

- 4.21 Developments identified as Conversions have been categorised into:
 - Sub-division the dividing of existing residential units to create additional units without involving any external additions to the building (internal works only)
 - Side Extensions where there has been a sideways extension of an existing building to create additional residential units, including where this also involves the sub-division of the existing building
 - Upward Extensions where there has been an additional floor added to a building to create additional residential units, including where this also involves the sub-division of the existing building
- 4.22 Of the 704 new homes created through conversion since 2006, 75% have been created through Sub-division, 21% have been created through Side Extensions, and 4% have been created through Upward Extensions.
- 4.23 Table 7 and Figure 14 illustrates that the number of new homes created through Sub-division has significantly decreased since around 2012. The reasons for this are unknown, however it could coincide with the introduction of a permitted

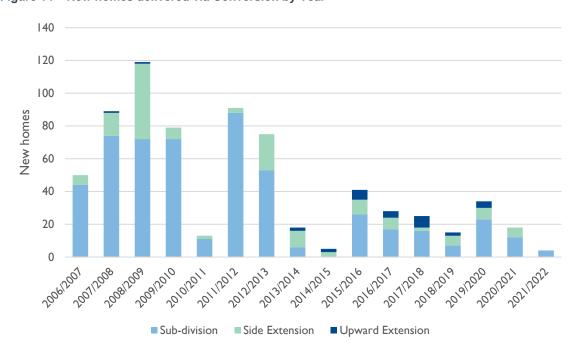
development right in 2010 for conversion of a dwelling (class C3) to a small house in multiple occupation (class C4), which could prove more attractive to potential conversions and would not come to the attention of the local planning authority. Other potential influences could be the introduction of technical space standards in 2015 that could have the impact of reducing the yield of conversion sites. Alternatively, there is potential that the stock of available and 'convertible' dwellings is being exhausted.

Table 7 - New homes via Conversion by period

Previous Use	2006 - 2013		2014	2014 - 2022		Total 2006 - 2022	
	New Homes	Annual Average	New Homes	Annual Average	New Homes	Annual Average	
Sub-Division	420	52.5	105	13.1	525	32.8	
Side Extension	110	13.8	40	5.0	150	9.4	
Upward Extension	4	0.5	25	3.1	29	1.8	
TOTAL	534	66.8	170	21.3	704	44.0	

4.24 Dwellings created on an annual basis via Side Extensions has remained relatively consistent since 2006; however, recent years have started to see new homes created through upward extensions. This is likely to be due to changes to the NPPF that encourage the use of airspace above buildings to create new homes.

Figure 14 - New homes delivered via Conversion by Year



4.25 As described earlier, the majority of Conversions have taken place in the Town Centre, Upperton, Seaside and Meads. This is emphasised in Figure 15.

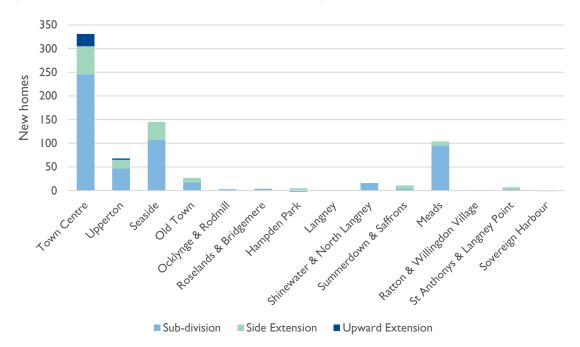


Figure 15 - New homes delivered via Conversion by neighbourhood

4.26 These neighbourhoods tend to have larger residential buildings of three storeys and more, particularly in areas of the Town Centre and Seaside close to the seafront area, which have been regularly converted. Meads also contains a number of large Victorian and Edwardian villas throughout the neighbourhood that have proved popular for Conversion and explains why most Conversions in Meads have been sub-division.

Conclusions on Conversions and Changes of Use

- 4.27 Over the 16-year period between 2006 and 2022, 1,610 new homes were delivered via Conversions and Changes of Use, at an average of 100.6 net additional dwellings per year.
- 4.28 On the basis of the average delivery from the past 16 years continuing over the next 15 years, it could be expected that a total of 849 new homes could be delivered through changes of use and 660 new homes could be delivered through conversions, at an average of 56.6 and 44.0 net additional dwellings per year respectively.

Table 8 - New homes via Conversion and Change of use (2006-2022) by type

Source	Annual Average	Total delivery 2006- 2022
Change of Use	56.6	906
From: Retail	6.2	99
From: Drinking Establishments	0.6	10
From: Offices	2.4	39
From: Light Industry	24.4	390
From: Storage and Distribution	1.8	28
From: Hotel	0.8	13
From: Residential Institutions	9.2	147
From: Non-Residential Institutions	3.8	60
From: Assembly & Leisure	5.3	85
From: Other	1.6	26
Conversions	44.0	704
Via: Sub-division	32.8	525
Via: Side Extensions	9.4	150
Via: Upward Extensions	1.8	29
TOTAL	100.6	1,610

- 4.29 It could be expected that around half of these new homes would be delivered within the Town Centre, with an additional 40% being located within the Upperton, Seaside and Meads neighbourhoods.
- 4.30 However, the time period over which past windfall trends have been assessed not only includes a significant period of economic depression, which is shown clearly in the analysis of past trends, but also significant changes to national policy and a national pandemic. The introduction of the NPPF in 2012 (updated in July 2018, February 2019 and July 2021) has allowed increased flexibility provided by policies that have encouraged windfall through a variety of sources. There has also been the introduction of a raft of changes to permitted development rights that take is a more lenient stance regarding change of use from commercial to residential that are intended to increase housing delivery.
- 4.31 Therefore, it is relevant to distinguish between the first half of the 16-year period (2006-2013) and the second half of the 16-year period (2014-2022).
- 4.32 The following section will give greater consideration to how past trends might be influenced in future, and the extent to which future projections should be based on past trends over the whole 16-year period, or just the eight-year period between 2014-2022.

Table 9 - New homes via Conversion and Change of use (2006-2022) by neighbourhood

Neighbourhood	Change of Use		Conversion		Total	
	Ann. Av ⁵	16 yr. ⁶	Ann. Av	16 yr.	Ann. Av	16 yr.
Town Centre	30.4	487	20.6	329	51.0	816
Upperton	9.3	149	4.1	65	13.4	214
Seaside	6.6	105	9.1	145	15.6	250
Old Town	1.2	19	1.6	26	2.8	45
Ocklynge & Rodmill	0.7	11	0.2	3	0.9	14
Roselands & Bridgemere	0.2	3	0.3	4	0.4	7
Hampden Park	1.6	26	0.3	5	1.9	31
Langney	0.1	1	0.0	0	0.1	1
Shinewater & North Langney	0.0	0	0.6	10	0.6	10
Summerdown & Saffrons	0.1	1	0.7	11	0.8	12
Meads	6.4	103	6.2	99	12.6	202
Ratton & Willingdon Village	0.1	1	0.0	0	0.1	1
St Anthony's & Langney Point	0.0	0	0.4	7	0.4	7
Sovereign Harbour	0.0	0	0.0	0	0.0	0
TOTAL	56.6	906	44.0	704	100.6	1.610

⁵ Ann. Av = Average delivery of new homes on an annual basis over the 16-year period (2006-2022)

⁶ 16 yr. = Total number of new homes delivery over the 16-year period (2006-2022)

5. IMPACTS OF CHANGES ON FUTURE TRENDS

- 5.1 In addition to projecting forwards existing trends, it is relevant to consider how changes to national policy, guidance and regulations may impact these trends in future, and if these trends can be sustained over a longer timeframe.
- 5.2 Some changes to national policy, guidance and regulations, such as the introduction of the NPPF and increased permitted development rights have already been taken into account in the trends identified in Table 8, but there have been recent changes will not have been reflected in completions data. These include:
 - Rights to convert buildings from the new E use class (Commercial, Business, and Service) to residential use.
 - Rights for upwards extensions of up to 2-storeys on residential and commercial buildings.
- 5.3 The Covid-19 pandemic could also have potential impacts relating to the continuation of past trends.
- 5.3 In addition, it will be important to take into account that new homes delivered through conversions and changes of use require existing buildings, and therefore new homes via these sources is an exhaustible supply, and that a high take-up rate following the introduction of a permitted development right may not sustain over the longer term.

Covid-19

- 5.4 The baseline trend period included at least one year of completions that is likely to be impacted by the immediate impacts of the Covid-19 pandemic.
- 5.5 On 23rd March 2020 Government announced that the UK was to go into lockdown in an attempt to control the spread of Covid-19 which had arrived in the country the previous month. No date was provided for when activities would return to normal.
- 5.6 At the time of the announcement, the Council were undergoing its annual monitoring of housing sites. This confirmed that the majority of construction sites in the Borough had closed in line with Government advice.
- 5.7 Lockdown was lifted for construction and manufacturing in mid-May 2020. It was anticipated that 2020/21 would see a lower number of completions due to the two-month lockdown, coupled with the shortage of some building materials and

products following lockdown⁷. However, this immediate impact was not seen as the 2020/21 year saw a greater number of completions than the previous year, which suggests that Covid has not had the immediate impact on housing delivery that was originally anticipated. However, delivery in 2021/22 was lower than previous years, which indicates a potential longer-term impact from Covid on housing delivery.

- There have been reports that the pandemic has influenced the types of residential property that is in demand, with a move away from flats to houses with gardens⁸. This is supported by higher percentage increases in the average house price for Detached (27.2%), Semi-detached (26.1%) and Terraced (26.8%) properties between March 2020 and June 2022, compared to flats (16.7%)⁹.
- As the majority of new homes delivered through conversions and changes of use will be in the form of flats, these recent trends may have the effect of reducing the number of changes of use and conversions coming forward. However, this may be a short-term trend that may not affect delivery over the plan period, and is assumed that it will not have a significant impact delivery over the next 15-year period

Class E to Residential

- 5.10 In August 2020, the new class E was introduced into the Use Classes Order, which amalgamated commercial, business and service use classes considered most suitable for town centres into a single use class. Class E consists of the former use classes of A1 (shops), A2 (financial and professional), A3 (restaurants and cafes), B1a (office), B1b (research and development) and B1c (light industry), as well as parts of D1 (non-residential institutions) and D2 (assembly and leisure). This means that there is no longer a requirement obtain planning permission to switch between these uses as a change of use within a single use class is not considered to be development.
- 5.11 New permitted development rights came into force in August 2021 that allows for changes of use from the new use Class E (Commercial, business and services) to Class C3 residential. This replaces the previous permitted development rights that referred to old use classes and allows a wider range of uses to change use to residential without obtaining planning permission.

⁷ Construction Leadership Council identified that supplies of plaster and aggregates may not return to normal until end of June 2020, with regional variations as some quarries are still closed (27 May 2020)

⁸ BBC News, How Covid has changed where we want to live, 19 March 2021

⁹ Land registry, UK House Price Index for Eastbourne

- 5.12 In order to qualify for the permitted development right, the building must have:
 - been vacant for a continuous period of at least 3 months immediately prior to the date of the application for prior approval;
 - fallen within a Class E use for a continuous period of at least 2 years prior to the date of the application for prior approval;
 - a cumulative floorspace of less than 1,500 square metres.
- 5.13 Local planning authorities must decide whether to give prior approval, and in doing so give consideration to matters such as:
 - Transport impacts including safe site access
 - Land contamination
 - Flooding risks
 - The impacts of noise from commercial premises on the intended occupiers of the development
 - Within a conservation area, the impact on the character or sustainability of that conservation area:
 - the provision of adequate natural light in all habitable rooms of the dwellinghouses
 - the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses
 - impact of the loss of health centres and registered nurseries on the provision of such local services
- 5.14 Development must be completed within a period of 3 years starting with the prior approval date.
- 5.15 The main reasons for these changes are identified as being to provide greater flexibility and enable businesses to respond rapidly to changing market demands, and to support housing delivery and bring more residential use into high streets and town centres, boosting footfall and creating additional demand¹⁰.
- 5.16 In addition, as of April 2021, all new homes provided through permitted development rights are required to meet the Nationally Described Space Standards.

¹⁰ MHCLG Consultation on Supporting housing delivery and public service infrastructure (Jan 2021)

Office to Residential

- 5.17 The majority of new homes created through permitted development rights since 2013 have been via a change of use from offices.
- 5.18 Data from the Valuation Office Agency (VOA)¹¹ indicates that Eastbourne has a stock of approximately 69,000sqm of office floorspace (as at 31st March 2022), which represents a reduction of around 18,000sqm since 2013/14. This is accommodated through a stock of around 510 rateable properties in the office sector.



Figure 16 - Change in Office Floorspace 2006 - 2022

Source: Valuation Office Agency, Non-domestic rating: stock of properties including business floorspace, 2022

- 5.19 This broadly matches planning application data on losses of office space via permitted development rights, which shows that 15,391 sqm of office space has been lost to residential use via prior approval. There is a further 8,565 sqm of office space that has prior approval for change of use from office to residential under permitted development, which has not yet been completed.
- 5.20 These completed and committed developments would result in a loss of 24,000 sqm, which represents 28% of the office stock that was present when permitted development rights were introduced in 2013.
- 5.21 Losses have mainly concentrated on old and often poor-quality office space that does not meet the needs of modern occupiers. It also reflects a shift from large, single office occupiers to smaller enterprises and shared space, which has meant that the majority of the large office blocks in Eastbourne, particularly around St

¹¹ Valuation Office Agency, Non-domestic rating: stock of properties including business floorspace, 2022

- Leonards Road and Upperton on the edge of the town centre, have either changed use to residential or have an outstanding prior approval yet to be implemented.
- 5.22 There are now relatively few large, older and under-occupied office blocks remaining (without an existing prior approval) that would be attractive for change of use, meaning that any future losses are more likely to be via smaller office premises.
- 5.23 However, the Eastbourne and Wealden Employment and Economic Study (2022) indicates that there is some demand for office floorspace in Eastbourne, particularly focused on high quality (Grade A) and small space. It identifies an expectation for on-going interest for smaller quality office space, which could suggest that such offices are less likely to be subject to change of use to residential.
- 5.24 The number of Prior Approvals granted has been falling in recent years, which further indicates an exhaustion of convertible supply. The Eastbourne and Wealden Employment and Economic Study (2022) suggests a stabilisation of losses in recent years indicates the stock that would be most readily converted to residential has already been completed. It also indicates that the latest office vacancy rate in Eastbourne is 1.7% and has declined since 2015, suggesting that there is little unoccupied space left that would be attractive for change of use.
- 5.25 The stock of office space that could change use to residential is not inexhaustible, and it is unrealistic to expect past trends of housing delivery through change of use from office to residential via permitted development to continue into the future, although changes in work patterns including increased working from home as a result of the Covd-19 pandemic are likely to result in some future losses.
- 5.26 Based on an average of 57 sqm of office floorspace lost per new dwelling created, the current trend since 2014 of 42 new homes per year created from office to residential change of use would require 2,400 sqm per year of office space to be lost each year. This equates to a loss of over half of the current office stock to 2039.
- 5.27 Taking into account the fact that the readily available and easily convertible office stock has already been lost, it is considered that halving the current rate of new homes created from office to residential change of use to an average of 21 homes per year would be appropriate. This would more closely aligned with the average yield per year from this source across the whole period from 2006 to 2022 and would result in 294 new homes being created over the 14-year windfall period and the loss of approximately 16,800 sqm additional office floorspace.
- 5.28 Since 2006, 71% of office space lost to residential was located in the Town Centre, and 23% was in the Upperton neighbourhood. These two neighbourhoods are the main focus for the remaining office space, so it is

considered likely that future retail to residential changes of use will take place here.

Retail to Residential

- 5.29 Since the introduction of the permitted development right for change of retail (former class A1 and A2 uses) to residential in 2014, there have been 26 new homes delivered in 18 locations through this method, resulting in the loss of 21 retail units and approximately 1,500 sqm of retail floorspace.
- 5.30 In addition, there are currently seven sites with an outstanding prior approval for change of use from retail to residential, which will deliver 10 new homes and result in the loss of seven retail units and approximately 500 sqm of retail floorspace.
- 5.31 At the same time, there have been 53 additional new homes created through change of use from retail through the planning system (i.e., not via permitted development) since 2014. This resulted in the loss of 46 retail units and approximately 4,600 sqm of retail floorspace.
- 5.32 The fact that only one third of the new homes created from retail to residential change of use came from permitted development suggests that permitted development rights have not had such a significant impact on encouraging retail to residential changes of use as they did, for example, with office to residential changes of use.
- 5.33 There have been some key changes in the recent permitted development rights compared to previously for retail to residential changes of use. The previous restriction on size of retail premises of 150 sqm has been increased to 1,500 sqm, and the impact of the loss of retail on a key shopping area can no longer be considered as a prior approval matter.
- 5.34 Since 2014, two prior approvals for change of use from retail to residential have been refused on the basis of the impact of the loss of retail on a key shopping area; one of which was allowed on appeal, and the other upheld on appeal.
- 5.35 Data from VOA suggests that there are 1,100 rateable properties in the retail sector in Eastbourne accommodating 280,000 sqm of retail floorspace. Whilst there has been little overall change for this over the last 15 years, there was a significant increase through 2013 to 2017, with a reduction after that time.
- 5.36 The increases in retail floorspace are likely to be as a result of the opening of new supermarkets in 2012/13 and 2015/16, and the extension to the Beacon Shopping Centre in 2017.

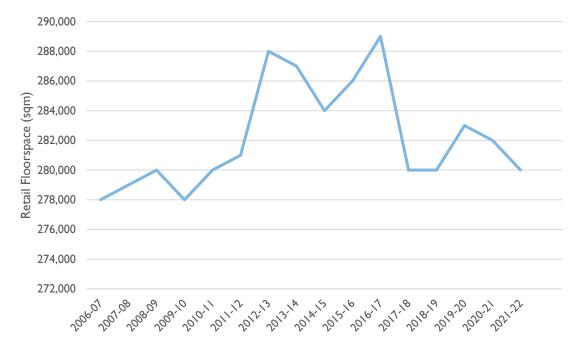


Figure 17 – Change in Retail Floorspace 2006 - 2022

Source: Valuation Office Agency, Non-domestic rating: stock of properties including business floorspace, 2022

- 5.37 Based on VOA data, it is estimated that just over half of the Borough's retail floorspace is located in the town centre. The remainder is located outside of the town centre, generally within large retail units in out-of-centre locations and smaller retail premises serving residential areas.
- 5.38 Outside of the town centre, there are 17 designated shopping centres in the Core Strategy, including seven district centres, three local centres, and seven neighbourhood centres.
- 5.39 Vacancy rates are lower than average in Eastbourne, despite the impacts of the Covid-19 pandemic. Within the town centre, there are 649 retail units, of which 66 were vacant as at June 2022. This vacancy rate of 10.1% is lower than the average for the South East. Within the other designated shopping centres, vacancy rate was 8% according to a survey undertaken in August 2021.
- 5.40 Based on analysis of VOA and business rates data, it is estimated that around 160,000 sqm are in managed shopping centres or are units that would exceed the 1,500 sqm threshold. Therefore, there is a maximum of around 120,000 sqm of retail space that could, in theory, be subject change use from retail to residential under PD rights.
- 5.41 It is highly unlikely that the full amount of retail space would be lost to residential, as retail is still a necessary amenity and the shopping experience is still a key part of the draw of town centres. Also, this would be undesirable as the loss of local retail centres outside of the town centre is contrary to the ambition to create sustainable neighbourhoods and reduce the need to travel, and it is likely that action would be taken to support the retail centres if this were the case.

- 5.42 It is suggested that the PD rights for class E will have some impact on the trend for change of use from retail to residential, however the number of outstanding prior approval for change of use from retail to residential is relatively small so the impact is not likely to be significant. Therefore, it is considered appropriate that the current rate of new homes created from retail to residential changes of use over the last eight years (through both permitted development and via the planning system) of nine homes per year could be increased by 50% to 14 homes per year going forward.
- 5.43 An allowance of 14 new homes created from retail to residential change of use would create 196 homes over the period to 2039. On the basis of 84 sqm of retail floorspace lost per new dwelling since 2014, this would result in the future loss of around 16,500 sqm of retail floorspace.
- 5.44 Past data indicates that just over half of new homes created via retail to residential change of use were in the Town Centre, and 30% were in Seaside neighbourhood, which reflects the key locations where retail is located. As such, it is considered that future allowance should reflect this trend, with a small allowance for neighbourhoods with a higher-than-average number of retail units such as Old Town and Hampden Park.

Light Industrial to Residential

- 5.45 There has been no loss of light industrial to residential through permitted development since the permitted development right was introduced in 2017.
- 5.46 The majority of light industrial use is located within the town's designated industrial areas, and it is likely that the implementation of permitted development rights to create new homes within industrial estates will be resisted through the prior approval process.
- 5.47 It is considered unlikely that the changes to permitted development rights through Class E would have a significant impact on homes delivered via change of use from light industrial, and therefore a continuation of the current trend of an average of 2 new homes per year would be appropriate.

Storage and Distribution to Residential

5.48 As part of the recent changes to permitted development rights, a temporary PDR for change of use from storage or distribution use (class B8) to residential has been extended and made permanent. Therefore, it is not expected that there will be a significant increase in changes of use from storage and distribution uses to residential from the current trend.

Upward Extensions

- 5.49 In August 2020, a number of new permitted development rights came into force allowing the construction of upward extensions on existing buildings to create new homes.
- 5.50 The first right enables upward extensions of up to two storeys on existing purpose-built, detached blocks of flats to create new flats on the topmost residential storey of a building, without the need for planning permission.
- 5.51 A second set of five further rights allows two additional storeys to be constructed to extend existing homes and the construction of two additional storeys on detached, semi-detached and terraced homes and commercial and mixed-use properties, to create new self-contained flats. The new permitted development rights do not apply in Conservation Areas.
- 5.52 These permitted development rights require prior approval from the local planning authority, who can give consideration to matters such as¹²:
 - Transport impacts including safe site access
 - Flooding risks
 - The external appearance of the building
 - The provision of adequate natural light in all habitable rooms of the new homes
 - Impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light.
- 5.53 In December 2020, an amendment to the GPDO introduced an additional matter for prior approval from the local planning authority for upward extensions. This change required, for buildings of 18 metres or more in height, the submission of a report to be provided from a chartered engineer or other competent professional confirming that the external wall construction of the existing building complies with building regulations, and to confirm that the external walls of the building will adequately resist the spread of fire over the walls and from one building to another.
- 5.54 Schemes for upward extensions have historically taken place through the planning system. They have been encouraged by the NPPF, which since the revision in 2018 has supported upward extensions as a way of making more effective use of land ¹³.

¹² As per Schedule 2, Part 20, Class A of the Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) (Coronavirus) Regulations 2020

¹³ NPPF (2021), para 120

- 5.55 In Eastbourne, there have been 10 implemented permissions for upward extensions since 2006, resulting in the creation 29 additional dwellings. There are also six committed sites involving upward extensions, all of which came through the planning system, and will contribute 42 new homes.
- 5.56 Since the introduction of the PD right in 2020, there has been two applications for prior approval for upward extensions on existing purpose-built detached blocks of flats, that would contribute 10 dwellings.
- 5.57 However, both of these were refused prior approval, one on the basis of adverse transport impacts, impact of the external appearance of the building relating to the surrounding Conservation Area, and impact on the amenity of neighbouring premises; and the other on the impact of the external appearance on the character of the area. One of these sites already had an extant planning permission for a single storey upward extension whilst the prior approval proposal was for a two-storey upward extension.
- 5.58 There have been no prior approval applications for the creation of new dwellings via the construction of additional storeys on detached, semi-detached and terraced homes or commercial and mixed-use properties since the PD rights were introduced in August 2020.
- 5.59 Research suggests that there have not been high levels of interest by developers and landlords in these PD rights nationally¹⁴ and that the uptake of the right may be limited due to the complexity of the prior approval process and the limited number of properties that are eligible for such development¹⁵. This is consistent with the evidence of take-up in Eastbourne since the introduction of the PD right.
- 5.60 Whilst the introduction of the permitted development right may make the application process marginally simpler and cheaper, there are still many issues which affect the viability and achievability of upward extensions.
- 5.61 The prior approval process for upward extensions does not remove the existing obstructions that limits this form of development coming forward. There are many complicated issues with the development of additional storeys to existing buildings, including but not limited to:
 - Legal complexities involving freehold/leasehold ownership and 'Right to Light' claims;
 - Building regulations compliance and its impact on viability, including the strengthened regulatory regime for high-rise buildings over 18m;

¹⁴ Planning Resource – High refusal rate and modest interest in new upward extension PD rights, Planning research suggests (November 2020)

¹⁵ Planning Resource – Why the new upwards extension permitted development right for blocks of flats may have limited uptake (July 2020)

- Unknown suitability of the existing structure and the cost implications of assessing the existing structure;
- Unknown suitability of the existing services, and the impact on viability if services would need upgrading;
- The appropriateness of internal infrastructure, such as whether existing lift/stairwells can be extended to accommodate additional floors;
- Whether it is physically possible to construct the additional floors and the disruption that it would cause, such as would existing occupiers need to be relocated for the works to take place;
- The provision of existing amenity space, bicycle, bin storage and car parking provisions and whether these are sufficient for additional occupiers.
- 5.62 Past data indicates that the majority of upward extensions have taken place in the Town Centre, and a small amount in Upperton. Of the 10 implemented upward extensions since 2006, eight were in the town centre, two in Upperton. Four of the implemented consents within the Town Centre were within the Conservation Area.
- 5.63 The majority of the Town Centre is within a Conservation Areas where the permitted development right does not apply. Similarly, the Meads neighbourhood where there are also a number of apartment blocks, is also predominantly in Conservation Areas. Upperton does contain blocks of flats that may meet the qualifying criteria, so this neighbourhood, along with Old Town, Langney and Sovereign Harbour, are more likely to be the locations where upward extensions may take place under permitted development.
- 5.64 Therefore it can be expected that upward extensions will continue to make some contribution to the delivery of new homes, however it is unlikely that the PD right can be expected to result in a significant increase in additional units from upward extensions.
- 5.65 It is considered appropriate to base an allowance for new homes created from upward extensions on the past trends and to include an uplift to take into account the introduction of the PD rights. It is considered reasonable that the current rate over the last eight years (through both permitted development and via the planning system) of 3 homes per year could be doubled going forward.
- 5.66 An allowance of 6 new homes created from upward extensions would create 84 homes between 2025 and 2039. With an average of three additional dwellings created per upward extension, this would mean that 28 buildings would be extended upwards over the period.
- 5.67 Given that the PD rights for upward extensions are new, applications for upward extensions will be closely monitored and the windfall assessment will be reviewed

at regular intervals to take into account evidence on the rate at which applications or prior approvals for upward extensions are coming forward.

Conclusions on Impacts of Policy Changes

- 5.68 Changes in national policy, guidance and regulations are expected to have an impact on the continuation of past trends.
- 5.69 It is not thought that Covid-19 had a significant direct impact on housing delivery, however there may be some short-term indirect impacts relating to the market for flats, which is most likely to be the type of homes that conversions and changes of use deliver. These impacts will be monitored.
- 5.70 The amalgamation of a number of uses into a single Class E use, and a permitted development right to change use from class E to residential, is expected to have some impact on housing delivery. It is considered that this is most likely to have the effect of increase housing delivery via change of use from retail, and the baseline trend will be amended going forward to take this into account.
- 5.71 Although office use is now also part of Class E, there has been a permitted development right for change of use from office to residential for some time now, and this means that the majority of the available and 'convertible' stock has been exhausted. The trend for working from home as a result of Covid-19 may have the effect of making some existing office stock redundant, but overall it is considered that past trends of office to residential change of use are unlikely to sustain. Therefore, the baseline trend will be adjusted going forward to reflect this.
- 5.72 There have also been new permitted development rights to encourage the upward extension of buildings to create new homes. This was taking place prior to the introduction of the permitted development right, but this change is expected to result in an increase in housing delivery by this method. However, restrictions on the use of this permitted development right and additional complexities for buildings of 18 metres or more, means that any increase in new homes via upward extensions is likely to be relatively modest, as evidenced by the current rates of take-up.

6. CONCLUSIONS

- 6.1 The NPPF is clear that a windfall allowance can be included in the anticipated housing supply where there is compelling evidence that such sites have and will continue to form a reliable source of supply.
- 6.2 The Eastbourne Land Availability Assessment has not applied a threshold to the identification of sites, which are considered most likely to be those that would involve New Build and Redevelopment. Therefore, the windfall allowance will be based upon anticipated supply from Conversions and Changes of Use going forward, which cannot be identified in advance.
- 6.3 Since 2006, 47% of new homes have been created via Conversions and Changes of Use. There has also been the introduction and extension of permitted development rights that is likely to mean that the delivery of new homes through these methods will continue. However, there are also other factors that mean that past rates of delivery could change.
- 6.4 Overall, it is considered that there is clear and compelling evidence that conversions and changes of use have been a reliable source of supply in the past and will continue to do so in the future.

Windfall Allowance 2025-2039

6.5 It is anticipated that windfall will contribute a total of 1,260 net additional homes over the period 2025 to 2039, at an average of 90 new homes per year. The allowance by source is shown in Table 10. A windfall allowance will not be included within the next three years to avoid double counting within extant permissions.

Conclusions Page | 37

Table 10 - Windfall Allowance 2025-2039 by source

Source	Annual Average	Anticipated Delivery 2025-2039	
Change of Use	62	868	
From: Retail	14	196	
From: Drinking Establishments	2	28	
From: Offices	21	294	
From: Light Industry	2	28	
From: Storage and Distribution	2	28	
From: Hotel	9	126	
From: Residential Institutions	4	56	
From: Non-Residential Institutions	5	70	
From: Assembly & Leisure	2	28	
From: Other	1	14	
Conversions	28	392	
Via: Sub-division	13	182	
Via: Side Extensions	9	126	
Via: Upward Extensions	6	84	
TOTAL	90	1,260	

Changes of Use

- An allowance has been made for 868 new homes via change of use between 2025 and 2039, at an average of 62 new homes per year. The future predictions for change of use from former uses is made below:
- 6.6.1 **From: Retail** it is considered appropriate to increase the average annual delivery between 2014-2022 by 50% from 9 homes per year to 14 homes per year to take into account removal of previous restrictions on size and prior approval matter relating to impact on local retail centres. The majority of new units created through retail to residential change of use are likely to be in the Town Centre and Seaside neighbourhoods, reflecting the main locations where qualifying retail units are currently found. An allowance is also made for a small number of retail to residential in Old Town and Hampden Park.
- 6.6.2 **From: Drinking Establishments** this use is not subject to permitted development rights, so it is assumed that the average rate of change of use between 2006 and 2022 of 2 net additional homes per year will continue. The allowance is allocated mainly to the Town Centre, and also Seaside, as the predominant locations for such uses, and reflecting past trends.

38 | Page Conclusions

- 6.6.3 From: Offices it is considered appropriate to apply a 50% reduction in the overall trend between 2014 and 2022 for office to residential change of use to represent a balance between the exhaustion of the readily available office stock and a potential increase in under-used office space as a result of increased working from home. This represents an average of 21 new homes per year via change of use from office going forward. The majority of the remaining office stock is located within the Town Centre, with some remaining in Upperton, so these are likely to be the main locations for future losses.
- 6.6.4 **From: Light Industry** Although light industry is part of the Class E permitted development right to change use to residential, the majority of light industrial space in Eastbourne is located within the designated industrial estates. The prior approval process allows consideration to be given to the introduction of residential use within industrial estates, and prior approval is therefore likely to be refused on this basis. Where it is located outside of designated industrial estates, the nature of the use means that the buildings are more likely to be redeveloped rather than change use within the existing building, and these are therefore likely to be captured through the LAA. The current trend of light industry to residential change of use between 2006 and 2022 of 2 new homes per year has been projected forward on the basis of the locations where such developments have taken place previously the Town Centre and Seaside.
- 6.6.5 *From:* Storage and Distribution The permitted development right that allowed storage/distribution to residential change of use has been withdrawn, so it is assumed that the overall average rate of change of use between 2006 and 2022 of 2 net additional dwellings per year will continue. This continues to be focused on the Town Centre and Seaside.
- 6.6.6 From: Tourist Accommodation – current local plan policy requires that the proposed loss of tourist accommodation within the tourist accommodation area along the seafront, being the primary location where visitors would expect to find tourist accommodation, demonstrates that it is no longer viable before a change of use to residential can be justified. Eastbourne's economy is heavily reliant on tourism, and this policy aims to support the town as a tourist destination. Therefore, these restrictions on changes of use are likely to continue to some extent in the new local plan. However, there are instances of tourist accommodation being able to successfully prove that the use is unviable, particularly in the secondary areas of the tourist accommodation area further inland, and it is expected that this will continue in future. Therefore, the current rate of tourist accommodation to residential change of use between 2006 and 2022 is projected forward as a future allowance. The majority of the tourist accommodation is in the tourist accommodation area, which stretches across the seafront part of the Town Centre, Seaside and Meads neighbourhoods, so future new homes from tourist accommodation change of use are expected to be delivered in these areas.

Conclusions Page | 39

- 6.6.7 **From: Residential Institutions** this use is not subject to permitted development rights, so it is assumed that the average rate of change of use between 2006 and 2022 will continue. The allowance is allocated between the Town Centre, Upperton, Ocklynge & Rodmill and Meads as the predominant locations for such uses and reflecting past trends.
- 6.6.8 From: Non-Residential Institutions parts of the former D1 use class have been absorbed into the new Class E, including nurseries, and medical and health services. It is considered unlikely that there will be a significant increase in delivery of new homes from these uses, and therefore the current trend of five net additional dwellings per year between 2006 and 2022 will be projected forward. New dwellings created from changes of use of non-residential institution uses to residential are most likely to take place in the Town Centre, Upperton and Meads neighbourhoods.
- 6.6.9 From: Assembly & Leisure parts of the former D2 use class have been absorbed into the new Class E, including gymnasiums and indoor sport and recreation centres. It is considered unlikely that there will be a significant increase in delivery of new homes from these uses, and therefore the current trend of two net additional dwellings per year between 2006 and 2022 will be projected forward. New dwellings created from changes of use of assembly & leisure uses to residential are most likely to take place in the Town Centre.
- 6.6.10 *From: Other* the current trend over the period from 2006 to 2022 of one new home per year from changes of use of 'other' uses to residential will be projected forward.

Conversions

- 6.7 An allowance has been made for 392 new homes via conversion between 2025 and 2039, at an average of 28 new homes per year. The future predictions for conversion by type is made below:
- 6.7.1 Via: Sub-division There has been a clear drop in the number of new homes being created through sub-division since 2013. Whilst the reasons for this is unknown, it is considered that it could be due to the introduction of permitted development rights making conversion to a small HMO a more attractive option (which does not come to the attention of the planning system), the introduction of minimum space standards reducing the yield from individual 'conversion' developments; and a reduction in the stock of buildings appropriate for conversion. It is therefore considered appropriate that the future allowance is based on the trends over the 2014-2022 period, which was an average of 13 net additional homes per year through sub-division. Following past trends, these are most likely to come forward in the Town Centre, Seaside and Meads.

40 | Page Conclusions

- 6.7.2 **Via: Side Extensions** There has been gradual reduction in the number of new homes created via side extensions over the period 2006-2022. However, the number of new homes delivered via this means has been low across the whole period from 2006, and therefore it is considered appropriate to project the average delivery between 2006 and 2022 forward. This means an average of 9 new dwellings per year via side extensions going forward, with these mainly expected to take place in the Town Centre and Seaside.
- 6.7.3 Via: Upward Extensions Upward extensions have only started to take place since 2013 and were being delivered prior to the introduction of permitted development rights in 2020. It can be expected that permitted development rights will have some impact on housing delivery via upward extensions, but the restrictions around this permitted development right means that it is not expected to make a significant impact, particularly as each upward extension is only likely to have small yield. On the basis of the introduction of the permitted development right, it is considered appropriate that the rate of delivery via upward extensions between 2014 and 2022 is doubled from three homes per year to six homes per year. The restrictions of this permitted development right in Conservations Area means that the Town Centre and Meads are less likely to be locations for the delivery of new homes by this means, but Upperton, Old Town, Langney and Sovereign Harbour could be potential locations.

By Location

- 6.8 The anticipated distribution of the windfall allowance by neighbourhood is identified in Table 11.
- 6.9 This suggests that the highest windfall delivery will be in the Town Centre, which is anticipated to take 616 new homes through change of use and conversion, which represents 49% of the total allowance. This is consistent with the aims behind the changes to permitted development rights, particularly the introduction of a right to change use from class E to residential to support housing delivery and bring more residential use into high streets and town centres, boosting footfall and creating additional demand.
- 6.10 Upperton, Seaside and Meads the neighbourhoods immediately surrounding the Town Centre are expected to deliver the majority of the remaining allowance. The other neighbourhoods are not expected to see any significant housing delivery via conversions or changes of use.

Conclusions Page | 41

Table 11 - Windfall Allowance 2025-2039 by location

Neighbourhood	Change	of Use	Conve	ersion	То	tal
	Ann. Av	2025- 2039	Ann. Av	2025- 2039	Ann. Av	2025- 2039
Town Centre	36	504	9	126	45	630
Upperton	7	98	4	56	11	154
Seaside	13	182	5	70	18	252
Old Town	1	14	4	56	5	70
Ocklynge & Rodmill	1	14	0	0	1	14
Roselands & Bridgemere	0	0	0	0	0	0
Hampden Park	1	14	0	0	1	14
Langney	0	0	1	14	1	14
Shinewater & North Langney	0	0	0	0	0	0
Summerdown & Saffrons	0	0	0	0	0	0
Meads	3	42	4	56	7	98
Ratton & Willingdon Village	0	0	0	0	0	0
St Anthony's & Langney Point	0	0	0	0	0	0
Sovereign Harbour	0	0	1	14	1	14
TOTAL	62	868	28	392	90	1,260

42 | P a g e Conclusions

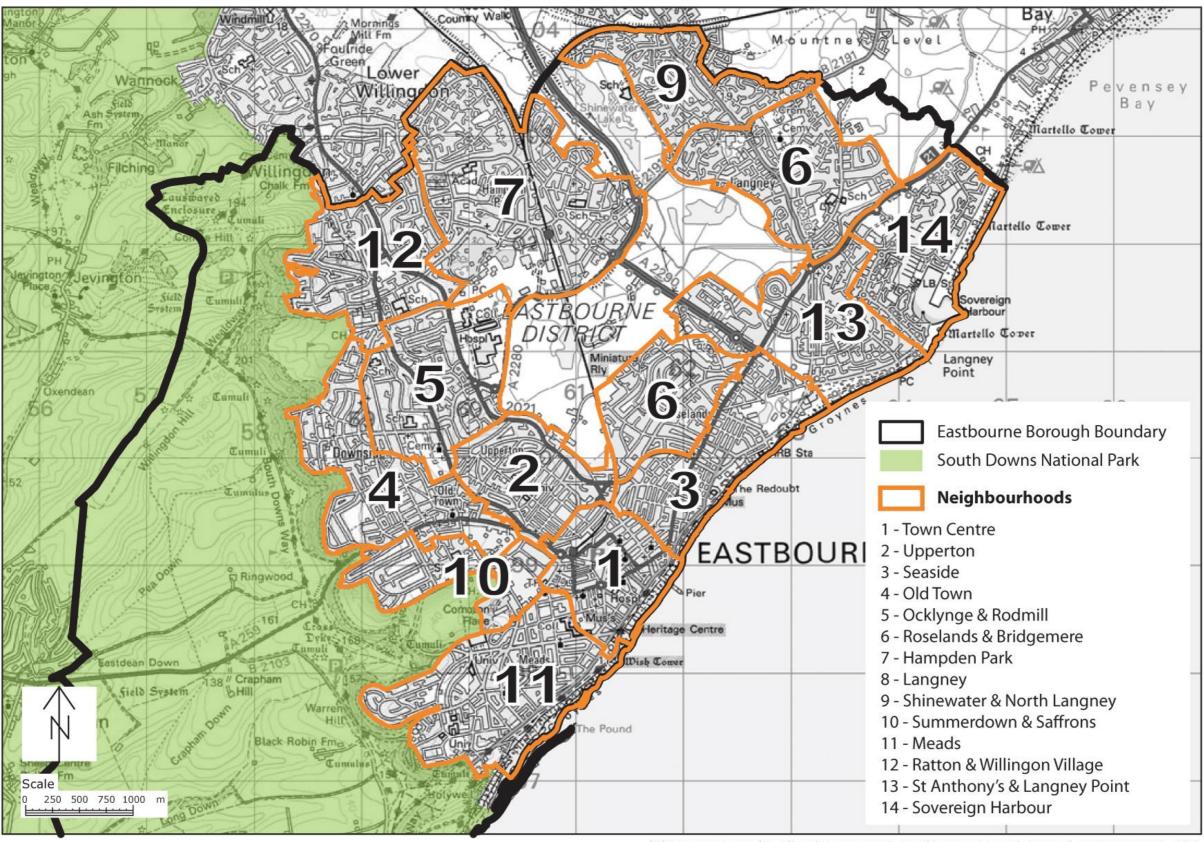
APPENDICES

Appendix I – Map of Neighbourhoods

Appendix 2 – Completions Data

44 | P a g e Appendices

Appendix I – Map of Neighbourhoods



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Appendix 2 – Completions Data

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2006/07	EB/2002/0663	50 Ashford Road	Town Centre	Conversion	2	1
2006/07	EB/2002/0663	50 Ashford Road	Town Centre	Conversion	2	2
2006/07	EB/2003/0254	Llewellyn's Yard South Street	Town Centre	Change of use	4	4
2006/07	EB/2003/0303	27 Jevington Gardens	Meads	Conversion	8	8
2006/07	EB/2003/0370	49 Pevensey Road	Town Centre	Change of use	2	2
2006/07	EB/2003/0438	27 Ceylon Place	Town Centre	Change of use	1	1
2006/07	EB/2003/0476	Pumping Station Bedfordwell	Upperton	Change of use	12	12
2006/07	EB/2004/0396	3 Prideaux Road	Upperton	Conversion	6	5
2006/07	EB/2004/0467	49A Grove Road	Town Centre	Change of use	1	1
2006/07	EB/2004/0502	19-21 Pevensey Road	Town Centre	Conversion	8	7
2006/07	EB/2004/0526	11 North Street	Town Centre	Change of use	1	1
2006/07	EB/2004/0754	41 Cavendish Place	Town Centre	Conversion	4	3
2006/07	EB/2004/0883	83 Seaside Road	Town Centre	Conversion	2	1
2006/07	EB/2004/0928	20/22 Bourne Street	Town Centre	Change of use	6	6
2006/07	EB/2005/0081	16 Rowsley Road	Meads	Change of use	1	1
2006/07	EB/2005/0255	96 Willingdon Road	Ocklynge & Rodmill	Conversion	2	2
2006/07	EB/2005/0396	75 Seaside	Seaside	Conversion	2	2
2006/07	EB/2005/0621	26 Vian Avenue	St Anthony's & Langney Point	Conversion	1	1
2006/07	EB/2005/0625	110 Pevensey Road	Seaside	Conversion	4	4
2006/07	EB/2005/0710	51-53 Cavendish Place	Town Centre	Change of use	9	9
2006/07	EB/2005/0808	54 Willingdon Road	Ocklynge & Rodmill	Change of use	1	1
2006/07	EB/2005/0809	34a Milnthorpe Road	Meads	Conversion	2	2
2006/07	EB/2005/0838	32 Carlton Road	Seaside	Conversion	2	2
2006/07	EB/2006/0024	12 Enys Road	Upperton	Conversion	3	2
2006/07	EB/2006/0060	1 Grand Parade	Town Centre	Change of use	1	1
2006/07	EB/2006/0066	2 Marine Parade	Town Centre	Conversion	4	3
2006/07	EB/2006/0120	Flats A & B 106 Langney Road	Seaside	Conversion	1	0
2006/07	EB/2006/0257	19-21 Burlington Place	Town Centre	Conversion	1	1
2006/07	EB/2006/0410	70 Royal Parade	Seaside	Conversion	1	1
2006/07	EB/2006/0446	24 Jevington Gardens	Meads	Conversion	1	1
2006/07	EB/2006/0545	94 Royal Parade	Seaside	Conversion	1	1
2006/07	EB/2007/0033	3 Hampden Terrace	Seaside	Conversion	1	1
2006/07	EB/2012/0609	The Parkfield Public House, Lindfield Road	Hampden Park	Change of use	12	12
2007/08	EB/2002/0285	61A Pevensey Road	Town Centre	Conversion	4	3
2007/08	EB/2002/0692	17/19 Compton Street	Town Centre	Change of use	6	6
2007/08	EB/2003/0231	34 Grange Road	Meads	Conversion	3	1
2007/08	EB/2004/0109	293 Seaside	Seaside	Conversion	4	4
2007/08	EB/2004/0294	121 Tideswell Road	Town Centre	Conversion	3	2

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2007/08	EB/2004/0695	7 Burlington Place	Town Centre	Conversion	10	9
2007/08	EB/2005/0251	5 Arlington Road	Summerdown & Saffrons	Change of use	1	1
2007/08	EB/2005/0377	17 Carlisle Road	Town Centre	Conversion	2	2
2007/08	EB/2005/0413	408 Seaside	Seaside	Change of use	0	-1
2007/08	EB/2005/0462	12 St. Johns Road	Meads	Conversion	1	1
2007/08	EB/2005/0521	6 De Roos Road	Upperton	Conversion	1	1
2007/08	EB/2005/0596	25-29 Cornfield Road	Town Centre	Conversion	6	6
2007/08	EB/2005/0628	29 Penhale Road	Seaside	Conversion	2	2
2007/08	EB/2005/0667	14 Moat Croft Road	Old Town	Conversion	7	7
2007/08	EB/2005/0791	9 Beachy Head Road	Meads	Conversion	2	2
2007/08	EB/2005/0805	9 The Goffs	Old Town	Change of use	1	1
2007/08	EB/2005/0839	3 Halton Road	Seaside	Conversion	5	5
2007/08	EB/2005/0853	31 Cavendish Place	Town Centre	Conversion	2	1
2007/08	EB/2006/0024	12 Enys Road	Upperton	Conversion	3	3
2007/08	EB/2006/0116	16 Cambridge Road	Seaside	Conversion	4	3
2007/08	EB/2006/0138	9 Darley Road	Meads	Change of use	1	1
2007/08	EB/2006/0140	12-14 Upper Avenue	Upperton	Conversion	1	1
2007/08	EB/2006/0291	Lennox Lodge 59 Carlisle Road	Meads	Conversion	5	5
2007/08	EB/2006/0299	Beechwood, Hartfield Road	Upperton	Change of use	1	0
2007/08	EB/2006/0316	28 Jevington Gardens	Meads	Change of use	8	8
2007/08	EB/2006/0333	30-32 Jevington Gardens	Meads	Change of use	10	10
2007/08	EB/2006/0424	55-61 Seaside Road	Town Centre	Conversion	6	6
2007/08	EB/2006/0479	75 Royal Parade	Seaside	Conversion	3	2
2007/08	EB/2006/0495	10 St Aubyns Road	Seaside	Conversion	4	3
2007/08	EB/2006/0531	69 Langney Road	Seaside	Conversion	3	2
2007/08	EB/2006/0735	Manor Garden Cottage	Old Town	Conversion	4	3
2007/08	EB/2006/0843	45 Cavendish Place	Town Centre	Change of use	4	3
2007/08	EB/2006/0857	Granville Crest	Meads	Conversion	6	6
2007/08	EB/2006/0925	15 Lushington Road	Town Centre	Conversion	1	1
2007/08	EB/2006/0939	34 Redoubt Road	Seaside	Change of use	1	1
2007/08	eb/2007/0168	14 Hurst Road	Upperton	Change of use	5	5
2007/08	eb/2007/0327	41 Vicarage Road	Old Town	Conversion	2	1
2007/08	eb/2007/0358	110 Longstone Road	Town Centre	Conversion	2	1
2007/08	eb/2007/0412	11 Carlisle Road	Town Centre	Change of use	1	1
2007/08	eb/2007/0456	9 College Road	Town Centre	Conversion	5	5
2007/08	eb/2007/0468	14 Hurst Road	Upperton	Change of use	5	5
2007/08	eb/2007/0531	25 Bourne Street	Town Centre	Conversion	1	1
2008/09	EB/2004/0427	22 Meads Street	Meads	Conversion	5	4
2008/09	EB/2004/0855	176-180 Terminus Road	Town Centre	Change of use	3	3
2008/09	EB/2005/0103	1 Compton Street	Town Centre	Conversion	1	1

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2008/09	EB/2005/0280	12 Malvern Close	Hampden Park	Conversion	2	1
2008/09	EB/2005/0354	7 Upperton Gardens	Upperton	Conversion	4	4
2008/09	EB/2005/0470	9 Hampden Terrace Latimer Road	Seaside	Change of use	3	3
2008/09	EB/2005/0759	84 Green Street	Old Town	Conversion	2	2
2008/09	EB/2005/0795	42 Compton Drive	Summerdown & Saffrons	Conversion	1	1
2008/09	EB/2005/0827	Bernesmede, Paradise Drive	Meads	Conversion	13	13
2008/09	EB/2006/0097	64 Meads Street	Meads	Conversion	9	9
2008/09	EB/2006/0117	23 Lushington Road	Town Centre	Change of use	0	-2
2008/09	EB/2006/0275	5 Grange Gardens	Meads	Conversion	8	8
2008/09	EB/2006/0397	22 Derwent Road	Meads	Conversion	3	2
2008/09	EB/2006/0418	All Saints Hospital	Meads	Change of use	52	52
2008/09	EB/2006/0470	518 Seaside	St Anthony's & Langney Point	Conversion	3	3
2008/09	EB/2006/0548	7 The Avenue	Town Centre	Change of use	0	-1
2008/09	EB/2006/0562	36 Carlton Road	Seaside	Conversion	2	2
2008/09	EB/2006/0599	99b Cavendish Place	Town Centre	Change of use	1	1
2008/09	EB/2006/0692	12 Lushington Road	Town Centre	Conversion	3	3
2008/09	EB/2006/0696	26 Bourne Street	Town Centre	Conversion	6	6
2008/09	EB/2006/0702	2/2a Old Orchard Road	Town Centre	Conversion	14	14
2008/09	EB/2006/0833	60 The Goffs	Old Town	Conversion	7	3
2008/09	EB/2006/0848	29 Latimer Road	Seaside	Change of use	9	9
2008/09	EB/2006/0912	1 Trinity Trees	Town Centre	Change of use	0	-1
2008/09	EB/2007/0014	106 Cavendish Place	Town Centre	Conversion	2	2
2008/09	EB/2007/0019	7 Silverdale Road	Meads	Conversion	4	4
2008/09	EB/2007/0134	39 Upperton Gardens	Upperton	Conversion	7	7
2008/09	EB/2007/0210	22 Church Street	Old Town	Change of use	1	1
2008/09	eb/2007/0245	10 Bourne Street	Town Centre	Conversion	2	2
2008/09	eb/2007/0279	33 Firle Road	Seaside	Conversion	1	1
2008/09	eb/2007/0347	35 Cavendish Place	Town Centre	Conversion	3	3
2008/09	eb/2007/0358	110 Longstone Road	Town Centre	Conversion	2	2
2008/09	EB/2007/0380	ROYAL ALFRED SEAFARERS	Town Centre	Change of use	14	14
2008/09	eb/2007/0394	19 Mill Road	Upperton	Conversion	5	4
2008/09	eb/2007/0425	3 Compton Place Road	Summerdown & Saffrons	Conversion	5	3
2008/09	EB/2007/0652	1D Susans Road	Town Centre	Conversion	1	1
2008/09	eb/2007/0662	14 Pevensey Road	Town Centre	Conversion	3	2
2008/09	eb/2007/0725	91 Langney Road	Seaside	Change of use	1	1
2008/09	EB/2007/0837	3 St Aubyns Road	Seaside	Conversion	2	2
2008/09	EB/2008/0028	The Welkin Bungalow, Carlisle	Meads	Change of use	1	1
2008/09	eb/2008/0068	83 South Street	Town Centre	Conversion	4	4
2008/09	EB/2008/0163	73 Enys Road	Upperton	Conversion	2	2
2008/09	EB/2008/0246	6 Wellesley Road	Town Centre	Conversion	1	1

48 | P a g e Appendices

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2008/09	EB/2008/0247	1 Winchcombe Road	Seaside	Conversion	1	1
2008/09	EB/2008/0401	28 Jevington Gardens	Meads	Conversion	1	1
2008/09	EB/2008/0729	243 Terminus Road	Town Centre	Conversion	1	1
2008/09	EB/2012/0778	107-109 Enys Road	Upperton	Change of use	0	-1
2009/10	EB/2004/0394	13 South Street	Town Centre	Conversion	4	4
2009/10	EB/2005/0016	11 Cornfield Terrace	Town Centre	Conversion	5	5
2009/10	EB/2005/0266	24 Seaside Road	Town Centre	Conversion	1	1
2009/10	EB/2006/0280	Towers House 8 Ratton Road	Upperton	Conversion	1	1
2009/10	EB/2006/0424	55-61 Seaside Road	Town Centre	Conversion	6	6
2009/10	eb/2006/0499	41 Seaside Road	Town Centre	Conversion	3	3
2009/10	EB/2006/0531	69 Langney Road	Town Centre	Conversion	3	3
2009/10	EB/2006/0571	52 Ceylon Place	Town Centre	Change of use	1	1
2009/10	EB/2006/0574	69 Terminus Road	Town Centre	Change of use	2	2
2009/10	EB/2006/0765	148a/156/160 Seaside	Seaside	Conversion	6	3
2009/10	EB/2006/0849	10-12 Burlington Place	Town Centre	Change of use	10	10
2009/10	EB/2006/0881	169 Seaside	Seaside	Conversion	2	2
2009/10	eb/2007/0172	40 Terminus Road	Town Centre	Change of use	1	1
2009/10	eb/2007/0274	1 Ashburnham Gardens	Upperton	Conversion	1	1
2009/10	EB/2007/0299	25 Seaside Road	Town Centre	Conversion	3	2
2009/10	eb/2007/0493	2 and 3 Motcombe Lane	Old Town	Conversion	2	1
2009/10	eb/2007/0646	84 Church Street	Old Town	Conversion	2	1
2009/10	EB/2007/0750	3 Grand Parade	Town Centre	Conversion	5	5
2009/10	eb/2007/0804	7 Compton Street	Town Centre	Change of use	1	1
2009/10	EB/2008/0031	Rear Unit. 38 South Street	Town Centre	Change of use	1	1
2009/10	EB/2008/0130	19 Hartfield Road	Upperton	Change of use	1	1
2009/10	EB/2008/0146	42 Cavendish Place	Town Centre	Change of use	1	1
2009/10	EB/2008/0176	6 Chiswick Place	Town Centre	Conversion	4	3
2009/10	EB/2008/0282	35 Elms Avenue	Town Centre	Change of use	1	1
2009/10	EB/2008/0313	191-193 Terminus Road	Town Centre	Conversion	1	1
2009/10	EB/2008/0317	37A Grove Road	Town Centre	Conversion	4	3
2009/10	EB/2008/0364	39A Grove Road	Town Centre	Conversion	3	2
2009/10	EB/2008/0373	75 Royal Parade	Seaside	Conversion	7	6
2009/10	EB/2008/0453	62 Seaside Road	Town Centre	Conversion	1	1
2009/10	EB/2008/0469	Land at St Philips Avenue	Roselands & Bridgemere	Conversion	4	4
2009/10	EB/2008/0472	82 Longstone Road	Town Centre	Conversion	3	2
2009/10	EB/2008/0499	38/40 Ocklynge Road	Old Town	Change of use	1	1
2009/10	EB/2008/0591	48 Upperton Gardens	Upperton	Change of use	1	1
2009/10	EB/2008/0621	15 Cornfield Terrace	Town Centre	Conversion	5	4
2009/10	EB/2008/0681	172 Seaside	Seaside	Change of use	1	1
2009/10	EB/2008/0784	3-5 Nevill Avenue	Hampden Park	Change of use	0	-1

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2009/10	EB/2009/0316	1 Trinity Trees	Town Centre	Change of use	0	-1
2009/10	EB/2009/0355	16 Finistere Avenue	St Anthony's & Langney Point	Conversion	1	1
2009/10	EB/2009/0392	10-12 Jevington Gardens	Meads	Conversion	10	10
2009/10	EB/2009/0475	21 Terminus Road	Town Centre	Change of use	1	1
2009/10	EB/2009/0482	Flat 3 22 Enys Road	Upperton	Conversion	1	1
2009/10	EB/2009/0488	80 Great Cliffe Road	Langney	Conversion	2	1
2009/10	EB/2009/0615	12 Bourne Street	Town Centre	Conversion	3	2
2009/10	EB/2009/0633	51 Bradford Street	Old Town	Change of use	1	1
2010/11	EB/2004/0386	72-74 Pevensey Road	Town Centre	Conversion	8	7
2010/11	EB/2007/0861	27 Upperton Road	Upperton	Conversion	1	1
2010/11	EB/2008/0367	31 Bedfordwell Road	Upperton	Conversion	2	2
2010/11	EB/2009/0121	101-111 South Street	Town Centre	Conversion	2	-1
2010/11	EB/2009/0478	18 Pevensey Road	Town Centre	Conversion	1	1
2010/11	EB/2009/0506	81 South Street	Town Centre	Conversion	3	2
2010/11	EB/2010/0093	5 Langney Road	Town Centre	Conversion	2	1
2010/11	EB/2010/0437	47 Aldro Building (University of Brighton)	Meads	Change of use	0	-1
2011/12	EB/2004/0242	30,32,32A Seaside Road	Town Centre	Conversion	3	1
2011/12	EB/2004/0344	40-56 Seaside Road	Town Centre	Conversion	20	14
2011/12	EB/2005/0014	116-118 Cavendish Place	Town Centre	Conversion	4	2
2011/12	EB/2008/0037	4 Silverdale Road	Meads	Conversion	4	3
2011/12	EB/2008/0038	6 Silverdale Road	Meads	Conversion	4	3
2011/12	EB/2008/0235	37 Cavendish Place	Town Centre	Conversion	4	3
2011/12	EB/2008/0301	91 Pevensey Road	Seaside	Conversion	4	3
2011/12	EB/2008/0516	111 Seaside Road	Town Centre	Change of use	14	14
2011/12	EB/2009/0161	53 Pevensey Road	Town Centre	Conversion	3	2
2011/12	EB/2009/0281	38 Cavendish Avenue	Town Centre	Conversion	2	1
2011/12	EB/2009/0568	Cambridge Hotel 1-15 Cambridge Road	Seaside	Conversion	4	3
2011/12	EB/2009/0634	Cumbria Court, 14 Milfoil Drive	Shinewater & North Langney	Conversion	18	15
2011/12	EB/2009/0656	136-138 Seaside	Seaside	Conversion	4	2
2011/12	EB/2009/0659	15-19 Prideaux Road	Upperton	Change of use	0	-1
2011/12	EB/2009/0804	12 Station Parade	Town Centre	Change of use	2	2
2011/12	EB/2010/0122	2 Wellesley Road	Town Centre	Conversion	2	1
2011/12	EB/2010/0273	Cambridge Hotel 1-15 Cambridge Road	Seaside	Conversion	9	9
2011/12	EB/2010/0348	43 Cavendish Place	Town Centre	Conversion	7	6
2011/12	EB/2010/0425	40 Seaside	Seaside	Change of use	1	1
2011/12	EB/2010/0454	Flat 2, 98 Seaside Road	Town Centre	Change of use	0	-1
2011/12	EB/2010/0535	31 Bedfordwell Road	Upperton	Conversion	2	1
2011/12	EB/2010/0572	Hill Court, 12 St Johns Road	Meads	Conversion	1	1
2011/12	EB/2010/0616	Cambridge Hotel 1-15 Cambridge Road	Seaside	Conversion	5	5
2011/12	EB/2010/0618	44 Grove Road	Town Centre	Change of use	2	1

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2011/12	EB/2010/0651	141 Seaside	Seaside	Conversion	3	2
2011/12	EB/2010/0742	Cambridge Hotel 1-15 Cambridge Road	Seaside	Conversion	6	6
2011/12	EB/2011/0004	112 Cavendish Place	Town Centre	Conversion	2	1
2011/12	EB/2011/0111	Upper Floors 220 Seaside	Seaside	Conversion	6	5
2011/12	EB/2011/0117	30 The Hydneye	Hampden Park	Conversion	2	1
2011/12	EB/2011/0194	42 Grove Road	Town Centre	Change of use	3	3
2011/12	EB/2011/0225	Flat 4 Oakley Down 67 Silverdale Road	Meads	Conversion	2	1
2012/13	130311	Elm Park Hotel 20 Cavendish Place	Town Centre	Change of use	28	28
2012/13	EB/2009/0027	14 North Street	Town Centre	Change of use	1	1
2012/13	EB/2009/0272	26 Bedford Grove	Upperton	Conversion	3	2
2012/13	EB/2009/0698	19 Hurst Road	Upperton	Conversion	2	1
2012/13	EB/2009/0710	3 Grand Parade	Town Centre	Conversion	5	4
2012/13	EB/2010/0060	16 Lushington Road	Town Centre	Conversion	1	1
2012/13	EB/2010/0399	Rear of 24, 26 and 30 Terminus Road	Town Centre	Change of use	7	7
2012/13	EB/2010/0653	28 Susans Road	Town Centre	Conversion	2	1
2012/13	EB/2011/0118	Claremont House 89 Pevensey Road	Seaside	Change of use	1	1
2012/13	EB/2011/0124	Ground Floor 220 Seaside	Seaside	Conversion	3	3
2012/13	EB/2011/0219	10 Neville Road	Hampden Park	Change of use	1	1
2012/13	EB/2011/0235	167 & 169 Terminus Road	Town Centre	Conversion	4	2
2012/13	EB/2011/0285	60-62 Terminus Road	Town Centre	Change of use	1	1
2012/13	EB/2011/0295	39a Grove Road	Town Centre	Conversion	3	2
2012/13	EB/2011/0360	Cambridge Hotel 1-13 Cambridge Road	Seaside	Conversion	22	21
2012/13	EB/2011/0422	Saffrons View 11 Meads Road	Meads	Conversion	1	1
2012/13	EB/2011/0440	64A Grove Road	Town Centre	Conversion	2	1
2012/13	EB/2011/0555	83 Cavendish Place	Town Centre	Conversion	3	2
2012/13	EB/2011/0622	9-11 Borough Lane	Old Town	Change of use	1	1
2012/13	EB/2011/0763	32 Hyde Gardens	Town Centre	Change of use	1	1
2012/13	EB/2011/0779	79 Seaside	Seaside	Change of use	5	5
2012/13	EB/2011/0800	Cambridge Hotel (nos 1,3, & 5) 1-13 Cambridge Road	Seaside	Conversion	9	9
2012/13	EB/2012/0124	84-86 Wish Hill	Ratton & Willingdon Village	Change of use	2	1
2012/13	EB/2012/0138	5 Chyngton Close	Shinewater & North Langney	Conversion	2	1
2012/13	EB/2012/0209	70 Cavendish Place	Town Centre	Conversion	1	-1
2012/13	EB/2012/0219	98 Seaside Road	Town Centre	Change of use	1	1
2012/13	EB/2012/0244	The Wolds 13 College Road	Town Centre	Conversion	7	4
2012/13	EB/2012/0254	Ground Floor Flat 1 Saffrons View 11 Meads Road	Meads	Conversion	3	2
2012/13	EB/2012/0373	77 Seaside	Seaside	Conversion	4	1
2012/13	EB/2012/0396	4 Lewes Road	Upperton	Conversion	8	7
2012/13	EB/2012/0497	1 Arlington Road	Summerdown & Saffrons	Change of use	0	-2
2012/13	EB/2012/0579	24 Furness Road	Meads	Conversion	1	-1
2012/13	EB/2012/0699	126-134 Seaside	Seaside	Conversion	12	12

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2012/13	EB/2012/0704	5 Motcombe Lane	Old Town	Change of use	1	1
2013/14	130224	6 Lushington Road	Town Centre	Conversion	5	4
2013/14	130328	Upwyke House, Green Street	Old Town	Conversion	2	1
2013/14	130376	1 Vicarage Road	Old Town	Change of use	1	1
2013/14	EB/2010/0495	The Corner House, 3 Dittons Road	Summerdown & Saffrons	Conversion	1	1
2013/14	EB/2011/0305	70 Cavendish Place	Town Centre	Conversion	1	1
2013/14	EB/2011/0314	Flat 4, Cavendish Court, 12-14 Blackwater Road	Meads	Conversion	3	2
2013/14	EB/2011/0388	Camberley Hotel 27-29 Elms Avenue	Town Centre	Change of use	2	2
2013/14	EB/2011/0574	70 Cavendish Place	Town Centre	Change of use	1	1
2013/14	EB/2011/0715	46-50 South Street	Town Centre	Change of use	5	5
2013/14	EB/2011/0750	Tyrone Court, 1 Wrotham Close	Langney	Conversion	16	-1
2013/14	EB/2012/0010	Former Royal British Legion 109-11 Pevensey Road	Seaside	Change of use	8	8
2013/14	EB/2012/0220	Sutherland Court, 35 The Hydneye	Hampden Park	Conversion	14	-3
2013/14	EB/2012/0386	Fitzalen House 7-9 Arundel Road	Upperton	Conversion	2	2
2013/14	EB/2012/0395	13 Compton Street	Town Centre	Conversion	11	2
2013/14	EB/2012/0407	13 Meads Street	Meads	Conversion	2	1
2013/14	EB/2012/0417	22 Seaside Road	Town Centre	Conversion	1	1
2013/14	EB/2012/0556	32-34 Terminus road	Town Centre	Change of use	6	5
2013/14	EB/2012/0575	Riverbourne House, Belmore Road	Seaside	Conversion	2	1
2013/14	EB/2012/0637	182-184 Seaside	Seaside	Conversion	6	6
2013/14	EB/2012/0642	New Surrey Court, 11 Avard Crescent	Old Town	Conversion	3	3
2013/14	EB/2012/0660	70 Cavendish Place	Town Centre	Change of use	1	1
2013/14	EB/2012/0668	5 Derwent Road	Meads	Conversion	1	-4
2013/14	EB/2012/0681	2 Terminus Road	Town Centre	Change of use	1	1
2013/14	EB/2012/0732	New Derby House, 506 Seaside	St Anthony's & Langney Point	Conversion	2	1
2013/14	EB/2012/0744	61 Croxden Way	Hampden Park	Change of use	1	1
2013/14	EB/2012/0749	22 Pevensey Road	Town Centre	Conversion	0	-1
2013/14	EB/2012/0787	5 Wish Road	Town Centre	Change of use	1	1
2013/14	EB/2012/0807	98 Seaside	Seaside	Change of use	2	2
2013/14	EB/2013/0002	1 Hyde Gardens	Town Centre	Change of use	1	1
2013/14	EB/2013/0003	15-17 Charleston Road	Old Town	Change of use	2	2
2013/14	EB/2013/0022	31 Lushington Road	Town Centre	Conversion	0	-1
2013/14	EB/2013/0026	92 Seaside	Seaside	Change of use	1	1
2013/14	EB/2013/0028	66 Cavendish Place	Town Centre	Change of use	1	1
2013/14	EB/2013/0092	South Cliff Tower, 16 Bolsover Road	Meads	Conversion	2	1
2013/14	EB/2013/0112	Dyke House, South Street	Town Centre	Change of use	11	11
2013/14	EB/2013/0160	Llanthony, 1 Darley Road	Meads	Conversion	2	1
2014/15	120907	111 Seaside Road	Town Centre	Change of use	5	5
2014/15	130220	Palm Court Nursing Home, Prideaux Road	Upperton	Change of use	0	-1
2014/15	130256	76/76a Whitley Road	Seaside	Conversion	1	-1

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2014/15	130359	Camberley Hotel, Elms Avenue	Town Centre	Change of use	1	1
2014/15	130447	Winchester House, 61-93 Holly Place	Hampden Park	Conversion	21	-11
2014/15	130542	48-50 St Leonards Road	Town Centre	Change of use	23	23
2014/15	130564	80 Church Street	Old Town	Change of use	3	3
2014/15	130759	28 St Leonards Road	Town Centre	Change of use	18	18
2014/15	130761	78 Seaside	Seaside	Change of use	1	1
2014/15	130890	188A Terminus Road	Town Centre	Change of use	1	1
2014/15	130895	19 Langney Road	Town Centre	Conversion	3	2
2014/15	130911	72 Willingdon Road	Upperton	Change of use	2	1
2014/15	130914	66 Cavendish Place	Town Centre	Change of use	1	1
2014/15	130994	Marshall Garage Vine Square	Seaside	Change of use	1	1
2014/15	131010	18-22 Terminus Road	Town Centre	Change of use	3	3
2014/15	131073	Flat A 7 Old Orchard Road	Summerdown & Saffrons	Conversion	1	-1
2014/15	140011	Esher House 48 St Leonards Road	Town Centre	Conversion	2	2
2014/15	140039	Park View House 19 The Avenue	Upperton	Change of use	4	4
2014/15	140124	111 Seaside Road	Town Centre	Conversion	1	1
2014/15	140197	Saffrons View, Meads Road	Meads	Conversion	1	1
2014/15	140366	6 Wellesley Road	Town Centre	Conversion	2	1
2014/15	140416	59 Watts Lane	Upperton	Conversion	1	1
2014/15	140540	41 Marlow Avenue	Roselands & Bridgemere	Change of use	1	1
2014/15	140548	19 Elms Avenue	Town Centre	Conversion	1	1
2014/15	140552	33 Hartfield Road	Upperton	Conversion	1	-1
2014/15	140581	Beach Haven Guest House 61 Pevensey Road	Seaside	Change of use	1	1
2014/15	140792	78 Seaside	Seaside	Change of use	1	1
2014/15	140831	36a Meads Street	Meads	Conversion	5	4
2014/15	140894	Archery Court Willoughby Crescent	Roselands & Bridgemere	Conversion	1	1
2014/15	140926	Unit 4 Arch Mews 43-45 Longstone Road	Town Centre	Change of use	1	1
2014/15	140962	15 Mountfield Road	Hampden Park	Change of use	1	1
2014/15	141015	Units 1 to 3 Arch Mews 43-45 Longstone Road	Town Centre	Change of use	3	3
2014/15	141280	21-22 Vicarage Drive	Old Town	Conversion	2	1
2014/15	141428	Kelvin Lodge Old Wish Road	Town Centre	Change of use	0	-1
2014/15	150025	106 Cavendish Place	Town Centre	Conversion	1	1
2014/15	EB/2007/0854	Swanley Court Hotel, 18-20 Trinity Trees	Town Centre	Change of use	11	11
2014/15	EB/2011/0269	Hurst Motors, Hurst Lane	Upperton	Change of use	2	1
2014/15	EB/2011/0402	18-22 Terminus Road	Town Centre	Change of use	3	3
2014/15	EB/2012/0564	75 Cavendish Place	Town Centre	Conversion	3	3
2014/15	EB/2012/0606	225 - 227 Seaside	Seaside	Change of use	2	2
2014/15	EB/2012/0738	22 Pevensey Road	Town Centre	Change of use	1	1
2014/15	EB/2012/0747	19 The Avenue	Town Centre	Change of use	1	1
2014/15	EB/2013/0073	37 Marine Parade	Seaside	Conversion	1	0

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2015/16	130511	49 Susans Road	Town Centre	Conversion	2	1
2015/16	130525	38 St Leonards Road	Town Centre	Change of use	18	18
2015/16	130533	76 Firle Road	Seaside	Change of use	1	1
2015/16	130580	Highland Lodge 17 Carew Road	Upperton	Conversion	2	1
2015/16	130598	38 St Leonards Road	Town Centre	Conversion	6	6
2015/16	131012	Upwyke House, Green Street	Old Town	Conversion	1	1
2015/16	140001	Willowfield Studios, 67A Willowfield Road	Seaside	Change of use	1	1
2015/16	140031	57-63 Green Street	Old Town	Change of use	3	2
2015/16	140077	3 Cornfield Lane	Town Centre	Change of use	5	5
2015/16	140095	171 Terminus Road	Town Centre	Conversion	4	3
2015/16	140147	46 Upperton Gardens	Upperton	Conversion	3	2
2015/16	140219	Vintry Residential Care Home, Farlaine Road	Ocklynge & Rodmill	Change of use	8	8
2015/16	140343	The Cavalier Inn, 13-15 Carlisle Road	Town Centre	Conversion	6	5
2015/16	140357	1-5 Seaside	Seaside	Conversion	0	-1
2015/16	140693	38 Cornfield Road	Town Centre	Change of use	0	-2
2015/16	140715	51 Seaside Road	Town Centre	Change of use	1	1
2015/16	140720	66 Langney Road	Town Centre	Conversion	5	3
2015/16	140755	1 Glynde Avenue	Hampden Park	Conversion	10	4
2015/16	140905	37 Brassey Avenue	Hampden Park	Change of use	1	1
2015/16	140954	Second Floor, 30 Terminus Road	Town Centre	Conversion	3	2
2015/16	141031	56 Upperton Gardens	Upperton	Conversion	2	1
2015/16	141120	38 Farlaine Road	Ocklynge & Rodmill	Change of use	2	2
2015/16	141169	Cavalier Inn 13-15 Carlisle Road	Town Centre	Change of use	4	4
2015/16	141278	4 Dalton Road	Meads	Conversion	1	-2
2015/16	141359	17 Bedfordwell Road	Upperton	Conversion	2	1
2015/16	150037	30 Terminus Road	Town Centre	Conversion	1	1
2015/16	150052	10-11 Sia Court 49 Pevensey Road	Town Centre	Conversion	4	2
2015/16	150081	25-31 Langney Road	Town Centre	Conversion	10	3
2015/16	150111	Willingdon Methodist Church, Wish Hill	Roselands & Bridgemere	Change of use	2	2
2015/16	150514	37a The Goffs	Upperton	Change of use	4	4
2015/16	150645	Flat 4, Sia Court, 49 Pevensey Road	Town Centre	Conversion	2	1
2015/16	150648	Flat 1 Sia Court 49 Pevensey Road	Town Centre	Conversion	2	1
2015/16	150689	106 Cavendish Place	Town Centre	Change of use	1	1
2015/16	150846	20 Bradford Street	Old Town	Change of use	1	1
2015/16	150898	43 Pevensey Road	Town Centre	Conversion	0	-1
2015/16	150912	3 Chiswick Place	Town Centre	Change of use	1	1
2015/16	150917	Longworth House, 28 Eversfield Road	Upperton	Change of use	7	7
2015/16	150978	82 Church Street	Old Town	Change of use	1	1
2015/16	151227	41 Pevensey Road	Town Centre	Conversion	2	1
2015/16	151258	2 Kings Drive	Upperton	Conversion	1	1

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2015/16	EB/2008/0340	41 Pevensey Road	Town Centre	Conversion	3	2
2015/16	EB/2011/0187	14 Pevensey Road	Town Centre	Conversion	2	1
2015/16	EB/2011/0532	56 Grove Road	Town Centre	Change of use	3	2
2015/16	EB/2011/0569	14 Pevensey Road	Town Centre	Conversion	2	1
2015/16	EB/2012/0583	Farnol House, 62 Upperton Road	Upperton	Conversion	2	1
2015/16	EB/2012/0591	68 Grove Road	Town Centre	Change of use	10	10
2015/16	EB/2013/0075	5-7 Cavendish Place	Town Centre	Change of use	10	10
2016/17	120665	Lathom House Hotel, 4-6 Howard Square	Town Centre	Change of use	8	8
2016/17	130541	5 Gildredge Road	Town Centre	Change of use	4	4
2016/17	131003	218 Seaside	Seaside	Change of use	2	2
2016/17	140151	67-69 Seaside Road	Town Centre	Conversion	4	3
2016/17	140357	1-5 Seaside	Seaside	Conversion	3	3
2016/17	140634	28 Carlton Road	Seaside	Conversion	2	1
2016/17	140741	51 Upperton Lane	Upperton	Change of use	1	1
2016/17	140892	Latham House Hotel	Town Centre	Change of use	10	8
2016/17	141333	56 Grove Road	Town Centre	Change of use	1	1
2016/17	141349	70 Susans Road	Town Centre	Change of use	3	2
2016/17	141403	28 Gorringe Road	Upperton	Conversion	3	3
2016/17	150172	27 St Leonards Road	Town Centre	Conversion	4	4
2016/17	150179	27 St Leonards Road	Town Centre	Change of use	12	12
2016/17	150266	218 Seaside	Seaside	Change of use	1	1
2016/17	150467	218 Seaside	Seaside	Conversion	2	1
2016/17	150537	70 Seaside	Seaside	Change of use	1	1
2016/17	150538	79 Seaside	Seaside	Change of use	1	1
2016/17	150662	218 Seaside	Seaside	Conversion	1	1
2016/17	150847	2a 2 The Avenue	Upperton	Conversion	2	1
2016/17	150959	112 Cavendish Place	Town Centre	Conversion	1	1
2016/17	151025	18 Southfields Road	Summerdown & Saffrons	Conversion	1	1
2016/17	151053	41 South Street	Town Centre	Change of use	2	2
2016/17	151194	20 Farlaine Road	Ocklynge & Rodmill	Conversion	1	1
2016/17	151298	15-17 Seaside	Seaside	Change of use	2	1
2016/17	151303	Gloucester House, 9 Gloucester Mews	Town Centre	Change of use	5	5
2016/17	151341	20 Gorringe Road	Upperton	Conversion	1	0
2016/17	151364	51a Grove Road	Town Centre	Conversion	1	1
2016/17	160002	60 Susans Road	Town Centre	Conversion	3	2
2016/17	160003	8 Dalton Road	Meads	Conversion	2	1
2016/17	160142	Le Mer, 7 Marine Road	Seaside	Change of use	1	1
2016/17	160165	Falcondale House, 5 South Cliff Avenue	Meads	Conversion	3	2
2016/17	160247	2 Hyde Gardens	Town Centre	Change of use	4	4
2016/17	160267	29a Grove Road	Town Centre	Change of use	4	4

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2016/17	160296	62 Seaside Road	Town Centre	Conversion	2	1
2016/17	160526	66 Willingdon Road	Upperton	Change of use	1	1
2016/17	160937	51a Grove Road	Town Centre	Change of use	1	1
2016/17	160947	70A Cavendish Place	Town Centre	Conversion	2	1
2016/17	161304	15a Bolton Road	Town Centre	Change of use	1	1
2017/18	130311	Elm Park Hotel 20 Cavendish Place	Town Centre	Conversion	1	1
2017/18	140833	Twin English Centre, 25 St Anne's Road	Upperton	Change of use	11	11
2017/18	141087	41 South Street	Town Centre	Change of use	1	1
2017/18	141439	22-24 Langney Road	Town Centre	Change of use	4	4
2017/18	150092	The Drive, 153 Victoria Drive	Old Town	Conversion	3	2
2017/18	150298	14 Jevington Gardens	Meads	Conversion	5	4
2017/18	150706	35 Susans Road	Town Centre	Conversion	2	1
2017/18	151061	56 Beach Road	Seaside	Conversion	3	2
2017/18	151157	The Drive, 153 Victoria Drive	Old Town	Change of use	1	1
2017/18	160178	Falconhurst, 16 Jevington Gardens	Meads	Conversion	4	3
2017/18	160223	12 Commercial Road	Town Centre	Change of use	1	1
2017/18	160332	182-184 Seaside	Seaside	Change of use	2	2
2017/18	160425	14 Lismore Road	Town Centre	Change of use	6	6
2017/18	160558	9 Churchdale Road	Roselands & Bridgemere	Conversion	1	-1
2017/18	160559	11 Lushington Road	Town Centre	Conversion	2	1
2017/18	160562	4 St James Road	Seaside	Change of use	1	1
2017/18	160593	8 College Road	Town Centre	Conversion	1	-1
2017/18	160758	41 Susans Road	Town Centre	Change of use	2	2
2017/18	160772	Old Crookham 24 York Road	Town Centre	Conversion	2	1
2017/18	160798	62a Tideswell Road	Town Centre	Change of use	4	4
2017/18	160832	Alleyn House, 99a Cavendish Place	Town Centre	Change of use	4	4
2017/18	161091	145 Seaside	Seaside	Change of use	2	2
2017/18	161130	Marine Lodge 13 Marine Road	Town Centre	Conversion	6	6
2017/18	161146	Flat 10 Wilshire Court Etchingham Road	Langney	Change of use	1	1
2017/18	161465	Flat 8 Sia Court 49 Pevensey Road	Town Centre	Conversion	2	1
2017/18	170024	32 South Street	Town Centre	Conversion	3	2
2017/18	170157	11 Meads Road	Meads	Conversion	3	2
2017/18	170276	315 Seaside	Seaside	Change of use	1	1
2017/18	170701	1a West Street	Town Centre	Change of use	1	1
2017/18	170874	4 Hyde Gardens	Town Centre	Change of use	4	4
2017/18	170918	68 Cavendish Avenue	Seaside	Conversion	0	-1
2017/18	170984	4 Aylesbury Avenue	St Anthony's & Langney Point	Conversion	2	1
2017/18	171470	8 Ratton Road	Upperton	Conversion	1	1
2018/19	141054	8 Gildredge Road	Town Centre	Change of use	2	2
2018/19	150050	4 Pevensey Road	Town Centre	Change of use	4	4

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2018/19	151249	26 Terminus Road	Town Centre	Conversion	2	2
2018/19	151290	4 South Street	Town Centre	Change of use	1	1
2018/19	151349	Ashberry Court, 39 Lewes Road	Upperton	Change of use	9	9
2018/19	160076	157 Terminus Road	Town Centre	Change of use	4	4
2018/19	160437	219 Terminus Road	Town Centre	Conversion	3	2
2018/19	160645	The Vintry, Farlaine Road	Ocklynge & Rodmill	Change of use	1	1
2018/19	161022	44 Seaside	Seaside	Change of use	1	1
2018/19	161216	43 South Street	Town Centre	Change of use	2	2
2018/19	161376	Mount View 21 Upperton Road	Upperton	Conversion	0	-1
2018/19	161385	Bourne Lea 93 Langney Road	Town Centre	Conversion	0	-1
2018/19	161473	196 Seaside	Seaside	Change of use	1	1
2018/19	170037	12 Eversfield Road	Upperton	Change of use	8	8
2018/19	170621	2 Hardwick Road	Town Centre	Conversion	1	1
2018/19	170725	21 Susans Road	Town Centre	Change of use	3	3
2018/19	170757	29 Grove Road	Town Centre	Change of use	1	1
2018/19	170758	14 Seabeach Lane	Seaside	Change of use	1	1
2018/19	170801	Veritek House, Edgeland Terrace	Hampden Park	Change of use	11	11
2018/19	170870	11 Lascelles Terrace	Town Centre	Conversion	5	4
2018/19	170881	Flat 4, Holmdale, 93 Pevensey Road	Town Centre	Conversion	2	1
2018/19	170898	Halton House, 56 Latimer Road	Seaside	Change of use	1	1
2018/19	171010	84 Seaside	Seaside	Change of use	1	1
2018/19	171038	112 & 114 Langney Road	Seaside	Change of use	3	2
2018/19	171133	8 Mill Gap Road	Upperton	Change of use	2	1
2018/19	171148	7c Bolton Road	Town Centre	Conversion	6	6
2018/19	171315	15 Beach Road	Seaside	Conversion	2	1
2018/19	171340	118 Langney Road	Seaside	Change of use	3	3
2018/19	171341	116 Langney Road	Seaside	Change of use	3	3
2018/19	171476	1 The Avenue	Town Centre	Change of use	4	4
2018/19	180032	28a Cavendish Place	Town Centre	Change of use	2	2
2018/19	180058	99 South Street	Town Centre	Change of use	3	3
2018/19	180064	8 Albert Parade	Old Town	Change of use	1	1
2018/19	180110	6 Station Parade	Town Centre	Change of use	4	4
2018/19	180193	Highland House 18-20 Carew Road	Upperton	Conversion	1	1
2018/19	180229	38 Cornfield Road	Town Centre	Change of use	1	1
2018/19	180240	34 Lushington Road	Town Centre	Conversion	1	-1
2018/19	180367	57 Pevensey Road, Eastbourne, BN21 3HS	Town Centre	Conversion	1	1
2018/19	180425	Robin Hill Nursery, 23 Fairfield Road, BN20 7NA	Meads	Change of use	1	1
2018/19	180685	2 The Avenue	Town Centre	Change of use	2	2
2018/19	180802	29 Pevensey Road	Town Centre	Conversion	0	-1
2019/20	140548	19 Elms Avenue	Town Centre	Conversion	4	4

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2019/20	141159	37 Grove Road	Town Centre	Change of use	2	2
2019/20	150031	6 Cornfield Terrace	Town Centre	Conversion	1	1
2019/20	150517	45 Susans Road	Town Centre	Conversion	4	3
2019/20	150537	70 Seaside	Seaside	Change of use	2	1
2019/20	151134	Courtlands Hotel, Wilmington Gardens	Meads	Change of use	21	21
2019/20	151363	6 Cornfield Terrace	Town Centre	Conversion	2	2
2019/20	160056	Regent Hotel 3 Cavendish Place	Town Centre	Conversion	1	1
2019/20	160242	32-34 Cornfield Road	Town Centre	Change of use	1	1
2019/20	160733	6 Bolton Road	Town Centre	Conversion	0	-1
2019/20	161153	21 Langney Road	Town Centre	Conversion	4	4
2019/20	161278	4a Wellesley Road	Town Centre	Change of use	4	4
2019/20	161385	Bourne Lea 93 Langney Road	Town Centre	Conversion	5	5
2019/20	170019	46 Ocklynge Road	Old Town	Change of use	1	1
2019/20	170275	315 Seaside	Seaside	Change of use	1	1
2019/20	170340	Bramble Guest House, 16 Lewes Road	Upperton	Change of use	1	1
2019/20	170680	1b Carlton Road	Seaside	Change of use	1	1
2019/20	171049	3 Hartfield Lane	Upperton	Conversion	5	5
2019/20	171369	Riverbourne House, Belmore Road	Seaside	Conversion	2	2
2019/20	171375	Samara House, 55-61 Seaside Road	Town Centre	Change of use	1	1
2019/20	180548	94a Melbourne Road	Seaside	Change of use	1	1
2019/20	180561	18-22 Terminus Road	Town Centre	Conversion	1	1
2019/20	180608	106 Cavendish Place	Town Centre	Change of use	1	1
2019/20	180723	63 Seaside	Seaside	Change of use	1	1
2019/20	181008	34 Dillingburgh Road	Old Town	Conversion	1	1
2019/20	181019	81-83 Seaside	Seaside	Change of use	3	3
2019/20	181106	34 South Street	Town Centre	Conversion	3	2
2019/20	181158	9 Langney Road	Town Centre	Conversion	1	1
2019/20	181198	Far End Private Hotel	Seaside	Change of use	1	1
2019/20	190069	1 and 2 Palmyra Place	Sovereign Harbour	Conversion	1	-1
2019/20	190135	150-152 Seaside	Seaside	Conversion	0	-2
2019/20	190276	66 Seaside Road	Town Centre	Conversion	2	2
2019/20	190702	8 Pevensey Road	Town Centre	Conversion	1	1
2019/20	190810	Flat B, 7 Old Orchard Road	Summerdown & Saffrons	Change of use	0	-1
2019/20	190881	14 Seaside Road	Town Centre	Conversion	2	1
2019/20	190976	Flat 1, 46 Carew Road	Upperton	Conversion	1	1
2019/20	200150	13 Lushington Road	Town Centre	Conversion	2	1
2020/21	160768	2 Enys Road	Upperton	Change of use	6	6
2020/21	161006	136-138 Seaside	Seaside	Change of use	3	3
2020/21	161308	Ravelston Grange 10 Denton Road	Meads	Change of use	9	9
2020/21	170341	12 North Street	Town Centre	Change of use	1	1

Financial Year	LA Reference	Site	Neighbourhood	Dev Type	Gross Units	Net Units
2020/21	170527	20 Upperton Road	Upperton	Change of use	73	73
2020/21	171028	14 Hartfield Road	Upperton	Conversion	1	1
2020/21	171321	Southfields House, Southfields Road	Summerdown & Saffrons	Conversion	6	6
2020/21	180773	117 South Street	Town Centre	Conversion	3	2
2020/21	190073	Minster House, York Road	Town Centre	Change of use	7	7
2020/21	190338	63 Pevensey Road	Town Centre	Conversion	6	6
2020/21	190541	Tudor House, 5 Marine Road	Seaside	Change of use	1	1
2020/21	190617	221 Terminus Road	Town Centre	Change of use	2	2
2020/21	190800	5 Hampden Terrace	Seaside	Change of use	1	1
2020/21	190809	28a Pevensey Road	Town Centre	Conversion	1	1
2020/21	190950	Bay Tree Guest House, Elms Avenue	Town Centre	Change of use	1	1
2020/21	190969	32 Hyde Gardens	Town Centre	Change of use	4	4
2020/21	190978	80 - 82 Pevensey Road	Town Centre	Change of use	3	1
2020/21	200033	41 Susans Road	Town Centre	Change of use	2	2
2020/21	200051	143 - 145 Terminus Road	Town Centre	Change of use	2	2
2020/21	200168	Berkley House, 26-28 Gildredge Road	Town Centre	Change of use	30	30
2020/21	200185	2 Bayham Road	Seaside	Conversion	0	-1
2020/21	200195	The Bungalow, Hurst Lane	Upperton	Conversion	1	1
2020/21	200287	6 Hampden Terrace	Seaside	Change of use	1	1
2020/21	200307	Richmond House, 3 Elms Avenue	Town Centre	Conversion	1	1
2020/21	200461	7 Gildredge Road	Town Centre	Change of use	2	2
2020/21	200541	10 The Avenue	Town Centre	Conversion	1	1
2021/22	141521	Heatherleigh Hotel, Royal Parade	Seaside	Change of use	24	24
2021/22	170286	164-168 Ashford Road	Town Centre	Change of use	3	3
2021/22	190846	9a South Street	Town Centre	Change of use	1	1
2021/22	200304	34 South Street	Town Centre	Change of use	1	1
2021/22	200514	Southcroft Hotel	Meads	Change of use	1	1
2021/22	200743	61 Pevensey Road	Town Centre	Conversion	1	1
2021/22	200987	9 West Street	Town Centre	Change of use	1	1
2021/22	211025	Worcester House, 77 Pevensey Road	Seaside	Conversion	1	1
2021/22	220006	3 St Leonards Road	Town Centre	Change of use	1	1
2021/22	190016	5B - 5D Commercial Road	Town Centre	Change of use	8	8
2021/22	190461	First Church of Christ Scientist	Town Centre	Change of use	7	7
2021/22	200262	18 - 22 Terminus Road	Town Centre	Change of use	1	1
2021/22	200321	78 Tideswell Road	Town Centre	Conversion	3	2
2021/22	200322	21 - 25 Gildredge Road	Town Centre	Change of use	17	17
2021/22	200568	Bishopsbourne	Meads	Conversion	1	1
2021/22	200745	Kingsmere Guest House	Seaside	Conversion	2	1
2021/22	210420	5 St Aubyns Road	Seaside	Conversion	2	1