

# **Lewes District Council**

Land Availability Assessment (LAA)

November 2023

## Addendum - January 2024

One site was omitted from the November 2023 publication within Table in Appendix 6 – Sites Excluded at Stage 1 with reason. The site, 11HY and the omitted line is shown below. This will be updated in the next LAA report.

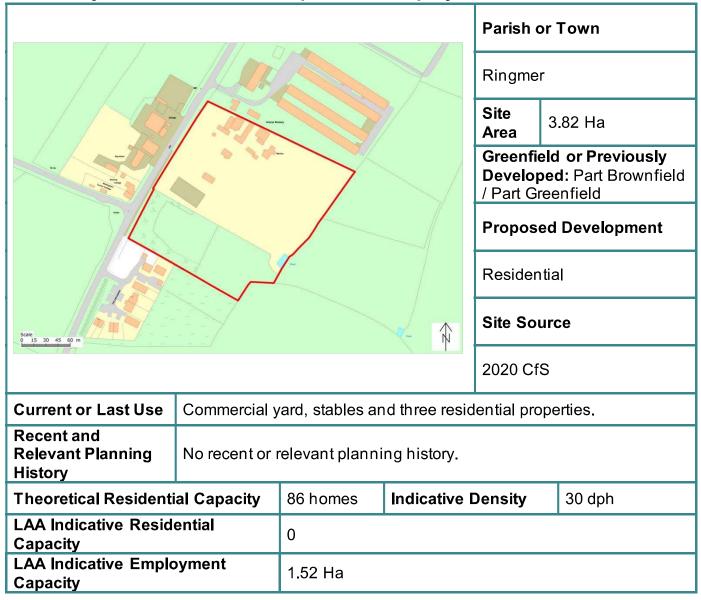
Parish	Site Ref	Location	Rationale for assessment
Hamsey	11HY	Land north of Hamsey Lane, Cooksbridge	Filtered - Assessed as part of 19HY

Two sites were omitted from the November 2023 publication within Appendix 3. The assessment pro-forma for these two sites 58RG and 41WV are shown below. The figures in the LAA Report have not been updated. The inclusion of these two sites brings the number of sites assessed as Not Deliverable or Developable in Table 6 of the published report to 94. The figure will be updated in the next LAA report.

Site Reference: 58RG

Clayhill Nurseries, Uckfield Road

## Potentially Deliverable or Developable for Employment



# **Suitability Assessment**

Residential Suitability: Not suitable

**Employment Suitability: Potentially suitable** 

The site is isolated and unrelated to an existing settlement, therefore site would be car dependant. Unsuitable for residential development as unsustainable location. Potentially suitable for employment uses, promoted for 510 sqm. Other key constraints relate to ecology, risk of surface water flooding and archaeological sensitivity.

Suitability Issue	Suitability As	ssessment Comments	
Adopted Local Plan Policies	Outside existing planning boundary, small part to the north of the site would fall within allocation EMP20 of the Ringmer Neighbourhood Plan for employment space at 'Clayhill Business Area'		
Minerals and Waste Designations	No minerals or waste constraints identified in the adopted Minerals and Waste Plans.		
Flood Zone	flow path thro approximately surface water		
Land Contamination	None identifice existing emplement	ed - could be contamination associated with the oyment use	
Topography	Flat site		
Environmental Constraints	No designation	ons on or adjacent the site.	
Ecological Constraints	Records of Great Crested Newts north and south of the site, site has habitat to support GCN and potential to support protected species. Would require further ecological survey. Trees/hedgerows surround and throughout the site. No TPO's or designations on site or adjacent.		
Within Air Quality Manag	ement Area?	Outside	
Agricultural Land Classif	cation Grade 3		
Distance from Ashdown	Forest SAC	Greater than 7KM	
Availability of Utilities	Unknown availability		
Bad Neighbours?	No bad neighbours identified		
Within Setting of SDNP?	No		
Landscape Sensitivity	Relatively well contained site, with tree coverage. ESCC Landscape Architect states that, "Development within this area could be acceptable with a strong landscape buffer to the countryside to the east."		
Historic Built Environment Constraints	No conservation areas or listed building on or adjacent the site. Site lies in an ANA relating to the Arlington to Barcombe Roman Road and west of an ANA and just northwest of an ANA relating to the medieval & post-medieval settlement of Ringmer, medieval potteries and post-medieval brick kilns. A number of dispersed post-medieval buildings, and farmsteads exist in proximity to the site. Evidence of prehistoric, Roman, medieval and post-medieval activity exists in close proximity (The Orchards immediately south of the site) and the wider area. Archaeological potential of site yet to be determined.		
Impacts on Highways Network	See LDC Sha	ared Transport Evidence Base (STEB) 2023	
Public Transport	Bus stop is situated to the south of the site on the A26, services to Lewes, Uckfield and Brighton with a fairly regular service Monday-Saturday, limited Sunday service. Nearest train station would be Lewes. No existing crossing point to access bus stop on other side of the road.		

Suitability Issue	Suitability Assessment Comments	
Active Travel	There is existing footpaths on either side of the A26 which would link the site with the convenience store at the filling station.	
Public Rights of Way	No Public Rights of Way across or adjacent the site.	
Site Access	Existing access from A26 but unknown if suitable for scale of development.	

# **Availability Assessment: Available**

The site is available for development. No ransom strips identified. The site is in single ownership.

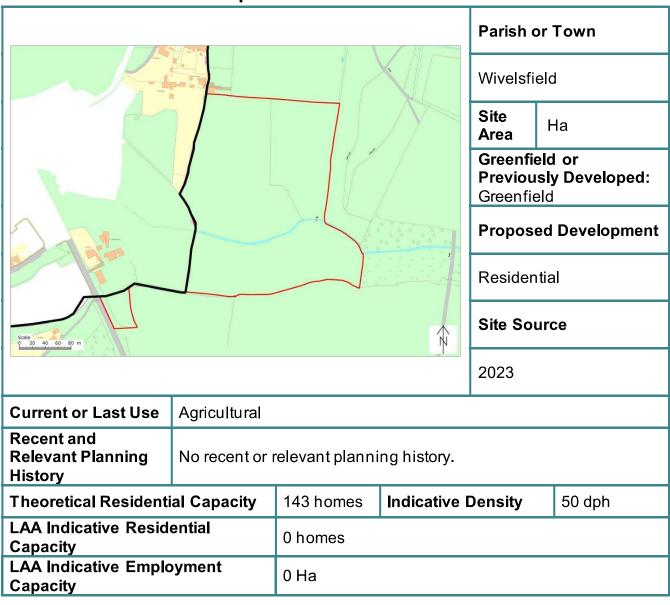
Availability Issue	Availability Assessment Comments	
Ownership	The site is believed to be within single ownership.	
Ransom Strips	None identified.	
Most Recent Evidence of Intention to Develop	2020 CfS	
Phasing Requirements	Single Phase	

# **Achievability Assessment: Potentially Achievable**

To be considered in LDC Whole Plan Viability Assessment. Ringmer is considered to have a relatively buoyant and stable housing market. Economic Needs Assessment will ascertain District need for Employment Land and types

Achievability Issue	Achievability Assessment Comments		
Attractiveness to the market w		benefits from a relatively strong and buoyant housing th good demand and viability. Economic Needs ent will ascertain District need for Employment Land and	
Within a Regeneration Priority Area		No	
Cumulative or Abnormal Delivery Costs	No cumulative or abnormal costs identified.		

Site Reference: 41WV Land adjacent to Cleavewater Barn, Lunce's Hill, Haywards Heath Not Deliverable or Developable



# **Suitability Assessment**

Residential Suitability: Not suitable Employment Suitability: Not Assessed

Part of the site is located outside of the Plan Area within Mid Sussex. The site based on the submitted vision would require land in Mid Sussex to provide access from Lunce's Hill. Site not taken forward for allocation in Mid Sussex District Plan 2021-2039 which is currently at Reg 19 stage. The site itself is not assessed individually or within a parcel identified within the Lanscape Sensitivity Study 2023. The site falls within Landscape Character Area C3 Ditchling Common Western Low Weald of the Landscape Character Assessment, where development

should be limited and designed to retain the rural character of the majority of the area. The existing vegetation at the edge of settlement areas should be protected and retained, with new development set within a robust landscape framework. Some services within walking distance including convenience store and GP surgery. The site is not contigous with the existing settlement nor an application or allocation site and is therefore seperated from the existing settlement.

Suitability Issue	Suitability Assessment Comments	
Adopted Local Plan Policies	Site is outside the existing planning boundaries, adjacent to the district boundary with Mid Sussex, site in Mid Sussex would be partially adjacent the Haywards Heath Planning boundary.	
Minerals and Waste Designations	There are no minerals or waste constraints identified in the adopted Minerals and Waste Plans.	
Flood Zone	Flood Risk Zone 1, however there is a watercourse running though the site.	
Land Contamination	Partially within 250m buffer of historic landfill.	
Topography	Flat. No onsite physical constraints identified.	
Environmental Constraints	The site is not located within or adjacent to any identified environmental designations.	
<b>Ecological Constraints</b>	Adjacent to ancient woodland, requiring buffer.	
Within Air Quality Management Area?	Outside	
Agricultural Land Classification	Grade 3	
Distance from Ashdown Forest SAC	Greater than 7km	
Availability of Utilities	Available adjacent to site.	
Bad Neighbours?	No bad neighbours identified.	
Within Setting of SDNP?	No	
Landscape Sensitivity	The site itself is not assessed individually or within a parcel identified within the draft Lanscape Sensitivity Study. The site falls to the south of Parcel Edge of Haywards Heath B of the Landscape Sensitivity Assessment, assessed as having a medium sensitivity to small and medium-scale residential development dependent on avoiding removing mature vegetation within the parcel and that is consistent with the settlement edge of Haywards Heath.	
	The site falls within Landscape Character Area C3 Ditchling Common Western Low Weald of the Landscape Character Assessment, where development should be limited and designed to retain the rural character of the majority of the area. The existing vegetation at the edge of settlement areas should be protected and retained, with new development set within a robust landscape framework.	

Suitability Issue	Suitability Assessment Comments
Historic Built Environment Constraints	Adjacent Cleavewater a grade II listed former farmhouse (in Mid Sussex). MSDC SHELAA appraisal states that proposal could be harmful to the original farmlands which were fundamental to its original function and purpose. Also listed buildings opposite, Rogers farmhouse and The Old Cottage both grade II listed buildings.
Impacts on Highways Network	See LDC Shared Transport Evidence Base (STEB) 2023
Public Transport	Within walking distance of bus stops on Lunces Hill with services to Haywards Heath, Crawley and Lewes. Nearest train station would be Wivelsfield approximately 4.5km.
Active Travel	Footpaths on Lunce's Hill, albeit only on the western side, no dedicated cycle path.
Public Rights of Way	None
Site Access	Access is shown from Lunce's Hill in submitted vision document. This would be reliant on land in Mid Sussex.

# **Availability Assessment: Available**

The site is confirmed as available for residential development within the plan period.

Availability Issue	Availability Assessment Comments	
Ownership	The site is believed to be within single ownership.	
Ransom Strips	If no access from land in Mid Sussex then access over third party land within the plan area required.	
Most Recent Evidence of Intention to Develop	Proponent states that site would be available within 5 years.  Being promoted for residential use.	
Phasing Requirements	Single Phase	

# **Achievability Assessment: Potentially Achievable**

To be considered in LDC Whole Plan Viability Assessment. Haywards Heath is considered to be a relatively buoyant and stable housing market.

Achievability Issue		y Assessment Comments
Attractiveness to the Market	The area benefits from a relatively strong and buoyant housing market with good demand and viability.	
Within a Regeneration Priority Area		No
Cumulative or Abnormal Delivery Costs		No abnormal costs identified.

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Note: Appendices, including the Site Assessment Outcomes and Parish Mapping are provided in separate documents available on the <u>Local Plan Consultation Portal</u>.

# 1. Executive Summary

- 1.1. The Land Availability Assessment (LAA) is an important part of the evidence base to support the preparation of the Local Plan, particularly in establishing the potential housing and economic land supply. Lewes District Council (LDC) is preparing a new Local Plan covering the areas of the district which fall outside the South Downs National Park (SDNP), termed the plan area. As the new Local Plan can only allocate sites in the areas outside the SDNP the council's LAA only assesses sites that fall outside the SDNP within the district.<sup>1</sup>
- 1.2. LDC last published an interim Land Availability Assessment during February 2022. While the traditional focus of a LAA is housing and employment land potential and supply, the scope of the interim LAA was wider and included assessment of other land uses to support future development, such as land for renewable energy or green infrastructure. The Strategic Housing and Economic Land Availability Assessment was therefore renamed the Land Availability Assessment.
- 1.3. The requirement to undertake a LAA is set out in the <a href="National Planning Policy Framework 2023">NPPF</a>). Further guidance is set out in the <a href="Planning Policy Guidance">Planning Policy Guidance</a>. Paragraph 68 of the NPPF requires that planning authorities should have a clear understanding of the land available in their area through the preparation of a land availability assessment.
- 1.4. The LAA is being published to support the preparation of the Local Plan. This report provides a brief introduction to the LAA, the policy background, a summary of the assessments and the district's theoretical housing capacity based on information available to the council at the time of concluding this LAA document.
- 1.5. It is important to make clear that the LAA does not allocate land for development or determine whether a site will be allocated for development. The inclusion of a site within the LAA should not be taken to imply that the site will be allocated for housing or looked upon favourably when determining planning applications. The LAA is also not a statement of council policy. The decision to allocate sites will be made through the emerging Local Plan which will be subject to further consultation.
- 1.6. Five new sites have been considered in this iteration of the LAA, 246 sites, sourced from other supply have also been reviewed, including sites bought forward from the previous Interim LAA 2022, current planning applications and lapsed planning permissions.
- 1.7. Out of the total sites identified, 143 sites were assessed in Stage 2 for residential potential. Ten are assessed as being deliverable or developable for residential development, 41 sites were considered to be potentially deliverable or developable

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<sup>&</sup>lt;sup>1</sup> We will work with the South Downs National Park Authority on sites which are either on or cross the boundary between the SDNP and district

<sup>&</sup>lt;sup>2</sup> Housing and economic land availability assessment - GOV.UK (www.gov.uk)

- for residential development, and 92 sites have been assessed as not deliverable or developable for residential development.
- 1.8. The LAA will help to inform the next stages of work in the preparation of the new Local Plan. The Local Plan remains an iterative process and additional sites and updated information can come forward throughout the process, it should be noted that this LAA represents a point in time.

## 2. Introduction

- 2.1. The Land Availability Assessment (LAA) provides the Council's assessment of land availability within the plan-making area of Lewes District, which includes the administrative boundary of Lewes District outside of the South Downs National Park. It identifies a future supply of land which is suitable, available and achievable for the identified development uses over the plan period.
- 2.2. The preparation of a strategic housing land availability assessment is required by national policy, as outlined in Paragraph 68 of the National Planning Policy Framework 2023 (NPPF)<sup>3</sup> and informed by guidance set out in the national Planning Practice Guidance<sup>4</sup> (PPG). The LAA therefore primarily considers housing land availability, but also assesses sites promoted for economic development, renewable energy generation and strategic green infrastructure.
- 2.3. The LAA assessment follows an evidence-led, proportionate and consistent methodology in accordance with national policy and guidance. It seeks to capture information on sites including site constraints as they exist at the time of assessment.
- 2.4. This document updates the Council's interim Land Availability Assessment published in February 2022 to a base data of 31st March 2023. This version of the LAA has been updated to reflect new evidence available or progress with existing sites since the publication of the previous version and to include new sites promoted to the Council since the assessment was last undertaken.
- 2.5. The Land Availability Assessment is an important part of the evidence base which supports the local planning framework, including the Local Plan and neighbourhood plans. It provides a strategic overview of the suitability, availability and achievability of each site and will help to inform plan-making and decision-making in the preparation of the new Local Plan.
- 2.6. Importantly, as explained in the national Planning Practice Guidance (PPG), the LAA does not in itself determine whether a site should be allocated for the assessment. It is the role of the assessment to provide information on the range of sites which are available to meet the development requirement of the plan area, but it is for the development plan to determine which of those sites are the most suitable to meet those requirements.
- 2.7. Where a site is assessed as suitable by the LAA, it does not imply that planning permission would be granted for development. Neither does the commentary relating to a site within the LAA constitute formal planning advice. Planning applications would need to follow the normal application process and will continue to be considered against the appropriate policies. The assessment of a site within this LAA does not preclude it from being considered for other uses.

National Planning Policy Framework (publishing.service.gov.uk)
Housing and economic land availability assessment - GOV.UK (www.gov.uk)

- 2.8. This LAA draws on site information currently available to the council at a point in time and will be reviewed and updated accordingly during the plan-making process. We will continue to work with stakeholders to ensure that the assessments in future iterations of the LAA take account of the most current information available at that time. Consequently, assessments determined in this LAA are subject to change as more up to date evidence becomes available during the preparation of the Local Plan.
- 2.9. This document should be read in conjunction with the emerging Local Plan and the series of topic papers and other evidence documents being prepared to support the new Local Plan. Information from these evidence documents, where it has been available, has also been used to inform the site assessments within the LAA.

# 3. Policy Context

3.1. This section summarises the key national policy requirements regarding the assessment of housing and economic land availability, in which Development Plans are expected to be consistent with in order to be found 'sound' at Examination.

## **National Planning Policy Framework**

- 3.2. The requirement to undertake a Land Availability Assessment is set out in Paragraph 68 of the NPPF. It requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. This will enable the authority to identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability.
- 3.3. The authority is also required to identify, through planning policies, a supply of specific 'deliverable' sites within the first five years of the plan period; and a supply of specific 'developable' sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan period.

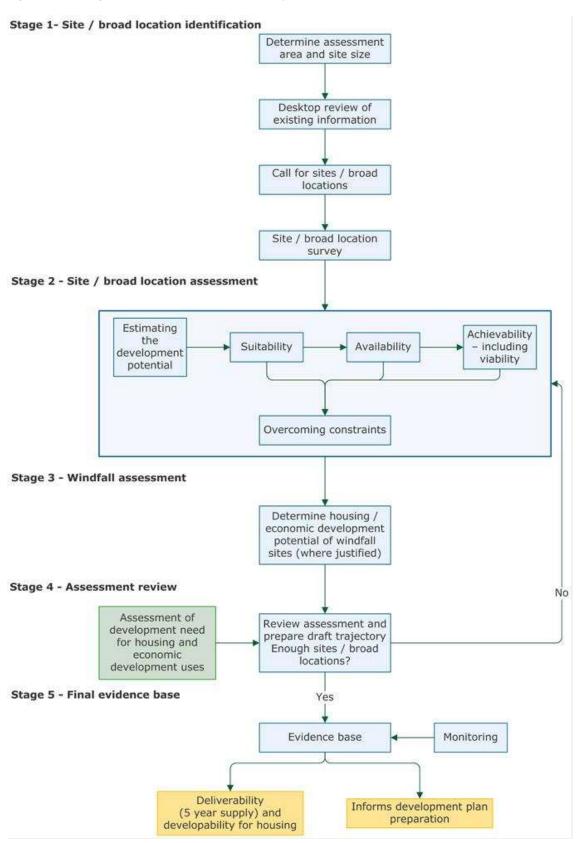
## **Planning Practice Guidance**

- 3.4. Further guidance on the assessment methodology for Housing and Economic Land Availability Assessment is set out through the relevant national Planning Practice Guidance<sup>5</sup> (PPG) which was most recently updated in July 2019.
- 3.5. The PPG defines a Housing and Economic Land Availability Assessment as an assessment of land availability to identify a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period. It advises that the assessment should:
  - identify sites and broad locations with potential for development;
  - assess their development potential; and
  - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 3.6. The PPG reiterates that the LAA does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the Local Plan process to determine which of those sites are the most suitable to meet those requirements.
- 3.7. The PPG also sets out a recommended methodology for the preparation of the LAA through a 5-staged approach, as shown in Figure 1. The preparation of this LAA has

<sup>&</sup>lt;sup>5</sup> Housing and economic land availability assessment - GOV.UK (www.gov.uk)

followed the recommended methodology in accordance with national guidance for a robust and transparent assessment.

Figure 1 Housing and Economic Land Availability Assessment Flowchart



## **Local Development Context**

3.8. The current development plan for Lewes District (outside of the South Downs National Park) consists of:

**Lewes Local Plan Part 1 (LPP1): Joint Core Strategy** with the South Downs National Park 2010-2030 (adopted in May 2016), which provides the strategic policies that set the overall strategy for the scale and distribution of development;

Lewes Local Plan Part 2 (LPP2): Site Allocations and Development Management Policies (adopted in February 2020), which contains the non-strategic policies that set out more detail for specific types of development, including site allocations;

'Saved' policies of Lewes District Local Plan (2003) a number of policies relating to Peacehaven and Telscombe were saved on adoption of LPP2.

#### 'Made' Neighbourhood Plans, including:

- Ditchling, Streat & Westmeston Neighbourhood Plan (2018)
- Hamsey Neighbourhood Plan (2016)
- Nehwaven Neighbourhood Plan (2019)
- Newick Neighbourhood Plan (2015)
- Plumpton Neighbourhood Plan (2018)
- Ringmer Neighbourhood Plan (2016)
- Seaford Neighbourhood Plan (2020)
- Wiveslfield Neighbourhood Plan (2016)

East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (2013) and East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017)

- 3.9. LDC is currently preparing a new Local Plan for consultation which will set out where and how new development will take place over the plan period to 2040. The new Lewes Local Plan 2020-2040 will need to propose site allocations for different land uses, including housing, and policies to help tackle the climate emergency, safeguard the environment and secure high quality design, before it can be adopted.
- 3.10. During May 2021, the Council published its 'Approach to Local Housing Need for Lewes District outside the South Downs National Park. Building on the 'Standard Method' prescribed through the NPPG and PPG<sup>6</sup>, this sets out a locally derived

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<sup>&</sup>lt;sup>6</sup> Housing and economic needs assessment - GOV.UK (www.gov.uk)

method for calculating local housing need for the plan area based on the total number of dwellings inside and outside of the SDNP. This results in a locally derived housing need figure of 602 dwellings per annum for the plan area. This approach is consistent with the findings of the Local Housing Needs Assessment (2023). This equates to a total need of 12,040 dwellings over the plan period, 2020-2040.

- 3.11. In relation to economic land uses, the Lewes Economic Needs Assessment (2023) anticipates that there will only be a modest requirement for new additional employment floorspace to 2040, and therefore the Local Plan should concentrate on protecting and improving the quality of employment sites that already exist, with any new floorspace being provided through the intensification and redevelopment of sites within existing employment locations.
- 3.12. The assessed development needs provide the development context for the plan area. It is the starting point of deciding the quantum of development to be planned for over the plan period or for any formal development requirement figure. It is undertaken separately from the assessment of land availability, which has not been constrained by the need for development.

# 4. Methodology

4.1. This section explains the Council's approach to producing the LAA following a robust and proportionate five-stage assessment, in accordance with the NPPF and PPG methodology shown in Figure 1. The methodology was made available for consultation during 2021.

## Stage 1: Identification of sites and broad locations

- 4.2. The first stage was to identify all potential development sites and broad locations in the plan-making area. The LAA identified a total of 250 sites from a broad range of sources, including a Call for Sites in 2020 and/or actively identified through desktop reviews in line with the PPG. The data sources reviewed include:
  - Sites identified through the 2018 Strategic Housing and Economic Land Availability Assessment (SHELAA);
  - Call for Sites undertaken between 28<sup>th</sup> September and 18th December 2020<sup>7</sup> and sites submitted since the Interim LAA publication;
  - Surplus and likely to become surplus public sector land as identified in the Register of Surplus Land;
  - Land in local authority ownership in consultation with LDC Property Services Officers<sup>8</sup>;
  - Engagement with key public bodies on potential surplus public sector land in Lewes<sup>9</sup> not currently identified through the Register of Surplus Land;
  - Brownfield Land Register;
  - Known vacant and derelict land and buildings;
  - Review of sites where previous planning applications have been refused or withdrawn and pre-application enquiries; and,
  - Consideration of windfall trends (Stage 3).

<u>Planning permission for housing and economic development that are unimplemented or under construction</u>

The Five-Year Housing Land Supply Statement 2023 sets out that there are 159 sites with a total of 1,872 dwellings with planning permission (large sites with planning permission, sites with outline consent and small sites) in the plan area at 31st March 2023<sup>10</sup>.

<sup>&</sup>lt;sup>7</sup> A Call for Sites was carried out between 28<sup>th</sup> September 2020 and 18<sup>th</sup> December 2020. The 'Call for Sites' is an opportunity for landowners, site promoters, individuals and other interested parties to submit land for consideration through the Land Availa bility Assessment. The Call for Sites response form covers all information identified in the PPG. Sites submitted after the publicised cut-off date but before 31<sup>st</sup> March 2023 have been considered as part of this iteration of the LAA. There will be further opportunities through the Local Plan process for organisations and individuals to submit alternative sites.

<sup>&</sup>lt;sup>8</sup> To date no sites with a development potential above the LAA threshold have been identified.

<sup>&</sup>lt;sup>9</sup> No additional LAA sites identified through engagement with key public bodies. Key public bodies engaged includes East Sussex County Council (ESCC), NHS, Sussex Police, Department for Transport(DfT), Department for Work and Pensions (DWP) and the Ministry of Justice.

<sup>&</sup>lt;sup>10</sup> Five Year Housing Land Supply Statement 2023

The Economic Needs Assessment 2023 sets out there are 7 sites subject to extant planning permissions that have not been built out or occupied and should be considered as potential future pipeline. The floorspace provided if these permissions were implemented would be 545sqm in respect of office floorspace and 4,625sqm in respect of industrial floorspace.

Existing housing and economic development allocations not yet with planning permission in local and neighbourhood plans

Four housing allocations from the Lewes Local Plan Part 1 (May 2016) and Local Plan Part 2 (February 2020) did not have planning permission as of 31 March 2023. Together these sites have a potential capacity of 720 dwellings. The Council will engage with the relevant landowners/developers in order to ensure that the most up-to-date information is available regarding deliverability/developability and phasing. Delivery projections for each of the relevant allocations are set out in the table below.

Table 1: Delivery Projections (allocations without planning permission)

Policy Reference and Site Name	Delivery Projection
LPP1 SP7 Land at Harbour Heights	The site is allocated for a mixed use development including employment units and up to 400 dwellings in LPP1. An application for outline consent (all matters reserved) for the development of 400 dwellings and approximately 1,500sqm of commercial floorspace was submitted in June 2023 (LW/23/0380). The application is under consideration. The site is therefore considered available and achievable for residential and economic development within the plan period for the purpose of the LAA.
LPP2 BA01 Hillside Nurseries, Barcombe	The site is allocated for 10 dwellings in LPP2. Planning application withdrawn (Ref: LW/20/0288) with indication that the site is not viable for residential development and will be reserved for the enjoyment of Hillside House. The site is therefore not available or achievable (0 dwellings) for residential development within the plan period for the purpose of the LAA.
LPP3 CH03 Land Adjacent Mill Lane, Chailey	The site is allocated for 10 dwellings in LPP2. No planning applications submitted as of 31 March 2023.
LPP4 NH02 Land at the Marina, Newhaven	The site is allocated for approximately 300 dwellings in LPP2. Planning Application for 259 residential apartments (Use Class C3) & 141 retirement living apartments (Use Class C2), up to 3,500m2 commercial floorspace (including restaurant (Use Class A3), marina related retail (Use Class

A1), marina related workshop (Use class B2), marina facilities (including offices, clubroom changing rooms etc.), office floorspace (Use Class B1), 50 bed apart hotel (Use Class C1) submitted and under consideration (Ref: LW/19/0926). The site is therefore considered available and achievable for residential and economic development within the plan period for the purpose of the LAA.

- 4.3. In addition to sites in the adopted Local Plan, there are also 31 housing allocations within the made neighbourhood plans, which either in full or in part, did not have planning permission as of 31 March 2023. The Council recognises the role of neighbourhood planning in supporting the delivery of sustainable development and expects these to be reviewed through planned neighbourhood plan reviews. These sites are expected to deliver 535 dwellings.
- 4.4. Existing employment allocations in adopted Local and Neighbourhood Plans were reviewed through the Lewes Economic Needs Assessment (2023) which surveyed employment land clusters sized above 0.25 Ha and above across the district, including within the South Downs National Park. It identifies that there are 208.0 Ha of employment land in Lewes District across the surveyed clusters. It also provides an assessment of prospects for intensification and/or redevelopment for existing employment clusters to provide either intensified floorspace and/or more modern space, based on qualitative analysis of a set of supply characteristics.

#### **Desktop Survey**

- 4.5. Following the identification of sites, an initial desktop survey was carried out in accordance with the PPG to aid the assessment of the sites and consideration of deliverability. The following information for each site has been recorded and updated, where sites were identified in previous iterations of the LAA, through a high-level site survey:
- site size, boundaries, and location
- current land use and character
- land uses and character of surrounding area
- physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure / utilities)
- potential environmental constraints
- potential heritage / historical environment constraints
- landscape character and visual amenity constraints
- consistency with the development plans' policies
- proximity to services and other infrastructure, such as public transport
- where relevant, development progress (e.g. ground works completed, number of units started, number of units completed); and

- initial assessment of whether the site is suitable for a particular type of use or part of a mixed-use development.
- 4.6. This process also helps remove 'void' sites, which have no site information submitted, and duplications put forward through different sources in order to avoid double counting of potential
- 4.7. The initial survey also excluded sites which wholly intersect with absolute constraints to development, including national and international designated sites protected by law. The absolute constraints include: Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including potential SPAs, possible SACs, and proposed Ramsar sites); Sites of Special Scientific Interest (SSSI); National Nature Reserves (NNR); Ancient Woodland; Priority Habitats (unless there are local survey which indicate otherwise); Scheduled Ancient Monuments; Historic Battlefields and Registered Parks and Gardens. These sites are unlikely to be suitable for housing, employment and renewable energy generation development and therefore not appropriate to be carried forward to Stage 2 for more detailed assessment.
- 4.8. Where the site only partly falls within or is adjacent to the above designations, it has been progressed to Stage 2 for further consideration. This is to understand whether the site may be suitable for partial development or whether development impacts could be potentially mitigated, instead of eliminating them based on high level surveys.
- 4.9. In addition, the PPG also encourages plan-makers to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments where appropriate. It suggests that it may be appropriate for the assessment to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. This is to ensure that the assessment is strategic in nature and aligns with the role of the Local Plan.
- 4.10. Consistent with the PPG, the minimum size threshold for the LAA included sites capable of accommodating 5 or more dwellings, or economic development on sites of 0.25 Ha (or 500 square metres of floorspace). Sites submitted for renewable energy generation or green infrastructure of any size were assessed. Sites below the LAA threshold are 'filtered' and excluded from further assessment.
- 4.11. The assessment does not have a maximum site size threshold, However site assessments for sites identified where there are opportunities for large-scale developments above 500 dwellings have been reported and published separately to smaller sites in **Appendix 4** to enable a separate overview of the assessment findings.
- 4.12. The assessment covers the plan area of the Lewes District Local Plan. Sites wholly outside of the plan area are excluded from further assessment in accordance

with national guidance. The Council recognises the role of cross-boundary sites within the district and have provided an assessment of areas of the sites which falls within the plan area. The Council is committed to continuously liaising with the relevant neighbouring authorities and consider a joint assessment of the site, if possible, through the Duty to Cooperate process.

4.13. **Appendix 6** sets out the sites that were excluded at this stage of the analysis. A total of 167 sites for all land use purposes were taken forward for further consideration at Stage 2.

## Stage 2 - Site/broad location assessment

- 4.14. Stage 2 of the LAA involved assessing whether a site was 'suitable', 'available' and 'achievable' (including whether the site is economically viable) for the proposed use and calculating the indicative development potential of the site. It is also used to help ascertain whether a site can be considered 'deliverable' (a realistic prospect that it will be delivered within 5 years), or 'developable' (available over a longer time within the plan period).
- 4.15. Information on suitability, availability and achievability was collected and analysed through a combination of desktop and GIS assessment, site visits and information submitted by site promoters. It was informed by a comprehensive range of available technical evidence base studies, engagement with selected stakeholders and review of relevant planning history.
- 4.16. Technical advice from East Sussex County Council on matters of transport, flood risk, heritage and archaeology and landscape impacts was gathered from planning applications on relevant sites to inform the assessment.
- 4.17. **Appendix 3 and Appendix 5** provide the detailed site proformas and maps of the assessment by parish area respectively.

#### Assessing Suitability

- 4.18. A site or broad location can be considered suitable if it would provide an appropriate location for the assessed development type when considered against the relevant constraints and their potential to be mitigated. The criteria informing the suitability assessment included:
  - Whether the site is broadly consistent with the NPPF particularly in relation to the potential loss of the best and most versatile agricultural land;
  - Whether the site is broadly consistent with the Development Plan including 'made' neighbourhood plans and Minerals and Waste Plans. The Planning Practice Guidance states that sites can be assessed against the development plan however the assessment will need to take account of how up to date the plan policies are. As the Lewes Local Plan Part 1 is five years old in May 2021, the sites have not been considered in relation to Spatial Policy 1 and 2. The assessment also recognises the

- emerging policy direction and the potential for policy changes, such as the amendments of the planning boundaries;
- Whether the site is within the setting of the South Downs National Park and may lead to adverse development impacts on its landscape, environment, wildlife and cultural heritage, based on the findings of the Lewes Landscape Sensitivity Assessment (November 2023), and subject to further consultation with the South Downs National Park Authority;
- Whether the site falls within 7km of the Ashdown Forest;
- Whether the site may contribute to regeneration priority areas;
- Whether the site consists of previously developed land;
- How the topography of the site influence the intended development;
- Whether the site could potentially connect to the existing utilities network and if there
  are any existing infrastructure on-site (such as pylons) which may reduce its
  developable area;
- Whether development of the site may result in the loss of an existing use, or negatively impact the conditions of its adjacent or nearby uses;
- Whether the site may be subject to any known contamination, based on analysis of its historic uses or any evidence submitted by the promoters or made available through past planning applications;
- Whether the site may be within or adjacent to any identified environmental or ecological designations (including irreplaceable habitats and other known protected species and priority habitats) and may harm their significance, including the potential loss of key ecological features and/or habitat identified by ESCC;
- Whether the site is subject to the risks of flooding, based on consultation with the ESCC and the emerging Stage 1 Strategic Flood Risk Assessment (2023);
- Whether there are any known risks or potential vulnerabilities of the site to climate change over its lifetime, including increased risk of flooding and coastal erosion;
- Whether the site has a safe and appropriate access or potential to be served a new appropriate access;
- Whether the site may put unacceptable pressure on the local highway network, based on high level desktop assessment working in partnership with ESCC as the Highway Authority which informed the production of the Shared Transport Evidence Base (STEB). The initial findings of the STEB have been referred to;
- Whether the site falls within the Air Quality Management Area;
- Whether the site is well located to the existing public transport network (including bus and rail) to promote sustainable travel, based on high level desktop assessment;
- Whether the site could be accessed via active travel modes;
- Whether development may impact on the existing Public Rights of Way network;
- Whether the site is in an accessible location in close proximity to existing local shops and services;
- Heritage sensitivity of the site, including high-level considerations of development impacts on the significance and setting of designated and non-designated heritage

- assets as well as archaeological potential, based on consultation with ESCC and GIS mapping; and.
- Landscape sensitivity of the site, based on consultation with the ESCC and findings of the Landscape Character Assessment and Landscape Sensitivity Study.
- 4.19. The Council has declared a climate emergency and addressing climate change is one of the core land use planning principles that the NPPF expects to underpin plan making. All sites will also be considered against the findings Renewable Energy Study and Climate Change Study to consider the best opportunities for carbon reduction technologies.
- 4.20. Each site is assessed against the topic areas above based on their impacts and capacity to accommodate development, considering any potential mitigation measures that are likely to be required. There is no weighting system for the different technical areas considered.
- 4.21. An overall suitability 'traffic light' rating, as set out in Table 2 below, is given to categorise if the site is suitable for the assessed use, having considered the constraints and likely mitigation measures required. At this stage, the assessment does not take into account the cumulative impacts of development (such as infrastructure capacity) which will be considered through the overall Spatial Strategy of the Plan.

Table 2 – RAG Suitability Assessment

Suitability Assessment	Description
Suitable (Green)	The site offers a suitable location for the identified type of development and there are no known constraints at the time of the assessment
Potentially suitable (Amber)	The site offers a potentially suitable location for development however further information, investigation or work is required.
Not suitable (Red)	The site is not a suitable location for development
Unknown (Grey)	Insufficient information available or additional evidence/work is required to complete the assessment

#### Assessing Availability

4.22. A site can be considered to be available for development when, on the best information available, there is confidence that there are no known legal or ownership impediments to development.

- 4.23. When submitting sites to the Council for consideration in the LAA, landowners or promoters were asked to include details of the ownership of the site and whether there are any known constraints to development. They were also asked to provide details of when they anticipate that the site could be available for the commencement of development.
- 4.24. Through the availability assessment, the Council has considered the information submitted and that available otherwise, as to whether the site is available for the assessed use and when it may be able to deliver development asset out in Table 3. This has taken into account the site's ownership, any known ransom strips identified and the landowners' indication of intention to development.
- 4.25. Where there are known complexities with the site, such as multiple owners or existing tenancies, the sites were categorised as 'potentially available' Further information and/or assessment may be sought if sites are otherwise suitable and achievable and selected as part of the new Local Plan.

Table 3 - RAG Availability Assessment

Availability Assessment	Description
Available	Landowner confirmed availability and there are no known legal or ownership issues.  Sites with planning permission (including major development with detailed permission unless there is evidence otherwise).
Potentially Available	The land is in multiple ownership and may have assembly issues.  The land accommodates an existing use which would require relocation, for which arrangements are not in place.  The land is subject to legal issues, preventing the site being available in the short term.
Not Available	Landowner(s) have expressed an intention to not develop the site, or no contact with landowner.
Unknown	Insufficient information as to the land owner intentions at that time.

#### Assessing Achievability

4.26. A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a

particular point in time. For the purpose of the LAA, the assessment currently identified key factors which may influence the development viability of each site at a high level. The criteria informing the achievability assessment included:

- Market attractiveness of the assessed use;
- Adjacent uses and attractiveness of the location (by-settlement);
- Whether there is a viable access to the site;
- Whether the site is likely to be subject to abnormal costs from known physical constraints which may reduce its developable, based on desktop analysis and consultation with ESCC;
- Whether the site require substantial infrastructure improvements; and,
- Whether development of the site may require reprovision or relocation of the existing uses.
- 4.27. As part of the Local Plan process, the Council will undertake a viability assessment of the whole plan that will take account of all relevant national and local policies and standards which could impact on the viability of a site, such as the Council's Community Infrastructure Levy, nationally or locally set affordable housing contributions, or other planning obligations. The purpose of the 'whole plan' viability assessment is to ensure that policies are realistic and that the cumulative cost of relevant policies will not undermine deliverability of the plan.

Table 4 – RAG Achievability Assessment

Achievability Assessment	Description
Potentially Achievable	The sites appear to be potentially achievable, subject to further consideration through the LDC Whole Plan Viability Assessment
Unlikely to be Achievable	The site appears not to have a realistic prospect of achievability
Unknown	Insufficient information available or additional evidence/work is required to complete the assessment

#### Calculating Development Potential

4.28. The indicative development potential for each site is informed by existing local plan policies (including 'made' neighbourhood plans), the indicative development capacity promoted by landowners, development densities of nearby sites recently completed or construction and the pattern of development in the area.

4.29. The density assumptions applied to each land use are set out in Table 5 below. Appendix 10 sets out an analysis of density of developments delivered in the plan area since the adoption of the Core Strategy in 2016.

Table 5 - Density Multiplier by proposed use

Assessed Use	Site Area	Gross to net ratio standards	Density Multiplier applied to net developable area
Residential Development	Up to 0.4 Ha	90%	Towns: 50 dwellings per hectare
	0.4 to 2 Ha	80%	Villages: 30 dwellings per hectare
	2 Ha to 10 Ha	75%	Open Countryside: 20
	Over 10 Ha	50%	dwellings per hectare (except large sites capable of delivering 500 dwellings or more)
Economic Development	A single plot ratio of 0.4 has been applied to all sites where a floorspace estimate has not been provided by the landowners / promoters owing to uncertainty on the type of economic development.		
Renewable Energy Generation	Indicative development capacity proposed by the landowner has been used for the purpose of the LAA.		
Strategic Green Infrastructure	Indicative development capacity proposed by the landowner has been used for the purpose of the LAA.		

4.30. The development potential provided in the assessment is indicative only and they are not binding on any decisions that the Council may make in the future. Any specific site and the assumptions made on densities in the LAA should not be considered as agreed. It represents a 'snapshot' of the theoretical development capacity of the sites based upon the data and information available at the time of assessment.

#### Stage 2 Key Findings: Residential Development

- 4.31. A total of 147 sites were assessed for potential residential development. All sites were reviewed against the most up to date information and evidence. With all new sites, information received by the council or known constraints relevant to the sites were fed into the assessment. The site capacity will be amended to ensure that double counting does not take place for the sites that overlap.
- 4.32. The NPPF at paragraph 73 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. There have been submissions to the LAA for extensions to Ringmer (900 dwellings Ref: 51RG), Cooksbridge (1100 dwellings Ref: 19HY) and a new settlement in the parish of East Chiltington (3000 dwellings Ref: 11EC).
- 4.33. These large sites have been assessed alongside the LAA to enable a separate overview of the assessment findings. The site assessments of these sites are available in **Appendix 4**.
- 4.34. Of the 143 sites assessed for housing, 10 are assessed as being deliverable or developable and 41 sites were considered to be potentially deliverable or developable as shown in Table 1. Of the sites assessed, 92 were assessed as not deliverable or developable for housing, the capacity of these is shown as 0 dwellings, as they are considered not able to deliver any units in the plan period, either by way of being unsuitable for development, unavailable, or unachievable. The 41 sites assessed as potentially deliverable or developable require further information and will be reassessed as part of the ongoing plan making process.

<u>Table 6: Summary of Housing Site Assessments outcomes (excluding new settlement and extensions)</u>

	Indicative	
	Capacity (Dwellings)	Count of Site
Deliverable or Developable	413	10
Chailey	154	3
Newhaven	13	1
Peacehaven	65	3
Ringmer	123	1
Seaford	40	1
Wivelsfield	18	1
Not Deliverable or Developable	0	92
Barcombe	0	5
Chailey	0	10
Ditchling	0	2
Hamsey	0	3
Newhaven	0	7
Newick	0	9
Peacehaven	0	14
Plumpton	0	12
Ringmer	0	14
Seaford	0	4
South Heighton	0	1
Telscombe	0	3
Wivelsfield	0	8
Potentially Deliverable or Developable	1745	41
Barcombe	70	1
Chailey	171	5
Ditchling	127	1
Newhaven	125	7
Newick	120	6
Peacehaven	5	1
Plumpton	50	1
Ringmer	546	7
Seaford	75	5
Wivelsfield	456	7
Grand Total	2170	143

## Stage 2 Key Findings: Economic Development

4.35. The Economic Needs Assessment (ENA) (2023), details the demand for employment space in our plan area in order to meet the needs of existing, as well as new, businesses. It identifies 39 employment clusters in the District, ranging from small (under 500sqm) to large (over 2000sqm) units, as well as

their quality. The ENA also concludes that while most of these clusters are performing well, potential opportunities to either intensify and/or redevelop exist in certain cases. The ENA's recommendation is that no new site allocations are needed for employment and instead 'well-performing' sites should be protected. A total of 16 existing employment sites are identified as potential pipeline for future development, including a number of vacant sites, sites currently in low density use that could be suitable for future intensification and consented planning permissions for employment use that have not been built out.

## <u>Stage 2 Key Findings: Renewable Energy Generation and Strategic Green</u> Infrastructure

- 4.36. In order to support future development, and to assist with achieving the Council's ambition for carbon neutrality, sites for green infrastructure and/or renewable energy proposals are also included in the LAA for assessment.
- 4.37. Three sites were submitted for consideration for Solar Farms of up to 50MW. Two of these sites are in the parish of Ringmer (Ref 62RG and 63RG) and one in the parish of Firle (Ref 02FL). All three of the sites have been considered as potentially suitable for their proposed development as energy generation sites but require further work around constraints before a firm conclusion can be drawn.

## Stage 3 - Windfall Assessment

- 4.38. The NPPF defines 'Windfall' sites as sites not specifically identified in the development plan. Paragraph 71 of the NPPF states "that where an allowance is to be made for windfall sites as part of the anticipated supply, there should be compelling evidence that they will provide a reliable source of supply [and] any allowance should be realistic having regard to the historic windfall delivery rates...".
- 4.39. The role of windfall is to provide an allowance for sites which contribute to future housing supply through an analysis of past trends. Using past trends and extrapolating/projecting these forward means that there is evidence and certainty that this source of supply will continue forward over the plan period.
- 4.40. In order to determine the potential supply of housing through windfall sites over the plan period, completions over the last ten monitoring years on small sites (4 units or less) have been analysed<sup>11</sup>. Table 7 below

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<sup>&</sup>lt;sup>11</sup> Completions are Lewes District outside of the SDNP

- shows the windfall supply of residential development over the past 12 years from all types of small sites.
- 4.41. Table 7 shows that an average of 42 (16%) dwellings have been completed through windfall/small sites over the last 12 years. This demonstrates that historically small site completions have provided a consistent source of windfall supply, and this is projected to continue over the plan period.

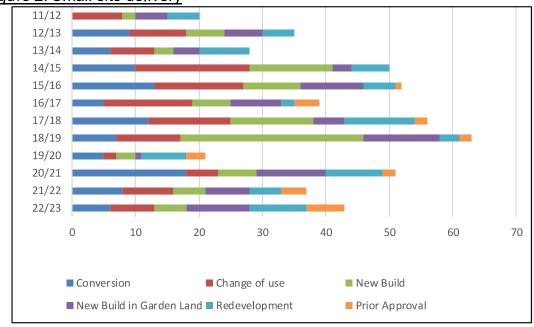
Table 7: Total small sites over previous 10-year period

YEAR	Total Housing	Total Housing	Delivery on Small
	Delivery (net)	Delivery on Small	Sites as % of
		Sites (net)	Total Delivery
			(net)
22/23	536	43	8%
21/22	310	37	12%
20/21	272	51	19%
19/20	242	21	9%
18/19	281	63	22%
17/18	316	56	18%
16/17	167	39	23%
15/16	214	52	24%
14/15	252	50	20%
13/14	90	28	31%
12/13	224	35	16%
11/12	205	20	10%
Total	3109	495	16%

- 4.42. There will be occasions when large (5 or more dwellings) unidentified sites such as a consequence of land ownership changing, land becoming redundant or being released- come forward which the council had not identified previously. Such sites are not considered in the windfall allowance at this stage as further detailed analysis of the potential source of supply is required. Further analysis of past trends and the LAA is required to consider if large windfall sites will be a reliable source of supply over the plan period.
- 4.43. Small sites, delivered over the last 12 years, have been broken down into specific development types to show the contribution to housing delivery that these types of development have made.
  - Conversion Subdivision of a larger unit into smaller units

- Change of Use Change of use class to or from residential (not including under prior approval)
- Prior Approval including change of use under any prior approval (including office to residential and agricultural barn conversions)
- Redevelopment Demolition of a site and provision of new build residential units
- New Build Construction of residential development on vacant land which does not involve demolition (excluding those in garden land);
- New Build in Garden Land Construction of a residential development on land previously forming a residential garden.
- 4.44. Figure 2 shows the dwellings delivered on small sites over the last 12 years broken down by type of development<sup>12</sup>.





- 4.45. Typically, opportunities for change of use, conversions and comprehensive redevelopments are difficult to identify in advance as they require the landowner to identify their intention to develop. However, these are shown above to be a reliable source of housing delivery.
- 4.46. Historically new build development on garden land has been excluded from the windfall allowance calculations. The 2012 version of the

<sup>&</sup>lt;sup>12</sup> Data is provided in Appendix 8

NPPF 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.' The definition of Windfall was amended in the 2018 NPPF to 'Sites not specifically identified in the development plan.' Paragraph 71 of the NPPF 2023 states that 'plans should consider the case for setting out policies to resist inappropriate development of residential gardens.'

4.47. Adopted Policy DM30 of LPP2 sets out that development in rear domestic gardens will be permitted where criteria relating to the impact on existing homes and the loss of features that make an important contribution to the character and appearance of the locality are met. Therefore, inappropriate backland development would be against national and local policy. However, permissions are granted where a proposed development is considered appropriate and, as shown in Figure 2, this is a reliable source of supply.

#### Windfall Calculation

- 4.48. Figure 2 shows that small scale windfall developments have historically contributed towards housing land supply within the district. There are currently 134 dwellings committed on small sites, of which 10 dwellings are with outstanding prior approval.
- 4.49. Delivery on small sites, over the past 12 years, has been an annual average of 42 dwellings. Based on this past trend, a windfall allowance of 42 dwellings per year is a realistic annual rate to include for the plan period. This would provide a total allowance of 588 unit, over the remaining 14 years of the plan period.<sup>13</sup>

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<sup>&</sup>lt;sup>13</sup> No allowance is made for the next 3 years of the plan period to avoid double counting with existing commitments.

## Stage 4 – Assessment Review

- 4.50. Stage 4 of the methodology recommended in the National Planning Practice Guidance involves comparing the identified development needs of the area with the sites identified as available, suitable and deliverable in Stage 3.
- 4.51. Table 8 sets out the summary findings from this Land Availability Assessment. The table shows an indicative capacity of the plan area for housing of 9157 dwellings over the plan period.

<u>Table 8: Housing Assessment totals- excluding New Settlement and Extension</u> sites

-	Yield
Dwellings delivered 2020-2023	1118
Allocations and Commitments (unimplemented planning permission and allocations without planning permission)	3293
Deliverable and Developable LAA Sites	413
Potentially Deliverable or Development LAA Sites	1745
Potentially Deliverable or Developable large Sites	2000
Windfall Allowance	588
Total	9157

- 4.52. In accordance with paragraph 025 of the PPG<sup>14</sup> in the first instance the interim assessments will be revisited, including density assumptions to ensure the efficient use of land. A further 'Call for Sites' will be undertaken following publication to ascertain if any other sites are available.
- 4.53. If following a further 'Call for Sites' and evidence gathering an insufficient supply of sites to meet housing need is identified, then it will be necessary for the council to consider how else it may meet the shortfall. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the Duty to Cooperate.

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<sup>&</sup>lt;sup>14</sup> PPG – Housing and economic land availability assessment - Paragraph: 025 Reference ID: 3-025-20190722

## Stage 5 – Final Evidence Base

- 4.54. Stage five of the land availability assessment methodology set out in the planning practice guidance is the production of the final evidence base report including outcome. It includes the core outputs defined in the NPPG, namely:
  - A list of excluded sites with clearly evidenced and justified reasons.
  - A list of all sites or broad locations considered, cross-referenced to their locations on maps.
  - An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when.
  - An assessment of the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when.
  - An indicative trajectory of anticipated development and consideration of associated risks.
- 4.55. An indicative trajectory is provided in Appendix 9. This should be read alongside the site assessments and should be viewed as the starting point for the council's journey on preparing its Local Plan, recognising that the LAA will undergo further iterations and the housing trajectory will be updated in future iterations of the LAA.

# 5. Next steps

- 5.1. The Local Development Scheme contains the timetable that the council has set itself to prepare its Local Plan. As stated earlier in this report, this will include gathering evidence to support the Local Plan's development.
- 5.2. The LAA is a key piece of evidence to understand the district's development capacity which the council will use to shape its spatial strategy. The LAA is published at this stage to help inform future assessments of existing and potential sites.
- 5.3. Submissions, including submission of new sites, should be made to the Planning Policy Team via email: <a href="mailto:localplan@lewes.gov.uk">localplan@lewes.gov.uk</a>

## **APPENDICES**

The report is supported by appendices, which are available as separate documents on the **Local Plan Consultation Portal** 

Appendix 1: Site submission proforma

Appendix 2: Assessment criteria

Appendix 3: LAA Site assessments outcomes

Appendix 4: Large sites assessment outcomes

Appendix 5: Maps of assessed sites

Appendix 6: Excluded sites list

Appendix 7: List of sites with planning permission, and existing allocations

without planning permission

Appendix 8: Windfall calculations

Appendix 9: Indicative Trajectory

Appendix 10: Density of development in Lewes District