



Urban Design and Plan
Making

Submitted to
Eastbourne Borough Council

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Eastbourne Borough Council

Strategic Housing and Economic Land Availability Assessment (SHELAA)

Methodology Report

September 2016
DRAFT Report

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1 Introduction

What is the purpose of this report?

1. The purpose of this report is to inform key stakeholders¹ of the methodology and assumptions employed in the Strategic Housing and Economic Land Availability Assessment (SHELAA) to identify a future supply of land which is suitable, available and achievable for housing and economic development uses in Eastbourne over the Local Plan period

What does the Government require Local Planning Authorities to do?

2. The SHELAA is a technical study which forms a critical component of the evidence base for local plans. The purpose of the SHELAA is to identify land which is suitable, available and economically viable for housing and economic development over the Local Plan period; assess how much development is achievable on each site and estimate when development is likely to occur. Specifically, Eastbourne Borough Council is required, by the National Planning Policy Framework (NPPF para 47)², to:
 - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
 - for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
 - set out their own approach to housing density to reflect local circumstances.
3. The SHELAA will therefore provide an up to date assessment of land supply in the borough and help to identify land for new housing and employment land uses for the period up to 2035 to supplement the strategic locations proposed through the Core Strategy Local Plan 2006-27.

How does this relate to 'housing need' and housing targets?

4. The role of the SHELAA is to test whether (and where) there is sufficient land available to meet the full objectively assessed needs for housing and economic development. National Planning Policy Guidance³ (known as PPG) requires that local authorities prepare an assessment to

¹ This report will be subject to a technical engagement/consultation of 6 weeks with all of our stakeholders on our Local Plan mailing.

² DCLG (2012) National Planning Policy Framework

³ <http://planningguidance.communities.gov.uk/>

establish the realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified full objectively assessed needs.

5. This stage is an important early evidence gathering exercise in the preparation of the new Local Plan; however it is not an allocations document and it does not necessarily follow that sites assessed as suitable, available and achievable in the SHELAA will be granted planning permission - they will be taken forward and formally considered and consulted upon through the statutory Local Plan process or, where relevant, through the statutory registers required through the Housing & Planning Act 2016, such as the Brownfield Sites Register.

Stakeholder involvement

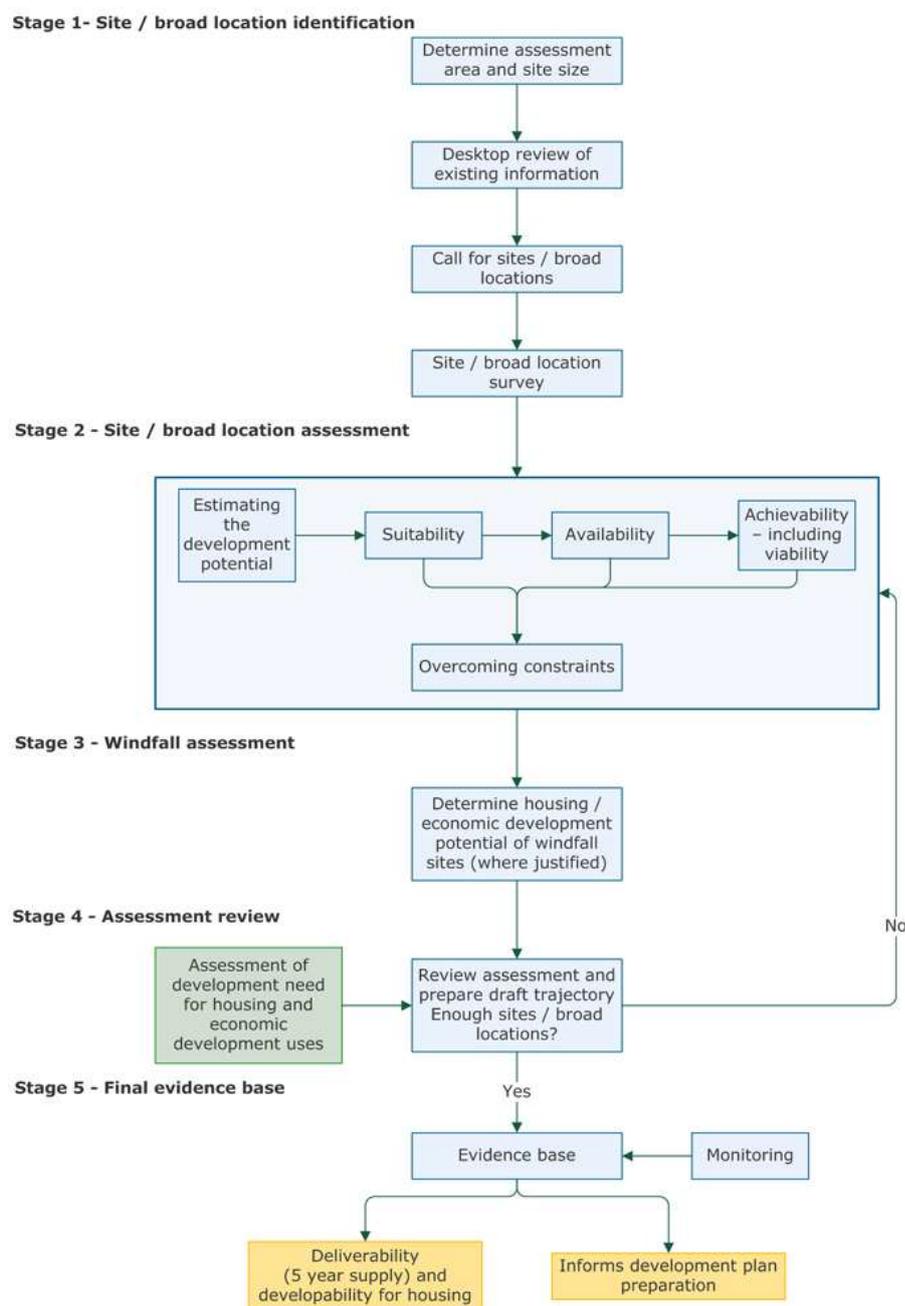
6. The views of internal and external stakeholders will be sought throughout the assessment. Stakeholders include landowners, developers, agents identified in Eastbourne's Development Control database and others operating in the local area, along with key statutory stakeholders. Consultation will take place in the following ways:
 - Call for Sites – an invitation to stakeholders and public to submit potential sites for development to be included in the SHELAA;
 - Councillor training session – a training session in August 2016 provided information to the Local Plan Steering Group on the SHLEAA process and invited initial comments on the approach;
 - Methodology report (this report) – stakeholders will be invited to comment on the approach;
 - Councillors will be provided with a list of all sites to be assessed and will be invited to provide factual information on potential development opportunities and constraints, particularly relating to whether the site is suitable, available and achievable.
 - Draft Report – Members will be invited to comment on the draft report

2 Methodology

Introduction

- The SHELAA approach is based on the standard methodology set out in the PPG as reproduced below in Figure 1.⁴ The following sections expand on the standard methodology providing additional clarification of the approach. Unless otherwise stated each stage relates to the assessment of both housing and economic uses.

Figure 1: PPG Housing and Economic Land Availability Assessment Methodology



⁴ PPG, Housing and economic land availability assessment, Methodology – flow chart ID 3-006-20140306

Stage 1 – Identification of sites and broad locations

9. Stage 1 involves the identification of all potential housing and economic sites for inclusion in the assessment. This section outlines the decisions and actions that will be completed to ensure there is a robust understanding of the amount of land with potential for housing and economic development within Eastbourne Borough.

Land uses to include in the SHELAA

10. The SHELAA will consider the types of housing and economic development set out in Table 1. The Planning Practice Guidance does not specify which uses should be included but indicates that residential should include different tenures and types and that economic uses would include retail, leisure, cultural, office and warehousing (PPG para 14)⁵.

Table 1: Uses included within the SHELAA

Housing	Housing development including: <ul style="list-style-type: none"> • Market and Affordable Housing • Housing provided for older people including residential institutions • Student housing
Economic	Economic development including those within the B Use Classes, public and community uses and main town centre uses: <ul style="list-style-type: none"> • A1 Shops • A2 Finance and professional services • A3 Restaurants • A4 Drinking establishments • A5 Hot food takeaways • B1 Business • B2 General industrial • B8 Storage and distribution • C1 Hotels • D1 Non-residential institutions • D2 Assembly and leisure

⁵ (PPG Reference ID: 3-014-20140306)

Geographical area of the SHELAA

11. The Planning Practice Guidance⁶ advises the area selected for the assessment should be the housing market area and functional economic market area. The Housing Market Area is wider than the administrative boundaries of Eastbourne and stretches into the southern areas of Wealden District. However, for practical reasons the area that will be assessed in this SHELAA is the Eastbourne Borough Council administrative area only.

Determining site size

12. The PPG includes advisory thresholds for sites and broad areas. Land availability constraints in Eastbourne mean that the Council has decided to be as thorough as possible in its identification of sites. As such it is considered that all sites capable of achieving a net gain in residential dwellings (i.e. sites that will deliver one or more net residential units) or 1000 sq m of employment floorspace should be assessed.

Desk top review of existing information

13. A desktop review of existing information will be carried out to identify potential sites for assessment. Table 2 sets out the sources of potential sites listed within the PPG,⁷ which also includes sites included on the brownfield register.

Table 2: Sources of site data	
Existing housing and economic development allocations and site development briefs not yet with planning permission	<ul style="list-style-type: none"> Local and neighbourhood plans. Planning application records. Development brief.
Planning permissions for housing and economic development that are unimplemented or under construction	<ul style="list-style-type: none"> Planning application records. Development starts and completions records.
Planning applications that have been refused or withdrawn	<ul style="list-style-type: none"> Planning application records.
Surplus and likely to become surplus public sector land	<ul style="list-style-type: none"> National register of public land. Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Police, Fire Services, utility providers, statutory undertakers.
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to	<ul style="list-style-type: none"> Eastbourne Borough Council empty property register.

⁶ PPG Housing and economic land availability assessment, ID 3-007-20140306.

⁷ PPG, Housing and economic land availability assessment, ID 3-012-20140306.

residential)	<ul style="list-style-type: none"> • English House Condition Survey. • National Land Use database. • Commercial property databases (e.g. estate agents and property agents). • Valuation Office database. • Active engagement with sector.
Sites included in the pilot brownfield register submission	<ul style="list-style-type: none"> • Brownfield register
Additional opportunities in established uses (e.g. making productive use of under utilised facilities such as garage blocks)	<ul style="list-style-type: none"> • Ordnance Survey maps. • Aerial photography. • Planning applications. • Site surveys.
Business requirements and aspirations	<ul style="list-style-type: none"> • Enquiries received by Eastbourne Borough Council local planning authority. • Active engagement with sector.
Large scale redevelopment and redesign of existing residential or economic areas	<ul style="list-style-type: none"> • Local and neighbourhood plans. • Ordnance Survey maps. Aerial photography. • Site surveys.

Call for sites / broad locations

14. PPG states that plan makers should issue a call for potential sites and broad locations for development. This is to ensure as many sites as possible are included in the assessment.
15. The assessment will consider a range of different site sizes from small-scale sites to opportunities for large-scale developments such as urban extensions and even new settlements where appropriate.
16. The Call for Sites is aimed at a wide an audience as is practicable so that those not normally involved in property development have the opportunity to contribute. Through the Call for Sites, private, public and voluntary sector bodies and individuals may submit potential housing sites for consideration as part of the SHELAA.
17. The SHELAA call for sites consultation was carried out in August and all sites received will be included in the assessment.

Site / broad location survey

18. The PPG advises that all sites (subject to site size thresholds) derived from data sources and the call for sites should be assessed against national policies and designations to establish which have reasonable potential for development and should be included in the site survey.⁸
19. An initial desktop review of sites and broad locations will be carried out to sift out those which should automatically be excluded from further assessment. Where exclusion constraints exist on part of a site or broad area, it will not be excluded from the assessment. In such circumstances the constraint will be considered within the more detailed Stage 2 assessment.
20. Sites subject to those constraints set out in Table 3 will be excluded from further assessment. The justification for exclusion is provided.

Table 3: Exclusion categories

Category	Reason for exclusion
Sites within the functional flood plain	<p>The PPG advises that only water compatible development should be permitted within the functional flood plain.⁹ Most forms of residential and economic development do not meet this requirement. Development in Flood Zone 3A (Tidal and Fluvial) requires an additional test known as an 'exception test', whilst Flood Zone 3B (functional floodplain) has the most severe risk of flooding within which housing development is not permitted.</p> <p>For the purposes of the SHELAA, sites which fall entirely within Flood Zone 3b will be excluded</p> <p>Sites which fall entirely within Flood Zone 3a will be excluded, unless there is site specific evidence that a design solution to mitigate the flood risk is being proposed. <u>Sites within Flood Zone 3a which are included in the SHELAA would be subject to an 'exception test' as part of the Local Plan process.</u></p> <p>Sites which fall partly within Flood Zone 3a and where there is no proposed flood mitigation measures will be included but the assessment will only take into account the developable part of the site (i.e. excluding any land within Flood Zone 3a).</p> <p><u>Sites falling partly or entirely within Tidal Flood Zone 3a would be included in the assessment as these areas are protected by flood defences that would be maintained throughout the Local Plan period.</u></p>
Sites within or in close proximity of the South Downs National Park (SDNP)	Any site within the SDNP would be excluded for housing due to the fact that there are no settlements within the Eastbourne portion of the SDNP and therefore development here would be contrary to NPPF sustainability policies.

⁸ PPG, Housing and economic land availability assessment, ID 3-014-20140306.

⁹ PPG, Flood risk and coastal change, ID 7-067-20140306

	<p>Any sites within the SDNP proposed for economic use would be excluded unless on previously developed land.</p> <p>Sites in close proximity to the SDNP would be judged on a case by case basis in terms of potential impacts.</p>
<p>Sites within or in close proximity to areas of biodiversity include Eastbourne Park and the Pevensey Levels RAMSAR site</p>	<p>Any sites within Pevensey Levels would be excluded. Any sites within Eastbourne park would be excluded unless it complied with Policy D11 of the Eastbourne Park 2013 Supplementary Planning Document.</p> <p>Sites in close proximity to Eastbourne Park and Pevensey Levels would be judged on a case by case basis in terms of potential impacts.</p>
<p>Sites within Site of Special Scientific Interest (SSSI)</p>	<p>Legislation and the NPPF advises that planning permission should not normally be granted for development that is likely to have an adverse effect on a SSSI.¹⁰</p> <p>Sites within SSSI, Areas of Outstanding Natural Beauty (AONB) and Site of Nature Conservation Interest (SNCI) would be excluded.</p>

21. All sites will be mapped and recorded on a database. Details of sites excluded from further assessment will be provided.
22. Site surveys will be carried out as necessary with appropriate site characteristics being recorded to assist the subsequent, more detailed assessment.

Stage 2 – Site / broad location assessment

23. Stage 2 is to assess the development potential for each site / broad location remaining in the SHELAA following Stage 1. This will be carried out by a combination of desktop assessment, site visits and contacting landowners, agents and developers.
24. The assessment of suitability, availability and achievability will inform the decision as to whether a site or broad location can be considered deliverable, developable or not currently developable.¹¹

Assessing suitability

25. The PPG indicates that the suitability of sites or broad locations should be guided by: the development plan, emerging plan policy and national policy; and market and industry requirements in that housing market or functional economic market area.¹²
26. The SHELAA will assess each site against a number of criteria, in line with PPG:
- The development plan and national policy taking into account how up to date policies are, the appropriateness of constraints and whether constraints can be overcome;

¹⁰ NPPF, paragraph 118.

¹¹ PPG, Housing and economic land availability assessment, ID 3-029-20140306.

¹² PPG, Housing and economic land availability assessment, ID 3-019-20140306.

- Physical limitations or problems – such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Potential impacts – including effect upon landscape features, nature and heritage conservation;
- Contribution to regeneration priority areas;
- Environmental/amenity impacts experienced by would be occupiers and neighbouring areas; and
- Appropriateness and likely market attractiveness for the type of development proposal.

27. All sites identified as part of the SHELAA will be assessed against the above factors to give an indication of each site's potential suitability for development (housing or economic). The assessment will draw on officers' detailed knowledge of individual sites and through site visits, and information from pre-application discussions and landowner engagement.

28. To assist with the assessment of suitability the following general approach to key issues will be undertaken:

Location

29. Sites will generally be deemed suitable where they are located within areas that already have appropriate infrastructure and a suitable range of services, community and other facilities. Sites will generally be deemed potentially suitable where appropriate infrastructure and a range of services, community and other facilities could be provided to support the development.

Proximity to environmental designations

Sites which are within a statutory/national or local environmental designation will generally be deemed to be unsuitable. Sites which are adjacent to a designation will be assessed in terms of the potential impact development could have on a designation. The relevant statutory designations that will be assessed are:

- Areas of Outstanding Natural Beauty (AONB);
- Local Nature Reserves (LNR);
- Scientific Interest (SSSI);
- Ramsar Sites Pevensey Levels;
- Special Areas of Conservation (SAC); and
- Special Protection Areas (SPA)

Proximity to Floodplain

30. If the site is within an area of high flood risk then residential development will not be acceptable. With respect to expansion of flood zone areas affecting sites due to the consequences of climate change, the Flood Risk Assessment for Eastbourne Borough Council and Wealden District Council sets guidance for the application of an exception test for sites in less vulnerable Flood Zone 3A sites.

Employment

31. Sites in economic use but not designated for such uses will generally be deemed suitable for alternative uses with regards to this factor. Sites which are currently designated for economic uses but emerging evidence and policy suggest the site is no longer required for employment use will generally be deemed potentially suitable for alternative uses. General residential amenity considerations will be appraised for each of these sites. Sites which are designated or in economic use and are proposed to be retained for such use will generally be deemed unsuitable for alternative uses.

Public Open Space

32. Sites which are designated or recognised public open spaces will generally be deemed unsuitable for development. Exceptions might occur for sites where arrangements are in place to make alternative public open space provision, where development would fund improvements to the quality of the public open space, where the development is linked to the use of the area as public open space. Sites which are currently designated or recognised public open spaces but emerging evidence and policy suggest the site is no longer required will generally be deemed potentially suitable for alternative uses. These sites must not contain important biodiversity or archaeology, in particular trees with Tree Preservation Orders.

Garages, Car Parks and Garden Space

33. Redevelopment of existing garage courts or open car parks will depend upon the site being redundant or there being an oversupply of car parking in the area. The impact of on-street parking on the quality and appearance of the area following the loss of such sites will be considered. The character of the local area will also be considered as part of the assessment of garden sites.

Scheduled Monuments

34. Sites which are designated Scheduled Monuments will be deemed unsuitable for development. Exceptions might occur for sites where development is linked to the benefit of the historic site.

Historic Parks and Gardens

35. Sites which are within registered historic parks and gardens will generally be deemed unsuitable for development. Exceptions might occur for sites which are previously developed or where development is linked to the use of the area.

Agricultural Land

36. Sites which do not comprise best and most versatile agricultural land will generally be deemed suitable with regards to this factor. Sites which comprise best and most versatile agricultural land and there are other constraints to development will generally be deemed unsuitable.

Other considerations

37. Further suitability considerations are set out in Appendix B. This list of considerations is not exhaustive.

38. The assessment of each site will be classified into the categories set out in Table 4.

Table 4: Suitability classification	
Suitable	<ul style="list-style-type: none"> The site offers a suitable location for development and there are no known constraints which significantly inhibit development for

	the defined use.
Potentially suitable	<ul style="list-style-type: none"> The site offers a potentially suitable location for development but is subject to a policy designation which inhibits development for the defined use. The development plan process will determine the future suitability for the defined use.
Suitability unknown	<ul style="list-style-type: none"> The site requires further assessment before a robust decision can be made on its suitability for being developed for the defined use.
Unsuitable	<ul style="list-style-type: none"> The site does not offer a suitable location for being developed for the defined use or there are known constraints which significantly inhibit development. The site is unlikely to be found suitable for the defined use within the next 15 years.

Assessing availability of sites for development

39. The availability assessment will use the NPPG definition that “a site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. (PPG ID 3-020-130729)
40. Sites will be assessed as available if there is evidence of an intention to develop immediately or at some point in the future. If there is no indication of an intention to develop or evidence of a likelihood of the site becoming available or land ownership is unknown, the site will be assessed as unavailable.
41. In assessing availability for housing we will seek to identify site ownership and availability through information held by the Council. This may also involve further consultation with stakeholders to supplement the Call for Sites. This will be done by letter / phonecalls.
42. We will consider extant planning permissions to be deliverable unless there is clear intelligence that such permissions will not be implemented within 5 years.

Estimating development potential

43. PPG states that the development potential should be “guided by the existing or emerging plan policy including locally determined policies on density. Where the plan policy ...does not provide a sufficient basis to make a judgement then relevant existing development schemes can be used as the basis for assessment, adjusted for any individual site characteristics and physical constraints” (PPG, paragraph 18).
44. For employment land, PPG suggests using floor space densities for certain industries (PPG para 18).
45. The approach followed in the SHELAA for estimating development potential is set out below and a worked example provided in the Appendices.

Housing

Sites where an existing estimate of development potential exists.

46. The starting point for a site capacity figure will be to consider any existing available information. This may be the planning permission figure, figures resulting from design work such as a masterplan or planning brief or a landowner or site promoters' capacity assessments where these are provided as part of the call for sites. These figures will be reviewed to ensure they are realistic in terms of the site size, location and characteristics, and adjusted if necessary.

Sites where an existing estimate of development potential does not exist:

47. For sites where the development potential has not been estimated, the following approach will be taken:

Site Under 2ha

48. To determine the potential capacity of sites under two hectares these will be benchmarked against recently consented schemes from across the Borough, based on three zones:

- town centre;
- within other sustainable neighbourhoods; and
- outside sustainable neighbourhoods.

49. A density range will be derived from the sample of consented schemes for each zone. A midpoint of the density range will then be applied to SHELAA sites falling within the same zone.

Sites Over Two Hectares

50. For sites over two hectares the same densities will be used but the site area will be adjusted to account for the larger size.

51. The final capacity assessment for each site over two hectares will apply the median between the high and low capacity estimate. Note this does not take account of other existing policy requirements such as onsite renewable energy provision, which may in actuality further reduce the capacity of some sites.

52. Some sites may be successful in achieving higher densities but, at the same time, other sites may only achieve lower densities due to design issues that emerge through the planning application process. Therefore it is more realistic and robust to assume the mid-point figure throughout unless the site specific circumstances justify otherwise.

Large Greenfield sites

53. If there are any large greenfield sites in the assessment, the development potential will be estimated using AECOM's research into the appropriate residential density at the neighbourhood level. This takes into account land for supporting infrastructure such as schools, community facilities and open spaces. The findings of this research are that an appropriate density is:

- for sites between 5-10 hectares = 25 to 35 dwellings per hectare are applied as the high and low scenario.
- for sites over 10 hectares = 20 to 30 dwellings per hectare are applied as the high and low scenario.

Economic sites

54. For economic sites the approach taken to assessing development potential is as follows:

55. For sites already in the planning process, with a realistic estimate of the amount of floorspace by type that is expected to be delivered already known, this figure will be reviewed, and if appropriate will be applied in the assessment. This is the case for planning permissions, planning application and pre-application sites.
56. For sites where the development potential was not already known, a simple plot ratio will be applied based on recently published guidance on employment floorspace. The plot ratio is the amount of employment floorspace of different types that is expected per hectare of land. It takes into account that office floorspace is often developed at a higher density than industrial floorspace because it is usually developed at a higher density and taller buildings than industrial, which tends to be in less central locations and requires more land.
57. The employment floorspace that has been derived from planning applications or through the call for sites information is likely to be relatively accurate. The estimates produced for employment sites based on plot ratios, in Table 5, are approximate figures only and should be taken as an indication rather than an exact figure.

Table 5: Proposed plot ratios

Land Use	Plot ratios (sq m per hectare)
B1 (Business)	9,000
B2 (Industrial)	3,800
B8 (Storage and Distribution)	3,800
Mixed use	5,932

Source: Adapted for Eastbourne from London Employment Sites Database GLA 2013

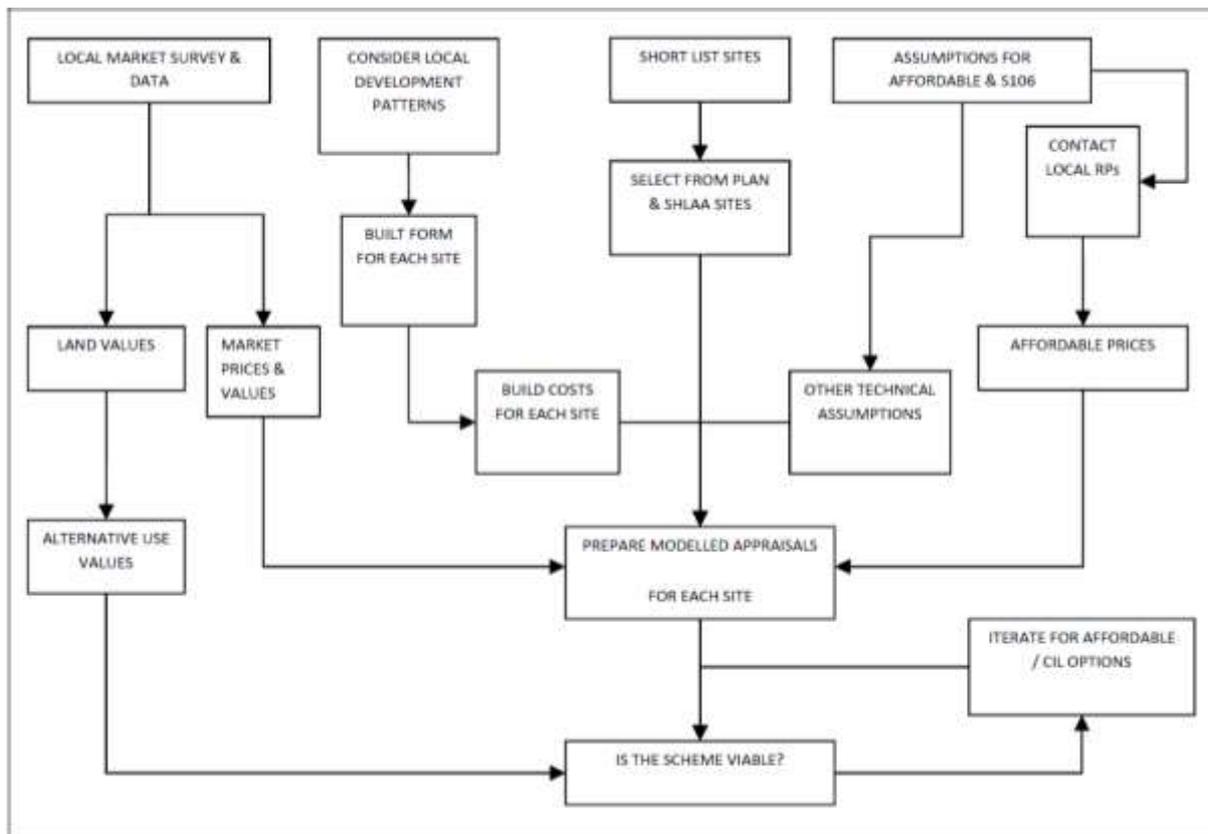
Assessing achievability of sites for development

58. An important part of the SHELAA process is an assessment of the deliverability of the sites identified. This is an explicit requirement of the NPPF and PPG. It is necessary to ensure that the sites for residential development identified through the plan-making process are deliverable in the context of the Council's policies.

Residential viability

59. The viability methodology is summarised in Figure 2 overleaf. It involves preparing financial development appraisals for a representative range of sites, both residential and commercial and using these to assess whether development, generally, is viable. We will not be preparing financial appraisals for each site.
60. The sites will be modelled based on discussions with Council officers, the existing available evidence supplied by the Council, and on our own experience of development. This process will ensure that the appraisals are representative of typical development in Eastbourne and adjacent areas.
61. The appraisals will be based on remaining saved policies and standards in the Eastbourne Borough Local Plan 2001-2011, the adopted Core Strategy (2006-2027), the Eastbourne Town Centre Local Plan and the emerging Employment Land Local Plan, and include appropriate sensitivity testing of a range of scenarios including different levels of affordable housing provision.

Figure 2: Residential Viability Methodology



62. The local property market will be surveyed in order to obtain a picture of sales values and assess land values to calibrate the appraisals and to assess existing and alternative use values. Alongside this, local development patterns will be considered in order to arrive at appropriate built form assumptions for those sites where information from a current planning permission or application is not available. These in turn will inform the appropriate build cost figures.
63. Other technical assumptions will be made before appraisals are produced. The appraisal results will be presented in the form of £/ha 'residual' land values, showing the maximum value a developer could pay for the site and still return a target profit level.
64. The Residual Value will then be compared to the Alternative Use Value for each site. Only if the Residual Value exceeded the Alternative Use Value / Existing Use Value figure by a satisfactory margin, could the scheme be judged to be viable.

Commercial viability

65. For the assessment of the viability of sites for economic development uses, we would carry out a 'light touch' approach, which would include a review of the Community Infrastructure Liability (CIL) Viability evidence as the main source of data. We will also look at the employment land local plan, retail study and any strategies or regeneration initiatives that may exist with any indicators of viability, e.g. rents, values and demand.

66. AECOM subscribes to CoStar which is a property intelligence data base that includes some good trend reporting of rents, yields, values, vacancies, take up, new build starts and allows printing and exporting a range of data. Whilst these on their own are not a measure of viability we will be able to draw inferences from them.
67. It may be that there are some sites where there is not enough information available from existing sources to be able to accurately assess the viability. We will identify the sites where more detailed assessment may be necessary.
- 68.

Notes on viability testing

69. The bespoke viability testing model used for the SHELAA has been designed and developed specifically for area wide viability testing as required by the NPPF (and CIL Regulation 14). The purpose of the viability model and testing is not to exactly mirror any particular business model used by those companies, organisations and people involved in property development; but to capture the generality and to provide high level advice to assist the Council in assessing the deliverability of the Plan.
70. It is important to note that the viability work required to support a SHELAA is carried out in the same way as that for a Local Plan Viability Study or a CIL Viability study, but at a higher level.
71. The work is based on the assessment of typologies that are broadly representative of the potential sites in the area. The viability testing does not involve site specific assessments of delivery.
72. The work will draw heavily on the Council's earlier viability studies, being based on updating the assumptions used earlier rather than new primary research. This approach is not only appropriate (the NPPF requires a proportionate approach based on existing available evidence) but necessary to avoid inconsistencies in the Council's wider evidence base.
73. The assessment of each site will be classified into the categories set out in Table 6.

Table 6: Achievability classification	
Achievable	<ul style="list-style-type: none"> There is a reasonable prospect that the site will be developed for the defined use within the next 15 years.
Potentially achievable.	<ul style="list-style-type: none"> The achievability of the site is inhibited by an external factor where the timing of resolution is unknown. The delivery of the resolution will determine the future achievability of the site.
Achievability unknown	<ul style="list-style-type: none"> The site is subject to issues upon which further information is required before a robust decision can be made on achievability.
Unachievable	<ul style="list-style-type: none"> There is no reasonable prospect that the site will be developed for the defined use within the next 15 years.

Assessment of the deliverability and developability of each site

74. The assessment of suitability, availability and achievability of sites and broad areas will provide information on which a judgement can be made in the plan making context as to whether a site can be considered deliverable over the plan period.¹³ The definitions of deliverable and developable are set out within the NPPF.¹⁴

75. The assessment of each site will be classified into the categories set out in Table 7.

- Sites classified as “deliverable” or “developable” may be expected to be developed within the SHELAA timeframe (by 2035).
- Sites classified as “not developable within the SHELAA timeframe” cannot realistically be expected to be developed in the foreseeable future.

Table 7 Deliverable and developable classification	
Deliverable (years 1-5)	<ul style="list-style-type: none"> • The site is available for development, offers a suitable location for the defined use, and is achievable with a realistic prospect that the defined use will be delivered on the site within 5 years.
Developable (years 6-10, 11-15, 16-19)	<ul style="list-style-type: none"> • The site is a suitable location for defined use and there is a reasonable prospect that the site is available and could be viably developed in years 6-10, 11-15, or 16-19.
Not developable within the SHELAA timeframe years	<ul style="list-style-type: none"> • Those sites assessed as having significant policy and/or environmental constraints that means that the site is unlikely to be become suitable in the next 19 years. • Those sites assessed as being unlikely to become available in the next 19 years. • Those sites assessed as having no reasonable prospect of being viable in the next 15 years.

76. Assessing the timescale and rate of development will use the information on suitability, availability, achievability and constraints to decide which time period each site is capable of being delivered by. This will take account of lead-in times and build-out rates for the development of different scales of sites (PPG Para 023).

77. Based on the PPG, each site will be assigned a timescale for delivery which is either 1-5 years, 6-10 years, 11-15 years, or 16-19 years from the base date of the SHELAA (2016).

78. The timescales depend on the information known about each site in relation to its suitability and availability for housing or economic use. If there are no known constraints to development and the site is owned or controlled by a landowner / developer who is in the process of bringing the site forward for development or intends to take the site forward for development immediately, this site will fall into the 0-5 year timescale. If a site is in multiple ownership, has constraints to development, has multiple issues or there is no clear immediate intent to develop, this site is assigned a later timescale e.g. 6-10 years or 11-15 years. If a site is expected to come forward

¹³ PPG, Housing and economic land availability assessment, ID 3-018-20140306.

¹⁴ NPPF, footnotes 11 and 12.

for housing within the plan period but there are severe constraints to delivery or intention to develop is not clear these sites are assigned the 16+ years category.

79. A broad assumption will be made on build out rates and lead in times reflecting the current housing market in Eastbourne.

Stage 3 – Windfall assessment

80. Windfall sites are those which have not been specifically identified in the SHELAA, usually because the Council is not yet aware of them. NPPF permits the inclusion of a windfall allowance in the five year supply where there is compelling evidence that such sites have and will continue to form a reliable source of supply, but should not include residential gardens.

81. The NPPF and PPG advise that, where justified, windfall sites can contribute towards housing supply:

- The NPPF confirms that an allowance for windfall sites can be made within the five-year supply; and
- The PPG confirms that broad locations in years 6-15 could include a windfall allowance based on geographical area.

82. The decision not to apply a site size threshold to SHELAA sites will lead to a more robust assessment, as it will include all potential sites regardless of size. It is important therefore to avoid any double counting in the windfall allowance.

83. The approach to assessing windfall allowance would be to review past windfall housing completion trends, going back as far as possible to take into account economic cycles e.g. 10 years if the information is available. This would include the following categories:

- Subdivision of existing housing;
- Flats over shops;
- Intensification of existing areas;
- Redevelopment of existing housing;
- Previously developed vacant and derelict buildings; and
- Conversion of commercial.

84. The windfall allowance will be based on an estimate of the amount of housing that could be delivered in an area on land that has not been identified. The average annual completion rate from each source will be calculated, and an informed view will be taken as to whether the annual rate is likely to increase or decrease, whether the pattern of redevelopment is likely to remain the same, grow or decline and whether current market conditions are likely to start the same, worsen or improve. This will take into account factors such as housing market trends, planning and development trends and permitted development trends.

85. There will be no windfall allowance included in years 1-3 to avoid double counting with extant planning permissions.

Stage 4 – Assessment review

86. Based on assessment of sites and broad locations through Stages 1 to 3, an indicative trajectory will be prepared setting out how much housing and the amount of economic floorspace that can be provided, and at what point in the future.¹⁵
87. The trajectory will be considered against the targets for housing and economic development set out in the up-to-date local plan or, where necessary, evidence of the objectively assessed need.
88. Where the trajectory shows there to be insufficient sites to meet objectively assessed needs, or the related targets, the assessments within Stages 1 to 3 will be revisited to establish whether anything can be done to alter the outcome of the assessment. This may include discussions with landowners/agents, reviewing density assumptions, and further research on identifying sites and overcoming constraints.
89. If following the review process, there is still insufficient capacity the PPG advises that it will be necessary to investigate how this shortfall should be best planned for.
90. If there is clear evidence that the target, or where necessary need, cannot be met locally, it will be necessary to consider how needs might be met in other parts of the housing market /economic area, and if necessary in areas beyond this, in accordance with the duty to cooperate.¹⁶

Stage 5 - Final evidence base

91. The final evidence base will be presented in 3 separate volumes, or as one report with 2 large appendices. The three reports will comprise a main SHELAA report, Mapping and Site Tables. These will contain the core outputs defined in the PPG, namely:
- a list of all sites or broad locations considered, cross-referenced to their locations on maps by neighbourhood area (see Table 8);
 - 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;
 - more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
 - the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, while setting out how any barriers to delivery could be overcome and when; and
 - an indicative trajectory of anticipated development and consideration of associated risks.¹⁷

Table 8: Eastbourne's Neighbourhood areas

1	Town Centre
2	Upperton
3	Seaside

¹⁵ PPG, Housing and economic land availability assessment, ID 3-025-20140306.

¹⁶ PPG, Housing and economic land availability assessment, ID 3-026-20140306.

¹⁷ PPG, Housing and economic land availability assessment, ID 3-028-20140306.

4	Old Town
5	Ocklynge & Rodmill
6	Roselands & Bridgemere
7	Hampden Park
8	Langney
9	Shinewater & North Langney
10	Summerdown & Saffrons
11	Meads
12	Ratton & Willingdon
13	St Anthony's & Langney Point
14	Sovereign Harbour

Monitoring

92. The assessment of sites should be kept up-to-date. Updates to the SHELAA report will account for changes which have taken place during the reporting period. Changes may include:

- Changes in the status of existing planning permissions, e.g. whether development has commenced or been completed;
- The inclusion of new sites with planning permissions;
- The inclusion of newly identified sites;
- Changes in the suitability of a site, e.g. as a result of new information or changes in the extent of severity of constraints;
- Changes in the availability of a site, e.g. as a result of changes in ownership or the landowner's intentions; and
- Changes in the economic viability of a site

93. New sites identified following the commencement of a report will be taken into account where possible. Once the SHELAA has reached draft report stage, no new sites can be accepted and will be considered in the next review.

APPENDIX A: GLOSSARY

Term	Definition
Best and most versatile agricultural land	Land in grades 1, 2 and 3a of the Agricultural Land Classification.
Constraints	Factors which limit or restrict the ability to develop a site. In some instances constraints will prevent development, whilst in others they might limit or influence the type, form or capacity of a site.
Deliverable	To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
Developable	To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
Economic development	Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).
Functional Economic Market Area (FEMA)	A geographical area defined by commercial property markets including location of premises and the spatial factors used in analysing demand and supply.
Strategic Housing and Economic Land Availability Assessment (SHELAA)	An assessment of land availability which identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.
Housing Market Area (HMA)	A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Neighbourhood Plan	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Opportunities	Beneficial factors. These might be the result of existing factors such as accessibility of a site to facilities, or they might be created through development itself such as contributing to regeneration or a community aspiration.
Previously Developed Land (PDL)	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Strategic Housing Land Availability Assessment (SHLAA)	An assessment of land availability which looks specifically at land for housing. This is now incorporated within the Housing and Economic Land Availability Assessment (SHELAA).
Strategic Housing Market Assessment (SHMA)	An assessment which identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: <ul style="list-style-type: none"> – meets household and population projections, taking account of migration and demographic change; – addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and – caters for housing demand and the scale of housing supply necessary to meet this demand.
Windfall sites	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.

APPENDIX B: SUITABILITY CONSIDERATIONS

The following table lists a number of considerations that will be taken into account when assessing the suitability of sites or broad locations. It is a generic list and is not specific to Eastbourne Borough.

The impact of some considerations may limit or influence the type, form or capacity of a site. In some instances, where the impact is significant and cannot be mitigated some considerations might prevent a site being suitable for development unless circumstances change. Conversely, the impact of development may positively influence the suitability of a site by way of creating specific opportunities.

Consideration	Justification
Location	- NPPF, paragraph 17, chapter 4, paragraph 55 - PPG, Ensuring the vitality of town centres - PPG, Rural housing
Previously Developed Land	- NPPF, paragraph 17, 89, 111 - PPG, Natural environment
Area of Outstanding Natural Beauty	- NPPF, paragraph 115-116 - PPG, Natural Environment
Green Belt	- NPPF, paragraph 17, chapter 9, paragraph 156-157
Economic Use	- NPPF, paragraph 17, Chapter 1, Chapter 2, paragraph 156-157
Housing use	- NPPF, paragraph 17, Chapter 6
Minerals	- NPPF, Chapter 13 - PPG, Minerals
Waste	- The National Planning Policy for Waste 2014 - PPG, Waste
Safeguarded Land ¹⁸	- NPPF, paragraph 162
Public Open Space	- NPPF, paragraph 69-70 and 74-74 - PPG, Design - PPG, Open space, sports and recreation facilities, public rights of way and local green space
Local Green Space	- NPPF, paragraph 76-78 - PPG, Open space, sports and recreation facilities, public rights of way and local green space
Nature Designations ¹⁹	- NPPF, Chapter 11 - PPG, Natural environment
Protected and Important Species	- NPPF, Chapter 11 - PPG, Natural environment
Priority Habitats	- NPPF, Chapter 11 - PPG, Natural environment
Agricultural Land Quality	- NPPF, Chapter 11 - PPG, Natural environment
Highway Access	- NPPF, Chapter 4
Highway Network	- NPPF, Chapter 4

¹⁸ Includes consideration of land safeguarded for e.g. transport and flooding project

¹⁹ Includes consideration of Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest, Ramsar Sites, Site of Nature Conservation Interest, Sustainable Alternative Natural Greenspace capacity, Local Wildlife Sites, National and Local Nature Reserves, Ancient Woodland.

Notified Safety Zones ²⁰	- NPPF, paragraph 172, 194 - PPG, Hazardous substances
Fluvial Flood Risk ²¹	- NPPF, Chapter 10 - PPG, Flood risk and coastal change
Non-Fluvial Flood Risk ²²	- NPPF, Chapter 10 - PPG, Flood risk and coastal change
Pollution ²³	- NPPF, paragraph 17 - PPG, Air quality - PPG, Health and wellbeing - PPG, Land affected by contamination - PPG, Light pollution - PPG, Noise
Land Stability	- PPG, Land stability
Historic Environment ²⁴	- NPPF, paragraph 17, Chapter 12 - PPG, Conserving and enhancing the historic environment - PPG, Tree Preservation Orders and trees in conservation areas
Natural Environment ²⁵	- NPPF, paragraph 17, chapter 7 - PPG, Design - PPG, Natural environment - PPG, Tree Preservation Orders and trees in conservation areas
Built Environment ²⁶	- NPPF, paragraph 17, chapter 7 - PPG, Design
Public Rights of Way	- NPPF, paragraph 75 - PPG, Design
Common Land	- The Commons Act 2006
Accessibility ²⁷	- NPPF, paragraph 17, chapter 4, chapter 8 - PPG, Design
Infrastructure ²⁸	- NPPF, paragraph 17, 162 - PPG, Water supply, wastewater and water quality
Community Aspirations ²⁹	- NPPF, paragraph 17 - PPG, Neighbourhood planning

²⁰ Includes consideration of major hazards such as high pressure gas pipes

²¹ Includes consideration of the probability of flooding, flood storage, and safety.

²² Includes consideration of the probability of flooding, flood storage, and safety.

²³ Includes consideration of land contamination, groundwater contamination, air quality, noise, dust, odour.

²⁴ Includes consideration of conservation areas, listed buildings, scheduled monuments, registered parks and gardens, battlefields, archaeology, local listed buildings, local listed parks and gardens.

²⁵ Includes consideration of landscape character and features, trees, hedgerows, geological features.

²⁶ Includes consideration of townscape character, public car parking, amenity impacts for the occupiers of existing properties and the occupier of the proposed development.

²⁷ Includes consideration of shops, primary schools, secondary schools, employment areas, train stations, bus routes.

²⁸ Includes consideration of utility capacity, education capacity, land safeguarded for strategic projects, e.g. strategic road, rail and flood defence.

²⁹ Includes consideration of initiatives set out in neighbourhood development plans.

APPENDIX C: Development Potential – Worked Example for sites under 2 hectares

The development potential of each site, if not already provided by a developer/landowner and reviewed to ensure it is at an appropriate density, will be based on analysis which uses recently consented schemes (last 5 years) in Eastbourne as a benchmark. The densities (number of dwellings per hectare of land) of recent schemes will be analysed for three 'zones': the Town Centre neighbourhood, other Sustainable Neighbourhoods³⁰ and outside Sustainable Neighbourhoods (as identified in the Eastbourne Core Strategy Local Plan).

The table below shows theoretical residential densities for three zones, which will be updated with actual observed densities for the assessment once the analysis has been carried out. . These densities will be applied to all potential sites within each of the three zones in order to estimate the potential capacity (number of homes) that could potentially be accommodated on that site.

Please note this worked example is based on a range of theoretical densities as the analysis of completed schemes has not yet been carried out.

This example is only for sites under 2ha. For sites over 2ha the same densities are used but the area for development is reduced to take account of other uses such as open space and other infrastructure associated with development.

Proposed density of development by zone

Zone	Average Density (dwellings per ha)	Typical dwelling types	Proposed density for SHELAA (dwellings per ha)		
			Low	High	Mid-point
Town Centre	100	Flats/ 1-2 bed homes	75	125	100
Sustainable Neighbourhood	50	Mix of flats/1-2 and 3-4 bed homes	40	60	50
Outside Sustainable Neighbourhood	30	3-4 bed homes.	25	35	30

Source: AECOM/EBC

To give three examples of how the above figures would be applied:

Sites in Town Centre

For a site within the town centre of 0.5 hectares, the potential number of homes that could be delivered on that site would be between 37 and 62 (low/high density divided by site area).

Sites in Sustainable Neighbourhoods

For a site within one of the 14 Sustainable Neighbourhoods (but outside the town centre) of 1.8 hectares, the potential number of homes that could be delivered on that site would be between 72 and 108 (low/high density divided by site area)

³⁰ Eastbourne is divided into Sustainable Neighbourhoods in the adopted Core Strategy as a basis for spatial policies.

Sites outside Sustainable Neighbourhoods

For a site outside of the sustainable neighbourhoods of 1 hectare, the potential number of homes that could be delivered on that site would be between 25 and 35 (low/high density divided by site area).

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