

Policy Constraints Report

March 2014



1. Introduction

Purpose of the Study

- 1.1 The district's objectively assessed housing need is between 460 & 520 net additional homes a year. This figure has been endorsed by the District Council's Cabinet and agreed by the South Downs National Park Authority.
- 1.2 The purpose of the study is to investigate whether the district's objectively assessed housing need could be met using sites assessed as part of the Strategic Housing Land Availability Assessment (SHLAA) process.
- 1.3 It is intended that the findings of this study will be used to inform the Sustainability Appraisal process that is being carried out as part of the production of the Proposed Submission Core Strategy: Focussed Amendments Document. Information from this study will also be used to produce a SHLAA update report.

How this Report is structured

- 1.4 The study is split into two main parts. The first identifies whether any sites (or part of sites) could overcome the current reasons for 'not suitable' SHLAA site classifications. This work is presented in **Section 3** of this report.
- 1.5 The second part of the work looks at whether it was possible to meet the district's housing need by increasing the number of suitable sites for development. This was done by disregarding certain SHLAA criteria and policy constraints that led to sites previously being assessed as unsuitable. This work is found in **Section 4** of this report.
- 1.6 **Section 2** contains the detailed background and methodology to the study. The study ends with some recommendations and conclusions in **Section 5**.

2. Background and Methodology

Context

- 2.1 Paragraph 14 of the National Planning Policy Framework (NPPF) requires that when producing Local Plans, Local Planning Authorities plan for their objectively assessed needs, “unless:
 - doing so would significantly and demonstrably outweigh the benefits, when assessed against other policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate that development should be restricted.”
- 2.2 The Lewes District Core Strategy will be a joint plan, produced by Lewes District Council and the South Downs National Park Authority. As evidence for the Core Strategy an Assessment of Housing Development Needs Study was undertaken¹ that identified the district needs between 460 – 520 homes per annum (9,200 – 10,400 overall) over the lifetime of the Core Strategy. This range has been accepted by both authorities as being the district’s objectively assessed housing need.
- 2.3 The January 2013 Proposed Submission version of the Core Strategy proposed a housing target of 4,500, a figure consistent with the now revoked South East Plan housing target, which was in place at the time that the Core Strategy was publicised for consultation. However, it is clear that the 4,500 is far below the up to date objectively assessed need. Indeed, if the highest figure is taken in the range, the housing target represents around 43% of the homes required in the district until 2030.
- 2.4 Due to this shortfall it was decided to consider whether, through a re-examination of the Strategic Housing Land Availability Assessment (SHLAA), additional capacity for housing development could be found.

The Strategic Housing Land Availability Assessment (SHLAA)

- 2.5 The SHLAA is a key evidence document in developing planning policies in the district. The primary role of it is to assess the potential of individual sites for housing and when they are likely to be developed. The SHLAA does not allocate land for development, but gives an indication as to the potential of land across the district to deliver sites for housing, thereby helping to ensure that the local planning authority is maintaining a sufficient supply of land to meet housing requirements.
- 2.6 The SHLAA uses an agreed, objective and consistent methodology based on the suitability, achievability and availability of individual sites before coming to an overall conclusion. The SHLAA, therefore, identifies

¹ http://www.lewes.gov.uk/Files/plan_SCAHN.pdf

any constraints that may prevent sites from being considered deliverable or developable.

- 2.7 This study is mainly concerned with sites that the SHLAA has assessed as being **not deliverable and/or developable** and thus were considered not suitable for housing development. Such sites have been ruled out either because a ‘showstopper’ constraint has been identified (i.e. an issues of high significance which would be difficult to overcome) or due to a ‘cumulative impact’ (i.e. a number of negatives that have resulted in a showstopper). This study examines whether any constraints resulting in the negative classification of those sites could be overcome.

Study Methodology

- 2.8 The study was done in a methodical manner, with five main stages to it. The first three stages centred on collecting the required information to allow for stages 4 and 5 to take place. These stages are explained:

Stage	Description
1. Identifying information sources	The SHLAA was initially undertaken by the consultants Nathaniel Lichfield and Partners in 2010. This comprised of a database that has since been updated on an ad-hoc basis as subsequent SHLAA updates have been carried out and information on specific sites has been obtained. The information and findings of the database has fed into the SHLAA reports which are published on an annual basis. Therefore, the SHLAA database and previously published SHLAA reports are the two primary sources of information. The information that has fed into the database and SHLAA reports has also been examined, for example, email correspondence from site proponents and previous planning applications, in order to establish a full and up-to-date picture for each site.
2. Identifying sites assessed as being unsuitable	This piece of work only concerns those sites assessed as not deliverable and/or developable in the 2013 SHLAA update and so before they could be looked at in any detail these sites first had to be identified and added to a spreadsheet.
3. Identifying why sites are seen as unsuitable	Sites are assessed for the SHLAA against three set criteria to maintain consistency, which are as follows: Suitability - an assessment of criteria such as the location, current use of land, landscape impact, environmental and built environment designations, highways and access and flood risk. Availability – considers the ownership of the land and its availability Achievability – considers the potential economic viability of the site any abnormal costs The sites are assessed against these criteria and any

	<p>'showstoppers' or 'cumulative impacts' which are likely to lead to 'showstoppers' are highlighted. An overall conclusion is then determined for each of the above criteria. This stage of the work involved identifying the reason/s why sites considered not deliverable or developable had been ruled out of the SHLAA process, primarily as a result of either 'showstoppers', 'cumulative impacts' or a combination of both. The results were recorded in a spreadsheet (Appendix 3).</p>
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2.9 The remaining stages relate to the main body of work carried out as part of the study. These stages and where the findings of the work can be found in this report are detailed below:

Stage	Description	Report Section
4. Overcoming site constraints	<p>This stage considered whether issues and constraints that have resulted in a site being ruled out of the SHLAA process could be overcome. This is something that is reflected in the SHLAA, however, it was felt that a more comprehensive approach was required to make the findings as robust as possible.</p> <p>This involved considering the site assessment in detail to see whether negative impacts could be reduced or removed altogether. This could be for example, determining whether a landscape impact could be mitigated by considering lower density development or a reduced site boundary.</p>	3
5. Creating scenarios that would allow sites to come forward in order to meet need	<p>This stage looked at considering scenarios that ignored certain policy choices and SHLAA criteria in order to make sites acceptable for housing. In so doing it allowed us to see how, by disregarding certain restrictions, the objectively assessed housing need for the district could be met.</p>	4

3. Overcoming Site Constraints

Introduction

- 3.1 As explained in the previous section of this report, the SHLAA assesses sites against fixed criteria in order to classify the sites. Simply put, sites are seen as either being:
- Deliverable (suitable sites that have the potential to come forward immediately)
 - Developable (suitable sites but unlikely to be able to come forward in the next 5 years)
 - Not Suitable (sites that are not considered capable of coming forward)
- 3.2 This part of the study looks at those sites seen as being not suitable and considers whether, following a reappraisal, any sites could become either deliverable or developable.

Methodology

- 3.3 All of the not suitable sites were examined through a desktop analysis, reconsidering the reasons for their classification and to investigate the possibility that any sites could be reclassified as either deliverable or developable. This analysis left a list of around a dozen sites for potential reclassification.
- 3.4 Further information on each of these sites meant that some were removed from consideration and so remain classified as not suitable. This left around 10 sites which were visited by Officers.
- 3.5 As a result of the site visits and the further information collected on the sites, **it is recommended that the classifications of the following 5 sites should be changed when the SHLAA is next updated.** Information on each of the sites can be found below:

Site: Land Adjacent to High Street, Barcombe (SHLAA Ref 05BA)

Area: 1.24

Site Yield: 37

Reason for Not Suitable Classification: Effect on adjoining Conservation Area.

Reclassified as: Deliverable

Explanation: Accept that site is adjacent to Conservation Area, but not within it. Location means that sensitive design would be required of development, but does not prohibit it.

Site: Part of Land at Railway Quay, Newhaven (SHLAA Ref 10NH)

Area: 0.5ha (overall site 4.65ha)

Site Yield: 25

Reason for Not Suitable Classification: Site not available

Reclassified as: Developable

Explanation: There are constraints which impact on the achievability of the site, particularly flood risk. However, there is now the intention from the owners to develop part of the site for residential use alongside other development associated with the University Technical College.

Site: Southern Water Pumping Station Site, Fort Road, Newhaven (SHLAA Ref 13NH)

Area: 0.2ha

Yield: 6

Reason for Not Suitable Classification: Impact upon the setting of a Scheduled Ancient Monument – Newhaven Fort.

Reclassified as: Developable.

Explanation: After undertaking the site visit, it is not considered that a development at this location would have an insurmountable impact on the Fort, although its proximity would demand a sensitive design and there is the possibility of land contamination. It is also considered unlikely that the site could accommodate 10 units as originally indicated in the SHLAA.

Site: Land adjacent to Ouseside Cottages/Land adjacent to Sunnyside Cottages, Rodmell (SHLAA Refs 01/02RD)

Area: 0.5ha

Yield: 10

Reason for Not Suitable Classification: Effect on Conservation Area.

Reclassified as: Deliverable

Explanation: It is accepted that the site is within the Conservation Area and the National Park. Development at this location would require sensitive design but would not prohibit it.

Site: Land at Lower Lodge Farm, Laughton Road, Ringmer (SHLAA Ref 31RG)

Area: 3.5ha

Yield: 100

Reason for Not Suitable Classification: Site considered an intrusion into the countryside.

Reclassified as: Deliverable.

Explanation: Whilst a greenfield site, the site is surrounded by development and it is not considered that it would be an intrusion into open countryside. The yield has been lowered to take into account the need to protect mature trees and the pond. Adjacent to industrial units and thus any development would need to reflect this and potential impact on residential amenity.

4. Scenarios to allow sites to come forward in order to meet our housing need

- 4.1 The previous section of the report looked at whether constraints to certain sites could be overcome and thus be classified differently in the SHLAA. This part of the study looks at identifying ways that would allow us to meet our housing need through the Core Strategy.
- 4.2 There are two separate tasks in this part of the study. The first task examines the policy restrictions that are preventing sites seen as deliverable or developable in the SHLAA from coming forward in the Core Strategy. The second looks at the SHLAA criteria that prevent sites from coming forward and creates scenarios that allow the need to be met.

The Core Strategy

- 4.3 As mentioned earlier in the report, the housing need equates to between 9,200 and 10,400 over the plan period, whereas the Proposed Submission Core Strategy had a housing target of 4,500.
- 4.4 Theoretically, it is possible that a housing target of **6,997²** can be reached already. Such a figure would be based on the following components:
- Sites assessed in the SHLAA as being deliverable or developable = **4,285 units³**
 - Sites assessed in the SHLAA that have planning permission = **972 units**
 - Sites assessed through Section 3 of this report as being deliverable or developable = **178 units**
 - Sites allocated for residential development in 2003 Local Plan = **187 units**
 - Completions between 2010 and 2013 = **628 units**
 - An allowance for windfall throughout the plan period⁴ = **518 units**
 - Large Sites⁵ not assessed through SHLAA but with planning permission = **27 units**
 - Small sites⁶ with planning permission (allowing for a 35% discount⁷) = **125 units**
 - Sites, with planning permission, subject to signing section 106 agreement = **77 units**
- 4.5 Totalling up the units, as done above, does ignore the fact that the SHLAA assesses each site on its individual merits and thus does not consider the appropriateness of the combination of sites coming forward.

² Approximately 1,250 of these units are located within the South Downs National Park

³ Not including sites with Planning Permission or are allocated for residential development.

⁴ Refer to background paper

⁵ Sites of 6 or more units

⁶ Sites less than 6 units and therefore not assessed through the SHLAA

⁷ Refer to background paper

- 4.6 Also, the Proposed Submission Core Strategy had to consider a number of factors when introducing planning policies in order to ensure that the plan contributed to the delivery of sustainable development in the district. Of these factors, some limited the delivery of housing. These included but are not limited to the following:
- Traffic advice from ESCC which states that Newhaven and Peacehaven/Telscombe can only accommodate up to 1,125 homes due to capacity issues on the A259.
 - Traffic advice from ESCC which states that development in Wivelsfield Green should not exceed 80 units owing to transport problems at Ditchling.
 - Recommendations from the Rural Settlement Study and Sustainability Appraisal that suggested that housing targets in some villages should be limited to a certain amount.
- 4.7 Thus, the 6,997 can only be reached if the above criteria are ignored and the individual nature of site assessments disregarded. **This figure should be tested through the Sustainability Appraisal process in order to see what the effect of planning for this total would be.**
- 4.8 The figure of 6,997 is far below the objectively assessed housing need and therefore, if the need were to be met through sites assessed through the SHLAA process, the criteria of the SHLAA itself would have to be looked at.

Scenario testing

- 4.9 Despite the reclassification of some sites in section 3 of this study, the majority of land considered as part of the SHLAA is seen to be unsuitable for development. If such land were considered suitable for development then, theoretically, there would be enough land in which to meet the housing need.
- 4.10 Typically, sites were assessed as being unsuitable for development if:
- Receiving a 'showstopper' (a factor that cannot be mitigated or overcome) against one or more criterion; or
 - Due to a cumulative impact, where negative assessments relating to a number of different factors have resulted in the site being ruled out.
- 4.11 Thus in order to use the SHLAA to achieve the housing target within the housing need range, it is necessary to consider ignoring some of the factors that cause a site to receive a not suitable classification⁸. This would allow scenarios whereby sites that are currently ruled out, could come forward and be considered 'deliverable or developable'. A methodology was created and followed for this purpose and is described below:

⁸ It is not considered reasonable to ignore factors relating to achievability or availability.

Stage 1 – Identifying site constraints

4.12 The first stage involved identifying those sites assessed in the 2013 SHLAA as being *not deliverable or developable* and the constraints that resulted in such conclusions being reached. A list of common constraints was produced and a spreadsheet (Appendix 3) was created which listed individual sites and the associated constraint numbers. The spreadsheet took into account the issue of double counting⁹. The constraints are highlighted below:

1. **Access** – Site ruled out on issues relating to site access
2. **Highways** – Site ruled out on issues relating to the highway network.
3. **Isolated Development** – Site ruled out on issues related to isolated development and proximity to services
4. **Flood Risk** – Site ruled out on issues relating to flood risk
5. **Landscape (National Park)**¹⁰ – Site ruled out on landscape issues within the National Park
6. **Landscape**² – Site ruled on landscape issues outside of the National Park
7. **Environment** – Site ruled out on grounds such as biodiversity, environmental designations and TPO's
8. **Built Environment (National Park)**² – Sites ruled out on issues relating to the built and historic environment, such as Listed Buildings and Conservation Areas in the National Park
9. **Built Environment**² – Sites ruled out on issues relating to the built and historic environment outside of the National Park.
10. **Other** – Sites ruled out for other issues, such as Existing Local Plan Allocations and Density.

Stage 2 – Creating scenarios to meet the lowest total in the objectively assessed housing need range - 9,200 homes over the plan period

4.13 This stage involved undertaking calculations on the number of homes that could be delivered to meet the lowest number in the objectively assessed housing number range (9,200), by ignoring certain characteristics that had accounted for not suitable SHLAA classifications. Given that 6,997 had been found in paragraph 4.4, this meant that a minimum of 2,203 additional homes were needed.

4.14 It became apparent that a site, with SHLAA reference of 11PL (5,000 units), had the capacity to exceed the required 2,203 units. As a result, it was deemed appropriate to remove this site from other calculations and consider the development of the site as a stand-alone scenario.

⁹ See Appendix 2

¹⁰ It was felt that the Landscape and Built Environment constraints (5, 6, 8, and 9) should be distinguished between the National Park and non-National Park due to the importance and sensitivity of the designation.

- 4.15 The first step involved totalling together all the units that could come forward on the SHLAA sites listed in the spreadsheet (see paragraph 4.12) if all of the constraints were ignored. This added up to **5,033**.
- 4.16 As the total was far in excess of the amount needed, it was necessary to start eliminating sites to get the total closer to the 2,203. This was done by removing sites with certain constraints. It was found that in order to create scenarios which included sites that totalled near to the 2,203, a combination of different constraints had to be taken out.
- 4.17 The process was repeated to create numerous scenarios which related to different combinations of constraints that had previously prevented sites from being seen as acceptable in the SHLAA.
- 4.18 The two scenarios that have been created which get closest to the 2,203 are shown in the table below. Other scenarios can be found in Appendix 1.

	Scenarios to meet residual need of 2,203	
	Scenario A1	Scenario A2
Constraints Ignored	Access	Access
	Isolated Development	Isolated Development
	Flood Risk	Landscape
	Landscape	Built Environment
	Environment	Other
	Other	
Total	2,206	2,216

Stage 3 – Creating scenarios to meet the highest total in the objectively assessed housing need range - 10,400 homes over the plan period

- 4.19 This stage repeated the processes explained in Stage 2 in order to find an additional 3,403 units to allow for the highest number in objectively assessed housing range (10,400) to be met.
- 4.20 It was found that there were two scenarios that could be created which would achieve a total near the 3,403 target. The constraints that would have to be ignored in order to get to such a figure are in the table below.

	Scenarios to meet residual need of 3,403	
	Scenario B1	Scenario B2
Constraints Ignored	Access	Access
	Highways	Isolated Development
	Landscape (NP)	Landscape (NP)
	Landscape	Landscape
	Environment	
	Built Environment (NP)	
	Built Environment	
Total	3,428	3,727

Scenarios

- 4.21 The study has shown that theoretically it is possible to achieve the additional numbers necessary to meet the need. This can be done by either classifying site 11PL as a deliverable or developable site by ignoring constraints that have prevented a positive outcome in the SHLAA. Delivering this site would essentially result in a new settlement being formed.
- 4.22 Alternatively, the need could be met by ignoring constraints when assessing sites through the SHLAA. This can be done in a number of ways, although the scenarios which get closest to the lowest and highest number of the objectively assessed housing need range have been found by going through the process described above.
- 4.23 It is not the purpose for this study to fully look at the impacts that any of the scenarios would have. This will be done through the Sustainability Appraisal process that will accompany the focussed amendments to the Core Strategy. However a summary of likely impacts of planning for the scenarios, based on the SHLAA constraints that they would ignore, follow:

Scenario A1

- 4.24 This scenario would allow development to occur at locations that would negatively impact on the district's valued landscape in areas outside of the National Park. This scenario would also rely on sites coming forward in isolated locations with little in the way of local services and thus would be likely to be dependent on cars.
- 4.25 Sites in areas of flood risk would also come forward as would sites that have insufficient access for what is proposed. This scenario is likely to lead to result in significant harm to the district's environmental assets. In addition, development would occur on sites that would be subject to odour issues or would be delivered at excessively high densities out of keeping with the surroundings.

Scenario A2

- 4.26 This scenario would involve sites coming forward that have inadequate access to serve a development of the stated size. In addition, development would come forward in isolated locations with little in the way of local services and thus likely to be dependent on cars.
- 4.27 Furthermore, sites located outside of the National Park that would have a significant landscape impact would have to come forward as would sites that have an impact on the built environment. Also, development would occur on sites that would be subject to odour issues or which

would be delivered at excessively high densities out of keeping with the surroundings.

Scenario B1

- 4.28 This scenario would involve sites coming forward that have inadequate access to serve a development, whilst other sites thought to have a significant impact on the existing highway network would also be developed.
- 4.29 In addition, significant built environment and landscape effects would be felt as a result of delivering this scenario across the entire district – including land within the National Park. Also, this scenario would result in sites coming forward that are likely to cause significant harm to the district's environmental assets.

Scenario B2

- 4.30 This scenario would involve sites coming forward that have inadequate access to serve the development. In addition, development would come forward in isolated locations with little in the way of local services and thus likely to dependant on cars.
- 4.31 Also, significant landscape effects would be felt as a result of delivering this scenario across the entire district (both within and outside of the National Park).

Scenario C (SHLAA Site PL11)

- 4.32 This scenario would have a very large impact on the highway network, negatively affecting nearby villages and Lewes Town significantly. It would also need sufficient access – with no identified solutions known to date.
- 4.33 It would also have a negative impact on some valued landscape in the district, including that within the National Park and would be reliant on services far from the area unless new services were provided as part of the development.

Findings

- 4.34 What is clear from the above scenarios is that, in order to meet the target, a significant amount of constraints would have to be purposefully overlooked before being able to bring sites forward. This would likely result in negative impacts caused by development in the district.
- 4.35 Whilst theoretically such scenarios would deliver the amount of housing, in reality ignoring constraints would not necessarily result in the sites coming forward.

- 4.36 As an example, some of the sites mentioned in the SHLAA have been ruled out on access grounds where there are no known solutions as to how suitable access can be gained. Thus, even if the lack of access was ignored as a constraint in the SHLAA (thus allowing it to be seen as suitable), sites do require suitable access in order to receive planning permission. As a result it is doubted whether releasing some of the sites for development would actually enable development to take place.
- 4.37 In addition, such work has not looked at cumulative effects of sites. It may well be true that an individual site would not present any significant impacts itself, but when coming forward alongside development nearby sites could collectively cause significant effects. The SHLAA does not capture this and consequently neither has this study.
- 4.38 **It is recommended that Scenarios A1, A2, B1, B2 and C are subject to Sustainability Appraisal in order for a reasoned assessment of the impact of the scenarios to be made.**

5. Conclusions and Recommendations

- 5.1 The study has noted that the Proposed Submission Core Strategy, produced for consultation in January 2013, had planned for 4,500 homes between 2010 and 2030. When compared against the district's objectively assessed need of between 9,200 and 10,400 homes in the same period, the current housing target would result in a large shortfall. The study thus examined the possibility of making changes in the assessment of sites included as part of the SHLAA in order to meet the district's objectively assessed need.
- 5.2 The study found that some constraints could be overcome on sites that are currently classified as not suitable for development in the 2013 SHLAA. As a result, **it is recommended that the classifications of the sites referenced in Section 3 of this report are changed to either being 'deliverable' or 'developable' in the next update to the SHLAA.**
- 5.3 Even allowing for the aforementioned changes to some of the site's classifications, an allowance for windfall development, inclusions of completions and totalling every site in the SHLAA that was seen as suitable, it was not possible to get to the objectively assessed need. Instead, it was only mathematically possible to have a total of around 6,997 and this did not include consideration of cumulative effects. **It is therefore recommended that the figure of 6,997 is subject to Sustainability Appraisal in order to fully assess the impacts of planning to meet this total.**
- 5.4 To get to a situation where the objectively assessed housing needs range could be theoretically reached, a process was undertaken which ignored certain SHLAA criteria and created scenarios that allowed sites previously considered as not suitable for development as appropriate sites for housing. Whilst the study has briefly presented the likely consequences of achieving the lowest and highest number in the housing needs range, **it is recommended that the 5 scenarios referenced in Section 4 of this report are assessed as part of the Sustainability Appraisal in order to fully consider the consequences of planning for such a figure.**

Appendix 1

Creating scenarios to meet 9,200 homes over the plan period

- A1. Five scenarios were created which allowed a target of 9,200 homes to be met by providing at least another 2,203 units. These scenarios can be found in the table below.

	Scenarios to meet residual need of 2,203				
Constraints Ignored	A1	A2	A3	A4	A5
	Access	Access	Access	Access	Landscape (NP ¹⁰)
	Isolated Development	Isolated Development	Isolated Development	Isolated Development	Landscape
	Flood Risk	Landscape	Flood Risk	Flood Risk	
	Landscape	Built Environment	Landscape	Landscape (NP ¹¹)	
	Environment	Other	Built Environment (NP ¹⁰)	Environment	
	Other		Other	Other	
Total	2,206	2,216	2,221	2,240	2,304

- A2. If it was desired that a particular constraint was retained, then this could be achieved by at least one of the five scenarios above. The table below shows the lowest figure that would allow for each of the constraints to be retained.

Constraint to be retained	Lowest achievable figure to meet 2,203 units
Access	2,304
Highways	2,206
Isolated Development	2,304
Flood Risk	2,216
Landscape (National Park)	2,206
Landscape	2,240
Environment	2,216
Built Environment (National Park)	2,206
Built Environment	2,206
Other	2,221

Creating Scenarios to meet 10,400 homes over the plan period

- A3. To get to a target of 10,400 homes, an additional 3,403 homes were needed to be found by removing SHLAA constraints. Only two scenarios got close to the figure, as shown below.

¹¹ Sites within the National Park

	Scenario to meet residual need of 3,403	
	B1	B2
Constraints Ignored	Access	Access
	Highways	Isolated Development
	Landscape (NP)	Landscape (NP)
	Landscape	Landscape
	Environment	
	Built Environment (NP)	
	Built Environment	
Total	3,428	3,727

- A4. There was no possible way of creating a scenario that met the residual need without ignoring the following constraints: Access, Landscape (NP) and Landscape.

Scenario of meeting housing need by New Settlement at PL11

- A5. There is a SHLAA site (11PL) that is sufficient in size to add 5,000 additional homes on its own. As a result, it was taken out of the scenario work above and is considered a standalone option to meeting the housing needs. The option involves ignoring the following constraints just for this site.

	Scenario C
Constraints Ignored	Access
	Highways
	Landscape
Total	5000

Appendix 2

Double Counting

- A6. A number of sites within the SHLAA overlap the same area or are duplicated. The SHLAA calculates the district's housing capacity after resolving the issue of double counting and a similar approach was used. Doing so ensured that sites were not counted more than once in any scenario.
- A7. The two areas where the issue of double counting was resolved were **Valley Road, Peacehaven** and a site in **Plumpton Green**. How this was done is explained below:

Valley Road, Peacehaven

- A8. There are a number of sites assessed as part of the SHLAA which are in the broad location of Valley Road. A number of these sites are completely contained in two largest sites that have received a classification that indicates that they are not suitable (41PT and 43PT). As a result of this, the following sites were removed from consideration when developing scenarios - **10PT, 25PT, 28PT, 29PT, 31PT, 35PT and 36PT**.
- A9. There was also an overlap between the larger Valley Road sites included in the scenario testing (41PT and 43PT) and the two large deliverable/developable Valley Road sites (06PT and 20PT)
- A10. The site yields for 41PT and 43PT were reduced taking into account the overlapped area and the density presumption of sites 06PT and 20PT as not doing so would have meant that parts of the sites were counted twice. This resulted in the following assumptions being made when generating scenarios:
- 41PT – 131 (previously 500 - reduced by 369)
 - 43PT – 185 (previously 200 – reduced by 15)

Plumpton Green

- A11. In order to reflect the landscape sensitivity of the area, the site proponents of 08PL also submitted a smaller site (16PL) which overlaps part of 08PL. The same method was used as done for Valley Road in order to calculate an accurate site yield for 08PL taking into account the issue of overlapping and different density presumptions. This resulted in the following assumptions being made when generating scenarios:
- 08PL – 110 (Previously 150 – reduced by 40)
- A12. This double counting reduced the capacity of not deliverable / developable sites by 601 units and was taken into account when developing scenarios.

Appendix 3

A13. This appendix contains the original spreadsheets upon which the study was based on:

- Master Spreadsheet of sites ruled out in the SHLAA
- Spreadsheet showing the impact of ignoring individual constraints
- Spreadsheet showing the total if all constraints were ignored
- Spreadsheets showing sites that would be included under scenarios A1-A5 and B1-B2

Master Spreadsheet of sites ruled out in the SHLAA

Ref	Site	Yield	Showstopper	Cumulative Impact	Conclusion
	Barcombe				
02BA	Land at Primrose Hill	20	Availability, Access		Ruled out - availability
05BA	Land adjacent to High Street, Barcombe	37	Landscape, Conservation Area		Assessment changed - ignore
06BA	Land to the east of Barcombe Cross	120	Landscape		6
	Chailey				
06CH	Land at Gradwell End, South Chailey	90	Availability		Ruled out - availability
11CH	Land at North Chailey	13	Environmental Designation	Yes - TPO's, Conservation Areas, Location / Isolated development, Availability	3, 7, 9
17CH	Land off Mill Lane	30	Landscape		6
	Ditchling				
04DT	Land lying to the rear of Wintons Farm, Folders Lane, Burgess Hill	200	Access, Landscape, N.P, Isolated Development, not		1, 3, 5
06DT	Land to the south of Folders Lane, Burgess Hill, straddling the boundary between West Sussex (Mid Sussex)	2000	Availability, Achievability, Landscape, N.P		Ruled out - availability
07DT	Land lying off of Common Lane, Ditchling			Yes - isolated developemnt and landscape	1, 3, 5
08DT	Land off Fragbarrow Lane 1	10		Yes - access and isolated location	1, 3, 5, 7
09DT	Land lying off Fragbarrow	225		Yes - access, landscape, national park and isolated location	1, 3, 5
	Falmer				

01FL	Land adjacent to B2123 close to junction with A27	30	Availability,	A number of other negatives although not considered a cumulative impact showstopper	Ruled out - availability
02FL	Land adjacent to University of Sussex	158	Access	Yes - landscape, national park, isolated development	1, 3, 5
04FL	South of Mill Street	15		Yes - National park, Conservation Area / listed buildings, density too high	8
Hamsey					
11HY	Land east and west	175	Landscape	Small area in flood zone	6
Kingston					
03KG	Land west of north Kingston Ridge	43	Access,	Yes - landscape and national park	1, 5
06KG	Star Field	75	Landscape, Environmental designation, N.P		5, 7

07KG	Land on Church Lane, opposite Tennis Courts	12	Landscape, N.P, Cons Area/Listed buildings		5, 8
10KG	Lewes Garden Centre	40		Yes - Landscape, National Park, isolated development, near to SSSI,	3, 5
11KG	Land adjacent to Saxondale Farm, Church Lane	7		Yes - Conservation Area, landscape and national park	5, 8
Lewes					
12LW	West of Winterbourne Hollow, West of the Gallops	153	Landscape, historical designation	Yes - National Park, highways, access and TPO's	1, 2, 5, 8
13LW	Former Southern Water Works Site, Ham Lane	60		Yes - Flood risk, Highways / Access, contaminated land, National park and isolated development	1, 3, 4
22LW	West part of Southover Building, Sussex Downs College, Mountfield Road	26	Availability		Ruled out
24LW	Land to the west of Malling Down	110	Landscape,		5
29LW	Buckwell Court	8	TPO's / Ancient woodland		7
Newhaven					
10NH	Railway Quay	200	Availability,	Yes - possible achievability issues due to flood risk mitigaiton	Ruled out - availability
12NH	Downland Park, Court Farm Road	67	Availability,		Ruled out - availability
13NH	Southern Water Pumping Station Site, Fort Road	10	Historical designation		Assessment changed - ignore
18NH	Land at Denton Drive / Devon Road,	10	TPO's/Ancient woodland		7
21NH	Newhaven Heights, Mobile Home Site, Court Farm	50	Availability		Ruled out
28NH	Land at South Heighton, Nr Newhaven	70	Landscape, Conservation Area / Listed building		6, 9

36NH	Land at Denton (covered reservoir)	8	Availability		Ruled out
37NH	Land at Denton, rear of Kings	13	TPO's/Ancient woodland		7
41NH	Meeching Down	200	Environmental designations		7
Newick					
02NW	Land at Newick Hill House, Jackies	8		Yes - Access, Landscape	1, 6
09NW	Land South of Allington Road, Newick	80	Landscape, Location / Isolated development		3, 6
14NW	Sheffield Park	27		Yes - Ancient Woodland, SNCI, Isolated development, Employment	3, 7
15NW	Woodgate Dairies	83		Yes - Ancient Woodland, SNCI, Isolated development, Employment	3, 10
Plumpton					
02PL	Rear of Plumpton School, North Barnes Lane	70	Landscape		Assessment changed - ignore
08PL	Little Inholmes Farm, Station Road	150	Landscape		6
09PL	Land west of Riddens Lane	130	Landscape		6
11PL	Land between Plumpton Green and South Chailey	5000	Landscape	No but other significant negatives due to scale of development: conjoining of two villages, access, isolated development, impact on existing settlement and local services	1, 2, 6 (Will not be included within scenario testing due to size)
Peacehaven					
10PT	37 Valley Road	6	Location / Isolated development		1, 3, 6
13PT	Links Avenue, Peacehaven	90	Landscape, N.P	Unknown availability	5
25PT	Land in two contiguous parcels, South of Valley Road	12		Yes - Isolated development, access, landscape. Would need to come forward as wider development in the	1, 3, 6
28PT	Site corner of Valley Road and East Side of Phyllis Avenue	12		Yes - Isolated development, access, landscape. Would need to come forward as wider development in the	1, 3, 6
29PT	Site West side downs Walk	20	Density too high		10
30PT	Land at Friars Bay Estate and Peacehaven Heights	113	Access, Highways		Removed - Achievability showstopper

31PT	Site at Corner of Roderick Avenue and Valley Road	70		Yes - Achievability (potential abnormal developer costs), Access, landscape and illogical incursion into countryside. Would need to come forward as wider development.	1, 2, 3, 6
33PT	Land lying to the South of Blakeney Avenue	31	Achievability	Yes - landscape, ecological value and access	Ruled out - Achievability
35PT	Land North of Valley Road, East of Roderick Avenue	17		Yes - A number of negative factors. Most prominent are landscape and achievability	6
36PT	Land to the North of Valley Road/ East of Downs Walk, Peacehaven	80		Yes - A number of negative factors. Most prominent are landscape and achievability	6
41PT	Land on the South Side of Valley Road, Peacehaven, Phyllis Avenue and land lying off of Sutton Avenue, along with land on the east side of Roderick Avenue, and rear of	500		Yes - Landscape and achievability (due to scale of development and required developer costs)	6
42PT	Land at Kirby Farm	625	Landscape, N.P		3, 6
43PT	Land north of Valley Road	200	Landscape	Also achievability (due to scale of development and required developer costs)	3, 6
	Rodmell				
01RD	Land adjacent to Ouseside Cottages	6		National Park, Conservation Area, Landscape	Assessment changed - ignore
02RD	Land adjacent to Sunnyside Cottages	7		National Park, Conservation Area, Landscape	Assessment changed - ignore
	Ringmer				
10RG	Land off Vicarage Way	99		Yes - Landscape, National Park	5
22RG	Land at Middleham	35	Landscape, N.P		5
24RG	Glebe Land, Ham Lane	20	Landscape	Access also an issue	6
27RG	Ham Lane	15	Landscape, N.P		5
29RG	Land north and east of Broyleside	400	Landscape		6
30RG	Land east of Broyleside	180	Landscape	Flood risk and isolated development	6

31RG	Land at Lower Lodge Farm, Laughton Road	120		Yes - illogical protrusion into countryside (would set precedent for development) and isolated	Assessment changed - ignore
09SF	Site 2 – Land North of Crown Hill off	10	TPO's/Ancient woodland		7
11SF	The Hawth, Surrey Road, Seaford	10	Landscape	Green gap between settlements	6
12SF	76 Rookery Way	24	Landscape, N.P		5
	Wivelsfield				
06WV	Antye Farm & Gamble Mead, Theobalds Rd, Burgess Hill	500		Yes - Highways/access, Ancient woodland, Landscape, Availability	1, 2, 6, 7
16WV	Site at Haywards Heath, east of Hurstwood Lane	201	Access	Yes - Isolated location, landscape and access	1, 3, 6
17WV	Site north of Abbots Leigh	243	Access	Yes - Isolated location, landscape and highway impact	1, 3 6
20WV	Springfield Industrial Estate, B2112	40	Industrial odours	Flood zone 3, proximity to local	10

5. Landscape (NP)	No.	6. Landscape	No.	7. Environment	No.	8. Built Env (NP)	No.
04DT (1, 3, 5)	200	6BA (6)	120	11CH (3, 7, 9)	13	04FL (8)	15
07DT (1, 3, 5)	40	17CH (6)	30	08DT (1, 3, 5, 7)	10	07KG (5, 8)	12
08DT(1, 3, 5, 7)	10	11HY (6)	175	06KG (5, 7)	75	11KG (5, 8)	7
09DT (1, 3, 5)	225	28NH (6, 9)	70	29LW (7)	8	12LW (1, 2, 5, 8)	153
02FL (1, 3, 5)	158	02NW (1, 6)	8	18NH (7)	10		
03KG (1, 5)	43	09NW (3, 6)	80	37NH (7)	13	Total	187
06KG (5, 7)	75	08PL (6)	110	41NH (7)	200		
07KG (5, 8)	12	09PL (6)	130	14NW (3, 7)	27		
10KG (3, 5)	40	11PL (1, 2, 6)	0	09SF (7)	10		
11KG (5, 8)	7	10PT (1,3, 6)	6	06WV (1, 2, 6, 7)	500		
12LW (1, 2, 5, 8)	153	25PT (1, 3, 6)	12				
24LW (5)	110	28PT (1, 3, 6)	12	Total	866		
13PT (5)	90	31PT (1, 2, 3, 6)	70				
42PT (5)	625	35PT (6)	17				
10RG (5)	99	36PT (6)	80				
22RG (5)	35	41PT (6)	500				
27RG (5)	15	43PT (3, 6)	200				
12SF (5)	24	24RG (6)	20				
		29RG (6)	400				
Total	1961	30RG (6)	180				
		11SF (6)	10				
		06WV (1, 2, 6, 7)	500				
		16WV (1, 3, 6)	201				
		17WV (1, 3, 6)	243				
		Total	3174				

Spreadsheet showing the total if all constraints were ignored

Site code	Yield
6BA (6)	120
11CH (3, 7, 9)	13
17CH (6)	30
04DT (1, 5, 3)	200
07DT (1, 3, 5)	40
08DT (1, 3, 5, 7)	10
09DT (1, 3, 5)	225
02FL (1, 3, 5)	158
04FL (8)	15
11HY (6)	175
03KG (1, 5)	43
10KG (3, 5)	40
06KG (5, 7)	75
07KG (5, 8)	12
11KG (5, 8)	7
12LW (1, 2, 5, 8)	153
13LW (1, 3, 4)	60
24LW (5)	110
29LW (7)	8
18NH (7)	10
28NH (6, 9)	70
37NH (7)	13
41NH (7)	200
02NW (1, 6)	8
09NW (3, 6)	80
14NW (3, 7)	27
15NW (3, 10)	83
08PL (6)	110
09PL (6)	130
13PT (5)	90
41PT (6)	131
42PT (5)	625
43PT (3, 6)	185
10RG (5)	99
22RG (5)	35
24RG (6)	20
27RG (5)	15
29RG (6)	400
30RG (6)	180
09SF (7)	10
11SF (6)	10
12SF (5)	24
06WV (1, 2, 6, 7)	500
16WV (1, 3, 6)	201
17WV (1, 3, 6)	243
20WV (10) (odour issues)	40

5033

Scenario A1 - ignoring constraints 1, 3, 4, 6, 7 & 10

Site	Yield
6BA (6)	120
17CH (6)	30
11HY (6)	175
13LW (1, 3, 4)	60
02NW (1, 6)	8
09NW (3, 6)	80
15NW (3, 10)	83
08PL (6)	110
09PL (6)	130
41PT (6)	131
43PT (3, 6)	185
24RG (6)	20
29RG (6)	400
30RG (6)	180
11SF (6)	10
16WV (1, 3, 6)	201
17WV (1, 3, 6)	243
20WV (10) (odour issues)	40

2206

Scenario A2 - ignoring constraints 1, 3, 6, 9 & 10

Site	Yield
6BA (6)	120
17CH (6)	30
11HY (6)	175
28NH (6, 9)	70
02NW (1, 6)	8
09NW (3, 6)	80
15NW (3, 10)	83
08PL (6)	110
09PL (6)	130
41PT (6)	131
43PT (3, 6)	185
24RG (6)	20
29RG (6)	400
30RG (6)	180
11SF (6)	10
16WV (1, 3, 6)	201
17WV (1, 3, 6)	243
20WV (10) (odour issues)	40

2216

Scenario A3 - ignoring constraints 1, 3, 4, 6, 8, 10

Site	Yield
6BA (6)	120
17CH (6)	30
04FL (8)	15
11HY (6)	175
13LW (1, 3, 4)	60
02NW (1, 6)	8
09NW (3, 6)	80
15NW (3, 10)	83
08PL (6)	110
09PL (6)	130
41PT (6)	131
43PT (3, 6)	185
24RG (6)	20
29RG (6)	400
30RG (6)	180
11SF (6)	10
16WV (1, 3, 6)	201
17WV (1, 3, 6)	243
20WV (10) (odour issues)	40

2221

Scenario A4 - ignoring constraints 1, 3, 4, 5, 7 &10

Site	Yield
04DT (1, 5, 3)	200
07DT (1, 3, 5)	40
08DT (1, 3, 5, 7)	10
09DT (1, 3, 5)	225
02FL (1, 3, 5)	158
03KG (1, 5)	43
10KG (3, 5)	40
06KG (5, 7)	75
13LW (1, 3, 4)	60
24LW (5)	110
29LW (7)	8
18NH (7)	10
37NH (7)	13
41NH (7)	200
14NW (3, 7)	27
15NW (3, 10)	83
13PT (5)	90
42PT (5)	625
10RG (5)	99
22RG (5)	35
27RG (5)	15
09SF (7)	10
12SF (5)	24
20WV (10) (odour issues)	40

2240

Scenario A5 - ignoring constraints 5 & 6

Site	Yield
6BA (6)	120
17CH (6)	30
11HY (6)	175
24LW (5)	110
08PL (6)	110
09PL (6)	130
13PT (5)	90
41PT (6)	131
42PT (5)	625
10RG (5)	99
22RG (5)	35
24RG (6)	20
27RG (5)	15
29RG (6)	400
30RG (6)	180
11SF (6)	10
12SF (5)	24

2304

Scenario B1 - ignoring constraints 1, 2, 5, 6, 7, 8 & 9

Site	Yield
6BA (6)	120
17CH (6)	30
04FL (8)	15
11HY (6)	175
03KG (1, 5)	43
06KG (5, 7)	75
07KG (5, 8)	12
11KG (5, 8)	7
12LW (1, 2, 5, 8)	153
24LW (5)	110
29LW (7)	8
18NH (7)	10
28NH (6, 9)	70
37NH (7)	13
41NH (7)	200
02NW (1, 6)	8
08PL (6)	110
09PL (6)	130
13PT (5)	90
41PT (6)	131
42PT (5)	625
10RG (5)	99
22RG (5)	35
24RG (6)	20
27RG (5)	15
29RG (6)	400
30RG (6)	180
09SF (7)	10
11SF (6)	10
12SF (5)	24
06WV (1, 2, 6, 7)	500

3428

Scenario B2 - ignoring constraints 1, 3, 5 & 6

Site	Yield
6BA (6)	120
17CH (6)	30
04DT (1, 5, 3)	200
07DT (1, 3, 5)	40
09DT (1, 3, 5)	225
02FL (1, 3, 5)	158
11HY (6)	175
03KG (1, 5)	43
10KG (3, 5)	40
24LW (5)	110
02NW (1, 6)	8
09NW (3, 6)	80
08PL (6)	110
09PL (6)	130
13PT (5)	90
41PT (6)	131
42PT (5)	625
43PT (3, 6)	185
10RG (5)	99
22RG (5)	35
24RG (6)	20
27RG (5)	15
29RG (6)	400
30RG (6)	180
11SF (6)	10
12SF (5)	24
16WV (1, 3, 6)	201
17WV (1, 3, 6)	243

3727