

Eastbourne HOUSING DELIVERY TEST Action Plan



August 2021

EASTBOURNE
Borough Council



www.eastbourne.gov.uk

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1.0 Introduction

- 1.1 In a bid to address the national housing crisis, Government published its Housing White Paper (HWP) - *Fixing our broken housing market* in 2017. The HWP identifies the need for at least 225,000 more homes to be built every year to meet the needs of the country's growing population and tackle the under-supply to date. The HWP sets out Government's plans to reform the housing market and boost the housing supply.
- 1.2 The HWP was followed by the revised National Planning Policy Framework (NPPF) and updated National Planning Policy Guidance published in 2018. The 2018 NPPF and PPG introduced the Housing Delivery Test (HDT). The NPPF has subsequently been updated in 2019 and 2021.
- 1.3 Local planning authorities (LPAs) have a longstanding role in planning for and demonstrating a sufficient supply of housing, as required by the NPPF (paragraph 68). The HDT is one of Government's initiatives to boost housing growth and seeks to encourage LPAs to have a more proactive role in supporting delivery, as well as greater accountability for under-delivery. The HDT measures the number of homes required over a three year period against the number of homes that were delivered, and calculates the result as a percentage.
- 1.4 The first HDT measurements for 2018 were published in February 2019, and were supported by the publication of the Housing Delivery Test: Measurement Rule Book (July 2018) and Housing Delivery Test: 2018 Measurement Technical note (February 2019). The 2019 HDT measurements were published in February 2020, and the most recent HDT measurements for 2020 were published in January 2021.
- 1.5 Eastbourne Borough Council (the Council) first published a Housing Delivery Test Action Plan in August 2019. The purpose of the Housing Delivery Test Action Plan is to provide an overview of housing delivery in the borough and identify actions to assist in increasing delivery. The Action Plan includes an analysis of recent housing delivery, potential barriers to delivery and identifies actions needed to support and increase housing delivery going forward. The actions identified in this document aim to obtain a micro understanding of local issues and help stimulate housing delivery.
- 1.6 The production of this third Action Plan is the consequence of the 2020 HDT result. The HDT is considered to be a 'live' document and therefore will be updated on at least an annual basis, usually following subsequent HDT result publications. Interim amendments may also be made to keep the document up to date.

2.0 Local context

Eastbourne Local Plan

- 2.1 The Council's Eastbourne Core Strategy Local Plan 2006-2027 [the Core Strategy] (adopted in February 2013), together with the 2003 Eastbourne Borough Plan 'saved' policies (2003), Town Centre Local Plan [TCLP] (2013) and Eastbourne Employment Local Plan [ELLP] (2016), forms the development plan for the borough. The Core Strategy is the planning framework and contains strategic policies for the borough.
- 2.2 Policy B1 (Spatial Development Strategy and Distribution) of the Core Strategy sets out the development target for Eastbourne; at least 5,022 homes (equivalent to 239 dwellings per annum) over the 21 year period between 2006 and 2027. This is based on 20 years of the South East Plan target of 240 per annum, plus one additional year of 222 per annum as a result of a slight over-delivery in the early years.
- 2.3 The Core Strategy further identifies the level of housing growth anticipated across the Borough's 14 neighbourhoods. Policy B1 states that, as the two 'sustainable centres', the Town Centre and Sovereign Harbour areas are the priority locations for housing growth. Table 1 sets out the distribution of housing delivery across the neighbourhoods.

Table 1 – Expected housing delivery by neighbourhood (2012-2027)

Neighbourhood	Identified Net Units	Windfall Net Units	Total Net Units
Town Centre	715	475	1,190
Upperton	245	154	399
Seaside	230	218	448
Old Town	55	46	101
Ocklynge & Rodmill	246	12	258
Roselands & Bridgemere	86	30	116
Hampden Park	75	9	84
Langney	164	14	178
Shinewater & North Langney	69	0	69
Summerdown & Saffrons	4	36	40
Meads	177	181	358
Ratton & Willingdon Village	7	5	12
St Anthony's & Langney Point	20	5	25

Neighbourhood	Identified Net Units	Windfall Net Units	Total Net Units
Sovereign Harbour	150	0	150
TOTAL (2012-2027)	2,243	1,185	3,428

Links with other key Council plans and strategies

2.4 The importance of delivering housing in the borough is not limited to planning. Other service areas of the Council recognise the local need for housing, the challenges that exist to delivering it and the part housing has in achieving overall sustainable communities. As such, the Council has a collective role and responsibility to proactively address this need. Table 2 outlines the existing plans and strategies that the Action Plan should complement.

Table 2 - Relationship with other Council plans and initiatives

Document	Description
Eastbourne Core Strategy 2006 – 2027 (2013)	<p>Sets out the framework for delivering housing and growth in the borough, including setting out the level and distribution of housing requirement.</p> <p>The Action Plan supports the Council to achieve the Local Plan’s Vision, Strategic Objectives and commitments.</p>
Eastbourne Town Centre Local Plan (2013)	<p>Provides a framework for strengthening the role of the Town Centre and its contribution to the sustainability of the Borough as a whole.</p> <p>The Action Plan supports exploring of a range of development types, including mixed use schemes, to maintain and enhance the Town Centre.</p>
The Corporate Plan 2020 - 2024 (2020)	<p>Highlights key outcomes for the Council, focussing on increasing housing supply, ensuring there is a wide range of quality housing, including affordable housing in the borough.</p> <p>The Action Plan supports the delivery of a range of development types to help ensure a suitable choice of homes is available to own/ rent.</p>
Eastbourne and Lewes Street Communities Strategy 2018-2021	<p>Acknowledges that the current housing market makes it challenging to reduce rough sleeping. The strategy sets out a framework to identify and address the needs of the ‘street community’, including ensuring there is suitable accommodation to help relieve and prevent rough sleeping.</p> <p>The Action Plan supports the delivery of a range of accommodation types to meet the needs of the local community.</p>
Lewes District Council and Eastbourne Borough Council Corporate Asset Management	<p>The Plan will help to unlock the potential of land and buildings across the two authority areas, including opportunities to stimulate provision of affordable housing, helping to deliver on the priorities of the</p>

Document	Description
Plan (2017-2020)	<p>Councils' corporate plans.</p> <p>The Action Plan supports the delivery of housing, including working with internal partners to explore Council-owned development opportunities.</p>
<p>Pride of Place: A Sustainable Community Strategy (2008-2026)</p> <p><i>Joint strategy produced by the six Local Strategic Partnerships (LSP)</i></p>	<p>Sets out a long term vision for improving people's quality of life and creating sustainable communities. It demonstrates how local organisations and agencies will work together to improve the economic, social and environmental well-being of the area. The lack of affordable housing is key theme across four of the six LSPs.</p> <p>The Action Plan supports the delivery of affordable housing through a range of mechanisms, including through Council-owned land and development contributions.</p>
<p>Eastbourne Housing Strategy 2020-2024</p>	<p>The Housing Strategy sets the tone and context for further work around its five main housing themes:</p> <ul style="list-style-type: none"> • Increasing the supply of new homes; • Promoting access to housing that meets modern standards; • Reducing homelessness; • Successfully managing and maintaining council homes; and • Promoting homes that sustain health & wellbeing. <p>The Action Plan will help highlight local housing delivery challenges/opportunities to feed into developing appropriate and focussed objectives for the Strategy.</p>

3.0 Housing Delivery Test

- 3.1 The HDT is a measurement of the number of homes built against the number of homes required over the previous three year period, expressed as a percentage:

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

- 3.2 The NPPF sets out certain 'actions' that must be implemented depending on the HDT result:
- Less than 95%: an LPA should produce an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
 - Less than 85%: a 20% buffer should be applied to the five year housing land supply calculation, as well as an Action Plan prepared;
 - Less than 75%¹: Policies are considered out of date and the presumption of favour of sustainable development applies to decision-taking.
- 3.3 In the 2020 Housing Delivery Test, the Core Strategy's fifth anniversary fell within the first year of the measurement. MHCLG's Measurement Technical note identifies that the requirement for years where local plans reach their fifth anniversary from adoption is proportionate to the amount of the year that the plan was less than 5 years old. For the period after the local plan is five years old, the requirement should be the minimum annual local housing need.
- 3.4 The Core Strategy was in-date for 89.9% of the 2017/18 year, so the housing requirement for 2017/18 is 89.9% of the Core Strategy target and 10.1% of the minimum annual local housing need. This equated to a requirement of 269.
- 3.5 For the 2018/19 year, the annual local housing need is the housing requirement, which was calculated to be 691. For the 2019/20 year, a Covid-19 adjustment was made to the requirement, which involved leaving out a month's worth of councils' housing requirement figures to reflect the temporary disruption caused by the first national lockdown announced on 23 March 2020. This resulted in the 2019/20 requirement being three-year requirement 611, and the total three-year requirement being 1,571 homes.
- 3.6 Housing delivery over the three-year period between 2017 and 2020 amounted to 457 homes. This equates to 29% of the number of homes required. The implication of a HDT result of 29% is that the presumption in favour of sustainable development should be applied. In addition, the local planning

¹ Transition arrangements for the HDT as outlined in Annex 1 of the NPPF identify that substantial under-delivery constitutes: below 25% in November 2018; below 45% in November 2019; and below 75% in November 2020 and beyond.

authority should prepare an Action Plan, and add a 20% buffer to the 5 year housing land supply calculation.

- 3.7 Table 3 identifies the details of the HDT, including number of homes required and the number of homes delivered for each year.

Table 3 - Housing Delivery Test 2019

Number of homes required				Number of homes delivered				HDT: 2019 measurement
2017-18	2018-19	2019-20	TOTAL	2017-18	2018-19	2019-20	TOTAL	
269	691	611	1,571	127	130	200	457	29%

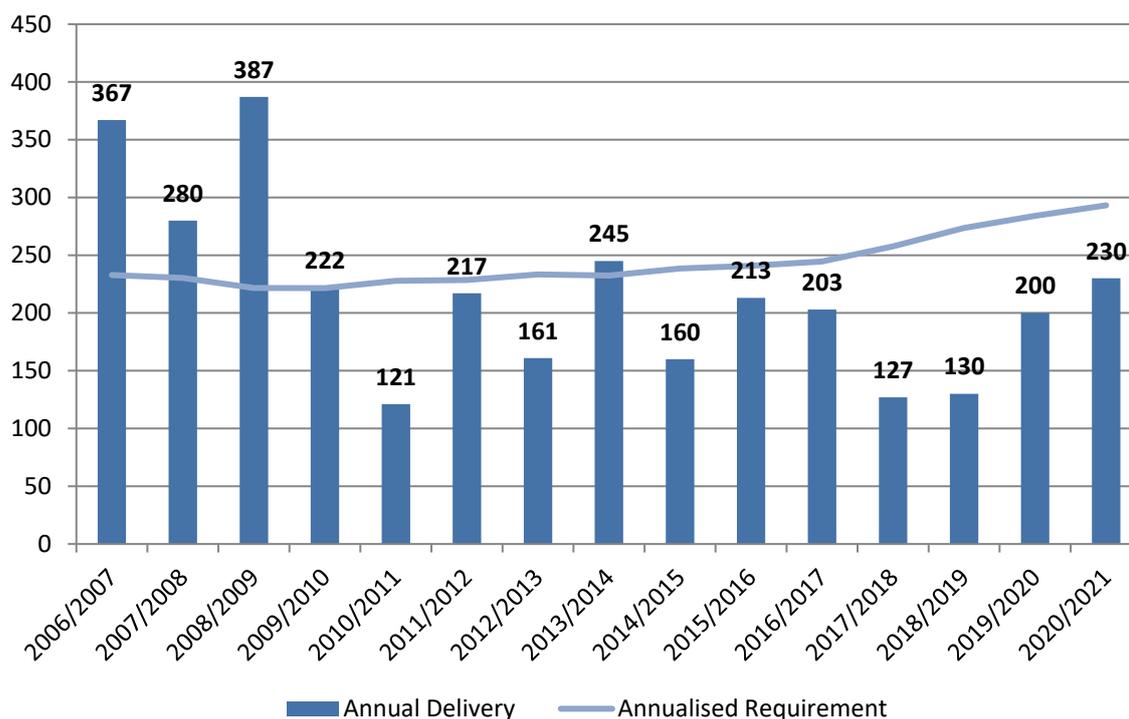
4.0 Housing Delivery in Eastbourne

- 4.1 The Council monitors planning applications throughout the year, including quarterly site visits to establish progress on site. The data collected on housing approvals and completions feeds into the Council's Authority Monitoring Report (AMR) which is published on an annual basis.
- 4.2 Monitoring consists of site visits to development sites and engaging with developers where necessary to understand delivery rates and completion targets.
- 4.3 This section looks at the Council's past housing delivery performance, the extent to which permissions for development are granted, and the average timescales for housing development to commence and complete.

Completions

- 4.4 Since the start of the Core Strategy plan period in 2006, a total of 3,263 net additional dwellings have been delivered in Eastbourne up to the end of the 2020/21 year. This is against a cumulative annual target of 3,600 over the same period. Therefore as at the end of 2020/2021, the cumulative housing delivery is 337 dwellings below the Core Strategy target.
- 4.5 On average, 217 units have been delivered per year since the start of the plan period; however this is influenced by high levels of housing delivery in the early years of the plan period and masks the significant under-delivered in recent years (Figure 1). Housing delivery has exceeded the Core Strategy target just once in since the UK recession in 2009.

Figure 1 - Annual Housing Delivery



4.6 Figure 1 shows that completions within the Borough have naturally fluctuated, with this trend expected to continue. The average number of completions over the last 10 years is 189. Delivery has not yet recovered to the levels seen prior to the 2009 recession; 367 in 2006/07, 280 in 2007/08 and 387 in 2008/09.

4.7 Housing delivery in Eastbourne has been reliant on small sites, with large sites being very limited in the borough. The 3,262 homes delivered since 2006 were across 677 sites, with 521 sites (77%) delivering less than five units each. A further 96 sites accommodated between five and nine units, which means that 91% of development sites were 'minor' development. Only 60 sites delivered more than 10 homes, 46 of which were between 10 and 24 units. Just four were large sites that delivered in excess of 100 homes.

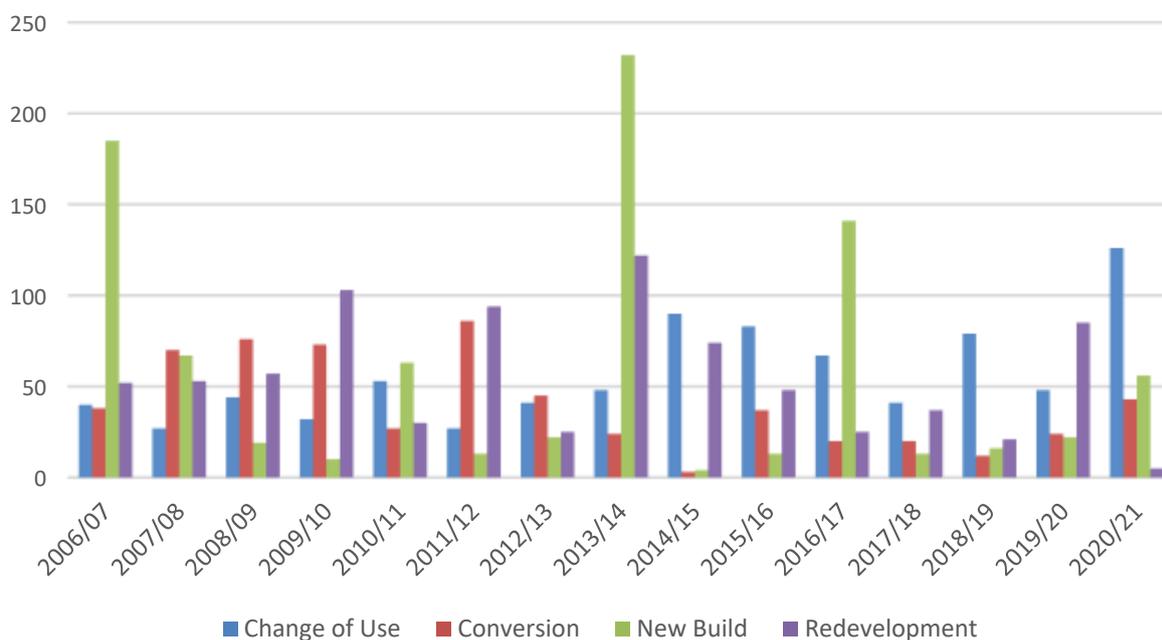
4.8 In the three years assessed as part of the HDT 2021, a total of 456 homes were delivered, consisting of 127 in 2017/18; 130 in 2018/19; and 200 in 2019/20. These 457 homes were delivered across 144 sites, the majority of which were small sites of less than five units (124 sites | 86%). A further 15 sites delivered between five and 9 units, and 4 sites delivered between 10 and 17 units. Two sites delivered between 21 and 32 units. The remaining and largest developments was of 58 units.

4.9 Housing completions in the Borough have been delivered via a range of development types. Over the plan period, changes of use schemes have contributed the highest number of homes (30%). New Builds have also

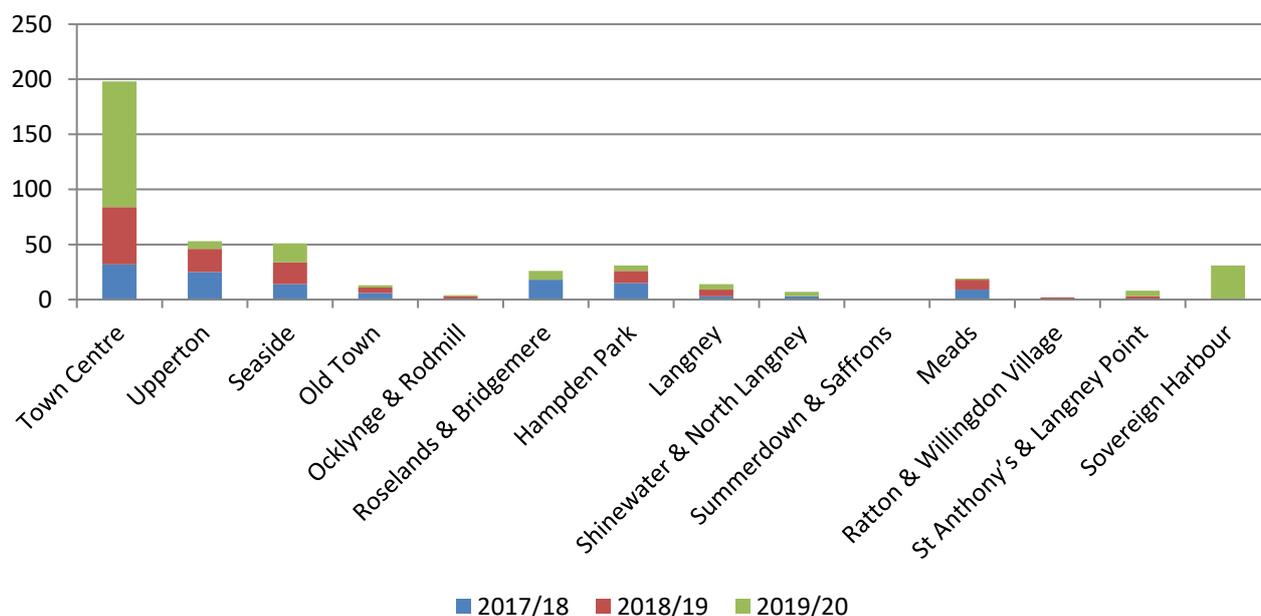
contributed 27%; however Figure 2 shows that the majority of these have been delivered early in the plan period, due to the completion of final phases of development at Sovereign Harbour, and on the completion of two large sites in 2013/14.

4.10 Over the last five years, there has been a strong trend towards changes of use, which has delivered 40% of homes over this period. This has been particularly influenced by the changes to Permitted Development rights that have allowed offices to be converted to residential without the need for planning permission.

Figure 2 - Completions by Development Type



4.11 Figure 3 shows that over the last three years the two neighbourhoods of the Town Centre and Upperton have delivered the highest number of housing completions, followed by Seaside. It also highlights that the Town Centre is achieving its role as a priority growth area as envisaged by the Core Strategy.

Figure 3 – HDT Completions by Neighbourhood

Permissions for new homes

4.12 Since the start of the Core Strategy plan period (2006), the Council has granted permissions for a net addition of 4,527 dwellings on 944 sites, at an average of 302 per year. Table 4 shows the number of new homes granted permission and the number of sites per year.

Table 4 - Numbers of new homes granted permission per year

Year	Net additional units granted permission	Number of sites
2006/07	460	85
2007/08	260	52
2008/09	232	75
2009/10	548	82
2010/11	296	42
2011/12	162	41
2012/13	251	59
2013/14	196	61
2014/15	375	69
2015/16	241	63
2016/17	297	77
2017/18	361	69

Year	Net additional units granted permission	Number of sites
2018/19	193	64
2019/20	348	63
2020/21	307	52
TOTAL	4,527	954

4.13 Of these 954 sites, 69% would accommodate less than five homes, and 82% would be non-major development. 100 sites would accommodate ten or more homes, with just four sites taking 100 homes or more.

Permission to Commencement

4.14 Of sites that have been developed since 2006, it has taken an average of 13.9 months between a development being granted planning permission and development starting on site, across all sizes of site. The average time for construction to start is fairly consistent for all sites with less than 25 dwellings being between 12 and 15 months; however for sites with more than 25 dwellings, the average increases to 27 months.

4.15 However, there were 99 sites (17%) that took more than 36 months before development started on site, including 59 sites that were developing less than five units. The longest time between the original planning permission being granted and development commencing was 123 months.

Commencement to Completion

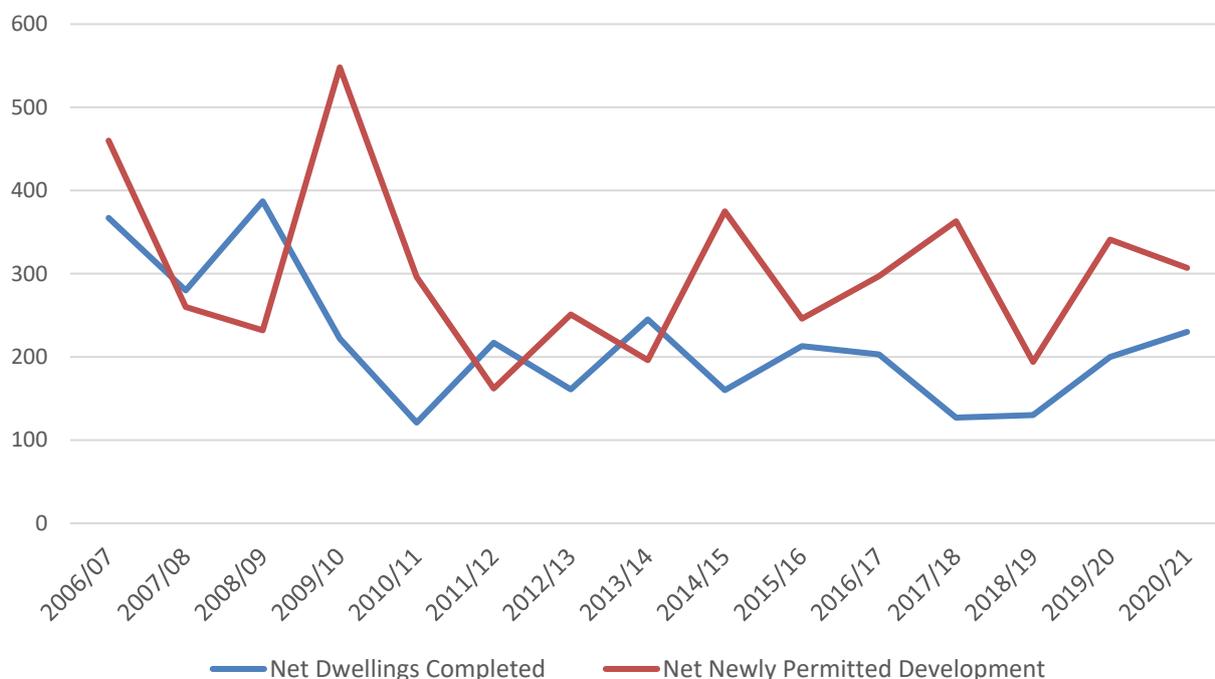
4.16 The size of the development does have a significant impact on the average time it takes for a development to be built out. Small sites of less than five units take an average of 5.8 months to complete, increasing to 8.6 months for developments of between five and nine units, and 12.5 months for developments of between 10 and 24 units. Developments of 50 to 99 units have taken an average of 19.2 months to build out, whilst the average build-out time for developments with over 100 units has been 38 months.

4.17 There were 99 sites (17%) that took more than a year to build out, including all of the developments over 25 units. Of these 99 sites, 51 sites were for less than five units, which equates to 12% of the total number of sites of less than five units.

Permitted sites not built out

4.18 Figure 4 shows the number of newly permitted dwellings per year compared to the number of units built.

Figure 4 - Permissions per year compared to completions



4.19 When compared against the number of homes that have been delivered over the same period, it suggests that around 28% of permitted homes have not been built out. This is particularly noticeable over the five year period from 2013/14 to 2017/18, when 1,477 homes were granted planning permission, but just 949 units (64%) have been built.

4.20 There are 158 sites that have been granted a permission for housing but where development is yet to commence. Of these 88 sites still have an extant permission and would deliver 663 units. However, there are 70 sites that could deliver 536 homes where permission has lapsed.

4.21 Of the 70 sites where permission has lapsed, 48 sites had permission for less than five homes. Only 10 of the lapsed sites would constitute major development.

5.0 Five Year Housing Land Supply

- 5.1 Paragraph 74 of the NPPF requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.
- 5.2 One of the implications of a HDT measurement below 85% is that a 20% buffer (equivalent to an additional year's housing need) should be added to the five year housing land supply calculation, instead of a 5% buffer required by the NPPF. However, due to persistent under-delivery of housing over recent years, the Council had already been adding the 20% buffer onto the five year housing land supply calculation.
- 5.3 At October 2020, the Eastbourne housing land supply stood at 1,440 homes. As the Core Strategy is more than five years old, this means that the land supply should be assessed against the local housing need, in accordance with the NPPF. The local housing need at 31st October 2020 is 675 homes per year.
- 5.4 Therefore, as at 31st October 2020, the Council could only demonstrate a 1.8 year supply of housing land. This means that the NPPF's presumption in favour of sustainable development applies in Eastbourne.

6.0 Planning Performance

- 6.1 This section investigates the performance of the Council's planning service in order to identify any issues in performance that may be influencing the low levels of housing delivery in Eastbourne.

Development Management

- 6.2 Government have set national performance criteria on speed and quality against which all Councils are judged. Persistent failure to perform against these targets runs the risk of the Council being designated as 'Non- Performing', and special measures will be initiated by Central Government.
- 6.3 The assessment of the new 'special measure' threshold has two limbs to it and reviews the Council's performance on a backward rolling two year basis. The targets for speed are 70% of 'major' applications to be determined within 13 weeks and for 60% of 'minor' and 'other' applications to be determined within 8 weeks.
- 6.4 In the 24 months to the end of March 2021 the Council determined 86% of major development decisions and 82% of non-major development decisions within these set timescales or by extension. Therefore the Council has exceeded the performance criteria for speed.
- 6.5 The targets for quality are less than 10% of refusals for major and non-major applications being allowed on appeal. In the 24 months to end of March 2021, the Council had 4 major development refusals overturned at appeal, (representing 14% of Major Decisions) and 10 non-major applications (representing 1%) overturned at appeal. It is acknowledged that the 14% of major applications overturned at appeal is above the target. However it should be noted that of these, two were appeals on the same site. This consisted of two different schemes for demolition and rebuild where Members were concerned about the loss of the original building and the design of the replacement building. In addition, it is considered the other two schemes were refused on material planning grounds. Given the small number of cases involved the Council do not consider this area to be an issue of concern regarding housing approval or delivery in the Borough.
- 6.6 Table 5 identifies the volume of planning applications determined over the past five years. It shows a consistent level of decisions made over the period.

Table 5 - Decisions made on planning applications

Decisions	2015	2016	2017	2018	2019	2020
All Decisions	545	569	598	531	499	475
Delegated	472 (87%)	505 (89%)	559 (93%)	478 (90%)	478 (96%)	450 (95%)
Granted	488 (90%)	515 (91%)	544 (91%)	487 (92%)	426 (85%)	429 (90%)
Refused	57 (10%)	54 (10%)	54 (9%)	49 (9%)	73 (15%)	46 (10%)

6.7 It is considered that in granting planning permission for 90% of all applications received that the planning services of Eastbourne Borough Council have supported the development industry and helped to meet the aspirations of the applicants. Only where there are substantive material planning considerations is an application refused.

6.8 Since 2017 the percentage of applications determined at delegated level has significantly increased, which is reflective of the changes made to the Council's scheme of delegation. This has assisted applicants in getting quicker decisions on their applications.

6.9 In addition to the formal applications received, the Council offers a paid for pre application advice service. Table 6 indicates the numbers of pre-application enquiries received by the Council over the last five years.

Table 6 - Pre-application advice issued

Pre-Application Advice	2016	2017	2018	2019	2020
Householder	229	96	134	91	129
Medium	147	102	67	14	19
Major	18	17	12	8	6
TOTAL	385	215	213	113	154

6.10 Prior to April 2017, the pre-application service was free; therefore we have seen a drop in pre-application requests since the introduction of the fee, especially in the Householder category. This amount of pre-application advice again shows support for the development industry in terms of trying to advise applicants on how schemes could be amended to make them more acceptable and more likely to be granted permission.

Planning Policy

- 6.11 The Core Strategy was adopted in February 2013, which meant that its 5-year anniversary was in 2018. The status of the Core Strategy and progress against the LDS is monitored on an annual basis through the Authority Monitoring Report (AMR). A review of the Core Strategy has determined that the Core Strategy cannot be considered to be up to date. There are a number of reasons for this:
- Housing delivery over the plan period has been lower than the amount required by the Core Strategy
 - Housing need has increased significantly since 2013
 - A five year housing land supply cannot be demonstrated.
 - It is more than 5 years old
- 6.12 The Eastbourne Local Development Scheme (LDS) 2019-2022 was adopted in February 2019. It identifies a timetable for the production of a new Local Plan for Eastbourne, covering the period 2018 to 2038, which will contain both strategic and non-strategic policies that will, once adopted, superseded all current planning policies for the Borough.
- 6.13 A Regulation 18 'Issues & Options' consultation was held between November 2019 and January 2020.
- 6.14 An update to the Strategic Housing & Employment Land Availability Assessment [SHELAA] was published alongside the Issues and Options consultation. This shows that the total potential housing capacity, including sites delivered in 2018/19, sites with an extant permission or currently under construction, and an allowance for windfall, is 4,965 dwellings (248 homes per year).
- 6.15 In December 2020, the Council published an update to the Brownfield Land Register, as required by legislation. The purpose of the Brownfield Land Register is to provide up-to-date, publicly available information on brownfield land (previously developed sites) that are suitable for housing. The intention is that it will provide certainty to developers and communities, encourage investment in local areas, and bring forward derelict and underused land for new homes.
- 6.16 The 2020 Brownfield Land Register contains 64 sites that meet the criteria for inclusion. The 64 sites have sufficient capacity to accommodate 1,521 new dwelling units. Of these 64 sites, 26 sites have already been granted planning permission (40% of the total sites), equating to 366 units (24% of the total units). There are two sites on the Register that are allocated in a local plan, both of which are in the town centre.

Council Plans and Initiatives

6.17 Table 7 outlines the key areas of work that the Council is involved in and its role in supporting housing delivery within the borough.

Table 7 - Council mechanisms to support housing delivery

Current Position and housing delivery mechanisms

Adopted **Eastbourne Core Strategy Local Plan** identifies the overall level of housing growth over the Plan period; 5,022 net dwellings. This growth is distributed to the 14 neighbourhood areas of the borough.

www.lewes-eastbourne.gov.uk/planning-policy/eastbourne-core-strategy/

The Council is committed to **updating its Local Plan**. It will contain both strategic and non-strategic policies and will cover the period between 2018 and 2028. Public consultation on Regulation 18 (Issues & Options stage) was undertaken in November 2019.

www.lewes-eastbourne.gov.uk/planning-policy/local-development-scheme/

Established a **Self-build and Custom Housebuilding Register** to record the interest of people wanting to build their own home within the borough outside the SDNP.

www.lewes-eastbourne.gov.uk/planning-policy/self-build-and-custom-housebuilding-register/

The Council maintains a **Brownfield Land Register** containing sites that are appropriate for residential development. The Register is updated on an annual basis. Future updates will gauge if any sites should be granted 'permission in principle'.

www.lewes-eastbourne.gov.uk/planning-policy/brownfield-land-register/

Continue to update the **Strategic Housing and Employment Land Availability Assessment (SHELAA)** on an annual basis to identify further potentially suitable housing sites to be considered for development in the new Local Plan, as well as inclusion in Brownfield Land Register.

www.lewes-eastbourne.gov.uk/planning-policy/strategic-housing-and-economic-land-availability-assessment/

In June 2017 Lewes District and Eastbourne Borough Councils set up the development arm of the Council; **Aspiration Homes**. Together with **Eastbourne Housing Investment Company Ltd** the Council has agreed a loan of £2.5m to enable investment in commercial and affordable residential accommodation schemes to deliver housing.

The Council is using its own land holdings in the town to replace its underused assets with new housing projects. As an example a site is coming forward for planning permission in Southfields Road, a former Council car park, alongside a number of smaller infill sites on housing estates that already have planning consent.

Regeneration sites are being brought forward in the Town Centre by the Council, including one

Current Position and housing delivery mechanisms

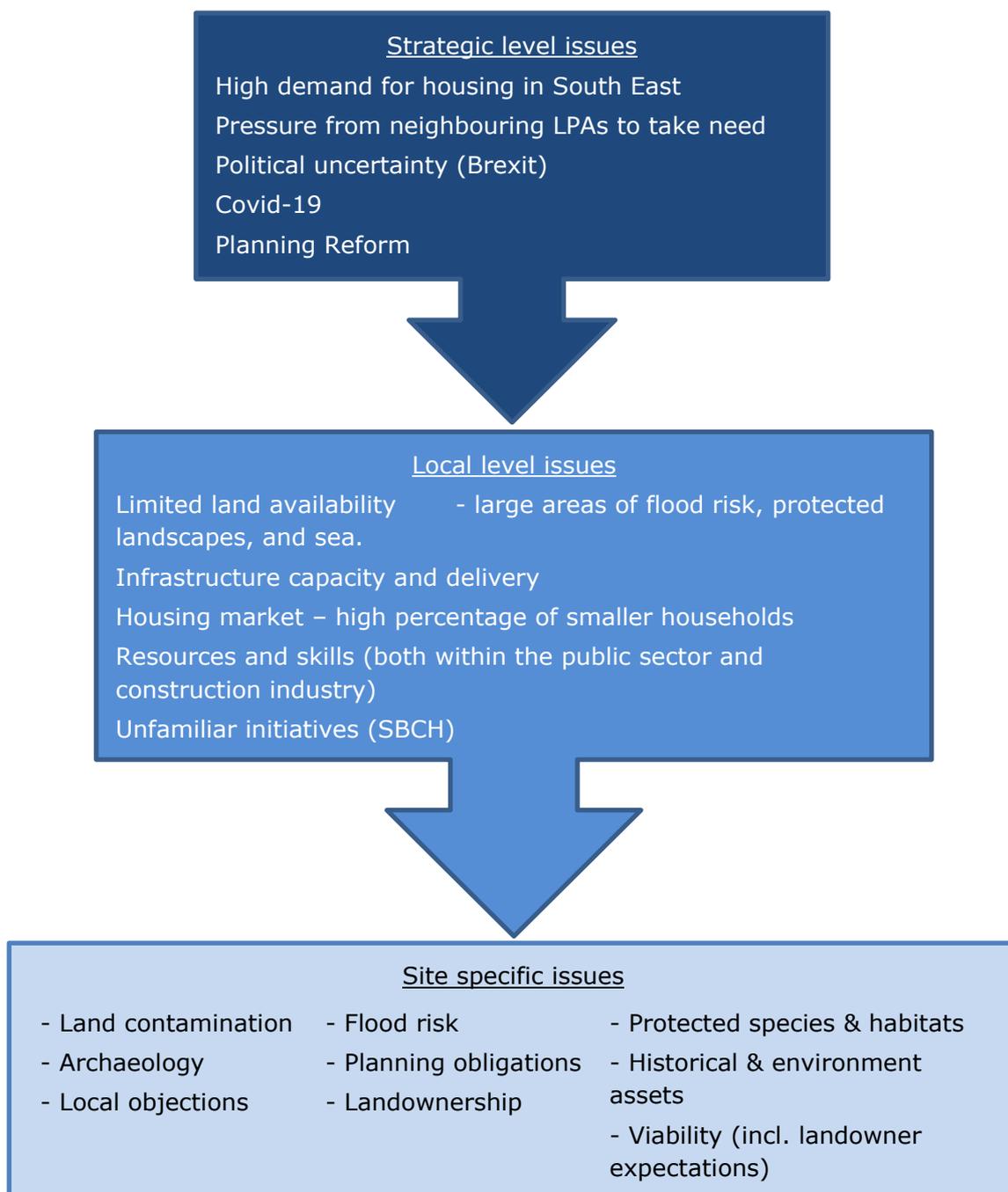
in Langney Road where derelict land has been acquired and is being developed for housing. The Council has begun to use off-site modular construction to accelerate time frames for housing delivery on projects such as this, and is in discussion with Homes England on further funding that could be available by expanding this programme.

The **Local Plan Steering Group** is formed of five Councillors. It provides direction and authorisation for actions and approaches to a variety of Planning Policy projects helping to avoid unnecessary delays to projects that may or may not need going to Cabinet.

7.0 Key Challenges

7.1 This section explores the challenges facing key stakeholders in bringing forward residential developments in the borough. Figure 5 highlights the different layers of challenges to housing delivery relevant to the borough.

Figure 5 - Layers of challenges to housing delivery



- 7.2 As part of the investigation into key challenges, the Council has engaged with 'Developers East Sussex', which is a forum of developers and local authorities that take an active role in the delivery of quality sustainable development in East Sussex, in order to try to understand the reasons for lack of delivery of housing in Eastbourne.
- 7.3 In addition to the nation-wide issues facing the construction industry such as uncertainties surrounding Brexit and a construction skills shortage, it is understood from discussions with local developers and stakeholders involved in the development industry that there are local factors that may help to explain relatively low levels of housing delivery.

Planning Service

- 7.4 It is not considered that the performance of the Council's planning service is having any significant adverse impact on the rate of delivery of housing. The Council are generally processing applications in a timely manner and granting permissions on around 86% of applications with refusals only where there are substantive material planning considerations to justify this. The high rate of approvals, along with the number of pre-application advice responses provided to potential applicants, shows that the Council is helping to support the development industry in delivering housing.
- 7.5 It is accepted that the Council does not currently have an up to date Local Plan; however progress is being made on preparing a new plan. However, the fact that the Council cannot demonstrate a five year housing land supply means that the NPPF's presumption in favour of sustainable development applies in Eastbourne, but this has not had any significant impact on the number of homes being delivered. This suggests that the reasons for low levels of housing delivery in Eastbourne are more likely to lie outside of the planning system.

Development constraints and land availability

- 7.6 Eastbourne's Local Housing Need, calculated through the standard methodology that was introduced as part of the revisions to the NPPF in 2018, currently amounts to **693 net additional homes per annum**. This is significantly more than the housing target in the Core Strategy, which itself has not been achieved for a number of years.
- 7.7 Eastbourne has a number of geographic constraints to development, including the South Downs National Park to the west, the English Channel to the south, and a tightly drawn administrative boundary with Wealden District to the north and east. A significant proportion of the town is within an area of flood risk,

particularly Eastbourne Park in the centre of the town, the majority of which is functional floodplain and therefore not suitable for development.

- 7.8 As such, a local housing need of 693 net additional homes per annum is unachievable within the Borough, but due to the Core Strategy being more than 5 years old, this local housing need is used to calculate the five year housing land supply and has a strong influence on the result of the Housing Delivery Test.

Development Finance

- 7.9 As identified earlier in this report, the majority of development sites in Eastbourne are small sites that can provide less than five units. There are very few large sites, which means that large volume housebuilders who operate on a national scale are not attracted into the Borough. The scale of the sites means that delivery is reliant on local builders and small development companies, who have different business models to larger developers.
- 7.10 The small scale of development, and the lower margins associated with this, means that the cost of development finance takes up a larger proportion of the developers return. Therefore they are less willing to borrow in order to fund development and are reliant on re-investing returns from other development in order to start the development on their next site.
- 7.11 If a developer had needed to borrow to purchase the site, they are more likely to build it out faster in order to minimise finance costs. However, if a developer has not had to borrow in order to buy the land, they are more willing to delay the development of the site until it is more advantageous for them to do so.

Local construction skills

- 7.12 The problem is exacerbated by the fall in the number of local builders operating over recent years. During the period of economic decline between 2009 and 2011, employment in the construction industry fell as skilled tradespeople left the industry. The impact of this fell most heavily on small and medium-sized enterprises (SME). Data from the Business Register and Employment Survey (December 2017) shows that the number of business in East Sussex that specialise in the development of building projects has fallen by 11% since 2010.
- 7.13 This means that there are fewer local builders and developers operating in the local area at a scale that is appropriate to deliver the type of sites in Eastbourne. A fall in the number of local builders and developers during economic uncertainties could help to explain the low rate of housing delivery since the recession.

7.14 In addition, the number of people completing construction-related apprenticeships has fallen heavily, reducing new entrants to the industry. The number of starts in 'construction, planning and built environment' subject area' courses in East Sussex has been steadily decreasing from 2,020 in 2011/12 to a low of 1,320 in 2016/17. This suggests that the lack of developers who operate at a level appropriate for sites in Eastbourne is going to be an on-going problem.

Viability

7.15 In addition to the small scale of the development sites in Eastbourne, the majority of sites are also on previously developed land. This has implications on the viability of development due to the higher existing use values, more expensive remediation and greater difficulties in design and construction compared to larger, undeveloped sites.

7.16 The viability issues in Eastbourne are further evidenced by the fact that the Eastbourne Community Infrastructure Levy (CIL) Charging Schedule puts a charge of £50 per sqm on residential houses (apartments are not viable for a CIL charge), however just the other side of the administrative boundary in Wealden District, the CIL charge is £150 per sqm.

7.17 The impact of having a zero rate for CIL for apartment development in Eastbourne has meant that 72% of homes delivered since CIL was adopted have been in the form of flats. The lack of variety in the types of homes that are being delivered reduces the absorption rates and reduces the pool of people looking to buy a new home in Eastbourne, which subsequently impacts on the returns for the developer and makes development less attractive.

Covid-19

7.18 On 23rd March 2020 Government announced that the UK was to go into lockdown in an attempt to control the spread of Covid-19 which had arrived in the country the previous month. No date was provided for when activities would return to normal.

7.19 At the time of the announcement, the Council were undergoing its annual monitoring of housing sites. This confirmed that the majority of construction sites in the Borough had closed in line with Government advice.

7.20 Lockdown was lifted for construction and manufacturing in mid-May. It is unlikely that lockdown had much of an impact on housing completions for 2019/20. It was anticipated that 2020/21 would see a lower number of completions due to the two month lockdown, coupled with the shortage of some

building materials and products following lockdown². However, this has not been the case as the 2020/21 year saw a greater number of completions than the previous year, and Covid has not had the impact on the market that was originally anticipated.

Planning Reform

- 7.21 In summer 2020, the Government published a White Paper setting out proposals for a radical reform of the planning system. The reforms are intended to boost the supply of homes by measures including: enabling local plans to be prepared more quickly; to make the planning system more accessible and clearer through rules-based systems; protect valued green spaces by allowing for more building on brownfield sites; and introducing a simpler levy to replace the current system of developer contributions.
- 7.22 There is some uncertainty around what the reforms will look like and when they will be introduced, which may have some impact on housing delivery in the short-term.

² Construction Leadership Council identified that supplies of plaster and aggregates may not return to normal until end of June 2020, with regional variations as some quarries are still closed (27 May 2020 - <https://www.theconstructionindex.co.uk/news/view/materials-shortages-easing-say-industry-leaders>)

8.0 Actions

- 8.1 This section highlights what mechanisms the Council already has in place to support and increase housing delivery, as well as what actions are required to continue this work. The Action Plan aims to identify where there may be opportunities to strengthen and/ or improve across the Council.

Preparing a new Local Plan

- 8.2 The Council is preparing a new Local Plan for Eastbourne covering the period from 2018 to 2038. The new Local Plan will contain both strategic and non-strategic policies, and will allocate site for housing development to provide greater levels of certainty for developers. As part of the process of preparing the Local Plan, the Council are investigating opportunities for releasing larger scale greenfield sites for development, considering how policies can help to increase the variety and type of homes that are being delivered, and also assessing the implications on local plan policies on development viability to ensure that development can come forward in a sustainable manner.

Reviewing CIL Charging Schedule

- 8.3 The Council had previously intended to review the CIL Charging Schedule in order to assess whether or not the current CIL charges are having an impact on viability. However, recent proposals for reforms to the planning system, including the introduction of a new Infrastructure Levy to replace Section 106 developer contributions and CIL has created some uncertainty over the future of the CIL Charging Schedule. This has meant that further work on the CIL Charging Schedule will be delayed until the details of planning reforms in this area are better known.

Direct provision of new homes by the Council

- 8.4 The Council will deliver new affordable and market homes through its local authority companies, Eastbourne Housing Investment Company Ltd, and Aspiration Homes LLP, which is a joint venture with Lewes District Council.
- 8.5 EHICL's programme is advanced and represents a mixed portfolio that helps meet the Council's strategic objectives in a number of ways. Through the financial delegations and established governance arrangements next phase delivery of acquisitions and new developments will further promote place shaping, generate financial returns and enable the Council to more directly meet strategic housing priorities. The Council also continues to work with developers in helping to bring forward the affordable housing elements of their schemes, and where necessary directly investing in affordable housing to help delivery of the whole site.

Updating the Strategic Housing & Employment Land Availability Assessment

- 8.6 The Council has taken a proactive approach to identifying and assessing potential development sites through the SHELAA, including undertaking regular 'calls for sites' and maintaining regular contact with site proponents to understand site availabilities and barriers to delivery.

Updating the Brownfield Land Register

- 8.7 The Council updates the Brownfield Land Register on an annual basis and ensure that the list of sites and site plans are made publicly available. The Council will also review Part 1 of the Brownfield Land Register to establish if there are any suitable sites for Part 2 of the register that will grant 'permission in principle'.

Maintaining Self-Build and Custom Housebuilding Register

- 8.8 The Council continues to maintain a Self-Build and Custom Housebuilding Register on its website, and undertake a review of all interested parties who have registered to ensure that they are still actively seeking a plot. The Local Plan will also consider a policy on supporting self-build and custom housebuilding.

Investigating funding opportunities

- 8.9 The Council will explore appropriate funding opportunities to help unlock sites with help from Regeneration and Economic Development Team.

Engaging with Developers

- 8.10 The Council will engage with the development industry through the Developers East Sussex forum in order to understand changes in the local market and reasons for under-delivery of sites. This could result in additional actions being identified through amendments to this action plan.
- 8.11 The Council will also continue involvement with Team East Sussex, which represents East Sussex at the SELEP Board and is involved in various local initiatives which aim to improve construction skills and the supply chain in East Sussex.

Encouraging opportunities for construction skills training

- 8.12 As part of the Construction Skills Fund, funding has been awarded to support a construction on-site training hub, which has now been delivered by the East

Sussex College Group at the Bedfordwell Road development, which is a site owned and being developed by the Council.

8.13 The Council also continues to seek local labour agreements on major development sites through its Local Employment and Training Supplementary Planning Document, in order to maximise local employment opportunities at both the construction and first operational phase of the development.

Actions and Timescales

8.14 Table 8 outlines the actions to be taken by the Planning Policy, with input from other teams within the Council where relevant. Each action is given a timescale within which the action should be progressed.

Table 8 - Actions to increase housing delivery

Overall Action	Specific Actions	Timescale
Monitoring	Continue to monitor and analyse policy performance and delivery against Core Strategy Monitoring Framework and publish results in annual Authority Monitoring Report.	Ongoing
Prepare a new Local Plan	Consult on Issues and Options in October 2019 to ensure that the Council is planning for the appropriate level of housing growth, supported by the required infrastructure.	✓
	Work with infrastructure providers to understand requirements for the new plan period	Medium
	Investigate opportunities for releasing larger scale greenfield sites for development through Local Plan allocations	Medium
	Assess the implications on local plan policies on development viability	Medium
	Adopt a new Local Plan with a new, realistic housing target	Long
Direct provision of new homes through Aspiration Homes & Eastbourne Housing Investment Company Ltd	Review portfolio of sites and explore opportunities for the Council to feed into and deliver housing through the Brownfield Land Register and Self-Build and Custom Housebuilding Register	Ongoing
	Planning and Commercial Business teams to engage at early stages of development	Ongoing

Overall Action	Specific Actions	Timescale
	projects to better understand potential challenges and reduce risk of delay at planning application stage.	
Strategic Housing and Employment Land Availability Assessment	Undertake regular 'Call for Sites' to identify additional development opportunities	Ongoing
	Maintain contact with proponents of existing registered sites to confirm availability and barriers to development	Medium
	Update SHELAA on an annual basis	Ongoing
Brownfield Land Register	Continue to update Register on an annual basis.	Short
	Review Part 1 of the Register to establish if there are any suitable sites to grant 'permission in principle'.	Medium
Self-build and Custom Housebuilding Register	Undertake review of registered interested parties to ensure still actively seeking plot.	Medium
	Consider how the local plan can help deliver self-build and custom housebuilding plots	Medium
	Identify alternatives to the private sector to help deliver suitable plots.	Medium
Investigate funding opportunities	Explore appropriate funding opportunities to help unlock sites with help from Regeneration and Economic Development Team.	Medium
Engage with Developers	Attendance at Developers East Sussex forum and discuss constraints to housing delivery with developers	On-going
	Continue involvement with Team East Sussex and representation in SELEP Board	Ongoing
Encourage opportunities for construction skills training	Secure local labour agreements on major developments through Local Employment & Training SPD	Ongoing
	Support a construction on-site training hub on the Bedfordwell Road development site	Ongoing
Local Plan Steering Group	Continue to involve Group in Policy projects, particularly the preparation of the new Local Plan	Ongoing
	Update Local Plan Steering Group on housing delivery on a regular basis	Ongoing

Short: 0-6 months; Medium: next 2 years; Long: next 5 years.

9.0 Monitoring

Next Steps

- 9.1 The Action Plan is a 'live' document and will be monitored on a regular basis alongside the Council's Authority Monitoring Report. The effectiveness of the actions will be reviewed and where necessary revised or new actions introduced.
- 9.2 Feedback and progress on the outcomes of the actions contained within this plan will be outlined in the 2022 Action Plan.

Projected Results for 2021

- 9.3 For the HDT 2021, the number of homes required will consist of three years of local housing need. As such, it is anticipated that the housing requirement for the three-year period to 2020/21 will be 1,993. The 2020/21 year delivered 230 new homes, so the three-year delivery is updated to 560. This equates to 28% of the housing requirement.

Table 9 - Projected Results for 2021 HDT

Number of homes required				Number of homes delivered				HDT: 2020 measurement
2018-19	2019-20	2020-21	TOTAL	2018-19	2019-20	2020-21	TOTAL	
691	611	691	1,993	130	200	230	560	28%

- 9.4 The NPPF identifies that a result of less than 75% will result in the presumption in favour of sustainable development. However, it should be noted that the presumption in favour of sustainable development does already apply in Eastbourne due to the lack of a five year housing land supply.