



Lewes District Council

Lewes District Council

Land Availability Assessment (LAA)

December 2024

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Summary

- S.1 A Land Availability Assessment (LAA) is an important part of the evidence base supporting the preparation of a local plan, particularly in establishing the potential land supply for development. Lewes District Council (the council) is preparing a new local plan which will cover the areas of the district which fall outside the South Downs National Park (SDNP), termed the plan area. The LAA only assesses sites that fall outside the SDNP within the district. The council will work with the South Downs National Park Authority to assess sites which are either on or cross the boundary between the SDNP and district.
- S.2 The requirement to undertake a LAA is set out in the [National Planning Policy Framework 2024 \(NPPF\)](#). Further guidance is set out in the [Planning Policy Guidance](#)¹. Paragraph 72 of the NPPF requires that planning authorities should have a clear understanding of the land available in their area through the preparation of a land availability assessment. LDC last published a Land Availability Assessment in November 2023².
- S.3 This LAA is being published to support the preparation of the Local Plan. This report provides a brief introduction to the LAA, the policy background, a summary of the assessments and the district's theoretical housing capacity based on information available to the council at the time of concluding this LAA document. It should be noted that this LAA was completed prior to the publication of the NPPF 2024.
- S.4 It is important to make clear that **the LAA does not allocate land for development nor determine whether a site will be allocated for development. The inclusion of a site within the LAA should not be taken to imply that the site will be allocated for housing or looked upon favourably when determining planning applications.** The LAA is also not a statement of council policy. The decision to allocate sites will be made through the emerging Local Plan which will be subject to further consultation.
- S.5 In this update to the LAA, 48 new sites have been considered. A total of 357 sites, have been reviewed, including sites brought forward from the previous LAA 2023, sites allocated in LDC Local Plan Part 1 and Local Plan Part 2, current planning applications, officer identified sites and lapsed planning permissions.
- S.6 Out of the total sites identified, 224 sites were assessed in Stage 2 for residential potential. Of these, 46 have been assessed as being deliverable or developable for

¹ [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](#)

² <https://www.lewes-eastbourne.gov.uk/article/1934/Land-Availability-Assessment>

residential development, 23 sites were considered to be potentially deliverable or developable for residential development, and 148 sites have been assessed as not deliverable or developable for residential development.

- S.7 The LAA will help to inform the next stages of work in the preparation of the new local plan. Plan making is an iterative process and additional sites and updated information can come forward throughout the process, it should be noted that this LAA represents the information available at this point in time.

Introduction

- 1.1 The Land Availability Assessment (LAA) provides the council's assessment of land availability within the plan-making area of Lewes District. This is the administrative boundary of Lewes District outside of the South Downs National Park. It identifies a future supply of land which is suitable, available and achievable for the identified development uses over the plan period.
- 1.2 The preparation of a strategic housing land availability assessment is required by national policy, as outlined in Paragraph 72 of the National Planning Policy Framework 2024 (NPPF) and informed by guidance set out in the national Planning Practice Guidance³ (PPG). The LAA therefore primarily considers housing land availability, but also assesses sites promoted for economic development, renewable energy generation and green infrastructure.
- 1.3 The LAA assessment follows an evidence-led, proportionate and consistent methodology in accordance with national policy and guidance. It seeks to capture information on sites including site constraints as they exist at the time of assessment.
- 1.4 This document updates the council's LAA published in November 2023 to a base data of 31st March 2024. This version of the LAA has been updated to reflect new evidence available or progress with existing sites since the publication of the previous version and to include new sites promoted to the council since the assessment was last undertaken.
- 1.5 The LAA is an important part of the evidence base which supports the local planning framework, including the local plan and neighbourhood plans. It provides a strategic overview of the suitability, availability and achievability of each site and will help to inform plan-making and decision-making in the preparation of the new local plan.
- 1.6 Importantly, as explained in the national Planning Practice Guidance (PPG), the LAA does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the development requirement of the plan area, but it is for the development plan to determine which of those sites are the most suitable to meet those requirements.
- 1.7 Where a site is assessed as being suitable for development by the LAA, it does not imply that planning permission would be granted for development. Neither does the

³ [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment)

commentary relating to a site within the LAA constitute formal planning advice. Planning applications still need to follow the normal application process and will continue to be considered against the appropriate policies. The assessment of a site within this LAA does not preclude it from being considered for other uses.

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

Policy Context

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

National Planning Policy Framework

- 2.2 The requirement to undertake a Land Availability Assessment is set out in Paragraph 69 of the NPPF. It requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. This is expected to enable the authority to identify a sufficient supply and mix of sites taking into account their availability, suitability and likely economic viability.
- 2.3 The authority is also required to identify, through planning policies, a supply of specific 'deliverable' sites within the first five years of the plan period; and a supply of specific 'developable' sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan period.

Planning Practice Guidance

- 2.4 Further guidance on the methodology for Housing and Economic Land Availability Assessment is set out through the relevant national Planning Practice Guidance⁴ (PPG) which was most recently updated in July 2019.
- 2.5 The PPG defines a Housing and Economic Land Availability Assessment as an assessment of land availability to identify a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period. It advises that the assessment should:
- identify sites and broad locations with potential for development;
 - assess their development potential; and
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.6 The PPG reiterates that the LAA does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the local plan process to determine which of those sites are the most suitable to meet those requirements.

⁴ [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414424/Housing_and_economic_land_availability_assessment_-_PPG.pdf)

- 2.7 The PPG also sets out a recommended methodology for the preparation of the LAA through a 5-staged approach, as shown in Figure 1. The preparation of this LAA has followed the recommended methodology in accordance with national guidance for a robust and transparent assessment.

Local Development Context

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

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

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

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

‘Made’ Neighbourhood Plans, including:

Chailey Neighbourhood Plan (2021)
Ditchling, Streat & Westmeston Neighbourhood Plan (2018)
Hamsey Neighbourhood Plan (2016)
Newhaven Neighbourhood Plan (2019)
Newick Neighbourhood Plan (2015)
Plumpton Neighbourhood Plan (2018)
Ringmer Neighbourhood Plan (2016)
Seaford Neighbourhood Plan (2020)
Wivelsfield Neighbourhood Plan (2016)

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

East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan Revised Policies (2024)

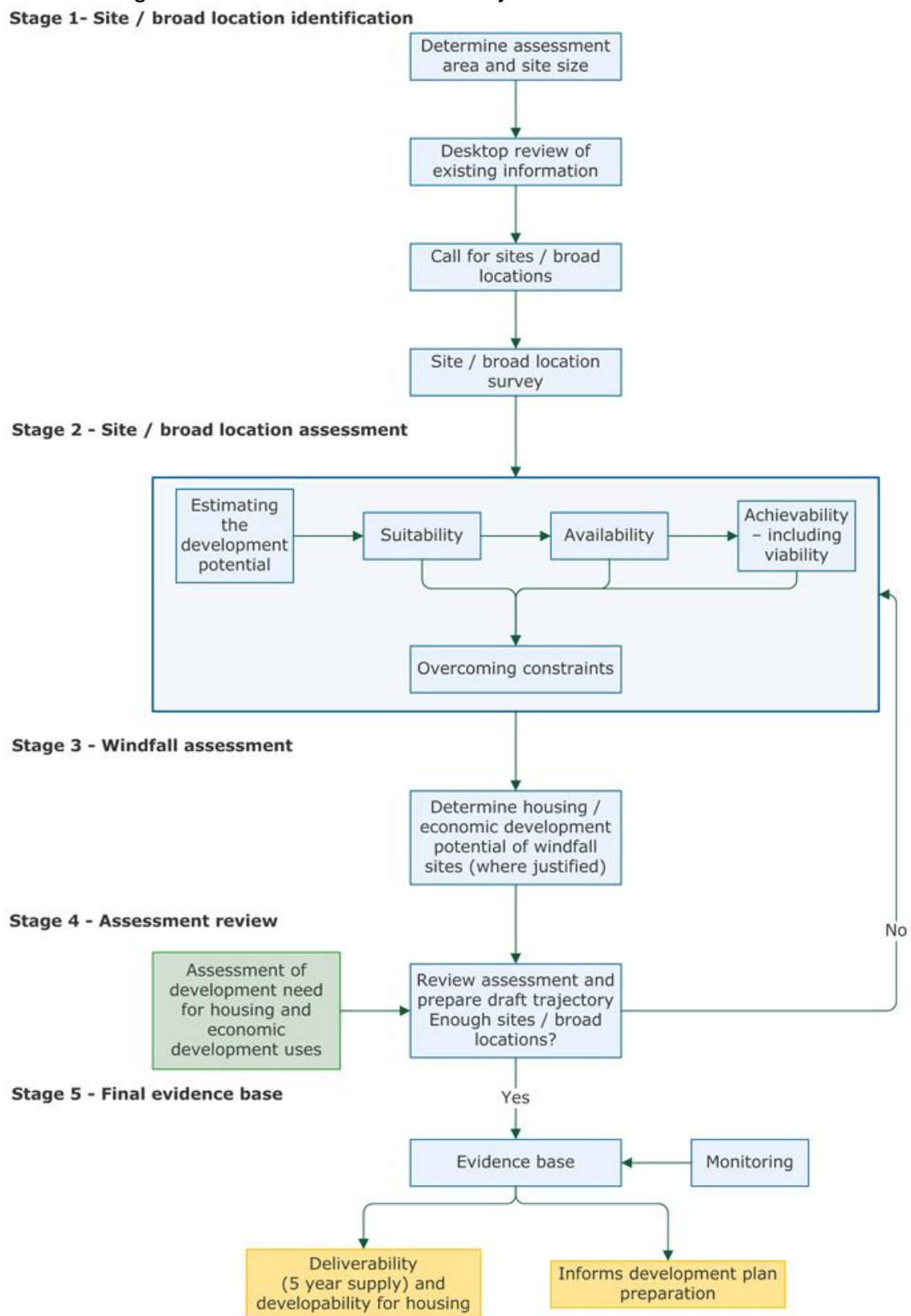
- 2.9 LDC is currently preparing a new local plan which will set out where and how new development will take place over the plan period to 2040. The new Lewes Local Plan 2020-2040 will need to propose site allocations for different land uses, including housing, and policies to help tackle the climate emergency, safeguard the environment and secure high quality design.

- 2.10 During May 2021, the council published its 'Approach to Local Housing Need for Lewes District outside the South Downs National Park⁵. Building on the 'Standard Method' prescribed through the NPPG and PPG⁶, this sets out a locally derived method for disaggregating the local housing need under the 2023 standard method for the plan area based on the total number of dwellings inside and outside of the SDNP. This results in a locally derived housing need figure as at May 2021 of 602 dwellings per annum for the plan area. This approach is consistent with the findings of the Local Housing Needs Assessment (2023). This equates to a total need of 12,040 dwellings over the plan period, 2020-2040.
- 2.11 In relation to economic land uses, the Lewes Economic Needs Assessment (2023) anticipates that there will only be a modest requirement for new additional employment floorspace to 2040, and therefore the local plan should concentrate on protecting and improving the quality of employment sites that already exist, with any new floorspace being provided through the intensification and redevelopment of sites within existing employment locations.
- 2.12 The assessed development needs provide the development context for the plan area. It is the starting point of deciding the quantum of development to be planned for over the plan period or for any formal development requirement figure. It is undertaken separately from the assessment of land availability, which has not been constrained by the need for development. The publication of the revised NPPF during late December 2024 was accompanied by a revised approach to the standard method for deriving housing need. This approach increases the overall housing need for Lewes District under the standard method which will be considered by future updates to the LAA.

⁵ [Approach to Local Housing Need for Lewes District May 2021](#)

⁶ [Housing and economic needs assessment - GOV.UK \(www.gov.uk\)](#)

Figure 1: Housing and Economic Land Availability Assessment Flowchart



Methodology

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

Stage 1: Identification of sites and broad locations

3.2 The first stage was to identify all potential development sites and broad locations in the plan-making area. The LAA identified a total of 358 sites from a broad range of sources, including a Call for Sites in 2020 and/or actively identified through desktop reviews in line with the PPG. The data sources reviewed include:

- Sites identified through the 2018 Strategic Housing and Economic Land Availability Assessment (SHELAA);
- Previous Call for Sites;
- Surplus and likely to become surplus public sector land as identified in the Register of Surplus Land;
- Land in local authority ownership in consultation with LDC Property Services Officers⁷;
- Engagement with key public bodies on potential surplus public sector land in Lewes District⁸ not currently identified through the Register of Surplus Land;
- Brownfield Land Register;
- Known vacant and derelict land and buildings;
- Review of sites where previous planning applications have been refused or withdrawn and pre-application enquiries; and,
- Consideration of windfall trends (Stage 3).

Planning permission for housing and economic development that are unimplemented or under construction

3.3 There were 181 sites with a total of 1,886 dwellings with planning permission in the plan area as at 31st March 2024, details of these sites are provided in Appendix 6.

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

⁷ To date no sites with a development potential above the LAA threshold have been identified.

⁸ No additional LAA sites identified through engagement with key public bodies. Key public bodies engaged includes East Sussex County Council (ESCC), NHS, Sussex Police, Department for Transport (DfT), Department for Work and Pensions (DWP) and the Ministry of Justice.

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

3.5 Four residential allocations from the Lewes Local Plan Part 1 (May 2016) and Local Plan Part 2 (February 2020) did not have planning permission as of 31 March 2024. Together these sites have a potential capacity of 454 dwellings of which 434 are considered to be deliverable. The council will continue to engage with the relevant landowners/developers in order to ensure that the most up-to-date information is available regarding deliverability/developability and phasing. Delivery projections for each of the relevant allocations is as follows:

- LPP1 SP7 Land at Harbour Heights

The site is allocated for a mixed use development including employment units and up to 400 dwellings in LPP1. An application for outline consent (all matters reserved) for the development of 400 dwellings and approximately 1,500sqm of commercial floorspace was submitted in June 2023 (LW/23/0380). The application is under consideration. The site is therefore considered available and achievable for residential and economic development within the plan period for the purpose of the LAA.

- LPP2 BA01 Hillside Nurseries, Barcombe;

The site was allocated for 10 dwellings in LPP2. Planning application LW/20/0288 was withdrawn with indication that the site is not viable for residential development and will be reserved for the enjoyment of Hillside House. The site is therefore not available or achievable (0 dwellings) for residential development within the plan period for the purpose of the LAA.

- LPP3 CH03 Land Adjacent Mill Lane, Chailey;

The site was allocated for the development of 10 dwellings by LPP2. No planning applications had been submitted as of 31 March 2024 and the full 10 dwelling potential remains.

- LPP2 NH01 South of Valley Road;

The site was allocated for the development of 24 dwellings by LPP2. Planning application LW/19/0205 was approved for part of the site for 9 units. The remainder of the site is occupied by a single residential property and its curtilage. It is unknown whether the present owner would like to develop the site at this stage and potential for the full 24 dwellings remains.

3.6 In addition to sites in the adopted Local Plan, there are also 24 residential allocations within made neighbourhood plans, which either in full or in part, did not have planning permission as of 31 March 2024. The council recognises the role of neighbourhood planning in supporting the delivery of sustainable development and expects these to

be reviewed through planned neighbourhood plan reviews. These sites are expected to deliver 414 dwellings.

- 3.7 Existing employment allocations in adopted Local and Neighbourhood Plans were reviewed through the Lewes Economic Needs Assessment (2023) which surveyed employment land clusters sized above 0.25 Ha and above across the district, including within the South Downs National Park. The assessment identified that there were 208.0 Ha of employment land in Lewes District across the surveyed clusters. The study also provides an assessment of prospects for intensification and/or redevelopment for existing employment clusters to provide either intensified floorspace and/or more modern space, based on qualitative analysis of a set of supply characteristics.

Desktop Survey

- 3.8 Following the identification of sites, an initial desktop survey was carried out in accordance with the PPG to aid the assessment of the sites and consideration of deliverability. The following information for each site has been recorded and updated, where sites were identified in previous iterations of the LAA, through a high-level site survey:
- site size, boundaries, and location
 - current land use and character
 - land uses and character of surrounding area
 - physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure / utilities)
 - potential environmental constraints
 - potential heritage / historical environment constraints
 - landscape character and visual amenity constraints
 - consistency with the development plans' policies
 - proximity to services and other infrastructure, such as public transport
 - where relevant, development progress (e.g. ground works completed, number of units started, number of units completed); and
 - initial assessment of whether the site is suitable for a particular type of use or part of a mixed-use development.
- 3.9 This process also helps remove 'void' sites, which have no site information submitted, and duplications put forward through different sources in order to avoid double counting of potential. The initial survey also excluded sites which wholly intersect with absolute constraints to development, including national and international designated sites protected by law. The absolute constraints include: Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including potential SPAs, possible SACs, and proposed Ramsar sites); Sites of Special Scientific Interest (SSSI); National Nature Reserves (NNR); Ancient Woodland;

Priority Habitats (unless there are local survey which indicate otherwise); Scheduled Ancient Monuments; Historic Battlefields and Registered Parks and Gardens.

- 3.10 These sites are unlikely to be suitable for housing, employment and renewable energy generation development and therefore not appropriate to be carried forward to Stage 2 for more detailed assessment. Where the site only partly falls within or is adjacent to absolute constraints, it has been progressed to Stage 2 for further consideration. This is to understand whether the site may be suitable for partial development or whether development impacts could be potentially mitigated, instead of eliminating them based on high level surveys.
- 3.11 In addition, the PPG also encourages plan-makers to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments where appropriate. It suggests that it may be appropriate for the assessment to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. This is to ensure that the assessment is strategic in nature and aligns with the role of the Local Plan.
- 3.12 Consistent with the PPG, the minimum size threshold for the LAA included sites capable of accommodating 5 or more dwellings, or economic development on sites of 0.25 Ha (or 500 square metres of floorspace). Sites submitted for renewable energy generation or green infrastructure of any size were assessed. Sites below the LAA threshold are 'filtered' and excluded from further assessment.
- 3.13 The assessment does not have a maximum site size threshold, however site assessments for sites identified where there are opportunities for large-scale developments above 500 dwellings have been reported separately to smaller sites to highlight the assessment findings.
- 3.14 The assessment covers the plan area of the Lewes District Local Plan. Sites wholly outside of the plan area are excluded from further assessment in accordance with national guidance. The Council recognises the role of cross-boundary sites within the district and have provided an assessment of areas of the sites which falls within the plan area. The Council is committed to continuously liaising with the relevant neighbouring authorities and consider a joint assessment of the site, if possible, through the Duty to Cooperate process.
- 3.15 **Appendix 5** sets out the sites that were excluded at this stage of the analysis, a total of 63 sites. A total of 247 sites for all land use purposes were taken forward for further consideration at Stage 2.

Stage 2 – Site/broad location assessment

- 3.16 Stage 2 of the LAA involved assessing whether a site was 'suitable', 'available' and 'achievable' (including whether the site is economically viable) for the proposed use and calculating the indicative development potential of the site. It was also used to help ascertain whether a site can be considered 'deliverable' (a realistic prospect that it will be delivered within 5 years), or 'developable' (available over a longer time within the plan period).
- 3.17 Information on suitability, availability and achievability was collected and analysed through a combination of desktop and GIS assessment, site visits and information submitted by site promoters. It was informed by a comprehensive range of available technical evidence base studies, engagement with selected stakeholders and review of relevant planning history.
- 3.18 Technical advice from East Sussex County Council on matters of transport, flood risk, heritage and archaeology and landscape impacts was sought and also gathered from planning applications on relevant sites to inform the assessment. **Appendix 3 and Appendix 4** provide the detailed site proformas and maps of the assessment by parish area respectively.

Assessing Suitability

- 3.19 A site or broad location can be considered suitable if it would provide an appropriate location for the assessed development type when considered against the relevant constraints and their potential to be mitigated. The criteria informing the suitability assessment included:
- Whether the site is broadly consistent with the NPPF particularly in relation to the potential loss of the best and most versatile agricultural land;
 - Whether the site is broadly consistent with the Development Plan including 'made' neighbourhood plans and Minerals and Waste Plans. The Planning Practice Guidance states that sites can be assessed against the development plan however the assessment will need to take account of how up to date the plan policies are. As the Lewes Local Plan Part 1 was adopted more than five years ago in May 2021, the sites have not been considered in relation to Spatial Policy 1 and 2. The assessment also recognises the emerging policy direction with regards to the spatial hierarchy and the potential for policy changes, such as the amendments of the planning boundaries;
 - Whether the site is within the setting of the South Downs National Park and may lead to adverse development impacts on its landscape, environment, wildlife and cultural heritage, based on the findings of the Lewes Landscape Sensitivity Assessment (November 2023), and subject to further consultation with the South Downs National Park Authority;
 - Whether the site falls within 7km of the Ashdown Forest;
 - Whether the site may contribute to regeneration priority areas;

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

3.20 Each site is assessed against the topic areas above based on their impacts and capacity to accommodate development, considering any potential mitigation measures

that are likely to be required. **There is no weighting system for the different technical areas considered.**

- 3.21 An overall suitability ‘traffic light’ rating, as set out in Table 1 below, is given to categorise whether the site is suitable for the assessed use, having considered the constraints and likely mitigation measures required. At this stage, the assessment does not take into account the cumulative impacts of development (such as infrastructure capacity) which will be considered through the overall Spatial Strategy of the Plan.

Table 1 – RAG Suitability Assessment

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

Assessing Availability

- 3.22 A site can be considered to be available for development when, on the best information available, there is confidence that there are no known legal or ownership impediments to development. When submitting sites to the council for consideration in the LAA, landowners or promoters were asked to include details of the ownership of the site and whether there are any known constraints to development. They were also asked to provide details of when they anticipate that the site could be available for the commencement of development.
- 3.23 Through the availability assessment, the council has considered the information submitted and that available otherwise, as to whether the site is available for the assessed use and when it may be able to deliver development asset out in Table 2. This has taken into account the site’s ownership, any known ransom strips identified and the landowners’ indication of intention to development.
- 3.24 Where there are known complexities with the site, such as multiple owners or existing tenancies, the sites were categorised as ‘potentially available’. Further information and/or assessment of the availability will be sought if sites are otherwise suitable and achievable and selected as part of the new local plan.

Table 2 – RAG Availability Assessment

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

Assessing Achievability

3.25 A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. For the purpose of the LAA, the assessment currently identified key factors which may influence the development viability of each site at a high level. The criteria informing the achievability assessment included:

- Market attractiveness of the assessed use;
- Adjacent uses and attractiveness of the location (by-settlement);
- Whether there is a viable access to the site;
- Whether the site is likely to be subject to abnormal costs from known physical constraints which may reduce its developable, based on desktop analysis and consultation with ESCC;
- Whether the site require substantial infrastructure improvements; and,
- Whether development of the site may require reprovion or relocation of the existing uses.

3.26 As part of the local plan process, the council will undertake a whole plan viability assessment which will take account of all relevant national and local policies and standards which could impact on the viability of a site, such as the adopted Community Infrastructure Levy, nationally or locally set affordable housing contributions, or other planning obligations. The purpose of the whole plan viability assessment is to ensure that policies are realistic and that the cumulative cost of relevant policies will not undermine deliverability of the plan.

Table 3 – RAG Achievability Assessment

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

Calculating Development Potential

- 3.27 The indicative development potential for each site has been informed by both existing local plan policies (including ‘made’ neighbourhood plans), the emerging settlement hierarchy through the local plan and the indicative development capacity promoted by landowners, development densities of nearby sites recently completed or construction and the pattern of development in the area.
- 3.28 The density assumptions applied to each land use are set out in Table 4 below. Appendix 8 sets out an analysis of density of developments delivered in the plan area since the adoption of the Core Strategy in 2016.
- 3.29 The development potential provided in the assessment is indicative only and they are not binding on any decisions that the council may make in the future. Any specific site and the assumptions made on densities in the LAA should not be considered as agreed. It represents a ‘snapshot’ of the theoretical development capacity of the sites based upon the data and information available at the time of assessment.

Table 4 - Density Multiplier by proposed use

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

Stage 2 Key Findings: Residential Development

- 3.30 A total of 224 sites were assessed for potential residential development. All sites were reviewed against the most up to date information and evidence. With all new sites, information received by the council or known constraints relevant to the sites were fed into the assessment. The site capacity shown is for individual sites, where sites overlap occurs the overall capacity will need to be amended to ensure that double counting does not take place.
- 3.31 The NPPF at Paragraph 77 states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. There have been submissions to the LAA for extensions to Ringmer (800 dwellings Ref: 51RG) and Cooksbridge (800 dwellings Ref: 19HY), and new settlements in the parish of East Chiltington (3000 dwellings Ref: 11EC) within Ringmer Parish at Clay Hill (1000 dwellings: Ref 68RG) and within Hamsey Parish at Hewen Street Farm (600 dwellings: Ref 20HY).
- 3.32 Of the 224 sites assessed for residential development, 46 are assessed as being deliverable and developable for residential/mixed use and 7 sites are assessed as being deliverable and developable for employment. A further 23 sites are considered to be potentially deliverable or developable and 148 are assessed as not deliverable or developable for development for their promoted use.
- 3.33 The indicative capacity of sites assessed as not deliverable or development is shown as 0 dwellings, as they are considered not able to deliver any units over the next fifteen years, either by way of being unsuitable for development, unavailable, or unachievable. The 23 sites assessed as being potentially deliverable or developable require further information and will continue to be reassessed through the iterative LAA process.

Table 5: Summary of Residential and Mixed use Site Assessments outcomes (excluding new settlement and extensions but including local plan allocations without permission)

	Number of Sites	Total LAA Indicative Capacity (Dwellings)
Deliverable and Developable	46	2688
Chailey	4	121
Hamsey	1	150
Newhaven	9	885
Newick	5	57
Peacehaven	5	91
Plumpton	1	20
Ringmer	8	747
Seaford	5	189
Telscombe	2	10
Wivelsfield	6	418
Potentially Deliverable or Developable	21	861
Chailey	4	187
Newick	4	174
Peacehaven	3	200
Plumpton	1	34
Ringmer	1	71
Seaford	2	20
Wivelsfield	6	175
Not Deliverable or Developable	145	0
Barcombe	12	0
Beddingham	1	0
Chailey	13	0
Ditchling	3	0
Hamsey	4	0
Newhaven	15	0
Newick	12	0
Peacehaven	22	0
Plumpton	15	0
Ringmer	17	0
Seaford	15	0
South Highton	1	0
Telscombe	3	0
Wivelsfield	12	0
Overall Total	212	3549

Stage 2 Key Findings: Economic Development

- 3.34 The Economic Needs Assessment (ENA) (2023). details the demand for employment space in our plan area in order to meet the needs of existing, as well as new, businesses. It identifies 39 employment clusters in the district, ranging from small (under 500sqm) to large (over 2000sqm) units, as well as their quality. The ENA also concludes that while most of these clusters are performing well, potential opportunities to either intensify and/or redevelop exist in certain cases. The ENA's recommendation is that no new site allocations are needed for employment and instead 'well-performing' sites should be protected. A total of 16 existing employment sites are identified as potential pipeline for future development, including a number of vacant sites, sites currently in low density use that could be suitable for future intensification and consented planning permissions for employment use that have not been built out.
- 3.35 In total 13 sites were assessed for economic development by the LAA. Of these, two are existing local plan allocations. Of the sites assessed for economic led development 7 were considered to be deliverable and developable for economic use and six were considered to be not deliverable or developable. LAA sites promoted for mixed use schemes were considered under the leading residential element of the scheme.

Stage 2 Key Findings: Renewable Energy Generation and Strategic Green Infrastructure

- 3.36 In order to support future development, and to assist with achieving the council's ambition for carbon neutrality, sites for green infrastructure and/or renewable energy proposals are also included in the LAA for assessment.
- 3.37 One new site was submitted for consideration for Solar Farms of up to 50MW. Of the four sites under consideration for renewable energy generation two are no longer available for this land use. One of the remaining sites is considered to be potentially deliverable or developable while the other is considered to be deliverable.
- 3.38 Two new sites have been submitted for consideration of green infrastructure, both at Valley Road, and both submitted by members of the public. The smaller of the two sites (90PT) was submitted for consideration of designation as a Local Green Space. The second site (89PT) for consideration of designating the area at Valley Road for Nature Recovery. All three sites assessed are considered to be potentially suitable for the delivery of green infrastructure.

Stage 3 – Windfall Assessment

- 3.39 The NPPF defines ‘Windfall’ sites as sites not specifically identified in the development plan. Paragraph 71 of the NPPF states “that where an allowance is to be made for windfall sites as part of the anticipated supply, there should be compelling evidence that they will provide a reliable source of supply [and] any allowance should be realistic having regard to the historic windfall delivery rates...”.
- 3.40 The role of windfall is to provide an allowance for sites which contribute to future housing supply through an analysis of past trends. Using past trends and extrapolating/projecting these forward means that there is evidence and certainty that this source of supply will continue forward over the plan period.
- 3.41 In order to determine the potential supply of housing through windfall sites over the plan period, completions over the last ten monitoring years on small sites (4 units or less) have been analysed⁹. Table 7 below shows the windfall supply of residential development over the past 10 years from all types of small sites.
- 3.42 Table 6 shows that an average of 44 (14%) dwellings have been completed through windfall/small sites over the last 10 years. This demonstrates that historically small site completions have provided a consistent source of windfall supply, and this is projected to continue over the plan period.

Table 6: Total small sites over previous 10-year period

YEAR	Total Housing Delivery (net)	Total Housing Delivery on Small Sites (net)	Delivery on Small Sites as % of Total Delivery (net)
23/24	516	23	4%
22/23	536	43	8%
21/22	310	37	12%
20/21	272	51	19%
19/20	242	21	9%
18/19	281	63	22%
17/18	316	56	18%
16/17	167	39	23%
15/16	214	52	24%
14/15	252	50	20%
Total	3106	439	14%

- 3.43 There will be occasions when large (5 or more dwellings) unidentified sites - such as a consequence of land ownership changing, land becoming redundant or being released- come forward which the council had not identified previously. Such sites are not considered in the windfall allowance at this stage as further detailed analysis of the potential source of supply is required. Further analysis of past trends and the LAA

⁹ Completions are Lewes District outside of the SDNP

sites already identified is required to consider if large windfall sites will be a reliable source of supply over the plan period.

3.44 Small sites, delivered over the last 10 years, have been broken down into specific development types to show the contribution to housing delivery that these types of development have made.

- Conversion – Subdivision of a larger unit into smaller units
- Change of Use – Change of use class to or from residential (not including under prior approval)
- Prior Approval – including change of use under any prior approval (including office to residential and agricultural barn conversions)
- Redevelopment – Demolition of a site and provision of new build residential units
- New Build – Construction of residential development on vacant land which does not involve demolition (excluding those in garden land);
- New Build in Garden Land – Construction of a residential development on land previously forming a residential garden.

Figure 2 shows the dwellings delivered on small sites over the last 10 years broken down by type of development¹⁰.

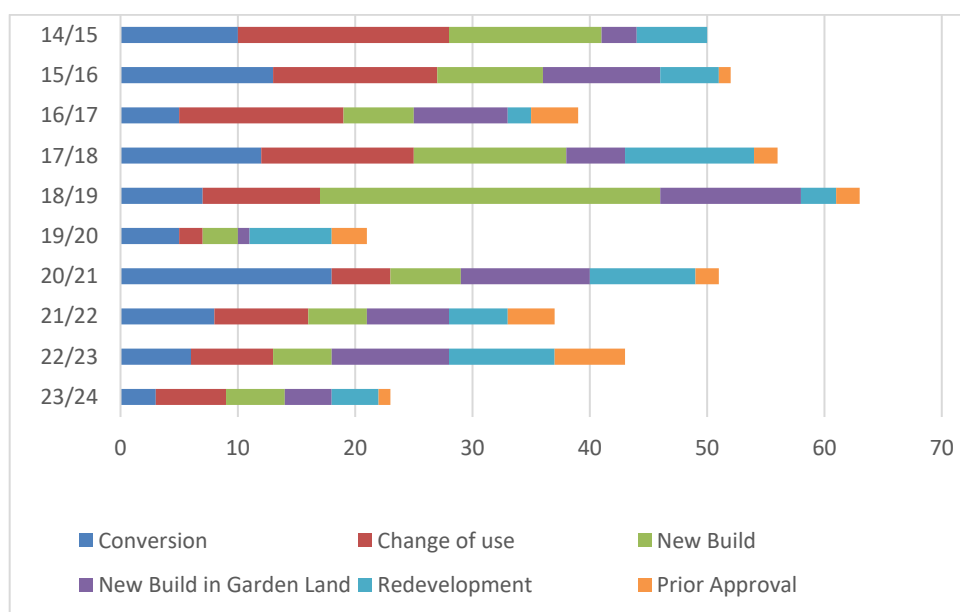


Figure 2: Small site delivery

3.45 Typically, opportunities for change of use, conversions and comprehensive redevelopments are difficult to identify in advance as they require the landowner to identify their intention to develop. However, these are shown above to be a reliable source of housing delivery.

¹⁰ Data is provided in Appendix 7

- 3.46 Historically new build development on garden land has been excluded from the windfall allowance calculations. The 2012 version of the NPPF defined Windfall Sites as *'sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.'* The definition of Windfall was amended in the 2018 NPPF to *'Sites not specifically identified in the development plan.'* Paragraph 75 of the NPPF 2024 states that 'plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'
- 3.47 Adopted Policy DM30 of LPP2 sets out that development in rear domestic gardens will be permitted where criteria relating to the impact on existing homes and the loss of features that make an important contribution to the character and appearance of the locality are met. Therefore, inappropriate backland development would be against national and local policy. However, permissions are granted where a proposed it is considered appropriate and this is a reliable source of supply as illustrated in Figure 2.

Windfall Calculation

- 3.48 Figure 2 shows that small scale windfall developments have historically contributed towards housing land supply within the district. There are currently 176 dwellings committed on a total of 115 small sites (4 dwellings or less)
- 3.49 Delivery on small sites, over the past 10 years, has been an annual average of 44 dwellings. Based on this past trend, a windfall allowance of 44 dwellings per annum is a realistic expectation of the contribution of small site delivery to the land supply each year.

Stage 4 – Assessment Review

3.50 Stage 4 of the methodology recommended in the National Planning Practice Guidance involves comparing the identified development needs of the area with the sites identified as available, suitable and deliverable in Stage 3.

3.51 Table 7 sets out the summary findings from this Land Availability Assessment. The table shows an indicative capacity for the plan area for residential development of 8,197 dwellings over the next twenty years.

Table 7: Residential Assessment from 2024 to 2044

Site Category	Capacity to Year 20
Allocations and Commitments (unimplemented planning permission)	1,886
Allocations and Commitments (local plan allocations without planning permission)*	434
Allocation in Neighbourhood Development Plans*	414
Deliverable and Developable LAA Sites	2,254
Potentially Deliverable or Developable LAA Sites	861
Potentially Deliverable or Developable Large Sites	1,600
Windfall Allowance	748
Total	8,197

*The contribution from neighbourhood development plans has not been assessed for deliverability.

3.52 In accordance with paragraph 025 of the PPG¹¹ in the first instance the assessments will be revisited, including density assumptions to ensure the efficient use of land. Further 'Calls for Sites' will be undertaken following publication of this report to ascertain whether any further sites are available. The council will also assess all allocations made within neighbourhood development plans to understand the contribution that could be anticipated from this source of supply.

3.53 Where further site calls and evidence gathering are unable to identify a sufficient supply of sites to meet housing need, then it will be necessary for the council to consider how else the shortfall in land supply may be met. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met within the housing market area through the Duty to Cooperate.

¹¹ PPG – Housing and economic land availability assessment - Paragraph: 025 Reference ID: 3-025-20190722

Stage 5 – Final Evidence Base

3.54 Stage five of the land availability assessment methodology set out in the planning practice guidance is the production of the final evidence base report including outcome. It includes the core outputs defined in the NPPG, namely:

- A list of excluded sites with clearly evidenced and justified reasons.
- A list of all sites or broad locations considered, cross-referenced to their locations on maps.
- An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when.
- An assessment of the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when.
- An indicative trajectory of anticipated development and consideration of associated risks.

An indicative trajectory for the theoretical potential land supply as assessed by the LAA is provided in Appendix 9. This should be read alongside the site assessments and should be viewed as the starting point for the council's journey for preparing the plan, recognising that the LAA will undergo further iterations and that the indicative trajectory will be updated in future iterations of the LAA.

Next steps

- 4.1 The LAA is a key piece of evidence to understand the district's development capacity which the council will use to shape its spatial strategy. The LAA is published at this stage to help inform future assessments of existing and potential sites and will be reviewed over time to include new information from the plan making evidence base and further information regarding the sites as this becomes available.
- 4.2 Submissions regarding the LAA, including submissions of new sites, should be made to the Planning Policy Team via email: localplan@lewes-eastbourne.gov.uk

APPENDICES

The report is supported by appendices, which are available as separate documents on the [Local Plan Consultation Portal](#)

- Appendix 1: Site submission proforma
- Appendix 2: Assessment criteria
- Appendix 3: LAA Site assessments outcomes
- Appendix 4: Parish Overview Maps
- Appendix 5: Stage 1 Excluded Sites
- Appendix 6: Permissions and Allocated Sites Status
- Appendix 7: Windfall Calculations
- Appendix 8: Density Review
- Appendix 9: Indicative Trajectory