



# South Downs National Park

## Land Availability Assessment

**Draft Methodology – Consultation Version**  
*June 2022*

# Contents

Page

Disclaimer	3
1. Introduction	5
2. What is a Land Availability Assessment	6
3. Methodology	8

## Appendix A – Assessment Criteria

**South Downs National Park Authority**  
**Strategic Housing Land Availability Assessment**

## **Important Notice**

In relation to the information contained within the South Downs National Park Land Availability Assessment (LAA), and any other report relating to the findings of the LAA, the National Park Authority makes the following disclaimer without prejudice:

- **The LAA does not allocate sites to be developed. It is but one of many pieces of evidence that will inform the Local Plan.** The allocation of sites for future development will be determined through either the South Downs Local Plan Review or neighbourhood development plans.
- **The identification of potential housing sites within the LAA does not imply that planning permission would be granted for development.** The LAA is a high level assessment of potential land availability. Determination of planning applications will require a high level of detail and understanding of the site constraints. All planning applications will continue to be considered against the appropriate policies and having regard to any other material considerations.
- The inclusion of potential housing sites within the study does not preclude them from being considered for other uses. The boundaries of sites are based on the information available at the time. The LAA does not prejudice future changes to these boundaries for the purpose of allocating a site in the South Downs Local Plan or a Neighbourhood Development Plan, or with respect to planning applications.
- The omission of sites from the study does not preclude the possibility of planning permission for development on them being granted. It is acknowledged that sites will continue to come forward that may be suitable for development that have not been identified in the LAA.
- The categorisation of sites in terms of when they come forward is based on an assessment at the time of the study. Circumstances or assumptions may change which may mean that sites could come forward sooner or later than originally envisaged or not at all.
- The development capacity of a site in the study either relates to the development granted in a planning permission (where applicable) or is an estimate based on an assessment of what is considered appropriate for that specific site and use. However,

the site capacities in the study do not preclude different numbers coming forward at the planning application stage.

- The study has a base date of 01 April 2022. Sites that have been granted planning permission prior to 01 April 2022 will be considered commitments and therefore will not be included in the LAA, in line with the approach to site allocations. All the findings are a 'snap-shot' of information held at the time of assessment. Therefore, some of the information held within the LAA will have changed. For example, sites that are identified as not having planning permission may have secured permission since the information was compiled and published.
- The LAA, whilst providing evidence of opportunities for land supply, does not provide a housing trajectory or a five-year rolling supply of housing land. This evidence is provided in the Authority Monitoring Report (AMR). Updates will be provided through review of the AMR.

# I. Introduction

- I.1 The South Downs Land Availability Assessment (LAA) is an essential part of the evidence base for the Local Plan Review. The LAA identifies potential land and assesses the availability, suitability and achievability of potential sites. This evidence will help the National Park Authority (NPA) to understand what sites are theoretically available to provide opportunities for development, what sites have permission and to provide detailed information on past development. This will help identify potential locations for development, to be allocated in the emerging South Downs Local Plan Review and neighbourhood development plans.
- I.2 The LAA will consider the availability of the following land uses: new homes, 100% affordable housing sites, specialised care (C2) for example for older persons, self and custom build homes, economic development including offices, manufacturing and warehousing, permanent and transit accommodation for travellers and travelling showpeople, renewable energy, biodiversity net gain offsetting sites and nutrient offsetting sites.
- I.3 This methodology document provides an overview of the approach the NPA will take in undertaking the LAA.
- I.4 The consultees on this LAA methodology are:
- Members of the South Downs Agents' Forum
  - Town and parish councils wholly or partly in the National Park
  - Local authorities within the National Park
  - Statutory consultees Natural England, Historic England and the Environment Agency
- I.5 The consultation will run from 30 June 2022 to 21 July 2022 and comments received will help to inform the final version of the methodology.

## Previous Land Availability Assessment

- I.6 A Strategic Housing Land Availability Assessment (SHLAA) was produced in 2016, and an Employment Land Review (ELR) and subsequent update were produced in 2015 and 2017 respectively as part of the suite of evidence for the South Downs Local Plan, adopted in 2019. Since this time, national planning policy and guidance have been updated. This methodology follows on from the original SHLAA methodology which has been reviewed and revised to align with current practices.

## 2. What is a Land Availability Assessment?

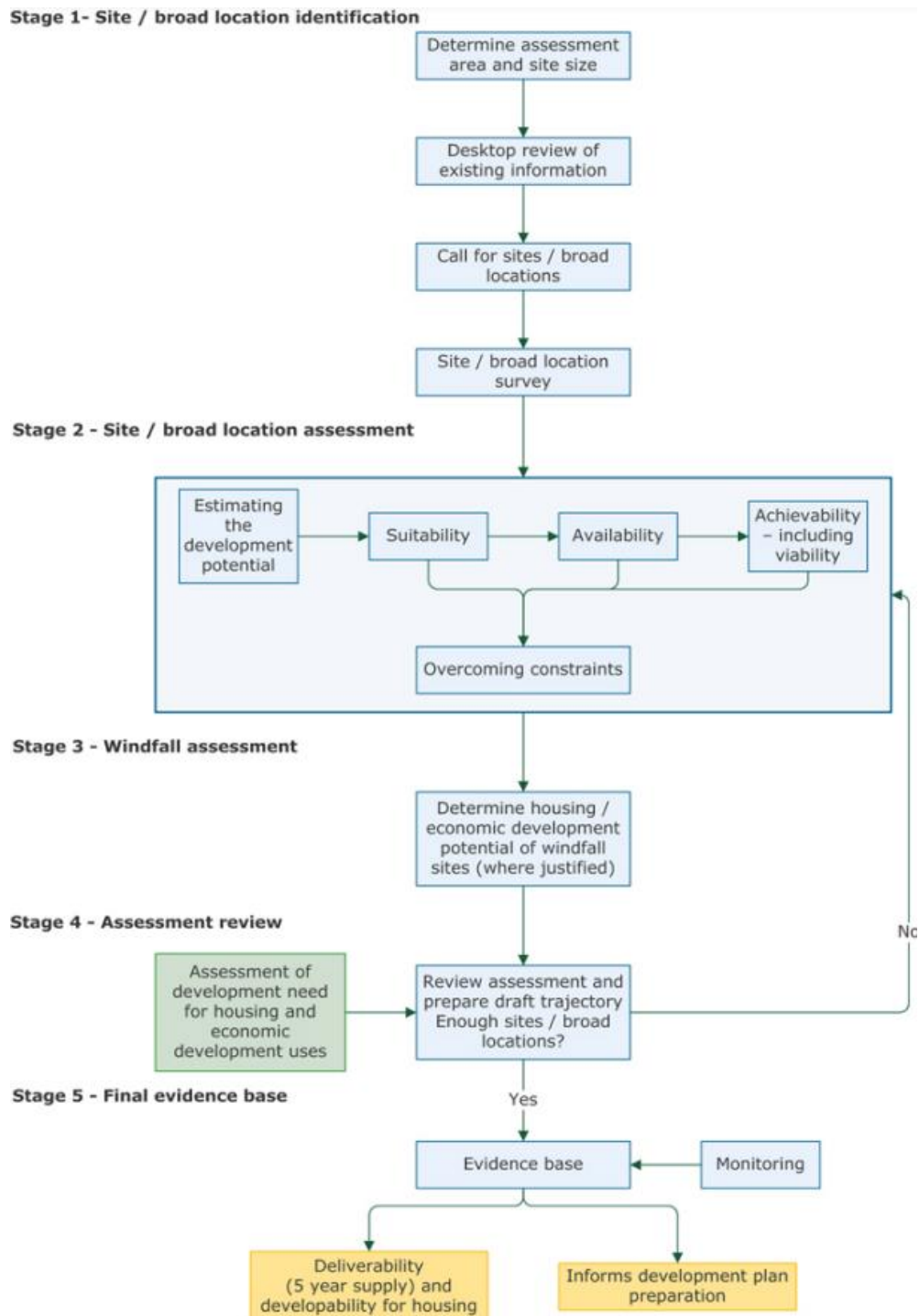
- 2.1 The National Park Authority is required by the [National Planning Policy Framework \(NPPF\)](#) 2021 paragraph 68 and guided by National Planning Practice Guidance (PPG) to have a clear understanding of the land available in the area through the preparation of a LAA to identify available, achievable and deliverable sites over the Plan period. However, it is important to refer to the great weight given to conserving landscape and natural beauty in National Parks, as outlined in Paragraphs 176-177 of the NPPF. Paragraph 78 of the [DEFRA English National Parks and the Broads: UK Government Vision and Circular 2010](#) states that the Government recognises that National Parks are not suitable locations for unrestricted housing.
- 2.2 The assessment of land availability is an important step in the preparation of Local Plans. The PPG (paragraph 001 Ref ID: 3-001-20190722) states that assessments should:
  - a. Identify sites and broad locations with potential for development
  - b. Assess the development potential of these sites
  - c. Assess the suitability of these sites for development and the likelihood of development coming forward (the availability and achievability)
- 2.3 The aim of the study is to identify land that is the most suitable and deliverable for a variety of types of development. This evidence will help the NPA understand what sites are theoretically available to provide opportunities for development. Together with information on past planning permissions and completions (as reported annually in the Authority Monitoring Report), the LAA provides evidence that there is an adequate land supply for meeting the objectives of the Authority and towards the needs of local communities. This evidence will underpin the policies in the emerging Local Plan Review and allow the NPA to plan proactively to meet the appropriate level of development within the National Park. It will help to identify potential locations for development to be allocated in the emerging South Downs Local Plan Review and neighbourhood development plans.
- 2.4 The methodology in Section 3 of this report sets out how the LAA will be prepared in accordance with the standard process in the PPG.
- 2.5 The LAA only identifies opportunities for development on sites, which are considered deliverable and developable. **It does not allocate sites to be developed.** The allocation of sites for future development will be determined through either the South Downs Local Plan Review or neighbourhood development plans.

2.6 **The identification of potential development sites within the LAA does not imply that planning permission would be granted for development.** All planning applications must be considered against the appropriate policies and having regard to any other material considerations.

### 3. Methodology

3.1 The PPG (paragraph 005 Ref ID: 3-005-20190722) sets out what inputs and processes should lead to a robust assessment of land availability. The flow chart below (**Figure I**) outlines the 5-stage process.

**Figure I – PPG Land Availability Assessment Flowchart**





## **Time period**

- 3.2 The LAA will have a base date of 01 April 2022 and will provide an assessment of supply based on a 15 year period from this date. Any sites with an outstanding planning permission as at 01 April 2022 will be included/taken into account (recorded in a schedule of permissions), any planning applications which were yet to be determined on this date will be considered alongside other identified sites (subject to meeting the criteria outlined below).

## **Partnership Working**

- 3.3 The PPG (paragraph 007 Ref ID 3-007-20190722) says that assessments need to be undertaken working with other LPAs in the relevant area and involve a range of parties including landowners and promoters, agents and developers and parish and town councils. The NPA undertakes ongoing duty to cooperate work with neighbouring authorities, engages with the development industry for example through the Agents' Forum, and works in collaboration with the parish and town councils in the National Park.

## **Major Development**

- 3.4 The NPPF paragraph 177 sets out the approach local planning authorities should take to major development in national parks. The NPPF does not define major development. The NPA has sought legal opinions on this matter and these opinions are that the definition of major development is based on whether, prima facie, the development might potentially have adverse impacts on a national park, rather than whether, after a careful and close assessment, it will have such adverse impacts. It is necessary at the plan-making stage to consider potential for adverse impacts on the South Downs National Park due to scale, character or nature and are therefore considered to be major development in the National Park for the purposes of plan-making. The consequence of failing to do so would be to risk allocating land for major development that was undeliverable in a National Park because it was contrary to both paragraph 177 of the NPPF. The major development test will also apply at the planning application stage, as set out in paragraph 177 of the NPPF and in the PPG.

## **Stage 1 – Site / Broad Location Identification**

- 3.5 The geographical area covered by this assessment is the South Downs National Park. The National Park covers parts of 12 district/borough/unitary local authority areas.

## Types of development

3.6 To reflect the PPG (paragraph 018 Ref ID: 3-018-20190722), the LAA will consider the availability of land for a range of uses including, 100% affordable housing sites (*this can be of any scale – see site threshold criteria in figure 3*), specialised care (C2) for example for older persons, self and custom build homes, economic development including offices, manufacturing and warehousing, permanent and transit accommodation for travellers and travelling showpeople, biodiversity net gain offsetting sites and nutrient offsetting sites and renewable energy (*non-domestic scale renewable energy projects that are standalone renewable projects and not those attached to a building or individual dwellings. Domestic proposals will not be considered*).

## Search for Potential Sites

- 3.7 A Call for Sites will be undertaken in Summer 2022. This will update on sites already submitted, and identify any further new sites to consider in the 2022 LAA.
- 3.8 In addition to sites submitted through the Call for Sites, the Authority will consider other sources of potential development land. The PPG identifies a range of sources from which identified sites can be drawn shown in **Figure 2** below. A desktop search to identify potential housing sites and to review progress on known sites will be undertaken using the sources of sites and information as set out in Figure 2. Some further sites have been submitted since the last Call for Sites which supported the 2016 SHLAA; these will now be assessed as part of this LAA.
- 3.9 The search for potential sites will be confined to brownfield land and greenfield land that is within, adjacent or well related to settlements with an identified settlement boundary either within or outwith the National Park. Within the National Park, this means settlements listed in Policy SD25 of the South Downs Local Plan that have settlement boundaries shown on the Local Plan Policies Map or in the relevant Neighbourhood Development Plan. For settlements located just outside the National Park, these must have a settlement boundary identified in the most recent Local Plan or Made Neighbourhood Development Plan for the area. This is aligned with the exclusion criteria discussed later in this section and shown in **Figure 3**.

**Figure 2: Sources of sites with potential for development** (Housing and Economic Land Availability Assessments Practice Guidance 2019 (Paragraph: 011 Reference ID: 3-011-20190722))

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development Briefs

Type of site	Potential data source
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers
Additional opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Large scale redevelopment and redesign of existing residential or economic areas Sites in adjoining villages and rural exceptions sites Potential urban extensions and new free-standing settlements	Local and neighbourhood plans Planning applications Ordnance Survey maps Aerial photography Site surveys

3.10 In line with the PPG (paragraph 008 Ref ID: 3-008-20190722), the identification and assessment of sites will not be constrained by the amount of development needed.

### Site / broad location survey

3.11 The final part of Stage 1 is the site / broad location survey. This is an assessment of the potential sites / broad locations to determine which are suitable to move to the next stage of assessment. The PPG (paragraph 014 Ref ID: 3-014-20190722) says the initial surveys need to be proportionate, with a more detailed assessment being made at Stage 2.

**Sites not assessed**

3.12 Sites with planning permission will be recognised as part of the overall supply of sites in the LAA, however these will not be assessed on the LAA processes because these have been fully assessed through the planning application process.

**Excluded sites**

3.13 The PPG (paragraph 014 Ref ID: 3-014-20190722) advises that, where justified, particular types of land or areas may not be appropriate to carry out more detailed assessment for where it is clear they will not be suitable for development. Such sites would therefore be excluded from the next step of assessment. The sites and areas to be excluded from this assessment are listed in Figure 4. Where the criteria apply the sites / broad locations will be assessed as having nil potential due to their inappropriateness for development, as national and local policy advises against development within these areas. If a larger site has any of these areas within its boundaries, then consideration will be given to whether any portion of the site is developable. Further information on possible mitigation measures will be sought from site promoters where necessary. Excluded sites, and the reason for exclusion will be listed in the LAA report.

**Figure 3 - Sites and Areas to be excluded from the Assessment**

Sites and Areas to be excluded from the Assessment
Designations
<p>Sites located wholly or largely within any one of the following designations:</p> <ul style="list-style-type: none"> <li>• Ancient Woodland</li> <li>• Local Wildlife Sites (LWS), Sites of Nature Conservation Interest (SNCI), Sites of Importance for Nature Conservation (SINCs).</li> <li>• Sites of Special Scientific Interest (SSSI)</li> <li>• National Nature Reserves (NNR)</li> <li>• Local Nature Reserves (LNR)</li> <li>• Local Geological Sites (also known as Regionally Important Geological/Geomorphological Sites (RIGS)</li> <li>• Ramsar sites</li> <li>• Scheduled Ancient Monuments</li> <li>• Special Protection Area (SPA)</li> <li>• Special Area of Conservation (SAC)</li> <li>• Sites on the English Heritage Register of Historic Parks and Gardens</li> </ul>

<b>Sites and Areas to be excluded from the Assessment</b>
<p><b>Designations</b></p> <ul style="list-style-type: none"> <li>• Sites designated as Local Green Space</li> <li>• Within the 400m buffer zone of the Wealden Heaths Phase II SPA (<i>applicable to sites proposed for new homes. Other uses, including high dependency C2 care homes, will be assessed on a case-by-case basis</i>)</li> <li>• Existing nutrient or biodiversity net gain offsetting sites.</li> </ul>
<p><b>Site Location</b></p> <p>Greenfield or non-Previously Developed Land (as defined in the glossary of the NPPF) that is not within, adjacent or well related to those settlements with an identified settlement boundary either within or outwith the National Park will be excluded from Stage I of the Assessment.</p> <p>This exclusion criteria does not apply to offsetting and renewable development sites.</p>
<p><b>Site Size Threshold</b></p> <p>For residential sites not currently in the planning process a site size threshold for the study is based on an estimated yield of 5 or more net additional dwellings. An exception to this is for sites for 100% affordable housing. It may not be possible to determine the estimated yield of all sites at this stage and they may be excluded on these grounds later in the assessment process.</p> <p>For employment sites the size threshold for the study is 0.25 hectares or 500 square metres net floorspace.</p> <p>There is no site size threshold for the other land uses.</p>

- 3.14 The above constraints are applicable to proposals for housing and economic development as outlined. Some of these will also be applicable to other land uses. This is likely to be dependent on the specific type of use and will therefore be assessed on a case-by-case basis.
- 3.15 As identified under the criteria in Figure 3, a minimum yield-based threshold of 5 dwellings will be applied to the study. The consideration of whether a site has potential for 5 or more dwellings will take into account opportunities and constraints on the site, as well as the site size, for example the potential impacts on landscape character of developing the whole site, or conversely, the opportunity for higher density development in urban areas.
- 3.16 Smaller sites will contribute to the overall supply of housing in the National Park and will be considered as windfall (**Stage 3**).

## **Stage 2 – Site / Broad Location Assessment**

- 3.17 All sites which are not excluded from the survey under the criteria outlined in Figure 3 will move to the Stage 2 Assessment. These sites will be subject to further detailed assessment based on the criteria in **Appendix A**.
- 3.18 The criteria in Appendix A set out the key topics and questions which will form the basis of the high level assessment of submitted sites. The list of questions under each topic is not exhaustive. The assessment criteria in Table A-1 are overarching assessment criteria. These are applicable for assessing housing sites, plus many of these will also be applicable to other land uses. Table A-2 sets out additional bespoke considerations for other types of sites considered in the LAA. These are not exhaustive and further considerations may be applicable.
- 3.19 Assessments will consist of desktop reviews and site visits by a Planning Officer, if necessary. A pro-forma for the planning site survey will be used, which is based on criteria set out in Appendix A. This information has fed into the wider assessment of the sites as outlined below.

### ***Landscape Assessment***

- 3.20 As a designated landscape, the South Downs National Park benefits from the highest status of protection in relation to landscape and natural beauty. The National Park Authority has two statutory purposes, as set out in the Environment Act 1995. All public bodies and utility companies, when undertaking any activity that may have an impact on the designated area, must have regard to these purposes. The National Park Authority also has a duty when carrying out the purposes. The Purposes and Duty are set out below:

#### Purposes

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

#### Duty

To seek to foster the economic and social well-being of local communities within the National Parks.

- 3.21 This is also enshrined in the NPPF paragraphs 176-177. The South Downs Local Plan is landscape-led, which is the same as good contextual design. The definition of landscape

encompasses all types and forms, including the historic landscape character and also townscape. Therefore, a fundamental part of the assessment of potential development sites is the consideration of any potential detrimental impact on landscape and indeed how potential development sites can work positively with the landscape.

- 3.22 The landscape assessment will consider a number of criteria in relation to potential development, as set out in Appendix A – Landscape Assessment (Stage 2). It will engage robust tools to ensure a consistent and detailed approach, including the South Downs Landscape Character Assessment (LCA) published in 2020. A summary assessment of landscape sensitivity will be concluded for each site assessed, ranging from low sensitivity to high sensitivity.

### **Assessment of Suitability, Availability and Achievability**

- 3.23 The NPPF requires Local Planning Authorities to identify a supply of specific ‘deliverable’ sites to provide five years’ worth of housing and ‘developable’ sites to provide a supply of housing over the longer term.
- 3.24 To be considered **deliverable**, sites should be *available* now, offer a *suitable* location for development now, and be *achievable* with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
- 3.25 To be considered **developable**, sites should be in a *suitable* location for housing development and there should be a reasonable prospect that the site is *available* and could be viably developed at the point envisaged.
- 3.26 If a site is not considered to ‘have potential’ by being either deliverable or developable because for example, a constraint to development is so severe it is not known when it may be overcome, the site will be rejected.
- 3.27 Following the guidance in the PPG, an assessment of the *suitability*, *availability* and *achievable* of a site will provide the information on which the judgements can be made in the plan making context as to whether a site can be considered deliverable, developable or rejected. The assessment criteria are available to view in **Appendix A**. The overarching assessment criteria under each sub-stage is summarised below:

#### **(i) Assessing suitability**

- 3.28 Factors that make a site suitable for development are considered throughout the assessment process. This includes consideration of the following constraints and/or potential impacts:

- Landscape & Special Qualities of the National Park (informed by the Landscape Assessment as set out above)
- Flood risk
- Ground conditions/topography
- Land contamination
- Protected trees
- Biodiversity
- Neighbouring land uses
- Listed buildings, heritage assets and Conservation Areas
- Public Rights of Way
- Public of community open space in active use for which there is no suitable alternative
- Noise
- Previous land use
- Sustainability
- Relationship to defined settlements
- In another active use
- Accessibility and proximity to local services
- Density and character of the surrounding area

3.29 Inherent to many of these criteria is consideration of the impact on Ecosystem Services. This term is used to describe the multiple benefits provided by the natural environment of the National Park, from water supply and air quality regulation, to providing opportunities for human recreation, relaxation and well-being. The ecosystem services concept has informed the development of both the landscape and wider suitability criteria for carrying out the LAA assessments.

3.30 Appendix A includes criteria regarding the relationship to settlements. One key element of this states that where sites are not considered to be previously developed land (as defined in the NPPF), they will be excluded from the assessment if located outside a settlement with a defined settlement boundary and is detached and unrelated to that settlement. This includes settlements both within and outwith the boundary of the National Park. The NPA will work closely with the local planning authorities of these settlements to ensure that cross boundary strategic issues are addressed.

**(ii) Assessing availability**

3.31 The following has been taken into account when assessing the availability of the site for development:

- Ownership and/or control of the land
- Planning status and planning history



- Intention to develop, including timings
- Potential legal constraints
- In any active other use

3.32 A site will generally be judged as available if it has been promoted as a potential development site within a reasonable timeframe, and there is no subsequent evidence that circumstances have changed. Some sites may not be available within the first 5 years, in which case they will be considered ‘developable’ but not ‘deliverable’

**(iii) Assessing achievability**

3.33 The following will be taken into account when assessing the achievability of the site for development:

- Economic viability
- Potential marketability of the site
- Impact on the Strategic Road Network
- Access to the site
- Highways issues
- Exceptional costs and/or site preparation costs
- Third party land required

3.34 A site will generally be judged as achievable if there are no immitigable physical or legal barriers to development. The Whole Plan & Affordable Housing Viability Assessment was produced as part of the evidence base for the Local Plan in August 2017, and showed that there are no major viability-related barriers to delivering housing sites in the National Park. A Whole Plan Viability Assessment will be prepared as part of the Local Plan Review evidence base, prior to the Plan publication. This will further test the ability of a range of development types throughout the National Park to viably meet emerging Local Plan and adopted CIL requirements.

**(iv) Overcoming Constraints**

3.35 There may be the option to overcome certain constraints to development through mitigation. These will be considered alongside the survey and assessment of the site and based on the conclusions of the wider Stage 2 assessment.

**Stage 3 – Windfall Sites**

3.36 Windfall sites are sites that have not been specifically identified in the development plan. A windfall site can be identified in a LAA. Windfall is a term used for housing sites and is not a term typically used for other types of development. Windfall sites often comprise previously developed sites that have unexpectedly become available, however, they may also include greenfield sites which have not previously been identified or allocated.

- 3.37 Paragraph 71 of the NPPF states that where an allowance is made for windfall sites as part of anticipated supply, there should be compelling evidence that they have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the LAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 3.38 Calculation of windfall will be undertaken separately and will be integrated into the future LAA output report. It will be monitored in the Authority Monitoring Report.

#### **Stage 4 – Assessment Review**

- 3.39 Once the sites have been assessed for their deliverability / developability, the development potential of all sites will be set out as an indicative theoretical supply. This sets out the approximate housing development and economic development potential over the Plan period in five year tranches (i.e. within years 1-5, 6-10, or 11 and beyond). Information on the development potential and timing for other types of development considered in this LAA will also be set out. An overall risk assessment will be made as to whether sites will come forward as anticipated.
- 3.40 It is important to note that all sites found to be deliverable / developable will still need to be considered through the plan-making process. The LAA is a starting point to identify deliverable / developable sites and does not in itself allocate sites for development. Therefore, the theoretical supply indicated in the LAA does not translate to an actual housing supply trajectory. The actual housing supply trajectory is contained in the Authority Monitoring Report, which is published annually.
- 3.41 The amount of supply will be reviewed alongside progress of the Local Plan Review. The Local Plan Review will determine the housing and economic development provision figures for the National Park as informed by the purposes and duty of the National Park, the findings of the LAA, the Housing and Economic Needs Assessment (HEDNA) and other evidence such as Sustainability Appraisal and Habitats Regulations Assessment.

#### **Stage 5 - Evidence**

- 3.42 The set of standard outputs to be produced from the LAA is as follows:
- a. A list of all sites considered, cross referenced to their locations on maps
  - b. A detailed assessment of each site which is considered to have potential for housing, including when development is expected to come forward
  - c. A list of Excluded sites which have not been subject to detailed assessment with reasons to explain why

- d. The quantity of development that could be delivered on each location, including a reasonable estimate of build out rates
- e. An indicative trajectory of anticipated development and consideration of associated risks.

### ***Monitoring and Review***

3.43 The NPA has continued to accept new sites submitted for consideration in Land Availability Assessments since the last assessment as part of the SHLAA in 2017. Any new sites received after the forthcoming call for sites closes will be considered in any subsequent review, informing the next LAA.