

# **Strategic Housing and Economic Land Availability Assessment (SHELAA)**

**Prepared for Hastings Local Plan (Regulation 18),  
Winter 2020/21**

October 2020

[www.hastings.gov.uk/localplan](http://www.hastings.gov.uk/localplan)

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## **Contents**

Part 1: Introduction (Page 3)

Part 2: Policy context (Page 4)

Part 3: Methodology (Page 6)

Part 4: Appendices (Page 34)

## **1. Part 1: Introduction**

### **1.1. What is this document?**

1.2. This document is the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) 2020 It supersedes all previous Strategic Housing Land Availability Assessments (2010, 2011 update and 2014 update) and now covers all sites with potential to be development or redeveloped for housing and employment uses. This SHELAA has been developed in accordance with latest guidance published in Planning Practice Guidance, dated September 2018.

1.3. This Strategic Housing and Economic Land Availability Assessment (SHELAA) is a research document that identifies the future supply of land for housing and employment within the Borough and will inform decisions about whether further allocations are needed to meet demand over the plan period. The report will also help inform for the five-year land supply assessment that the Council is required to produce annually.

1.4. The assessment considers the suitability, availability and achievability of potential development sites in line with the criteria set out in Part 1 of this document. This SHELAA is an important part of the Local Plan evidence base and covers the period to 2039. Producing and maintaining a SHELAA is a requirement of national planning policy<sup>1</sup>.

<b>How does the SHELAA relate to site allocations and planning permission?</b>
The SHELAA does not allocate land, or determine whether land should be allocated or not, this is the role of the Local Plan itself as well as any Neighbourhood Plans. This is because not all the sites within the SHELAA will be suitable for development as they may have constraints or be unviable to develop. It also does not determine the likelihood of a site gaining planning permission.

### **1.5. How will the SHELAA be used?**

1.6. The SHELAA will be used to inform the Local Plan 2019-2039 by identifying the capacity within the Borough to accommodate new development to meet housing and employment needs as identified in our Housing and Economic

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<sup>1</sup> As set out in the National Planning Policy Framework 2018.

Development Needs Assessment (HEDNA) and other key evidence base documents.

### **1.7. What area does the SHELAA cover?**

1.8. The SHELAA covers the administrative Borough of Hastings, in East Sussex.

## **2. Part 2: Policy context**

### **2.1. National Planning Policy Framework**

2.2. Paragraph 67 of the National Planning Policy Framework (NPPF<sup>2</sup>) requires local planning authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. This will assist local planning authorities to identify a sufficient supply and mix of sites for housing, taking into account their availability, suitability and likely economic viability.

2.3. The SHELAA assessment should:

- 2.3.1. identify sites and broad locations with potential for development;
- 2.3.2. assess their development potential;
- 2.3.3. assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

2.4. The NPPF requires planning policies to identify a supply of specific, deliverable housing sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.5. The NPPF identifies the advantages of undertaking both a housing and economic assessment as part of the same exercise. This approach ensures that all land is assessed together as part of the preparation of the Local Plan to identify which sites or broad locations are most suitable and deliverable for a particular use.

### **2.6. Planning Practice Guidance**

2.7. The Planning Practice Guidance<sup>3</sup> (PPG) provides more detailed guidance on housing and economic land availability assessments and sets out a methodology for the inclusion of housing land that is suitable, available and achievable for housing over the plan period (up to 2039).

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<sup>2</sup> Ministry of Housing Communities and Local Government, 2018

<sup>3</sup> Ministry of Housing Communities and Local Government, updated 2018

2.8. This SHELAA has been developed and undertaken in the context of the 2018 update to the PPG.

## **2.9. Local Policy**

2.10. The Hastings Planning Strategy (2014) and Hastings Development Management Plan (2015) form the current Local Plan for the Borough and continue to be used in the determination of planning applications until such time as a new Plan is in place.

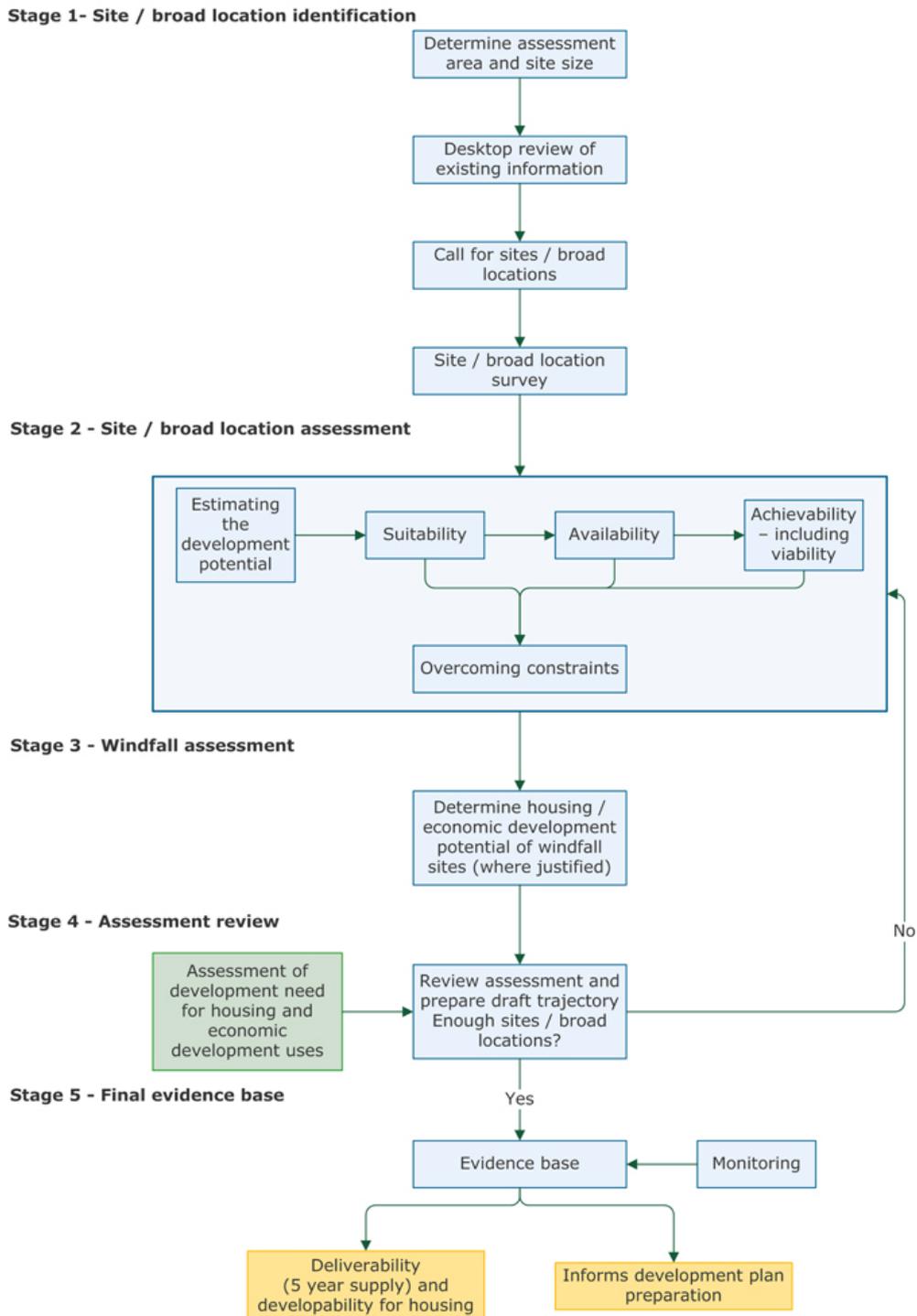
2.11. The Council is now developing a Local Plan for period 2019 - 2039. As part of this the Council needs to identify sites that have the potential to accommodate housing and employment development and to estimate the likely future yields from sites across the Borough. The SHELAA will form an important part of the evidence base for the Local Plan as required by the NPPF.

## **2.12. Impact of Covid-19 on the SHELAA**

2.13. Due to the local, national and international impact of Covid-19 on planning law and guidance; town centres; transport; commercial sectors and housebuilding we have continued to review and update information in the SHELAA. In August 2020 adjustments to site phasing and development typologies were made accordingly.

### 3. Part 3: Methodology

3.1. The Planning Practice Guidance<sup>4</sup> (PPG) sets out a clear methodology for undertaking a SHELAA to ensure it leads to a robust assessment of land availability. This SHELAA follows the PPG methodology, illustrated in the following flowchart.



<sup>4</sup> ibid

## 3.2. Stage 1 – Identification of sites and broad locations

### 3.3. Step 1 - Determine assessment area and site size

3.4. The area of assessment for this SHELAA is the whole of Hastings Borough. Whilst the housing and employment market areas extend into Rother District, assessment regarding the suitability and availability of land for development purposes in Rother District fall to that Council and not Hastings.

3.5. Both Hastings Borough Council and Rother District Council have undertaken separate SHELAA's and each can be used to understand the overall potential supply of land within these market areas. Rother District Council will be consulted on the assessment outcomes of this SHELAA to accord with the Duty to Cooperate<sup>5</sup>.

3.6. This SHELAA includes sites which are capable of delivering a yield of at least 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. Sites which are expected to yield fewer than 5 dwellings (small sites) have been excluded from investigation as these are unlikely to be allocated within the Local Plan, regardless of their suitability.

*Table 1: Site inclusion threshold, all sites*

<b>Site type</b>	<b>=/&gt; 0.25 ha/ 5 dwellings</b>	<b>&lt; 0.25ha/ 5 dwellings</b>
<b>Housing</b>	Include at =/> net 5 dwellings	Exclude at < net 5 dwellings
<b>Employment</b>	Include at =/> 0.25ha	Exclude at < 0.25ha

3.7. Where planning permission has already been granted for residential development, these sites will form part of the Council's 5-year supply of housing.

### 3.8. Step 2 - Desktop review of existing information

3.9. PPG guidance requires plan-makers to be proactive in identifying as wide a range of sites and broad locations for development as possible. Consideration should be given to all available types of sites and potential data sources that may be relevant in the assessment process.

<sup>5</sup> This was completed in January 2020

3.10. The following data sources have been used to assist with the identification of sites that may have potential capacity for housing or employment or other uses.

Table 2: Types of sites as set out in Planning Practice Guidance

<b>Type of site</b>	<b>Data source</b>
Existing housing and economic development allocations and site development briefs not yet with planning permission	Hastings Development Management Plan (2015) Planning application records
Planning permissions for housing and economic development that are unimplemented or under construction	Housing Retail and Employment Monitoring Extant planning permissions Building Control notification
Planning applications that have been refused or withdrawn	Planning application records
Sites that have not received planning permission	SHLAA January 2010, April 2011 and July 2014 update sites
Land in the local authority's ownership	HBC Estate Services Records
Surplus and likely to become surplus public sector land	Consultation with landowners such as ESCC, Registered Providers, emergency service organisations (ESFRS, NHS) Network Rail, utilities, Highways Agency, other statutory undertakers etc. National Register of Public Sector Land
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	Empty Property Register Brownfield Register Valuation Office database Active engagement with the sector
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photograph Local knowledge Pre-application advice Site surveys
Business requirements and aspirations	Call for Sites Enquiries, informal submissions received by HBC Estates, Planning and Regeneration Departments Previous site submissions
Sites in rural locations	Not applicable to Hastings Borough
Large scale redevelopment and redesign of existing residential or economic areas	Hastings Town Centre and Bohemia Area Action Plan Preferred Approaches 2018

Sites in and adjoining villages or rural settlements and rural exception sites	Not applicable to Hastings Borough
Potential urban extensions and new free standing settlements	Not applicable to Hastings Borough

3.11. Step 3 - Call for sites / broad locations

3.12. At the end of August 2019 the Council undertook a 'Call for Sites' exercise as part of the SHELAA process. A call for sites provides an opportunity for developers, those with land interests, land promoters, local property agents, partner organisations, businesses and individuals to make the Council aware of any sites that are or may become available for development over the period to 2039. Previous call for sites (date) and informal site submissions by landowners/promoters were also notified.

3.13. This provides the Council with an opportunity to give consideration to the sites being promoted alongside those sites identified at Step 2.

3.14. The information requested as part of the call for sites included:

- 3.14.1. Ownership details (if known)
- 3.14.2. Site and extent of site
- 3.14.3. Known constraints
- 3.14.4. Capacity, availability and time period for development proposals

3.15. A copy of the Call for Sites form can be found in Appendix 1.

3.16. Step 4 – Site survey

3.17. The desktop review and call for sites resulted in over 100 potential sites requiring assessment. In order to ensure a consistent approach is applied to each site, a standard site assessment sheet has been used.

3.18. Each site has been given a unique reference number either beginning "HL" or "EL" for Housing, Employment sites respectively.

3.19. In some cases, a site will provide a quantum of land across multiple categories, in which case it will have two identifying numbers. An example of this is the Former Hastings Observer Building in Castle Ward, which has both a HL and an EL designation<sup>6</sup>.

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<sup>6</sup> This site was assessed with a view to whether it should be employment led or residential led

Reference numbering prefix	Designation
HL	Housing Land
EL	Employment Land

Table 3: Unique reference number prefix guidance

- 3.20. All sites have been mapped using GIS layers to enable identification to provide detail of key assets and constraints such as environmental and heritage designations.
- 3.21. Details of the location of each site and accompanying extent are presented in Appendix 2.
- 3.22. Each site has been assessed against possible constraints and opportunities. This has either been through desktop assessment, a more detailed site visit or a combination of the two.
- 3.23. In some cases, a secondary assessment was conducted after the initial site assessment had taken place, particularly where a site had specific conservation nature, and heritage designations.
- 3.24. The impact of Covid-19 and the accompanying lockdown has resulted in more detailed secondary assessments of some sites being completed using virtual assessment tools including GIS, photography and 3D topographical mapping tools.
- 3.25. Where a site is located in the Hastings and Rother fringe area, or would have significant impact on Rother District, a site review with Rother District Council also took place and the results were incorporated into the site assessment, as part of the Duty to Cooperate. These sites were:

Table 4: Hastings Rother fringe sites

Unique reference number	Site name
HL94	Land at Glyne Gap
HL90	Land adjacent to My Way Lodge
HL63	Land at Rock Lane
EL24	Land at Ivyhouse Lane
HL87	Land north west Winchelsea Lane

#### 4. Stage 2 – Site / broad location assessment

- 4.1. The SHELAA must include an assessment of whether a site is deliverable and developable.
- 4.2. **deliverable sites** – are available now, or have a specified availability date, offer a suitable location for development now, and be achievable with a

realistic prospect that development will be delivered on site within five years; within 6-10 years or 11 or more years and in particular that the site is viable.

4.3. **developable sites** – sites should be in a suitable location for development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

4.4. All sites have been assessed for their Suitability, Availability and Achievability, including an assessment of economic viability and deliverability within the 5-year supply period and across the plan period to 2039.

4.5. Economic viability calculations were developed using the methodology proposed in the Planning Practice Guidance on Viability<sup>7</sup>.

4.6. Screening Part 1 – Assessment of availability

4.7. The SHELAA provides an audit of land available and identifies all sites and broad locations regardless of the amount of land needed to meet local development needs.

#### **4.8. Availability of sites**

4.9. In accordance with the PPG a site is considered 'available' for development, when, on the best information available (confirmed through the call for sites, legal searches and information from the land owner/s) there is confidence that there are no legal or ownership problems, such as:

4.9.1. unresolved multiple ownership;

4.9.2. ransom strips;

4.9.3. tenancies;

4.9.4. or operational requirements of landowners

4.10. Land Registry enquiries were undertaken to clarify ownership where necessary, and to identify potential constraints such as multiple ownership. Where a potential problem has been identified, the assessment has given consideration about whether the issue can realistically be overcome.

4.11. Planning applications are not linked to land ownership; therefore efforts have been made to contact the applicant, developer or landowner of all large sites (> 5 dwellings) to identify what their plans are for development or land disposal.

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<sup>7</sup> Ministry of Housing Communities and Local Government, 2019

4.12. Where a landowner has not communicated with the council for a prolonged period, sites have been screened out of the SHELAA at Part 1 of the screening process and will be treated as windfall should they come forward for development.

4.13. Consideration has also been given to the planning background for the site and whether there is a history of unimplemented permissions, or if there has been recent pre-application interest from developers regarding the site.

4.14. Sites that are not available were removed at Part 1 screening.

#### **4.15. Size of sites**

4.16. Sites that fall below the size threshold for this SHELAA, which is at least 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) were removed at Part 1 screening.

4.17. Where planning permission has already been granted on smaller sites these will still form part of the Councils 5 year supply of housing.

#### **4.18. Environmental designations**

4.19. The town's biodiversity and geological resources will be protected and enhanced. Sites wholly within these designations were screened out at Part 1 and not given any further consideration:

- 4.19.1. Hastings Cliffs Special Areas of Conservation (SACs)
- 4.19.2. Special Protection Areas (SPAs)
- 4.19.3. Sites of Special Scientific Interest (SSSI)
- 4.19.4. Local Nature Reserves (LNR)
- 4.19.5. Local Wildlife Sites (LWS)
- 4.19.6. Local Green Spaces (LGS)
- 4.19.7. Ancient Woodland

4.20. Sites partially within these designations were screened out if development may result in significant harm<sup>8</sup>. In some cases, this involved adjustments to site extents.

4.21. Summary: Typologies of sites screened out during Screening Part 1

*Table 5: Typologies of sites eliminated from the SHELAA during Part 1*

<b>Site typology</b>	<b>Part 1 result</b>
Legal issues	Eliminated from the SHELAA

<sup>8</sup> National planning policy framework Paragraph 175(a)

Ownership problems	Eliminated from the SHELAA
Environmental designations	Eliminated from the SHELAA
Sites of insufficient size or capacity (as identified in Step 1)	Eliminated from the SHELAA

4.22. It should be noted that sites screened out at Part 1, while eliminated from the SHELAA, may still be granted planning permission as elimination from the SHELAA does not constitute a refusal.

4.23. For sites that have been eliminated based on environmental designations, it is recommended that pre-application advice should be sought.

## 5. Screening Part 2 – Suitability of sites

5.1. This part of the assessment provides greater detail than Part 1 and gives consideration to the overall suitability of sites in a consistent manner highlighting the potential positive and negative impacts of development.

5.2. The PPG is clear that the assessment of the suitability of sites should be guided by the development plan, emerging planning policy and national policy.

5.3. The following issues have been considered in line with PPG guidance:

- 5.3.1. physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- 5.3.2. impacts including effects upon the landscape or landscape features, nature and heritage conservations;
- 5.3.3. appropriateness and likely market attractiveness for the type of development proposed;
- 5.3.4. contribution to regeneration priorities;
- 5.3.5. environmental / amenity impacts for potential occupiers and neighbouring areas.

5.4. This SHELAA has also given consideration to climate change when assessing site for their suitability as recommended by Town and Country Planning Association within *'Rising to the Climate Crisis – A Guide for Local Authorities on Planning for Climate Change'*<sup>9</sup>. The issues have been built into the standard site assessment sheet.

<sup>9</sup> <https://www.rtpi.org.uk/practice/2019/september/rising-to-the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/>

<b>Part 2 screening criteria</b>	<b>Considerations</b>
<b>Long term suitability of site location</b>	Consideration to the long-term suitability of building in the location, including the intended lifetime of the proposed development and any risk resulting from climate change to known physical and environmental elements such as sea level rise, flooding, increased temperatures, instability and extremes of weather.
<b>Historic Designations on site</b>	Whether the site contains a Listed asset; Locally listed asset; Asset suitable for local listing; Building at risk or sits within a Conservation area
<b>Access and Infrastructure</b>	Whether additional access points or other resolution to access issues needs to be sought.  Infrastructure current position and new demands.
<b>Ground conditions</b>	Ground conditions that may impact upon development.
<b>Flood risk</b>	Flood zone or other elevated risk; mitigations/ adaptations.
<b>Contamination, hazardous risk and pollution</b>	Risk from contamination, hazards and pollution.
<b>Landscape, including landscape features and AONB</b>	Assessment of impact upon the landscape; including adjacent.
<b>Tree cover / hedgerows</b>	Current position and mitigation/ enhancements needed.
<b>Open space / Green corridors</b>	Current role and function of open space and wildlife corridors, requirements of development.
<b>Local Character</b>	Existing character of development in surrounding area. Potential of site to contribute positively to this through development.
<b>Amenity Issues e.g. noise, smell, dust, visual amenity</b>	Potential of development to impact upon amenity.

<b>Archaeology and historic environment</b>	Is the site in an archaeological notification area; other historic designations.
<b>Decentralised energy, heat demand and networks</b>	<p>The extent to which existing or planned opportunities for decentralised energy (local renewable and local low-carbon energy source) could contribute to the energy supply for new development on the site.</p> <p>The potential for new development on the site to contribute to heat demand, or be a potential source of supply, where a heat network exists or could be provided.</p>
<b>Sustainable transport</b>	The scope for sustainable and low-carbon transport (particularly physically active modes) to make up a high proportion of trips to and from the site, including service trips.
<b>Carbon sink</b>	Whether development of the site would result in the loss of a significant carbon sink and whether the carbon capture potential of the site can be enhanced by development.
<b>Support existing communities</b>	Whether developing the site would offer opportunities to help the existing community to adapt to impacts arising from climate change, including through active water management (taking existing communities out of flood risk), sustainable drainage systems, and green infrastructure.
<b>Biodiversity</b>	The effect of developing the site on the capacity of biodiversity to adapt to likely climate change.
<b>Jobs creation</b>	Whether the development can improve sustainability through the creation of new jobs (not related to construction of the development) or by increasing the competitiveness of the area.

5.5. Existing Hastings Development Management Plan (2015) allocations and current sites with planning permission were re-appraised for their suitability, to assess whether circumstances have changed.

5.6. The overall results from the assessment criteria are summarised below.

6. Screening Part 3 – Achievability of sites, including viability

6.1. A site is considered 'Achievable' for development where there is a reasonable prospect that housing or employment will be developed on the site at a particular point in time. This requires a judgement about the economic viability of the site, through consultation with developer/landowners, and the capacity of the developer to complete and sell the housing/units over a certain period.

6.2. Sites with a yield of fewer than 10 dwellings with any kind of permission are automatically considered achievable, as are all sites of more than 10 dwellings with a detailed permission in place.

6.3. Factors that could affect achievability include:

6.3.1. **market factors** – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness to the locality, level of potential market demand and projected rate of sales;

6.3.2. **cost factors** – including site preparation costs in relation to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, and prospect of funding or investment to address identified constraints or to assist development; and

6.3.3. **delivery factors** – including the developers own phasing, the realistic build-out rates, and the size and capacity of the developer.

6.3.4. **Overcoming constraints** - Details about constraints preventing the site from being 'achievable', how such constraints can be overcome.

6.4. Sites not considered to be 'achievable' are removed at Part 3 of the assessment.

6.5. It has been necessary to include additional information regarding the impact of novel coronavirus COVID-19 pandemic<sup>10</sup> on site deliverability post-completion of the overall site assessments.

6.6. Sites that meet all criteria and therefore considered suitable, available and achievable, are taken forward into the Sustainability Appraisal to be assessed as potential allocations within the revised Local Plan.

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<sup>10</sup> COVID-19, World Health Organisation 2020 <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

## 7. Development Potential of each site

7.1. Each site must have its development potential, or 'yield', assessed as part of the SHELAA. The potential of both housing and employment sites is subject to a range of considerations including access; heritage and conservation constraints; environmental constraints and sustainability of location<sup>11</sup>.

Table 6: Average density assumption based on policy H1 of Hastings Planning Strategy

<b>Location</b>	<b>Average density assumption (dwellings per hectare)</b>
<b>Hastings Town Centre</b>	40 dph
<b>St Leonards Town Centre</b>	40 dph
<b>Silverhill District Centre</b>	40 dph
<b>Ore District Centre</b>	40 dph
<b>Hastings Urban Fringe Area</b>	30 dph
<b>Other areas across the Borough</b>	30 dph

### 7.2. *Housing site densities*

7.3. Policy H1 of the Hastings Planning Strategy (2014) requires housing development to make full and effective use of land by achieving a minimum of 40 dwellings per hectare in sustainable locations close to a good range of existing or potential services and facilities and where there is, or where there is potential for good public transport. This includes Hastings and St Leonards town centres, and the district centres of Silverhill and Ore.

7.4. Paragraph 123 of the NPPF, states that *'where there is an anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site'*.

7.5. The Housing and Economic Development Needs Assessment (HEDNA)<sup>12</sup> identifies a housing need of 430 dwellings per annum using the standard method (8,600 dwellings over plan period 2019 – 2039). Based on this need, there is an anticipated shortfall of land if the capacity of all developments is

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<sup>11</sup> National Planning Policy Framework, para 122 - 123

<sup>12</sup>

[https://www.hastings.gov.uk/content/planning/planning\\_policy/local\\_plan/pdfs/616654/Hastings\\_and\\_Rother\\_HEDNA.pdf](https://www.hastings.gov.uk/content/planning/planning_policy/local_plan/pdfs/616654/Hastings_and_Rother_HEDNA.pdf)

established based on the densities set out in Policy H1 of the Hastings Planning Strategy.



Figure 1: Maisonettes in Castledown Avenue. Source: [www.rightmove.co.uk](http://www.rightmove.co.uk)

7.6. Therefore, a new density matrix methodology has been established in line with Paragraph 123 as set out above. An overall density matrix has therefore been established, and then broken down into area-specific density measures which will be applied unless site constraints indicate otherwise.

Table 7: Density analysis of the urban character of the Borough

Density	Character and examples	Dwellings per hectare
<b>Low density</b>	Detached; link-detached; semi-detached.  Example: Detached housing in Harley Shute Road, St Leonards.	0-35
<b>Medium density</b>	Semi-detached; terraced; multi-unit (eg, Maisonette, low flats)	36-66

	Example: Victorian 'two-up, two-down terraces' at Pilot Road, Hastings	
<b>High density</b>	Multi-unit; tall or high-rise flats or mix of houses and flats  Example: Maisonettes, Castledown Avenue, Hastings	67-100
<b>Higher density</b>	Tall or high-rise flats; upward extensions to existing properties  'Marine Court', Hastings.	101 +



Figure 2: Marine Court, a well-known higher density apartment building with commercial parade. Credit: [www.johnbrayea.co.uk](http://www.johnbrayea.co.uk)

## 8. Establishing broad areas

8.1. The sites identified in the SHELAA are well dispersed throughout the Borough and therefore do not all share common characteristics including land and property values, typologies, existing local densities, constraints and servicing. In order to begin to review densities, typologies and establish deliverability the residential sites were divided into seven broad focus areas

based on a basket of indicators including property values, existing built densities, environmental constraints (eg, flood risk), presence of ‘enabling’ or ‘strategic’ sites<sup>13</sup> and infrastructure.

8.2. Employment sites were grouped into four broad employment focus areas based on existing employment geographies within the Borough and with regard to the differences in constraints within the locality of each site, use class suitability and environmental constraints.



Figure 3: Brook Way on the Ivyhouse Lane Industrial Estate. Credit: Planning policy department, Hastings Borough Council.

## 9. Applying densities

9.1. Not every site will be suitable for development at the same density due to a variety of factors including constraints as outlined above. The following broad average density assumptions were therefore applied to broad clusters of sites:

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<sup>13</sup> Enabling

Table 8: Broad SHELAA locations with density assumptions

Location	Average density assumption (dwellings per hectare) <sup>14</sup>
Ridge West	67-100 dph (High)
North Western	0 - 35 dph (Low)
Western coastal	36 - 66 dph (Medium)
Ridge East	36 – 66 dph (Medium)
Bohemia and Central St Leonards	67 - 101+ dph (High/ Higher)
Clive Vale and Ore Valley	30 – 66 dph (Low/ Medium)
Central Hastings	67 – 101+ (High – Higher)

9.2. Individual sites then had adjustments applied where necessary (for example, based on unique site constraints). For the majority of sites, the ‘developable area’ is considered to be the entirety of the development site and the density assigned is considered sufficient to allow for landscaping, open space and other site obligations.

9.3. Exceptions are indicated in the table below:

Table 9: Developable area HL115

Site #	Site name	Site size/ net developable area
HL115	Former West St Leonards Primary School, Bexhill Road	2.55ha/ 1.55ha

9.4. For all other sites, where no significant reduction in site area arose from constraints, indicative densities were further tested by applying a basic density multiplier to all sites<sup>15</sup> as set out in table 10. This was then further tested against analysis of planning history, consultation with statutory partners<sup>16</sup>, site-specific high-level design work, and a review of known site constraints.

Table 10: Density multipliers

Site size	< 0.4 ha	0.4 – 2 ha	> 2 ha
Density multiplier	1	0.9	85%

<sup>15</sup> “Tapping the Potential: Best Practice in Assessing Urban Housing Capacity”, 1999, The Urban and Economic Development Group

<sup>16</sup> Through the IDP process

9.5. The resulting median densities set a lower level baseline for development by area. Site densities of 101 dph or above are identified as being most suitable in central locations close to Town Centres with strong public transport, walking and cycling links.

Table 11: Median densities 'optimistic' and 'pessimistic'

<b>Location</b>	<b>Average (median) density (dwellings per hectare)<sup>17</sup></b>
<b>Ridge West</b>	67-100 dph
<b>North Western</b>	28 – 34 dph
<b>Western coastal</b>	53 dph <sup>18</sup>
<b>Ridge East</b>	25 – 65 dph
<b>Bohemia and Central St Leonards</b>	131 – 164 dph <sup>19</sup>
<b>Clive Vale and Ore Valley</b>	37 – 70 dph
<b>Central Hastings</b>	144 dph

9.6. All broad areas therefore have a median density in line with the area-based density assessment assumptions. It is therefore expected that windfall proposals will broadly correlate to the densities set out in table 8 above.

## 10. Employment sites

10.1. Employment sites include all development sites for office, warehousing, and industrial uses, leisure, cultural and retail use. For the purposes of the SHELAA, sites have been assessed based on their expected end use class as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended)<sup>20</sup>. Very few employment sites not previously identified through the Development Management Plan 2015 or Area Action Plan scoping work were identified as part of the SHELAA.

10.2. The HEDNA identified a need for gross 81,500sqm of new employment space. This figure incorporates regenerated or renovated space as current employment stock either reaches 'lifetime end' or fails to meet modern needs in terms of space, layout, infrastructure and onsite amenity.

Table 12: Employment yield (sqm)

<b>Yield sqm (SHELAA)</b>	<b>Yield sqm renewal</b>
56,551	24,949

<sup>17</sup> Median 'pessimistic' – Median 'optimistic'

<sup>18</sup> There is no "low-high" density threshold here as all strategic sites have no variance between models

<sup>19</sup> This area has two sites which will potentially yield densities in excess of 200 dwellings per hectare

<sup>20</sup> The changes introduced by the Town and Country Planning (Use Classes) Order 2020 (as amended) do not invalidate this assessment.

10.3. The anticipated yield by broad area and typology is shown in table 13.

Table 13: Anticipated yield by employment area

Area	Yield sqm (SHELAA)	Yield sqm (renewal)
<b>Queensway Employment Corridor</b>	29,878 (B1b-c/B2/B8 <sup>21</sup> )	4,990
<b>Ponswood Industrial Estate</b>	1,109 (B1b-c/B2/B8 <sup>22</sup> )	9,719
<b>Ivyhouse Industrial Estate</b>	11,464 (B1b-c/B2/B8 <sup>23</sup> )	9,240
<b>Hastings Town Centre</b>	17,100 B1a-c	1,000

10.4. *Queensway employment corridor*

10.5. The Queensway employment corridor contains a number of greenfield development opportunities and is anticipated to provide some, contribution to renewal.

10.6. *Ponswood Industrial Estate*

10.7. The Ponswood Corridor contains no greenfield opportunities, with all potential development comprising redevelopment. A proportion of the existing stock is older and as such may not be optimised for modern manufacturing methods and is of limited density.

10.8. *Ivyhouse Industrial Estate*

10.9. Ivyhouse Lane is primarily a renewal area with existing stock at Brook Way and Burgess Way of sub optimal layout, age and condition in many cases. There are limits to densification due to the proximity to the AONB and the need to protect important views from the cemetery as set out in the Rock Lane and Ivyhouse Lane Landscape assessment 2013<sup>24</sup>.

10.10. *Hastings Town Centre*

10.11. Hastings Town Centre is a key location for office development, and currently provides space for a range of civic functions. It is well connected,

<sup>21</sup> This report pre dates the 2020 amendment to the use class order and as such typologies have been established based on historic characteristics.

<sup>22</sup> This report pre dates the 2020 amendment to the use class order and as such typologies have been established based on historic characteristics.

<sup>23</sup> This report pre dates the 2020 amendment to the use class order and as such typologies have been established based on historic characteristics.

<sup>24</sup>

[https://www.hastings.gov.uk/content/planning/planning\\_policy/adopted\\_local\\_plan/supportingdocs\\_evbase/461705/ivehouse\\_lane\\_-\\_rock\\_lane\\_study\\_area\\_landscape\\_assessment\\_oct\\_2013.pdf](https://www.hastings.gov.uk/content/planning/planning_policy/adopted_local_plan/supportingdocs_evbase/461705/ivehouse_lane_-_rock_lane_study_area_landscape_assessment_oct_2013.pdf)

sustainable, and has potential for 'flexible', 'small' and 'executive' classes of office and meeting space.

10.12. *Employment densities*

10.13. The extent to which an identified employment site can be developed can vary based on the amount of space available, the type of development proposed, existing services in place and the scale and massing appropriate for particular types of end use class on particular sites.

10.14. For example, site EL24 (Ivyhouse Lane Northern extension), only 40% of the area is developable due to site constraints including boundary landscaping and the need to provide additional access. By contrast, almost 100% of EL15 (Queensbury House) can be developed due to location and existing servicing.

10.15. Decisions on the developable area are therefore based on information that is known about each site, including information submitted with SHELAA 'call for sites' forms, development history, possible scale and massing, existing evidence base reports, Area Action Plan information and developer's intentions.

11. *Opportunity sites*

11.1. A range of 'Opportunity Sites' were identified as part of the draft Area Action Plan (AAP) that was consulted on in 2018. Opportunity sites have been reappraised as part of the SHELAA and were either:

11.1.1. Given a SHELAA site number and an updated assessment of development potential;

11.2. Or

11.2.1. Retained as an 'Opportunity Site'.

11.3. 'Opportunity sites' are sites identified as suitable for a range of uses that may have the potential to become large site windfalls as mixed-use developments with a residential element. They cannot be formally included in the housing supply projections.<sup>25</sup>

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<sup>25</sup> This is to allow for maximum flexibility within the Town Centre as per Paragraph 85 NPPF 2018

Table 14: Opportunity sites

<b>AAP designation</b>	<b>Site name</b>	<b>Outcome</b>
SG1	Priory Street Carpark and ESK	Potential for mixed-use
SG2	Station approach car park and Royal Mail Delivery Office	Potential for mixed-use
QR2	Cornwallis Street Carpark	Potential for mixed-use/ hotel
SG4	Queensbury House	Potential for mixed-use
WP2	Site of former Harold Place Public Conveniences	Potential for mixed-use
WR2	White Rock Theatre <sup>26</sup>	Not retained.
WRP1	White Rock Gardens	Not retained
SG3	Former post office, Cambridge Road and former university of Brighton building, Priory Quater	Potential for mixed-use
WRP2	White Rock Sports Park	Potential for mixed-use if necessary for cross subsidy
WP1	Corner of Wellington Place and Albert Road	Potential for mixed-use
WP2	Cinema, Queens Road	Potential for mixed-use
WP4	1 – 7 Wellington Place	Potential for mixed-use
BP1	Muriel Matters House	Potential for mixed-use
DEB	Debenhams, 1-3 Robertson Street	Potential for mixed-use

11.4. These opportunity sites will be subject to regular review as the SHELAA is updated and will only be included in future housing land supply figures if there is sufficient indication that they will be developable within ten years, or a development project plan is in motion for a period in excess of ten years.

## **12. Stage 3 – Windfall assessment**

### **12.1. Windfall assessment (housing)**

12.2. Paragraph 70 of the NPPF makes provision for an allowance of ‘windfall’ sites<sup>27</sup> as part of expected housing supply as long as the inclusion

<sup>26</sup> Changes under the Covid Act will be material for this site

<sup>27</sup> A ‘windfall’ site is one that has not been specifically identified as part of the SHELAA or Local Plan Process.

of such sites is supported by compelling evidence that the supply is reliable and likely to continue.

12.3. The PPG further indicates that a justified windfall site allowance may be included within the SHELAA.

12.4. Small windfall sites continue to make a significant contribution to the supply of new housing in the Borough. The Local Plan includes a small site windfall allowance of 35 dwellings per annum. All future small sites would be screened out during Part 1 of the SHELAA process since they are too small for inclusion providing less 5 (net) or more dwellings.

12.5. As part of the SHELAA process, broad typologies of potential windfall over the period 2019 – 2039 have been evaluated in terms of their likelihood to come forward. Analysis of historic and current windfall typologies, and new typologies as a result of changes to the General Permitted Development Order and Town and Country Planning (Use Classes) Order (as amended) 2020 have been included in this assessment. Table 15 sets out potential windfall typologies, together with the likelihood of coming forward for development within the Borough during period 2019-2039.

Table 15: Windfall typologies

<b>Typology</b>	<b>Assessment summary</b>	<b>Contribution to windfall</b>
Subdivision existing dwellings	The subdivision of larger dwellings, including but not limited to Care Homes, made a contribution to housing numbers during the period 2015 – 2019.  It is not expected that this will be a dominant typology for plan period 2019-2039, although some small gains may still be made.	Low
Previously-developed vacant and derelict land and buildings (non-residential)	The Brownfield Land Register (BLR) captures all previously developed sites with a potential capacity of five or more dwellings that may be suitable for redevelopment, although smaller sites may also be included where development is suitable, available and achievable <sup>28</sup> .	Medium

<sup>28</sup> Regulation 5(3) of the Town and Country Planning (Brownfield Land Register) Regulations 2017 allows local planning authorities to enter sites below the minimum site size or capacity threshold of 0.25 hectares, or capable of supporting at least 5 dwellings in brownfield land registers, where the site meets the criteria referred to in paragraphs (1)(b) to (d) of regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017.

	<p>The majority of BLR sites also meet the criteria for inclusion within the SHELAA.</p> <p>Analysis of windfall development that has come forward under the current plan indicates that some previously developed land will continue to come forward.</p>	
Small site infill development	<p>This may include vacant plots and change of use. There continues to be a steady supply of small infill sites within the Borough, both greenfield and brownfield, with the potential to deliver housing in line with or exceeding the minimum density for the area set out in Part 2, above. It is expected that small sites of less than 0.4 ha should develop 100% of the plot.</p> <p>Small site infill continues to be the primary source of windfall within the Borough.</p> <p>The Self-build and Custom housebuilding landing page has been updated to better support the acquisition and development of small infill sites for self-build and custom housebuilding to continue to encourage infill development within this typology.</p>	High
Flats above shops or other town centre premises	<p>The conversion of upper floors no longer required to support the town centre use at street level is expected to continue to provide 'ad hoc' windfall for at least the first half of the plan period (up to 2030), particularly in sustainable locations.</p>	High
Demolition and rebuild (residential and associated land) – planning permission route	<p>A number of sites excluded from the SHELAA due to insufficient yield contain proposals for demolition of existing buildings and redevelopment of residential dwellings. This has also been a reliable source of development during the preceding plan period.</p> <p>It is expected that small sites of less than 0.4 ha should develop 100% of the plot.</p>	Medium
General intensification	<p>Policy H1 should be used to support and enable the general intensification of sites at the pre application engagement stage in line with the densities set out in Part 2, above.</p>	Low

	<p>It is expected that small sites of less than 0.4 ha should develop 100% of the plot.</p>	
Other permitted development	<p>Class O of the GPDO</p> <p>Part 1 of the Second Schedule to the GPDO: Class AA</p> <p>Part 20 of the Second Schedule to the GPDO - Class ZA, Class A, Class AA, Class AB, Class AC and Class AD.</p> <p>It is anticipated that the yield from development of this type will be limited to a relatively small number of dwellings during plan period.</p>	Low
Garden and 'backland' development	<p>Schemes of this typology have come forward during the lifetime of the previous plan, although somewhat limited and in many cases as part of a comprehensive scheme that involved the demolition of an existing property as part of the proposal, which is captured above in a separate typology.</p> <p>It is anticipated there may continue to be a relatively steady supply of single unit development on corner plots, usually of terraced or detached family housing but due to the nature of these developments as single dwellings, their cumulative contribution to a windfall allowance during the life of the plan is anticipated to be steady but low in yield.</p>	Low

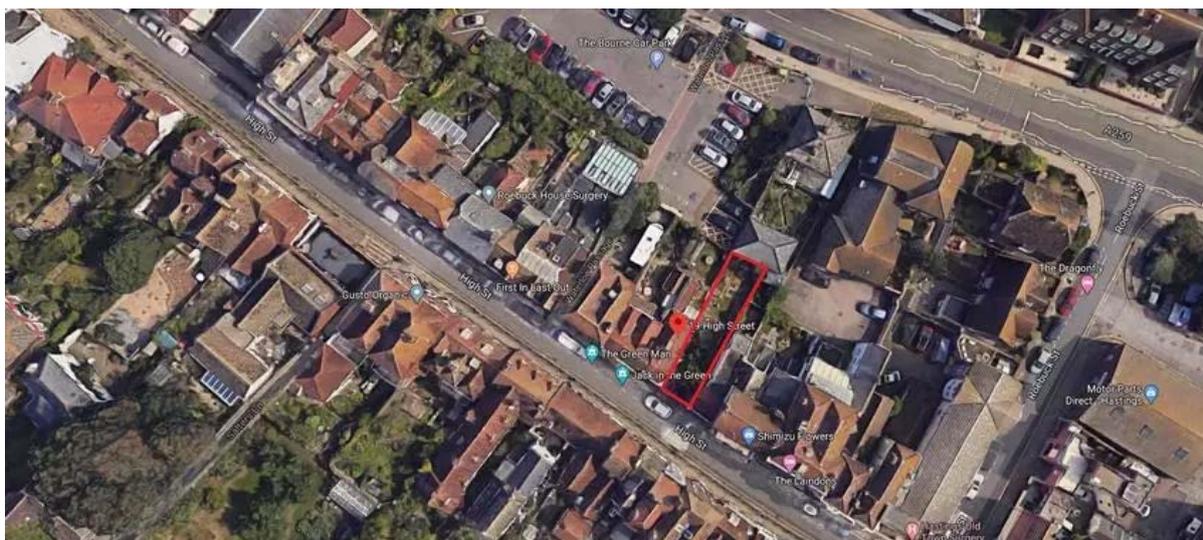


Figure 4: Example 'infill' site with planning permission for a dwellinghouse ([www.onthemarket.co.uk](http://www.onthemarket.co.uk))

12.6. Opportunities for windfall will therefore be, in general, smaller sites which cumulatively will provide not insignificant windfall which will be broadly in line with historic windfall numbers over the period 2014 – 2019 as shown in table 16.

Table 16: Historic windfall 2014-2019

Year	Completions	Windfall (no/%) <sup>29</sup>
2014/15	167	67 (40%)
2015/16	244	59 (24%)
2016/17	191	56 (29%)
2017/18	204	67 (33%)
2018/19	184	62 (34%)

12.7. The mean and median annual completions yielded by windfall sites over the period 2014 – 2019 are 62. A conservative windfall allowance of 45 dwellings per annum – a total of 855 dwellings during period 2020-2039<sup>30</sup> is therefore considered achievable.

### 13. Stage 4 – Assessment review

13.1. The information from the SHELAA will form a part of the evidence base for the Local Plan 2019- 2039, indicating which sites have the potential to be brought forward for allocation within Part 3 of the plan.

<sup>29</sup> Local Plan Monitoring Reports, <https://www.hastings.gov.uk/planning/policy/localplanmonitoring/>

<sup>30</sup> This figure is 19 years of windfall housing as housing completion figures for 2019/20 relate to actual completed dwellings.

13.2. The PPG advises that once stages 1-3 have been completed, the information can be used to develop an overall trajectory of housing and employment sites.

13.3. Housing

13.4. All developments should be deliverable during the life of the plan, either in 'Phase 1' (0-5 years), 'Phase 2' (6-10 years) or 'Phase 3' (more than 11 years). Phasing is based on a build out rate of 50 dwellings<sup>31</sup> per annum (average), and for the avoidance of doubt reflects the period when all dwellings on site will be completed.

Table 17: worked example of site phasing

**Worked example:**

Development of a 200-dwelling site starts in the fourth year of the Plan. The build out rate is 50 dwellings per annum.

This will result in the site being given a 'phasing' of years 6-10 due to the final 50 dwellings being completed in the eighth year of the plan.

13.5. Phasing of sites

13.6. A site is considered deliverable within 1-5 years if it is already under construction, has planning permission that the developer intends to implement or is consistent with the definition of 'deliverable' as set out in NPPF<sup>32</sup>.

13.7. A site is considered deliverable within 6-10 years if it has planning permission, but the developer or landowner does not intend to implement or complete (where permission is extant) development within 5 years, the site may not yet be available for development but will become so during this period and the owner intends to develop the site<sup>33</sup>.

13.8. A site is considered developable within 11-20 years if the site will only become available during this period<sup>34</sup>.

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<sup>31</sup> Based on Local Plan Monitoring report data

<sup>32</sup> Glossary of terms, 'deliverable', page 66

<sup>33</sup> This may include, for example, the assured resolution of legal issues.

<sup>34</sup> This may include sites that are inaccessible at the moment but will become accessible during this period when infrastructure is improved.

Table 18: Site phasing

Year 1 – 5 (2019/20 – 2025/6)	Year 6 – 10 (2026/27 – 2030/31)	Year 11 – 20 (2031+)
1,169	1,610	1,495

13.9. 'Opportunity sites' have no specified phasing due to their nature as set out in paragraph 1.11. When phasing for 'opportunity sites' becomes available, they will be reevaluated using the SHELAA site criteria set out in stages 1-3.

### 13.10. Employment Space Development Pipeline (Commitments)

13.11. The phasing of employment sites will largely be determined by wider local, regional and national priorities, including criteria for leveraging public sector investment through the Shared Prosperity Fund. A broad phasing may be developed using pipeline projects and information supplied by landowners, agents, the local authority and developers as part of the SHELAA process.

Table 19: Pipeline employment sites

SHELAA ref	Name	Status
EL1	Queensway North, Queensway	GTD: Pre-commencement
EL2	Sites PX and QX Churchfields	GTD: Pre-commencement
EL11	Land East of Burgess Road, Ivyhouse	GTD: Under construction
EL21	Plot R, Offerfair self storage, Drury Lane, TN38 9BA	GTD: Pre-commencement
EL22	Iberian Lighting, Plot small w, Drury Lane, TN38 9XP	GTD: Under construction

13.12. All sites in table 19 above are anticipated to complete within the first five years of the plan and therefore form the phase 1 pipeline.

## 14. Neighbourhood Planning

14.1. There are currently no designated neighbourhood planning areas within Hastings Borough, should this position change in future it will be for the Neighbourhood Planning groups to undertake their own site assessments for inclusion within their Neighbourhood Plan with regard to the typologies and densities set out in Part 2 of the SHELAA.

## 15. Monitoring

- 15.1. The SHELAA forms an important part of the Local Plan evidence base and will be regularly reviewed. All housing and employment data has been entered onto a SHELAA database, which is maintain through regular reviews and updates when new information becomes available.
- 15.2. If there are concerns about the accuracy of any of the site information contained within this SHELAA, this can be submitted as part of the public consultation stages in the preparation of the revised Local Plan 2019-2039.

## **Appendices**

Appendix 1: Example Call for Sites form

Appendix 2a: Full list of SHELAA housing sites and site assessment sheets

Appendix 2b: Full list of SHELAA employment sites and site assessment sheets

Appendix 3a: Housing sites removed at Part 1 screening

Appendix 3b: Employment sites removed at Part 1 screening

Appendix 4: Site sites removed at Part 2 screening

Appendix 5: Viability appraisal - deliverability

Appendix 6: Site assessed for other uses (including Gypsy and Travellers)

## Appendix 1: Example Call for Sites form



### SHELAA call for sites submission form 2019

We are requesting information about sites which might be suitable for the following:

- Housing, including specialist housing such as housing for older people
- Business uses, including offices, research and development, industrial, and storage
- Other commercial uses including leisure and cultural uses

For housing sites, we are collecting information on sites capable of delivering 5 or more homes. For all other uses we are collecting information on land of 0.25 hectares or more or capable of supporting 500 square metres or above.

**Please submit site details by 5pm on Wednesday 9 October 2019 and complete a separate form for each site you want to put forward for consideration.**

Return this form by email to: [fplanning@hastings.gov.uk](mailto:fplanning@hastings.gov.uk)

or by post to: Planning Policy Team, Hastings Borough Council,  
Muriel Matters House, Breeds Place, Hastings TN34 3UY

Please feel free to expand the boxes below or provide details on a separate sheet as appropriate.

### Section 1: Your contact details

This section asks you to confirm your contact details

Your name	Agent name (if applicable)
Company name (if applicable)	Company name (if applicable)
Address	Agent address
Telephone number	Agent telephone number

Email	Agent email	
Do you wish the agent to act for you?	YES <input type="checkbox"/>	NO <input type="checkbox"/>

## Section 2: Your status

This section asks you to confirm who you are, please tick all that apply

Land owner	Developer
Land Agent	Registered Provider (affordable housing)
Planning consultant	Other, please state

## Section 3: Land / Site ownership

This section asks you to confirm the ownership of the land or site. If you are not the owner, please provide their details below. If there are more than 2 owners, please confirm their contact details on a separate sheet.

<b>Land/Site owner 1</b>	Full name
Organisation (if applicable)	Address
Email	Telephone number
<b>Land/Site owner 2</b>	Full name
Organisation (if applicable)	Address
Email	Telephone number
Is the owner(s) aware you are suggesting their land or site?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Do any other parties have any legal rights that relate to the land or site?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain
Are there any legal covenants on the land or site or long tenancies?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain
An unaccompanied site visit will be required to enable a full assessment of the land/site. If it is necessary to arrange access, please provide details for the person to contact (name, telephone number, email address) to plan this. If an unaccompanied visit is not possible, please say why.	

## Section 4: Site details

This section asks you to confirm the site location, size, current and proposed use

<p>Site address and postcode (please also provide a location map clearly showing site boundaries edged in red).</p>	<p>Site area (minimum size 0.25ha, 5 dwellings or 500m<sup>2</sup> floorspace)</p> <p>Is the whole area suitable for development          Yes <input type="checkbox"/> No <input type="checkbox"/>          If no, why not?</p>		
<p>Is the site greenfield, brownfield (built on previously) or a mixture?</p>			
<p>What is the current use of the site?          (Please describe the site providing photos if possible)</p>			
<p>If the site has no current use, what was the last use and what date did this use stop?</p>	<p>Are there any current or past planning applications for this site?          Yes <input type="checkbox"/> No <input type="checkbox"/>          If yes, please give the application number(s)</p>		
<p>Proposed site use          Please tick all that apply and/or say if you have a specific intention.</p>	<p>Market housing <input type="checkbox"/></p>	<p>Affordable housing <input type="checkbox"/></p>	<p>Self-build and custom housebuilding <input type="checkbox"/></p>
	<p>Housing for older people <input type="checkbox"/></p>	<p>Other types of housing          (please specify) <input type="checkbox"/></p>	
	<p>Land for gypsy, traveller and travelling showpeople <input type="checkbox"/></p>	<p>Business use          (please specify) <input type="checkbox"/></p>	
	<p>Recreation and leisure use          (please specify) <input type="checkbox"/></p>	<p>Other use (please specify) <input type="checkbox"/></p>	

## Section 5: Site suitability

This section asks you to provide information on physical, environmental or other constraints affecting the site.

<p><u>Site access</u>          Is there a current means of vehicular access to and from the site from the public highway?          Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>Does access need to be improved or created?          Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p><u>Physical and environmental constraints</u>          Are there any slopes, significant changes in ground level or unstable ground on any part of the site?          Yes <input type="checkbox"/> No <input type="checkbox"/></p>

If yes, please explain	
Does the site have any heritage or archaeology? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
Is the site affected by flooding? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
Is the site affected by contamination, pollution or hazard risk from its current or previous use? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
Are there any trees or hedgerows on site? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
Does the site have any other physical or environmental constraints to development? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
<u>Infrastructure/utility</u> Is the site crossed by electricity pylons, gas mains, water or sewer pipes, telecommunications masts or other infrastructure/utilities? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
<u>Other issues</u> Does the site have any other issues not covered in the questions before? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please explain	
Do you believe the above could be overcome through mitigation? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, how?	

## Section 6: Site availability

This section asks you to provide information on the availability of the site

Is the site in multiple ownership? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please ensure all land owner details are provided in Section 3	
Is there agreement by all parties that the land could be promoted for development? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Have all owners and those with an interest in the land made a formal agreement? Yes <input type="checkbox"/> No <input type="checkbox"/>	
When do you anticipate that the site could become available for development?  Available now <input type="checkbox"/>  In the next 5 years <input type="checkbox"/>  In the next 6-10 years <input type="checkbox"/>  In 10+ years <input type="checkbox"/>	Please give your reasons for this timescale

<p>Is the site currently for sale or being marketed?          Yes <input type="checkbox"/> No <input type="checkbox"/>          If yes, please give details and provide a web link if possible</p>	
<p>Is there current interest from a developer?          Yes <input type="checkbox"/> No <input type="checkbox"/>          If yes, please give details          If no, have you received enquiries or turned down offers in the past?          Please give details</p>	

**Section 7: Achievability**

This section asks you to provide details which impact on the deliverability and viability of the site

<p>Would the development be new build, involve a conversion or both? Please state which</p>
<p>On housing sites, how many new homes approximately do you think the site could support and would these be houses, flats or both? Please state which</p>
<p>For other non-housing sites, how much floorspace approximately could the site support?</p>
<p>Are there any additional cost factors which could affect the site delivery (such as ground conditions and preparation, infrastructure, demolition or other costs)? Please state</p>
<p>Do you consider the site is currently viable for development taking into account all current policy considerations and known development costs associated with the site?          Yes <input type="checkbox"/> No <input type="checkbox"/>          Please explain your answer</p>

**Section 8: Other information**

Please provide any other information you feel is relevant to the site in this section

<p>Other relevant information</p>
-----------------------------------

If you have undertaken any studies or have any other supporting information for the site not mentioned above, please attach it with your call for sites form and email to [fplanning@hastings.gov.uk](mailto:fplanning@hastings.gov.uk) or post to Planning Policy, Muriel Matters House, Breeds Place, Hastings, East Sussex, TN34 3UY.

I consent to the information I have provided on this form and in any other documents I have provided through the 'call for sites' being processed in accordance with the General Data Protection Regulations.

I understand that the Council's privacy notice can be viewed at: [www.hastings.gov.uk/privacy/notices/](http://www.hastings.gov.uk/privacy/notices/) and that information supplied will be used for the SHELAA and therefore cannot be treated as confidential.

I understand that my personal contact details will not be published, but will be stored for use in plan making by the planning policy team. I understand that I may be contacted as part of the plan making process.

Signed:

**Appendix 2a: Full list of SHELAA housing sites and site assessment sheets**

**Appendix 2b: Full list of SHELAA employment sites and site assessment sheets**

Appendix 2a and 2b are available together with this report on the website at <http://www.hastings.gov.uk/planning/policy/new-local-plan/reg18-evidence-base/shelaa-evidence/>

**Appendix 3a: Housing sites removed at Part 1 screening**

**Appendix3b: Employment sites removed at Part 1 screening**

Appendix 3a and 3b are available together with this report on the website at <http://www.hastings.gov.uk/planning/policy/new-local-plan/reg18-evidence-base/shelaa-evidence/>

**Appendix 4: Housing and employment sites removed at Part 2 screening**

<b>Site Reference</b>	<b>Site Address</b>	<b>Link to assessment</b>
None	None	N/A

## Appendix 5: Viability

The purpose of this assessment is to identify issues that may impact on the viability of housing and mixed-use sites that are considered to be otherwise suitable and available by the SHELAA site assessment process.

This assessment is to be used as a strategic planning tool only, and complies with the requirements of the NPPF and PPG and follows best practice as set out in the Harman Report<sup>35</sup>. It should therefore be noted that as per Professional Standards 1 of the RICS Valuation Standards – Global and UK Edition<sup>1</sup>, the advice expressly given in the preparation for, or during negotiations or possible litigation does not form part of a formal “Red Book” valuation and should not be relied upon as such.

The assessment is in line with the Planning Practice Guidance (PPG) on Viability<sup>36</sup>, with the following methodology:

- Sites will be assessed based on broad locations;
- The assessment is at high level and act as a strategic planning tool, not as a site level viability assessment for use by developers;
- General assumptions will be identified and detailed;

Only ‘strategic sites’ will be subject to a viability assessment under the SHELAA. For the purposes of this document, all non-strategic and smaller sites will be considered deliverable if strategic sites within their area and typology are broadly viable.

### Step 1: Identifying broad locations

The PPG on the SHELAA states that an assessment of broad locations is a suitable method of site testing. Based on the clustering, number and size of sites the following broad locations have been identified:

<b>Location</b>	<b>No sites/ PYS<sup>37</sup>/ OY<sup>38</sup></b>
<b>Ridge West</b>	7/ 670/ 840 <sup>39</sup>
<b>North Western</b>	11/ 391/ 424 <sup>40</sup>
<b>Western coastal</b>	9/ 442/ 442
<b>Ridge East</b>	6/ 322/ 530
<b>Bohemia and Central St Leonards</b>	8/ 659/ 726
<b>Clive Vale and Ore Valley</b>	9/ 252/ 252
<b>Central Hastings</b>	9/ 202/ 222

<sup>35</sup> Harman Report, 2012

<sup>36</sup> Ministry of Housing communities and local government, last updated 1 September 2019.

<sup>37</sup> Pessimistic yield scenario

<sup>38</sup> Optimistic yield scenario

<sup>39</sup> Includes no.7 dwellings completed prior to report

<sup>40</sup> Includes no.10 dwellings completed prior to report

## Step 2: Principles of assessment

The viability assessment model for SHELAA sites considered to be suitable and available is a 'high level' strategic test of their deliverability, as set out in the opening paragraph of this appendix.

Sites are assessed based on location and characteristics, adjusted to take account of current planning obligations and then compared to the threshold value of the site, established by estimating the current site value with a premium of no more than 20% applied<sup>41</sup>. If the remaining or 'residual' amount is higher than the threshold, the site is viable. If it is not, then it is not viable under current policy conditions or for the type of development proposed<sup>42</sup>.

Residual assessments for individual sites are time consuming and rely heavily on the collection of significant levels of data, including up-to-date quotations for works; high-level site design already being in place; and other market comparables. For the purposes of the 'high level' viability required for the SHELAA, broad estimations have been used for the analysis and are subject to a margin of confidence.

Note: It is possible that sites that are not viable in present conditions will become viable during a later phase of the plan period.

## Step 3: Number, yield and location of sites

A total of 59 developable sites have been identified as part of the SHELAA. Of these sites, 23 are considered 'strategic' sites with yields of 20 dwellings or more that occupy key positions in the Borough that will enable other, smaller sites and windfalls to be more easily developed due to the increased population and infrastructure enhancements they will also enable.

A further five sites have been identified as larger, non-strategic sites which will deliver more than 20 dwellings but are largely 'stand-alone' in nature without significant enabling potential.

Of these sites, two are currently under development and are therefore considered to be 'deliverable'. A further six are subject to extant planning permissions and will therefore have been assessed for site specific viability by developers. One site has a prior approval for conversion from office to residential and is therefore also 'deliverable'.

Site #	Site address	Reason
HL38	Former Stills Factory, Ore	Under development

<sup>41</sup> Planning Practice Guidance, 'Viability' para 15 <https://www.gov.uk/guidance/viability#para015>

<sup>42</sup> Harman Report, 2012, indicates that the residual method should be the preferred method for such calculations.

HL27	Former Hastings College, Archery Road	Under development
HL1	Homhurst St Mary	Extant permission
HL2	Former Harrow Lane Playing fields	Extant permission
HL3	Land adjacent 777 The Ridge	Extant permission
HL12	Malmsebury House	Extant permission
HL40	Former Mount Pleasant hospital	Extant permission
HL7	Former Grove School	Extant permission
HL80	Ashdown House	Prior approval

This leaves a total of 33 sites to be assessed for deliverability.

It should be noted that all sites of 20 or more dwellings in the 'Ridge West' focus area have been screened out of this assessment due to already having permission or prior approval in place. It is therefore considered that development within this broad location is 'deliverable'. Likewise, the 'Clive Vale and Ore Valley' Focus Area is also considered 'deliverable' due to two of the three strategic sites subject to extant permission and under construction, respectively.

The remaining sites are assessed based on the following information:

- Location
- Current use (to establish threshold value)
- Past use (to establish constraints)
- Site area
- Yield and phasing
- Primary predicted dwelling type (houses or flatted)
- Constraints where known

#### Step 4: Establishing size of dwellings

To establish size of development, net internal floorspace data was taken from the EPC for a sample of 25 new builds identified through the land registry as sold between 1 April 2018 – 1 April 2020. It is acknowledged this does not correlate with completions data for the same period, which may be due to land registry processing 'lag' or a significant proportion of 'build to let' properties entering the market.

House (count)	House (Median size)	Flat (count)	Flat (Median size)
24	86sqm	1	63sqm

An additional 10% margin is then applied to estimate gross internal area.

House (count)	House (Median size)	Flat (count)	Flat (Median size)
24	95sqm	1	70sqm

## Step 5: Establishing typologies

Excluding sites from the 'Ridge West' focus area, as these have already been established as 'deliverable', three strategic sites can be considered to be 'greenfield' sites. The remainder are 'brownfield' sites (previously developed land).

Location	Greenfield	Brownfield
<b>Ridge West</b>	3 <sup>43</sup>	1 <sup>44</sup>
<b>North Western</b>	1	2 <sup>45</sup>
<b>Western coastal</b>	0	4 <sup>46</sup>
<b>Ridge East</b>	1	2
<b>Bohemia and Central St Leonards</b>	1	4
<b>Clive Vale and Ore Valley</b>	0	3 <sup>47</sup>
<b>Central Hastings</b>	0	1

It will be assumed that all Brownfield sites will require some remediation. This is adjusted by a location index factor of 1.02 for the South East. For the purposes of this assessment, due to geological and hydrological characteristics of the Borough, all sites have been considered to have a moderate to high water risk. Previous use category has been established on an area basis.

For sites with no industrialised history, a category A remediation value will be applied as a proxy for other abnormal costs.

Location	Previous use category	£/ha	Location index factor (multiplier)
<b>Ridge West</b>	N/A	N/A	N/A
<b>North Western</b>	N/A	N/A	N/A
<b>Western coastal</b>	B	£920	£938
<b>Ridge East</b>	N/A	N/A	N/A <sup>48</sup>
<b>Bohemia and Central St Leonards</b>	A	£230	£234
<b>Clive Vale and Ore Valley</b>	N/A	N/A	N/A
<b>Central Hastings</b>	B	£410	£418

<sup>43</sup> Sites already established as deliverable

<sup>44</sup> Sites already established as deliverable

<sup>45</sup> One site established as deliverable

<sup>46</sup> One site established deliverable

<sup>47</sup> Two sites established deliverable

<sup>48</sup> *ibid*

The majority of strategic sites have been subject to clearance of existing structures and therefore no cost for demolition has been included in broad calculations.

### Step 5: Establishing Gross Development Value

For the purpose of this exercise, up to date, model-based values in the local area were sought<sup>49</sup>.

Area	Average price (flats)	Average price (houses, terraced)
Ridge West	£135,110	£230,044
North Western	£156,498	£217,586
Western coastal	£153,315	£372,381
Ridge East	£145,165	£254,718
Bohemia and Central St Leonards	£145,165	£282,997
Clive Vale and Ore Valley	£118,888	£266,083
Central Hastings	£109,331	£205,812

For the purpose of assessment, the GDV is established on the basis of a 60:40 ratio of flatted to housing (terraced) development, unless the site is identified as fully flatted. No further adjustments for typologies have been made<sup>50</sup>.

Affordable housing has been applied in line with Policy H3 at the 'Brownfield' rate of 25%. A 30% discount on market value has been assumed for affordable housing<sup>51</sup>.

### Step 6: Establishing existing use values

Existing use values have been established based on the 2019 'Land Value Estimates for Policy and Appraisal' for Hastings borough<sup>52</sup> and are established as follows:

Existing use typology	£/ha
Residential	£2,360,000
Industrial	£750,000
Agricultural	£25,000

<sup>49</sup> Model based values a broad estimates created by Zoopla using land registry sold price data

<sup>50</sup> For the purposes of this board assessment, hr/ha are not calculated.

<sup>51</sup> Based on the predominant typology of low-cost home ownership.

<sup>52</sup> Ministry for Housing, Communities and Local Government 2019

<https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2019/land-value-estimates-for-policy-appraisal-2019-guidelines-for-use>

Where a site is vacant, a value is attributed based on last known use. For the avoidance of doubt, previously developed sites with community uses as their last known use are attributed a value of £ 387,500/ha<sup>53</sup>.

For the purposes of this assessment, in line with the PPG on Viability<sup>54</sup>, a premium of 20% is applied.

### Step 7: Residual Land Value methodological assumptions

It should be assumed in line with the Annual Monitoring Report that the build out rate is 50 u/a.

General assumptions made in line with the standard residual method methodology for residential site evaluation<sup>55</sup>:

- Construction professional fees – 12% costs
- Agents and legal fees – 3% GDV
- Developers risk and profit – 20% costs
- Contingency – 3% costs
- External works – 10% costs
- Finance – 7.5%
- Miscellaneous developer contributions (assume £5sqm)

### Step 8: Area viability

Overall, the broad basic viability analysis of strategic housing sites indicates that sites in the majority of areas will be deliverable and achievable.

Location	Deliverable RAG
Ridge West	Deliverable area
North Western	Deliverable area
Western coastal	Deliverable area
Ridge East	Viability gap – subsidy recommended (standard pricing model)
Bohemia and Central St Leonards	Viability gap – subsidy recommended (standard pricing model)
Clive Vale and Ore Valley	Deliverable area (executive pricing model)

<sup>53</sup> This includes sites currently used for sports and leisure; and former school sites.

<sup>54</sup> MHCLG, 2019

<sup>55</sup> Harman et al, Blackledge.

<b>Central Hastings</b>	Deliverable area
<b>Ridge West</b>	Viability gap – subsidy recommended (standard pricing model)
<b>North Western</b>	Deliverable area (executive pricing model)

### **Deliverability: Employment Land**

Availability of employment land in the borough is constrained by the tight geographical area, and large vacant or derelict sites rarely arise due to steady demand for existing stock typologies regardless of condition<sup>56</sup>. A review of the regeneration work completed by the Hastings and Rother Task Force Review 2020 identified typologies of investment in the Hastings and Rother combined economic area.

The majority of employment land development in Hastings is brought forward using a percentage of public funding in the form of grant or loan schemes in order to combat an historic viability gap inherent within employment land development within the Borough. This viability gap is created principally through a combination of low rental prices for employment land in the borough combined with high build costs.

In recognition of this viability gap, key employment areas of the Borough were subject to additional State Aid allowances for SME businesses through the Assisted Area Status scheme up to 2020.

It is the intention to address this issue of deliverability through:

- Application of planning tools: Enterprise Zones, Local Development Orders etc
- A continued external funding strategy: including Towns Fund
- Targeted inward investment

All employment sites will therefore be considered ‘deliverable’ due to the intervention packages to support their delivery during the first half of the plan period, after which the effectiveness of this package will be reviewed.

### **Conclusion**

In summary conclusion, it is anticipated that there is no unresolvable viability gap for development of employment and housing supply at would impact significantly on the ‘achievability’ and/ or ‘deliverability’ of the sites identified within the SHELAA 2020.

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<sup>56</sup> Cogswell, 2020

## **Appendix 6: Site assessed for other uses (including Gypsy and Travellers)**

The council is currently working with other districts and boroughs, the county council and the South Downs National Park to assess the accommodation needs of Gypsy, Traveller and Travelling Showpeople communities in line with the Planning Policy for Traveller Sites (PPTS) 2015.

This accommodation needs assessment will replace the existing Gypsy and Traveller Needs Assessment from January 2015. The new assessment will assist the authorities by providing recommendations of an appropriate quantum and type of pitch and plot provision for each authority area to inform the policies and proposals in their respective Development Plans. The assessment shall fulfil the requirements set out in the National Planning Policy Framework (the Framework) and PPTS, relating to the preparation of Local Plan documents in respect of such assessments. The assessment should also take account of any new guidance published by the Government during the study, together with any changes in case law.

Options for Traveller sites will be reviewed in Spring 2021 following the completion of this work.

