

## **Brighton and Hove City Plan Housing Delivery Options Paper**

### **1. Introduction**

1.1 The City Plan will set the framework for future development in Brighton & Hove up to the year 2030. Housing the population of the city in good accommodation is one of the council's priorities.

1.2 The planned provision of new housing is often viewed as a key driver behind a plan and its spatial strategy. As a result, a sound housing delivery strategy is essential to achieving a sound Plan for the City.

1.3 Currently, the housing target set in the South East Plan is to build 570 new homes each year. Over the last 9 years we have built on average 576 new homes per year although completions over the last 2 years have been significantly lower than this due to the impacts of economic recession<sup>1</sup>.

1.4 Regional Spatial Strategies (like the South East Plan) will be abolished through the enactment of the Localism Bill which is progressing through Parliament. The Coalition government wants local councils together with their local community to set their own housing targets. There are a range of factors which must be taken into account, including the needs of future households, the needs of the local economy and the physical capacity of the city to accommodate development.

1.5 A range of housing target options have been drawn up, each of which has advantages and disadvantages, as set out later in this paper. We are seeking views on the options and particularly whether the preferred option can be supported.

### **2. Background and Context**

2.1 In April 2010 the council submitted its Core Strategy Development Plan Document for the city and an Examination was planned for Summer 2010. However, at an Exploratory Meeting for the Core Strategy (held May 2010), the council's appointed Planning Inspector was not satisfied that the Council had made sufficient attempts to identify specific housing sites to meet its housing target as set by the South East Plan.

2.2 At the Exploratory Meeting, the council was criticised for relying too heavily upon future housing provision coming from 'windfall'<sup>2</sup> development to make up the outstanding plan requirement and the Inspector felt the council

---

<sup>1</sup> Residential Completions 2009/10 were 380 and for 2010/11 just 283 units.

<sup>2</sup> Previously developed sites that come forward unexpectedly and have not been identified through the plan process. Small windfalls frequently arise through a residential conversion or new flat over a shop. Larger windfalls arise through factory closure, changes of use.

had not met the specific tests set out in government planning guidance *Planning Policy Statement 3: Housing (PPS3)*.

2.3 In particular, the Inspector suggested the council had not sufficiently considered the scope for identifying additional housing gains from:

- a review of the city's employment sites;
- a review of the city's open space resource; and
- a serious consideration of opportunities within the urban fringe.

2.4 The Inspector's view at the time was that the Core Strategy was an opportunity to review policy (if and where necessary) where it constrained housing development. As a result of the Inspector's concerns, the Core Strategy Examination was suspended.

2.5 The council has now formally withdrawn the submission version of the Core Strategy and decided to redraft certain elements of the Plan to reflect new studies and new planning guidance emerging at the national level.

### ***Future housing requirements for the City***

2.6 As indicated above, the Coalition Government has made clear its intention to abolish Regional Spatial Strategies including the South East Plan through enactment of the Localism Bill.

2.7 This means the City Plan will now need to address some of the issues previously dealt with by the South East Plan. One of the most fundamental of these is setting the future housing requirement for the city<sup>3</sup>.

2.8 Once the South East Plan is abolished it will be for local authorities to determine their own local housing targets and to demonstrate how those targets will be met in their Plans.

2.9 Local housing targets will still be subject to an Inspector's scrutiny and the evidence used to derive the local housing target will be thoroughly tested at the Plan Examination. The government is already indicating that it expects housing supply to increase significantly and that local planning authorities should plan to meet the full requirements for market and affordable housing within their housing market areas<sup>4</sup>.

### ***National policy guidance***

2.10 The government has not yet published any 'best practice' guidance on how local authorities should determine their local housing targets. However, the draft National Planning Policy Framework sets an unprecedented new requirement on local authorities to assess and plan to meet the full range of

---

<sup>3</sup> Until final enactment, the South East Plan remains part of the statutory Development Plan and emerging Plan policies will still need to be in conformity with it. This is the current legal position.

<sup>4</sup> Draft National Planning Policy Framework published for consultation end July 2011.

current and future housing needs and demands in the context of a presumption in favour of sustainable development.

2.11 Current planning guidance in *Planning Policy Statement 3 – Housing* (PPS3) sets out a range of issues that must be taken into account in determining a housing target:

- >**Evidence of current and future levels of need and demand** for housing based on:
  - Local and sub-regional evidence of need and demand, set out in Strategic Housing Market Assessments and other market information such as long term house prices;
  - The government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts;
  
- >**Evidence of the availability of suitable land for housing** using a Strategic Housing Land availability Assessment;
  
- >**Government ambitions** including the need to improve affordability and increase the supply of housing;
  
- >**A Sustainability Appraisal** of the environmental, social and economic implications of development;
  
- >An assessment of the **impact of development upon existing or planned infrastructure and any new infrastructure required.**

2.12 It is clear from PPS3 and the emerging National Planning Policy Framework that the evidence base for a local housing target must consider both:

- **Demand-based** issues - demographics, household formation, housing affordability and the link between housing and the economy; and
  
- **Supply- side** issues - such as the availability and capacity of land.

### 3. Evidence Base

#### a) Evidence Base: GL Hearn Report on Local Housing Requirements (Draft Report, July 2011)

3.1 Brighton and Hove City Council commissioned consultants GL Hearn to provide an assessment of local housing requirements for the City based on demographic and economic performance factors.

3.2 A demographic based assessment of demand, based on ONS<sup>5</sup> migration assumptions (which indicate a slight net out migration of population) would result in a local housing requirement for 19,400 homes over the 2010-2030 period (970 pa)<sup>6</sup>.

3.3 Scenarios based on economic performance come out slightly lower. Taking account of the city's existing commuting (travel to work) dynamics and recognising the role the City plays within the wider labour market, in terms of the labour demand for housing the study identifies a requirement for 15,800 homes (790pa) for the 2010-2030<sup>7</sup>.

3.4 The local housing requirements study therefore concludes that a realistic assessment of housing need/demand for Brighton and Hove would fall within the following range:

**790 to 970 homes per annum range; equating to  
15,800 to 19,400 new homes in the 2010 – 2030 period<sup>8</sup>.**

#### **b) Demand for Affordable Housing**

3.5 Housing affordability is a major issue for the city, particularly for newly forming households and for many families. In the period 1997 – 2007, average house prices in Brighton and Hove almost tripled. Although there has been some decrease in house prices in recent times since their peak in 2007, prices remain relatively high in relation to local incomes. Affordability continues therefore to be a significant problem for many households.

3.6 Recent data for house prices and average household incomes<sup>9</sup> in the City indicates that a household income of £40,000 is now required to purchase an average priced one-bedroom flat in the city and a household income of £72,000 is required to purchase an average priced three-bedroom house<sup>10</sup>. Households would also now be required to find a much higher deposit than was the case several years ago (deposits of 25% are now the norm rather than 5% required in recent years).

3.7 Although the city has a very good track record for the delivery of affordable housing (rented and intermediate), demand for such housing still significantly exceeds supply. As at 1 July 2011, there were almost 11,000 households on the council's Housing Register seeking a home with an additional 2000 households already in housing seeking a transfer to more suitable accommodation.

---

<sup>5</sup> Office of National Statistics, 2008 based migration assumptions.

<sup>6</sup> This level of housing would result in population growth of 11.5% and economic growth of 15% over the 20 year plan period.

<sup>7</sup> This scenario implies population growth of 9% and employment growth of 13%.

<sup>8</sup> Paragraph 8.8, GL Hearn Local Housing Requirements Study, Draft Report July 2011.

<sup>9</sup> Housing Costs Update, 2011 Quarter 2: April to June 2011, BHCC.

<sup>10</sup> Average price 1- bed flat £172,000 and average 3-bed house £314,000, Housing Costs Update, 2011 Q2.



**c) Evidence Base – 2010 Strategic Housing Land Availability Assessment (SHLAA) Update (by GVA Grimley)**

3.8 The SHLAA assesses sites with potential for housing development and gives an indication of the 'capacity' of the City to absorb additional new housing provision.

3.9 The Updated 2010 SHLAA (Strategic Housing Land Availability) undertakes a comprehensive assessment of sites (6+ units) within the existing built up urban area. The density assumptions for sites are ambitious and, where relevant, take account of taller building opportunities in appropriate locations<sup>11</sup>.

3.10 The assessment also includes what is considered to be a balanced assessment of some of the city's allocated (EM1, EM2 and EM9) employment sites for mixed use development with housing and also includes many of the city's secondary employment sites on a mixed use re-development basis.

3.11 In terms of assessing sites for housing suitability, the SHLAA is 'policy' constrained. This means that where sites have a current 'high-level' policy constraint (such as sites in open space use, sites within the urban fringe and many of the strategic employment sites) then the assessment concludes these are not currently suitable. This does not necessarily mean there is no capacity on such sites; but before they could be considered for housing a policy change would be required.

3.12 The updated 2010 SHLAA<sup>12</sup> identifies specific sites within the existing built up area capable of providing around:

- **8,000 dwellings over the Plan's 20 year timeframe 2010 – 2030**
- **Of this, it was estimated only 1000 units are likely to be delivered in the early years 2010 – 2013, reflecting the current housing market downturn; and**
- **7000 units estimated as likely to be delivered over the 2013 – 2030 timeframe (from 2013; the anticipated adoption date of City Plan).**

3.13 It also anticipates that development from small scale 'windfall' sites will continue to make a valid contribution to the city's overall supply of new housing. However, current national policy guidance in PPS3 and that

---

<sup>11</sup> The consultants undertaking the study did not recommend increasing density assumptions

<sup>12</sup> NB: The SHLAA is not a 'static' document and will continue to be updated at regular intervals. Some updates and amendments to the published study have already been made. It is anticipated a full update and roll forward will take place Autumn 2011 to accommodate the results of the latest annual residential monitoring data 2010/11.

proposed in the draft National Planning Policy Framework only allows windfall to be 'counted' towards supply after the first ten years of the Plan.

3.14 The 2010 updated study suggests that, to boost housing supply, the following could be considered as potential additional sources of supply:

- Review the potential from currently safeguarded employment sites;
- Review the potential from the re-use of Private Open Space sites;
- Consider the potential from Urban Fringe sites;
- Review the potential from longer term regeneration opportunities associated with the council's HRA<sup>13</sup> Estates Renewal Strategy;
- Housing development within the Brighton & Hove part of Shoreham Harbour could count towards meeting the city's housing requirements if development is not 'ring-fenced'.

## 4. Housing target and delivery options

4.1 Historically, housing targets set for Brighton & Hove have not been strongly influenced by levels of the demand and/or need for housing. Planning Inspectors (at former Structure Plan and South East Plan Public Examinations) have accepted that there are significant constraints on the capacity of the city to physically accommodate new dwellings particularly in terms of environmental characteristics such as the sea to the south and the South Downs (now a National Park) to the north.

4.2 The South East Plan examination and approval process accepted that in a tightly constrained urban area like Brighton & Hove, it would not be possible to accommodate the full extent of demographically driven housing demand and there needed to remain a balance between opportunities for housing and employment provision and a recognition of the environmental constraints to further expansion. As a result, the South East Plan housing target for the City was essentially 'capacity' driven and was based on estimates of future housing potential to be achieved through (then) existing planning consents, planned allocations and a significant proportion of projected 'windfall' development.

4.3 The housing target options presented here, for consultation purposes, have been derived by taking account of the evidence base summarised above, the current and emerging national planning policy guidance, and a consideration of the wider planning impacts associated with exploring the potential from additional sources of housing supply.

### ***Note on Shoreham Harbour and housing targets***

4.4 The South East Plan designated Shoreham Harbour a 'Strategic Development Area' and looked at the potential for providing up to 10,000 new homes in the harbour and surrounding area. Due to the complexity of the

---

<sup>13</sup> Housing Revenue Account

development and the significant infrastructure requirements, development was 'ring-fenced' to the harbour development area itself. The city's housing target did not make any allowance for the new housing envisaged for the Shoreham Harbour Development Area. Studies have now concluded that such scenarios, which would have involved the need for significant land reclamation and the relocation of port activities, are not deliverable particularly given the current economic climate.

4.5 Brighton & Hove, Adur and West Sussex County Councils are now working together with the Shoreham Port Authority to draw up revised plans for major new development at Shoreham Harbour. Development will be taken forward on a jointly planned basis. It is now anticipated that future development could provide up to 2,000 new homes and 2,400 new jobs for local people and businesses over the next 20 years. Within the Brighton & Hove part of the regeneration area, it is anticipated that up to 400 units of housing could be achieved. Given the reduced amount of development, there is now scope to review the need for 'ring-fencing' development, particularly given the fact that within the Brighton & Hove part of the regeneration area, housing development is much reduced from earlier plan scenarios.

4.6 The following housing targets and delivery options for 2010 – 2023 are put forward for consultation. Target options are summarised at Appendix A.

<b>Housing Target Option 1 - 9,800 new homes (490 per annum)</b>
--

4.7 This housing target option represents a 'base' line level of housing provision. It is comprised of the identified sites assessed in the SHLAA (6+ units); small sites (up to 5 units) which already have planning permission; an allowance for windfall site development after the first ten years of the Plan period and the inclusion of HRA Estates Masterplan opportunities for regeneration and additional housing gains in the longer term.

4.8 This amount of housing development assumes that all new housing will come forward from within the existing built up area of the City.

4.9 As noted above, a significant amount of development is identified through the 2010 SHLAA exercise. The SHLAA assumes mixed use development on many of the development sites within the city including many of the city's employment sites. It sets ambitious densities and allows for taller buildings in appropriate locations.

4.10 Longer term regeneration and housing gains are also envisaged from some of the council's own housing land (through the Housing Revenue Account Estates Masterplan). As noted above, a further allowance is made for some windfall development after the first ten years of the plan (in accordance with national planning policy guidance) and for housing development from

small sites with planning permission. This base line scenario assumes that housing development at Shoreham Harbour is 'ring-fenced' and will not count towards meeting the city's requirements (the approach taken in the South East Plan).

**Advantages of this scenario:**

- All new housing would be developed within the existing built up urban area.
- The scenario provides for the retention of a strong base of employment sites.
- The scenario provides for the protection of open space.

**Disadvantages of this scenario:**

- Target provision is well below the assessed level of local housing requirements although it will still support some population and employment growth in the City.
- This level of housing provision will offer fewer opportunities to secure a range of housing types including family sized and affordable housing.
- New housing development at Shoreham Harbour will not count towards meeting the city's housing requirements under this scenario.
- There is a 'soundness' risk because the other target options demonstrate it would be possible to develop more housing for the city if a different policy stance was assumed.
- Development opportunities within the urban fringe may still be required to serve as 'contingency' provision should sites within the urban area not come forward.

**Housing Target Option 2 - 11,200 new homes (560 per annum)**

4.11 This level of provision maximises housing provision from exploring potential additional sources of supply whilst maintaining a balanced spatial strategy that considers housing alongside the city's other development requirements.

4.12 It is comprised of the base level of provision as outlined in Option 1 together with:

- the inclusion of housing development from the regeneration opportunities at Shoreham Harbour (instead of 'ring-fencing' development at Shoreham);
- by intensifying the housing element of mixed use development at some of the city's employment sites identified in the SHLAA for mixed use; and;
- the inclusion of a strategic allocation for mixed use development at Toads Hole Valley within the city's urban fringe.

**Advantages:**

- The majority (93%) of all new housing development will still come forward from within the existing built up area of the City.
- This target provision enables more housing need/demand than Housing Target Option 1 but does not meet local housing requirements in full.
- This approach demonstrates that the council has looked at the potential from additional sources of housing supply as recommended by its appointed Planning Inspector.
- The target is similar to the South East Plan target for the City (11,400) which was tested at a Public Examination (2006). It was accepted that in Brighton & Hove local housing requirements could not be met in full and there was a need to balance planned growth of housing provision with opportunities for employment provision. Significant environmental constraints to further growth were also recognised.
- The infrastructure requirements associated with this amount of development are generally considered deliverable; the demand for school places will require further investigation.
- This approach allows for the retention of a strong base of employment sites within the City and supports policy to continue investment in, and the protection of, the city's allocated employment sites.
- Carefully managed mixed-use development can yield more intensive use of under-utilised sites; this is already assumed for many of the employment sites identified in the SHLAA.
- A strategic allocation at Toads Hole Valley would provide an appropriate framework to guide development in terms of the protection and enhancement of the Site of Nature Conservation Interest; the mix of uses; the proportion of family and affordable housing; sustainable building standards; the quality of design and ability to achieve new open space and links to the South Downs National Park.
- The rest of the urban fringe which is largely in open space use will be protected and the urban fringe contingency position (as set out in the Submission Core Strategy) dropped.
- The approach affords greater protection for urban open space in the City.
- This housing target and delivery scenario is realistic and deliverable.

**Disadvantages:**

- This option does not meet assessed local housing requirements in full.
- This option includes the strategic allocation of a greenfield site within the urban fringe of the City.
- Given the draft National Planning Policy Framework, there may be a risk around a Planning Inspector accepting the need for a balanced approach between housing provision and the city's other development needs.

**Housing Target Option 3 – 13,500 new homes (675 per annum)**

4.13 This target level of provision represents the 'mid point' between Option 2 and the higher Option 4 which represents the lower end of the assessed range of full housing requirements (see paragraph 3.4 above).

4.14 It has been derived, in part, as set out for Option 2. However, to reach the higher target level of provision (an additional 2300 units) would require the release of either employment land or land in open space use or a mixture of both. An alternative delivery scenario might also include significantly higher residential densities on sites across the city with a consequent significant change in townscape form involving many more very tall buildings.

4.15 On the basis of a 50:50 split between the loss of employment land and the loss of open space land to achieve the additional amount of housing, this would mean:

- the need to release of approx 12 ha employment land; which equates to approximately 8-14 employment sites depending upon size; and the
- the need to release of 23 ha Open Space<sup>14</sup>

**Advantages**

- This option will meet more of the assessed level of local housing requirement than either Target Option 1 or Target Option 2.
- A higher housing target offers more opportunities to secure affordable housing for the City.

**Disadvantages**

- To achieve this amount of new housing development there will need to be significant losses of employment land and/or significant losses of Open Space. This is contrary to the evidence base which indicates the City has a requirement to achieve more of both over the course of the plan period to 2030.
- Such a scenario would result in an imbalance between housing and employment provision together with significant negative impacts in terms of the loss of the City's open space and biodiversity resource. This could not form part of a sustainable strategy to take forward.
- There would be significant physical, social and environmental infrastructure requirements to support such a level of housing development.

---

<sup>14</sup> On the basis of a 50:50 split between losses of Employment Sites and losses of Open Space sites to achieve an additional 2300 units. Using 100 dph for Employment Land and 50dph for Open Space. 1150 divided by 100dph = 12 ha requirement for Employment land. 1150 divided by 50dph = 23 ha requirement for Open Space.

- This is not a 'deliverable' strategy. Much of the additional land which would be required for release to housing is in active operational use and is not available for development in the short to medium term. Loss of employment land would mean firms needing to re-locate and find alternative sites and premises which could mean losing them from the City. The city also has a requirement for additional open space over the course of the Plan period (an additional 170 ha is required to maintain recommended standards) and the loss of open space would have detrimental consequences for the population of the city.

**Housing Target Option 4 – 15,800 new homes (790 per annum)**

4.16 This target level of provision will meet the lower end of the assessed range of full housing requirements for the City.

4.17 It is derived in the same way as outlined for Option 3. However, to reach the even higher target level of provision (an additional 4,600 units compared to Option 2 and an additional 2300 units compared to Option 3) and based on the same assumptions regarding a split of land requirement between employment land and open space land would mean:

- > the release of approximately 23 ha employment land; which is equivalent to 16 - 28 sites depending upon size; and
- > the release of 46 ha Open Space

4.18 An alternative delivery scenario might also include significantly higher residential densities across the city and a consequent significant change in townscape form involving many more very tall buildings.

**Advantages**

- This option will meet the lower end of the assessed range of full housing requirements for the City to 2030.
- A higher housing target offers more opportunities to secure affordable housing for the City.

**Disadvantages**

- To achieve this amount of new housing development there will need to be significant losses of employment land and/or significant losses of Open Space. This is contrary to the evidence base which indicates the City has a requirement to achieve more of both over the plan period up to 2030.
- Such a scenario would result in an imbalance between housing and employment provision together with significant negative impacts in terms of the loss of the City's open space and biodiversity resource. This could not form part of a sustainable strategy to take forward.

- There would be significant physical, social and environmental infrastructure requirements to support such a level of housing development.
- This is not a 'deliverable' strategy. Much of the additional land which would be required for release to housing is in active operational use and is not available for development in the short to medium term. Loss of employment land would mean firms needing to re-locate and find alternative premises which could mean losing them from the City. The city has a requirement for additional open space over the course of the Plan period (an additional 170 ha is required to maintain recommended standards) and the loss of open space would have detrimental consequences for the population of the city.

## 5. Sustainability Appraisal of options

5.1 A full Sustainability Appraisal (SA) has been undertaken of the housing target and delivery options presented above and is available on the council's website.

5.2 The SA found Option 1 to result in the least positive gains for housing and was therefore not recommended. The SA found Options 3 and 4 to result in the most positive gains for housing but that this would be at significant environmental, economic and social cost and therefore neither option was recommended.

5.3 The SA identifies housing Option 2 as the preferred option. The SA concludes that although this option has potential for negative impacts, it has more potential overall for more positive impacts than the other options and is therefore the recommended option for Housing Delivery. The SA notes that this option would require further investigation to clarify potential impacts and also to identify and secure necessary mitigation measures, particularly in relation to the release of the greenfield site Toads Hole Valley.

5.4 The SA notes the following recommendations:

### SA Recommendations for the preferred option:

- All housing should incorporate features to benefit biodiversity whether situated on brownfield, greenfield or existing employment sites.
- Where feasible, housing should incorporate features to reduce car ownership, e.g. a number of car-free units, provision of car-club membership, increased number of car-club vehicles.
- All housing, but particularly high density tall buildings, should have regard to the local characteristics of the surrounding neighbourhood and should consider the setting of the historic, built and natural environment.
- All housing should incorporate the provision of appropriate open space

to accommodate the needs of the future population.

- All housing should incorporate SUDS to minimise the risk of surface water flooding and pollution to groundwater.
- All housing should meet the required standards of Supplementary Planning Document 08 Sustainable Building Design (SPD08), particularly in terms of water and energy consumption.
- Construction job opportunities should be provided for local people, particularly where sites are situated within areas of deprivation.
- All housing should incorporate features to help adaptation to climate change.
- All housing should ensure construction and demolition waste is minimised and that appropriate waste management features are maximised in development.
- Where feasible, mixed use development on employment sites should aim to maintain the former amount of employment floorspace by intensifying development on the site to accommodate housing.

**SA Recommendations for housing delivered on an urban fringe site (Toads Hole Valley):**

- An ecological survey should be undertaken to assess the biodiversity value of the site and the biodiversity value of the site should be improved through mitigation measures.
- Development should secure enhancements to SNCI to facilitate improvements.
- An Impact assessment on the setting of the SDNP should be undertaken to ensure that any development does not compromise the designation.
- Options to link the site to the adjacent SDNP should be investigated.
- Screening of the development should take place to reduce noise and visual impact on surrounding communities.
- Open space should be provided, particularly of the typologies which are deficient in this area.
- Investment in public transport is required to link the site to existing local services.
- Housing should include a high proportion of traditional family type housing.
- Development of the site would need to incorporate substantial SUDS to mimic the role the sites plays in terms of absorbing surface water.
- Opportunities for district heating throughout the site should be maximised.
- Development should be complemented with essential services for the local community, including health services and local shops, including access to food.
- The site should be assessed for any potential mineral deposits and any useful top-soils and sub-soils stored and re-used on site where possible and other excavation wastes re-used.



## 6. Preferred Option and summary justification

6.1 Housing Target Option 2 is the preferred housing target and delivery option. This option will secure a similar amount of new housing development to that required of the City by the South East Plan which recognised the need to balance housing provision with opportunities for employment growth and recognised the significant physical and environmental constraints upon the city. This amount of housing is also similar to that which has been achieved in the City over the last 9 years; a period which covers both a housing peak and economic downturn. It is therefore considered a realistic, sustainable and deliverable amount of housing.

6.2 The planned development of one urban fringe site offers many benefits to the City in terms of opportunities to secure more family sized and affordable housing and improvements to the site itself in terms of biodiversity improvements through an enhanced SNCI, new open space provision and opportunities for links with the South Downs National Park. Under this target and delivery scenario the rest of the city's open space resource remains protected.

6.3 In addition, this target and delivery option provides for the retention of a mixed portfolio of employment sites across the City and the retention of the city's open space resource. **Appendix A: Housing Target and Delivery Options 2010 - 2030**

Sources of Supply	Option 1 9,800 (490)	Option 2 11, 200 (560)	Option 3 13, 500 (675)	Option 4 15,800 (790)
1. SHLAA - capacity on identified sites of 6+ units within the built up area.	•	•	•	•
2. Small sites with planning permission (up to 5 units)	•	•	•	•
3. Windfall allowance after first ten years (sites up to 5 units)	•	•	•	•
4. HRA Estates Masterplan Regeneration and Redevelopment Opportunities.	•	•	•	•
5. Shoreham Harbour Regeneration Opportunities		•	•	•
6. Increased Mixed use on Employment Sites (partial loss of employment to housing) .		•	•	•
7. Urban Fringe Development Opportunity (strategic		•	•	•

Item 96 Appendix 1

allocation of Toads Hole Valley).				
<b>8. Loss of Employment Sites to housing</b> (for Option 3, 1150 dwellings/ 100dpa = 11.5 ha) (for Option 4, 2300 dwellings/ 100dph = 23 ha)			<ul style="list-style-type: none"> <li>• Requires losses equivalent to 11.5 ha Employment Land<sup>15</sup> (8-14 sites)</li> </ul>	<ul style="list-style-type: none"> <li>• Requires losses equivalent to 23 ha Employment Land<sup>16</sup> (16 – 28 sites)</li> </ul>
<b>9. Loss of Open Space /Recreation/Sports Facilities – within urban area and on urban fringe.</b> (for Option 3, 1150 dwellings/ 50 dph = 23 ha) (for Option 4, 2300 dwellings/ 50 dph = 46 ha)			<ul style="list-style-type: none"> <li>• Requires losses equivalent to 23 ha of Open Space<sup>17</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Requires losses equivalent to 46 ha of Open space<sup>18</sup></li> </ul>

<sup>15</sup> On the basis of a 50:50 split between losses of Employment Sites and Open Space Sites to achieve an 2300 additional new homes in total . Using 100 dph for Employment Land and 50 dph for Open Space.

<sup>16</sup> As footnote above

<sup>17</sup> As for footnote 1 but on the basis of achieving an additional 4600 new homes through losses of Employment Sites and Open Space Sites.

<sup>18</sup> As footnote above.

