



# South Downs National Park Authority

## Land Availability Assessment

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December 2025  
(Updated May 2026)



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**Appendix A - Assessment Criteria.**

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- **Appendix B(i)** – Proformas for sites assessed as “Has Potential” in the Brighton & Hove and East Sussex Areas of the South Downs National Park.
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**Appendix C – Assessment outcomes for excluded sites.**

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## South Downs National Park Authority

### Land Availability Assessment

## Version Control

This Land Availability Assessment (LAA) was published on 09 December 2025 and updated on 11 May 2026 in response to the revised assessments of CH199 (Land east of A286 and north of Mill Lane, Cocking, West Sussex) and LE114 (Land rear of 49-53 St Anne’s Crescent, Lewes, East Sussex). The Authority Officers also used this opportunity to make any identified corrections, and any factual and timescale updates – see change table below.

Section	Change	Reason for Change
All	Replacement of “South Downs Local Plan Review” with “new South Downs Local Plan”.	Factual Update.
All	All references to Authority Monitoring Report (AMR) updated to reflect its publication in April 2026.	Factual Update.
All	All references to Employment Land Review (ELR) updated to reflect its publication in January 2026.	Factual Update.
All	All references to the Site Selection Paper updated to reflect its publication in March 2026.	Factual Update.
All	All references to Gypsy, Traveller and Travelling Showpeople Site Assessment Study [ <i>anticipated in 2026</i> ] replaced with Gypsies, Travellers & Travelling Showpeople Site Identification Report [March 2026].	Factual Update.
Paragraph 3.5	Revised text in relation to when affected town and parish councils had the opportunity to fact check and provide local knowledge about sites.	Clarification.
Paragraph 3.26	Replacement of “and” with “and/or”.	Correction.
Paragraph 3.34	Replacement of “social and economic wellbeing” with “economic and social wellbeing”.	Correction.
Paragraph 3.58	Reference to the Regulation 19 public consultation of the Proposed Submission South Downs Local Plan.	Timescale Update.
Paragraph 4.9	Updated numbers.	Revised assessments of CH199 and LE114.
Paragraph 4.10	Updated numbers.	Revised assessments of CH199 and LE114.
Appendix B(i)	Removal of LE114.	Revised assessment of LE114.
Appendix B(iii)	Removal of CH199.	Revised assessment of CH199.
Appendix D	Additions of – and amendments to the assessments of - CH199 and LE114.	Revised assessments of CH199 and LE114.

## South Downs National Park Authority

### Land Availability Assessment

## Important Notice – Limitations of Use

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

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

- The development capacity of a site in the LAA either relates to the development granted in a planning permission (where applicable) or is an estimate based on an assessment of what is considered appropriate for that specific site and use. However, site capacities in the LAA do not preclude different numbers coming forward in any future development allocations or at the planning application stage.
- All findings are a “snap-shot” of information held at the time of assessment. Therefore, some of the information held within the LAA will have changed. For example, sites that are identified as not having planning permission may have secured planning permission since the information was compiled and published.
- The LAA, while providing evidence of opportunities for land supply, does not provide a windfall calculation, a housing trajectory, or a five-year rolling supply of housing land. This evidence is either provided in the Authority Monitoring Report (AMR) [April 2026] or in the Site Selection Paper [March 2026].
- Any reference to current or existing land uses on a site in the LAA is based on submitted information, desktop analysis, and/or site visits and is not confirmation or a determination of the lawful use of land.
- The indicative theoretical supply set out in the LAA does not determine the development need or provision figure for the South Downs National Park or any future Neighbourhood Development Plans. The development provision figure will be set out in the relevant policy in the new South Downs Local Plan and information about development need is available in other evidence base documents on the Authority’s website: <https://www.southdowns.gov.uk/planning-policy/new-south-downs-local-plan/evidence-base/homes-and-economy/housing-and-economic-development-needs-assessment-2023/>

# I. Introduction

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- 1.1 The South Downs National Park was designated as a National Park on 31 March 2010 in recognition of its landscape and scenic beauty. The South Downs National Park Authority (“the Authority”) was established on 01 April 2011 and is the local planning authority for the South Downs National Park.
- 1.2 The Authority is required to prepare a local plan to provide a positive vision for, and address local development needs and priorities in, the South Downs National Park over a minimum 15 year period. The South Downs Local Plan was adopted in July 2019 covering a plan period from 2014 to 2033. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulation 2012 requires local planning authorities to review a local development document every five years from the date of adoption to ensure it remains up-to-date and effective. This is reiterated in the National Planning Policy Framework (NPPF) which explains that policies in local plans should be reviewed at least once every five years to assess whether an update is needed. In response, the Authority is preparing a new local plan to guide development up to 2042.
- 1.3 The South Downs Land Availability Assessment (LAA) is an essential part of the evidence base for the new South Downs Local Plan. This LAA provides an update of previous assessments (published in 2015, 2016, and 2024) and has assessed and considered the **suitability, availability, and achievability** of identified sites across the South Downs National Park. This evidence will help the Authority to understand and identify sites for further consideration – subject to further technical work - in the new South Downs Local Plan and any future Neighbourhood Development Plans.
- 1.4 The LAA has identified, assessed and considered sites and locations for:
  - Residential development (including affordable homes, specialised care, and self and custom build homes); and
  - Economic / commercial development (including offices, manufacturing and warehousing) which will be considered further in the Employment Land Review as appropriate.

1.5 The sites and locations identified for other uses have been considered as per the below:

- The Renewable Energy Study considers sites and locations for renewable energy development (*published in 2024 and addendum anticipated for 2026*);
- The Gypsies, Traveller & Travelling Showpeople Site Identification Report [March 2026] considers permanent and transit accommodation for gypsies, travellers, and travelling showpeople; and
- The sites and locations identified for biodiversity net gain (BNG) and/or nutrient neutrality offsetting sites were not found to be suitable for further consideration in the new South Downs Local Plan – see Section 3 (below).

### **Previous Land Availability Assessments (LAA)**

1.6 A Strategic Housing Land Availability Assessment (SHLAA) was published in January 2015 (updated in December 2016) and an Employment Land Review (ELR) was published in September 2015 (updated in 2017) as part of a suite of evidence used to inform the South Downs Local Plan (adopted July 2019). Since this time, national planning policy and guidance have been updated. The methodology in this Land Availability Assessment (LAA) follows on from the original SHLAA methodology which has been reviewed and revised to align with current practices.

1.7 A provisional LAA and provisional ELR were published in late 2024 to inform the Regulation 18 public consultation of the new South Downs Local Plan. The public consultation was carried out between 20 January and 17 March 2025. The comments and representations received during the consultation have been considered (as appropriate) in the finalisation of both this LAA and the ELR (January 2026).

## 2. What is a Land Availability Assessment?

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2.1 The assessment of land availability is an important step in the preparation of a local plan. A Land Availability Assessment (LAA) identifies a future supply of land which is **suitable, available and achievable** for housing and economic development over a plan period. A LAA is an important source of evidence to inform plan-making and decision-taking, and for the identification of a 5-year housing land supply. However, a LAA does not determine whether a site should be allocated for development. Instead, the role of the LAA is to provide information to help identify sites for further consideration in a development plan. Subject to further technical work, it is then for a development plan – i.e., the new South Downs Local Plan or a Neighbourhood Development Plan - to determine which sites should be allocated for future development.

### National Planning Policy Framework and DEFRA Circular

2.2 The National Planning Policy Framework (NPPF) was published in 2012 and has been amended several times. The most recent iteration is dated December 2024. The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF can be found online at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

2.3 **NPPF Paragraph 72** explains that:

*Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- (a) Specific, deliverable sites for five years following the intended date of adoption<sup>34</sup>; and*
- (b) Specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.*

- 2.4 It is also important to refer to the 2010 DEFRA English National Parks and the Broads UK Government Vision and Circular which can be found online at:

<https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

- 2.5 **DEFRA Circular Paragraph 78** states that the Government recognises that National Parks are not suitable locations for unrestricted housing and, therefore, does not provide general housing targets for them. In addition, **NPPF Paragraphs 189 and 190** explain that:

*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development with their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*

*When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development<sup>67</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

- (a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- (b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- (c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

### **Planning Practice Guidance**

- 2.6 The Planning Practice Guidance (PPG) provides further advice, guidance and information about how to interpret and implement the NPPF and is subject to regular amendments. The PPG can be found online at:

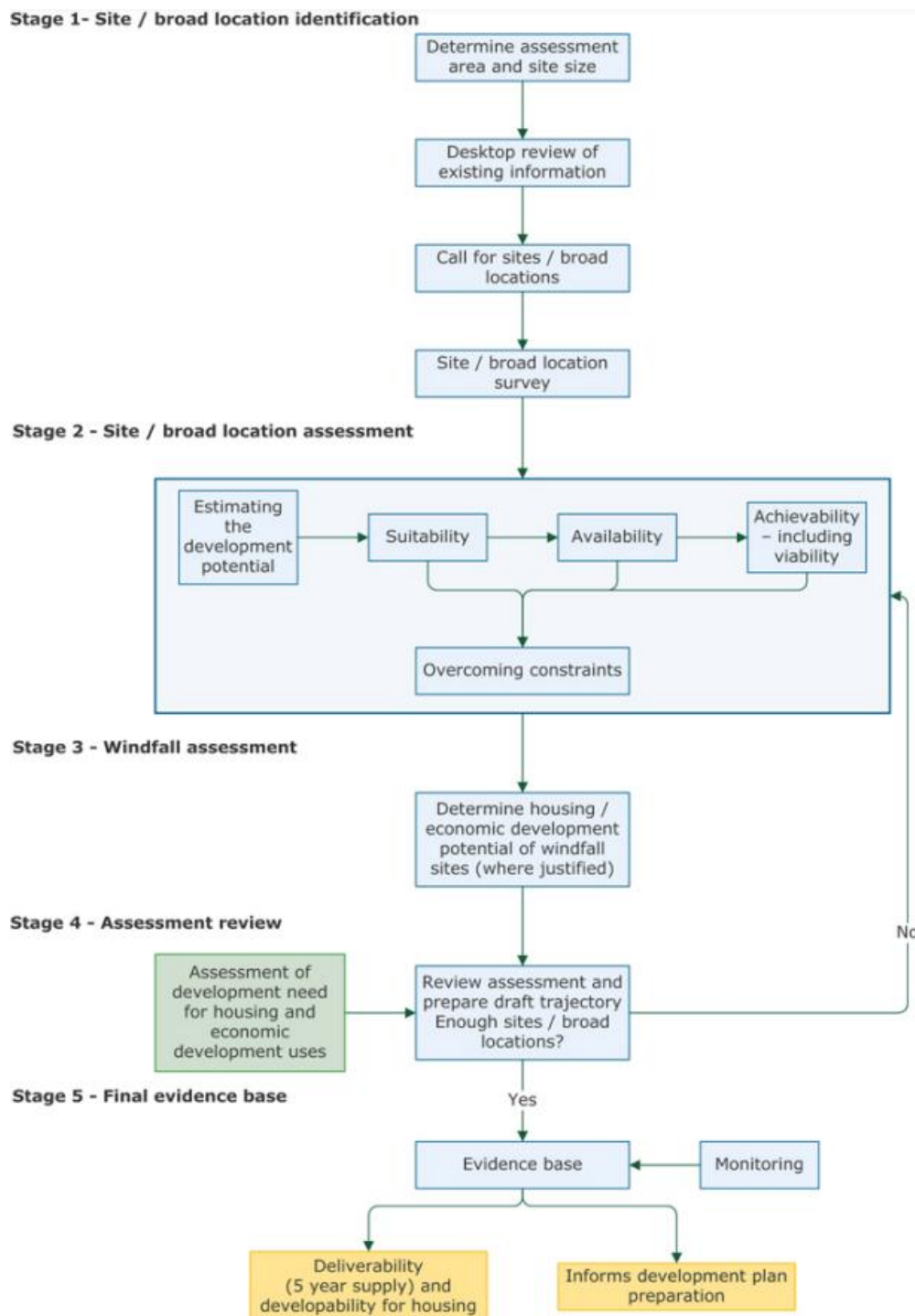
Planning Practice Guidance on housing and economic land availability assessment:  
<https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

- 2.7 The PPG indicates what inputs and processes can lead to a robust assessment of land availability. Plan-making bodies are expected to have regard to this guidance in preparing and updating their assessments of land availability. The PPG explains that assessments need to be thorough but proportionate, building where possible on existing information sources as outlined within the PPG.
- 2.8 **PPG Paragraph 001** (Reference ID: 3-001-20190722) explains that an assessment should:
- a. Identify sites and broad locations with potential for development;
  - b. Assess the development potential of these sites; and
  - c. Assess the suitability of these sites for development and the likelihood of development coming forward (the availability and achievability).
- 2.9 **PPG Paragraph 002** (Reference ID: 3-00220190722) explains that plan-making bodies should consider constraints when assessing the suitability, availability, and achievability of sites. For example, assessments should reflect the constraints in **NPPF Footnote 7** which sets out the areas where the NPPF would provide strong reasons for restricting the overall scale, type or distribution of development. These areas include National Parks, Heritage Coast, Sites of Special Scientific Interest (SSSI), habitat sites, irreplaceable habitat, designated heritage assets, areas at risk of flooding or coastal change, and local green spaces.
- 2.10 The LAA aims to identify sites and locations that are deliverable and suitable, and could provide opportunities for future development. Together with information on completions and extant planning permissions (as reported annually in the Authority Monitoring Report), the LAA provides evidence about land supply for meeting the objectives of the Authority and contributing towards the needs of local communities. Moreover, the LAA will help to identify potential sites to be considered for allocation – subject to further technical work - in the emerging new South Downs Local Plan and any future Neighbourhood Development Plans.
- 2.11 The methodology in Section 3 (below) sets out how the LAA has been prepared in accordance with the PPG.

### 3. Methodology

3.1 **PPG Paragraph 005** (Reference ID: 3-005-20190722) sets out a 5-stage process which is replicated in Figure 1. Further information about each stage is provided below.

**Figure 1:** PPG Land Availability Assessment Methodology Flowchart.



## Partnership Working

- 3.2 **PPG Paragraph 007** (Reference ID: 3-007-20190722) explains that assessments of land availability need to be undertaken and regularly reviewed while working with other local planning authorities in the relevant housing market areas or functional economic market areas. This can involve a range of parties including landowners and promoters, agents and developers, parish and town councils, local communities, and others.
- 3.3 The LAA methodology was subject to consultation between 30 June and 21 July 2022. The consultees included the South Downs Agents' Forum, town and parish councils (both wholly and partly in the National Park), local authorities within the National Park, and the statutory consultees of Natural England, Historic England, and the Environment Agency. The comments received helped to inform the methodology.
- 3.4 Since the above consultation, the methodology has been updated to reflect the NPPF, PPG, and the different assessments and studies which have been undertaken to assess land for specific uses.
- 3.5 The Authority carries out ongoing duty-to-cooperate work with neighbouring authorities, engages with the development industry (for example, via the South Downs Agents' Forum), and works in collaboration with parish and town councils in the South Downs National Park, including those with made – or in the process of making - Neighbourhood Development Plans. This has included engagement on the LAA alongside public consultation on the new South Downs Local Plan. Beyond the above, the Authority offered neighbouring authorities the opportunity to review and comment on the LAA in July and November 2025, and also offered affected town and parish councils the opportunity to provide local knowledge (September 2025) about, and fact-check draft LAA assessments (November 2025) for, both new sites and existing sites where recommendations had significantly changed since the provisional 2024 LAA.

## Stage 1 – Site / Broad Location Identification

### **Determine Assessment Area and Site Size**

- 3.6 The geographical area covered by this LAA is the South Downs National Park which covers parts (but not the entirety) of 12 borough/district/unitary local authority areas.

- 3.7 In line with the **PPG Paragraph 008** (Reference ID: 3-008-20190722), the LAA has sought to identify and assess all sites (regardless of development needs) in order to provide a complete audit of available land in the South Downs National Park.
- 3.8 **PPG Paragraph 009** (Reference ID: 3-009-20190722) explains that a range of different site sizes will need to be assessed, and that it may be appropriate to consider all sites and broad locations capable of delivering:
- Residential development of 5 dwellings or more; or
  - Economic development on sites of 0.25ha (or 500sqm floorspace) or more.

### Types of Development

- 3.9 **PPG Paragraph 018** (Reference ID: 3-018-20190722) explains that plan-makers need to assess the suitability of identified sites or broad locations for different forms of development (where appropriate), taking into account the range of needs for housing, economic and other uses. The forms/types of development considered through all sources (see Table 1 below) is as follows:

- New homes (*must be able to accommodate 5 dwellings or more*);
- 100% affordable homes (*no minimum threshold*);
- Specialised care (C2 residential institutions), for example for older persons;
- Self and custom build homes (*must be able to accommodate 5 dwellings or more*);
- Permanent and transit accommodation for gypsies, travellers and travelling showpeople;
- Economic development, for example offices, manufacturing and warehousing (*must be minimum of 0.25ha or able to accommodate 500sqm floorspace or more*);
- Renewable energy (*non-domestic scale*);
- Biodiversity Net Gain (BNG) offsetting; and
- Nutrient offsetting.

- 3.10 This LAA has considered identified sites for all the above except for the following:

- The sites and locations identified for renewable energy development have been assessed and considered in the South Downs Renewable Energy Study (*published in 2024 and addendum anticipated for 2026*); and
- The sites and locations identified for permanent or transit accommodation for gypsies, travellers and travelling showpeople have been assessed and considered in the South Downs Gypsies, Traveller & Travelling Showpeople Site Identification Report (March 2026).

3.11 In terms of the 11 sites and locations identified for biodiversity net gain (BNG) and/or nutrient offsetting, these have not been found to be suitable for further consideration in the new South Downs Local Plan because they are either:

- Too small;
- Not well connected in the landscape;
- Not in the appropriate nutrient neutrality offsetting area;
- Associated directly with a potential development site and, therefore, could be delivered through associated development; and/or
- Part of, or associated with, discussions for offsetting that are already being progressed.

3.12 Moreover, it has been determined that it would not be appropriate to allocate sites for BNG and/or nutrient offsetting in the new South Downs Local Plan. The market for offsetting sites is still emerging and any potential allocations would quickly become out of date. Sites for offsetting can be promoted to / identified by the Authority at any time. For further information about offsetting sites already available, please see:

- The Authority website: [https://www.southdowns.gov.uk/renature-credits/buy-  
renature-credits/buy/](https://www.southdowns.gov.uk/renature-credits/buy-renature-credits/buy/)
- The Biodiversity Net Gain (BNG) Register: [https://www.gov.uk/guidance/search-  
the-biodiversity-gain-sites-register](https://www.gov.uk/guidance/search-the-biodiversity-gain-sites-register)
- The Partnership for South Hampshire (PFSH) Potential Nutrient Mitigation Schemes: [https://www.push.gov.uk/work/mitigation-schemes-available-to-  
developers/](https://www.push.gov.uk/work/mitigation-schemes-available-to-developers/)

### **Desktop Review of Existing Information and Call for Sites / Broad Locations**

3.13 The Authority has identified sites for a range of development types (see Paragraph 3.9 above) from a range of sources (see Table 1 below). Further sites promoted to the Authority outside of these sources have also been assessed and considered in this LAA.

**Table 1: Site Sources.**

Site Source	Number of Sites Identified
2015/16 Strategic Housing Land Availability Assessment	541
2022 Call for Sites	331
2023 Call to Local Authorities	17
2023 SDNPA Sites Search	146
2025 Regulation 18 consultation	103
2025 SDNPA Sites Search	34
<b>TOTAL</b>	<b>1,172 sites</b>

3.14 **This LAA has assessed and considered 799 sites.** This is different to the total number of sites identified in Table 1 (above) due to the following reasons:

- Addition of sites and locations promoted to the Authority between January 2017 and October 2025 outside of the sources identified in Table 1 (above);
- Removal of sites and locations identified solely for non-residential and non-economic uses (i.e., biodiversity net gain (BNG) offsetting, nutrient offsetting, renewable energy development, and/or accommodation for gypsies, travellers and travelling showpeople);
- Removal of sites where planning permission has been implemented and development has been built out and completed;
- Removal of sites where planning permission has been implemented and development is currently being built out;
- Removal of site duplications (with the most recent site boundary and information assessed and considered in this LAA); and
- The merging, separating and/or subsuming of sites as per the most recent site boundary and information.

3.15 Beyond the ad hoc site promotions to the Authority between January 2017 and October 2025, the proceeding paragraphs provide summaries of each source identified in Table 1 (above) for the development types set out in Paragraph 3.9.

3.16 The **Strategic Housing Land Availability Assessment (SHLAA)** was published in January 2015 and updated in December 2016. The SHLAA included 541 sites and its findings were used to inform the South Downs Local Plan which was adopted in July 2019. The SHLAA provided the starting point for the preparation of this LAA.

- 3.17 A **Call for Sites** – as per **PPG Paragraph 012** (Ref ID: 3-012020190722) - was carried out between 10 August and 28 September 2022. This was an early opportunity for individuals, landowners, developers, town and parish councils, and others to identify, suggest and/or promote sites within the South Downs National Park for development.
- 3.18 A **Call to Local Authorities** (i.e., borough, county, district and unitary councils) was carried out between 17 April and 02 June 2023. This was to understand if there was any surplus publicly-owned land in the South Downs National Park which was available and could be considered for development.
- 3.19 A **Regulation 18 public consultation** of the new South Downs Local Plan was carried out between 20 January and 17 March 2025. During this time, the Authority received site submissions and information in relation to draft allocations, previously omitted sites, and wholly brand new sites.
- 3.20 In addition to above sources, the Authority has considered other sources of potential development land – see **SDNPA Sites Search** carried out in 2023 and 2025 in Table 1 (above). **PPG Paragraph 010** (Reference ID: 3-010-20190722) explains that plan-makers should not simply rely on sites they are informed about, and should actively identify sites through a desktop review process. **PPG Paragraph 011** (Reference ID: 3-011-20190722) adds that plan-makers should consider all available types of sites and sources of data that may be relevant in the assessment process. Further to this, the PPG identifies a number of sources that may be of particular relevance and these have been replicated in Table 2 (below).

**Table 2: Sources of sites with potential for development**

**Source:** [Housing and Economic Land Availability Assessments Practice Guidance 2019 \(Paragraph 011 Reference ID: 3-011-20190722\)](#).

Type of Site	Potential Data Source
Existing housing and economic development allocations and site development briefs not yet with planning permission.	Local and neighbourhood plans. Planning applications records. Development Briefs.
Planning Permissions for housing and economic development that are unimplemented or under construction.	Planning application records. Development starts and completions Records.
Planning applications that have been refused or withdrawn.	Planning application records.
Land in the local authority's ownership.	Local authority records.

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

3.21 In line with Table 2 (above), the Authority sought to search / identify sites and locations from the following sources:

- Sites allocated in the adopted South Downs Local Plan and made Neighbourhood Development Plans;
- Sites promoted (but omitted) in the preparation of the adopted South Downs Local Plan that were not included in the 2015/16 SHLAA;
- Sites considered (but omitted) in the preparation of made Neighbourhood Development Plans that were genuinely available at the time of plan preparation;
- Sites included in the South Downs Brownfield Register (Part 1);
- Sites subject to pre-application enquiries, valid planning applications, and lapsed planning permissions from April 2022 to October 2025; and
- Sites identified or enquired about by agents, groups, individuals, and/or town and parish councils from April 2022 to October 2025.

### Site / Broad Location Survey

3.22 The site / broad location survey is an assessment of sites and locations to determine which are suitable to move to the next stage of assessment. The PPG advises that the initial surveys need to be proportionate, with a more detailed assessment at Stage 2.

3.23 **PPG Paragraph 013** (Reference ID: 3-013-20190722) explains that plan-makers can assess sites and broad locations prior to a more detailed survey to:

- Ratify inconsistent information gathered through the call for sites and desktop assessment;
- Get an up-to-date view on development progress (where sites have planning permission);
- Obtain a better understanding of what type and scale of development may be appropriate;
- Gain a more detailed understanding of deliverability, any barriers and how they could be overcome; and
- Identify further sites with potential for development that were not identified through data sources or the call for sites.

3.24 The above has resulted in the refinement of all identified sites down to 799 sites as explained in Paragraph 3.14 (above). For the avoidance of doubt, the LAA has not assessed and/or considered sites where planning permission has been implemented. This is because development will be captured as completions in the annual Authority Monitoring Report (AMR).

## Excluded Sites

- 3.25 **PPG Paragraph 014** (Reference ID: 3-014-20190722) explains that there may be sites which - when taking into account national policy and designations - will not be appropriate for a more detailed assessment where it is clear that development will not be suitable. In line with the above, the types of sites and locations which have been “excluded” from the next stage of assessment are listed in Table 3 (below) and Table A-1 in Appendix A (Assessment Criteria).
- 3.26 In instances where any of the criteria in Table 3 / Table A-1 is applicable to a site or location, then the site or location has been assessed as having nil potential as national and/or local policy advises against development. If a larger site includes any of the listed designations in Table 3 (and Table A-1) within its boundaries, then consideration has been given to whether any portion of the site is developable and further information on possible mitigation measures has been sought from site promoters where necessary.
- 3.27 The sites which have been “excluded” - and the reason(s) for their exclusion – are set out in Appendix C (Assessment outcomes for excluded sites).

**Table 3: Exclusion from Assessment Criteria.**

Exclusion from Assessment Criteria
Designations
<p>Sites located wholly or largely within any one of the following designations (if a larger site has any of these designations within its boundaries, then there will need to be consideration as to whether any portion of the site is developable):</p> <ul style="list-style-type: none"> <li>• Ancient Woodland.</li> <li>• Local Wildlife Sites (LWS), Sites of Nature Conservation Interest (SNCI), or Sites of Importance for Nature Conservation (SINCs).</li> <li>• Sites of Special Scientific Interest (SSSI).</li> <li>• National Nature Reserves (NNR).</li> <li>• Local Nature Reserves (LNR).</li> <li>• Local Geological Sites (also known as Regionally Important Geological/Geomorphological Sites (RIGS)).</li> <li>• Ramsar sites.</li> <li>• Scheduled Ancient Monuments.</li> <li>• Special Protection Area (SPA).</li> <li>• Special Area of Conservation (SAC).</li> <li>• Sites on the English Heritage Register of Historic Parks and Gardens.</li> <li>• Sites designated as Local Green Space (LGS).</li> <li>• Sites within the 400m buffer zone of the Wealden Heaths Phase II SPA (<i>applicable to sites proposed for new homes. Other uses, including high dependency C2 care homes, will be assessed on a case-by-case basis</i>).</li> <li>• Existing nutrient or biodiversity net gain offsetting sites.</li> </ul>
Site Location
<p>Greenfield or non-Previously Developed Land (as defined in the NPPF Glossary) that is not within, adjacent, or well related (in terms of access and reflecting settlement character) to those settlements with an identified settlement boundary, either within or outside the National Park, will be excluded from Stage 1 of the Assessment.</p>
Site Size Threshold
<p>For residential sites, the site size threshold for the LAA is based on an estimated yield of 5 or more net additional dwellings. An exception to this is for sites for 100% affordable housing. It may not be possible to determine the estimated yield of all sites at this stage and they may be excluded on these grounds later in the assessment process.</p> <p>For economic / commercial sites, the size threshold for the LAA is 0.25 hectares or 500 square metres net floorspace or more.</p>

- 3.28 As identified in Table 3 (above), minimum yield-based thresholds have been applied to assessments for residential and/or economic / commercial development as per **PPG Paragraph 009** (Reference ID: 3-009-20190722). The consideration of whether a site has potential for development above these minimum yield-based thresholds has taken into account a site's opportunities, constraints and size. For example, the potential impacts on landscape character of developing the whole site or, conversely, the opportunity for higher density development in urban areas.
- 3.29 It should be noted that smaller sites will contribute to the overall supply of housing in the South Downs National Park and may be considered as windfall, see Stage 3 below.

### Stage 2 – Site / Broad Location Assessment

- 3.30 The remaining sites – i.e., the sites which have not been “excluded” under the criteria outlined in Table 3 / Table A-1 - have moved to the Stage 2 Site / Broad Location Assessment.
- 3.31 The remaining sites have been subject to detailed assessment based on the criteria in Tables A-2 to A-8 in Appendix A (Assessment Criteria). The criteria sets out the key topics and questions which have formed the basis of the high level assessment of identified sites. The list of key topics and questions in each table is not exhaustive and further considerations may be applicable. Moreover:
- Table A-2 sets out overarching criteria applicable for the assessment of all types of sites and development; and
  - Tables A-3 to A-8 set out additional bespoke criteria for the assessment of different types of sites and development.
- 3.32 The detailed assessments have consisted of desktop reviews and, if necessary, site visits by a Planning Officer. A proforma for the site assessment has been used, which is based on the criteria set out in Appendix A (Assessment Criteria). All of this information has fed into the wider assessment of sites as outlined below.

### **Landscape Assessment**

- 3.33 As a designated landscape, the South Downs National Park benefits from the highest status of protection in relation to landscape and natural beauty. This is also emphasised in **NPPF Paragraphs 189-190**.

3.34 The National Parks And Access to the Countryside Act 1949 – as amended by Section 245 of the Levelling Up and Regeneration Act 2023 – requires all public bodies and utility companies (when undertaking any activity that may have an impact on the designated area) to seek to further the purposes of National Parks. The Government also places a corresponding economic and social duty upon National Park Authorities to be considered when delivering the two purposes. The Purposes and Duty are:

**Purposes:**

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

**Duty:** To seek to foster the economic and social wellbeing of the local communities within the National Park.

3.35 The South Downs Local Plan (adopted July 2019) is landscape-led, which is akin to good contextual design. The definition of landscape encompasses all types and forms, including historic landscape character and townscape. Therefore, a fundamental part of the site assessments is the consideration of any potential detrimental impact(s) on landscape, and how potential development can work positively with the landscape.

3.36 The landscape assessment has considered a number of criteria as set out in Table A-2 in Appendix A (Assessment Criteria). It has engaged robust tools to ensure a consistent and detailed approach, including the 2020 South Downs Landscape Character Assessment (LCA). An assessment of landscape sensitivity has been concluded for each site, ranging from very low landscape sensitivity to very high landscape sensitivity.

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

3.37 **NPPF Paragraph 72** requires local planning authorities to identify a supply of specific “**deliverable**” sites to provide five years' worth of housing, and “**developable**” sites to provide a supply of housing over the longer term.

- 3.38 To be considered **deliverable**, sites should be *available* now, offer a *suitable* location for development now, and be *achievable* with a realistic prospect that development can come forward within five years and is viable. The sites with extant planning permission have been considered deliverable unless planning permission has expired / lapsed, or there is clear evidence that a scheme will not be implemented within five years (for example, a scheme is not viable, there is no longer a demand for the type of units, or a site has long term phasing plans).
- 3.39 To be considered **developable**, sites should be in a *suitable* location for development, and there should be a reasonable prospect that the site is *available* and could be viably developed at the point envisaged.
- 3.40 If a site is not assessed as “has potential” - by being neither deliverable or developable because, for example, a constraint to development is so severe it is not known if or when it may be overcome - the site has been “rejected”.
- 3.41 Following PPG guidance – including **PPG Paragraphs 015 to 020** - an assessment of the *suitability*, *availability* and *achievability* of a site has provided information to help inform judgements (in the plan-making context) as to whether a site can be considered as deliverable / developable, or should be “rejected”. The assessment criteria is in Appendix A (Assessment Criteria) and the criteria under each sub-stage is summarised below.

### Assessing Suitability

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

- Landscape Assessment (including Special Qualities of the National Park)
- Relationship to defined settlements
- Noise
- Neighbouring or nearby land uses
- Sustainability
- Accessibility and proximity to local services
- Previous land use
- In another active use
- Density, landscape and character of surrounding area
- Biodiversity
- Flood risk

- Ground conditions / topography
- Land contamination
- Minerals and waste
- Protected trees (or Tree Preservation Orders [TPOs])
- Agricultural land
- Archaeology
- Listed buildings / heritage assets
- Conservation areas
- Open space and recreation
- Public Rights of Way (PRoW)

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

3.44 Appendix A includes criteria regarding the relationship to settlements. One key element is that where sites are not considered to be previously developed land (as defined in the NPPF Glossary), they have been “excluded” from detailed assessment if outside, detached, and unrelated to a defined settlement boundary. This includes defined settlement boundaries both within and outside the South Downs National Park. In instances where sites assessed as “has potential” are related to defined settlement boundaries outside the South Downs National Park, the Authority will continue to work closely with the local planning authorities of these settlements to ensure that cross boundary strategic issues are addressed.

### **Assessing Availability**

3.45 The following has been taken into account when assessing the *availability* of a site:

- Ownership and/or control of the land
- Planning status and planning history
- Intention to develop, including timings
- Potential legal constraints
- In any active other use

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

### Assessing Achievability

3.47 The following has been taken into account when assessing the *achievability* of a site:

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

3.48 A site has generally been judged as *achievable* if there are no immitigable physical or legal barriers to development. The 2017 Whole Plan and Affordable Housing Viability Assessment was produced as part of the evidence base for the South Downs Local Plan (adopted July 2019). It showed that there were no major viability-related barriers to delivering development in the South Downs National Park. An updated Whole Plan Viability Assessment is being prepared as part of the evidence base for the new South Downs Local Plan. This will further test the ability of a range of development types throughout the South Downs National Park to viably meet the requirements in the emerging new local plan and adopted community infrastructure levy (CIL).

### Overcoming Constraints

3.49 As per **PPG Paragraph 021** (Reference ID: 3-021-20190722), there may be actions or options to overcome certain constraints to development through mitigation. These have been considered alongside site assessments and have informed (as appropriate) the conclusions of the wider Stage 2 assessments.

### Stage 3 – Windfall Sites

3.50 “Windfall” is a term used for residential sites and is not a term typically used for other types of development. Windfall sites are those that have not been specifically identified in the development plan. They can be difficult to accurately identify, and it can be difficult to realistically predict when they will come forward for development. They often comprise previously developed sites that have unexpectedly become available (i.e., conversion and/or sub-division of existing buildings, infill development etc.), but can also include greenfield sites which have not previously been allocated.

3.51 **NPPF Paragraph 75** states that:

*Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*

3.52 A windfall allowance has been calculated and published in the Site Selection Paper [March 2026]. The Paper has also considered the findings of this LAA.

### Stage 4 – Assessment Review

#### **Stage 4a – Supply**

3.53 The identified sites have been assessed for their deliverability / developability. The development potential of sites assessed as “has potential” (see Appendices B(i) to (iii)) is set out as indicative yields which, altogether, can be considered as an indicative theoretical supply. The approximate development potential over the plan period for each of these sites is set out in five year tranches (i.e. within years 0-5, 6-10, or 11-15). The Authority will continue to monitor whether sites come forward as anticipated through the preparation of the new South Downs Local Plan and the annual Authority Monitoring Report (AMR).

3.54 It is important to note that all sites found to be deliverable / developable – or “has potential” (see Appendices B(i) to (iii)) - will still need to be considered through the plan-making process. The LAA is a starting point to identify deliverable / developable sites and does not, in itself, allocate sites for development. Therefore, the indicative theoretical supply in the LAA does not translate to an actual housing supply trajectory. The actual housing supply trajectory is included in the Site Selection Paper [March 2026].

#### **Stage 4b – Review**

3.55 The amount of supply will be reviewed alongside the preparation of the new South Downs Local Plan. The new local plan will determine the housing provision figure for the South Downs National Park as informed by National Park purposes and duties, the findings of the LAA, the findings of the Housing and Economic Needs Assessment (HEDNA), and other evidence such as the Integrated Impact Assessment (IIA) and Habitats Regulations Assessment (HRA).

#### **Stage 5 – Final Evidence Base**

3.56 The set of standard outputs that have been produced from this LAA is as follows:

- An **interactive map** showing all the “has potential”, “rejected”, and “excluded” sites, along with a summary of the LAA recommendation for each site;
- A detailed assessment of each site which has been assessed as “has potential”, including an indicative type and quantum of development that could be delivered and an estimated build out rate (**Appendices B(i) to (iii)**);
  - This excludes sites where planning permission has been implemented.
  - This appendix is split into three parts; one for each county area.
- A list of “excluded” sites which have not been subject to a detailed assessment, along with the reason(s) for their exclusion (**Appendix C**); and
- A list of “rejected” sites which have been subject to a detailed assessment, along with the reason(s) for their rejection (**Appendix D**).

3.57 A Site Selection Paper [March 2026] has been prepared which includes a windfall calculation and a housing supply trajectory of anticipated development. Further work about the estimated build out rate of when sites may come forward will continue to be carried out in 2026.

## Monitoring and Review

3.58 The Authority has continued to assess and consider identified sites since January 2017 – i.e., after the previous SHLAA was published and updated. This LAA has considered all sites identified up to October 2025. Any new sites promoted or identified in and after November 2025 will be assessed and considered further after the Regulation 19 public consultation of the Proposed Submission South Downs Local Plan has been completed in 2026.

## 4. Conclusions

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- 4.1 The NPPF requires all strategic policy-making authorities to have a clear understanding of the land available for development in their local planning authority area through the preparation of a Land Availability Assessment (LAA).
- 4.2 This LAA has been prepared to inform the new South Downs Local Plan which is anticipated for Regulation 19 public consultation in 2026. In doing so, this LAA has (amongst other considerations) considered the comments and representations received on the provisional findings of the 2024 LAA during the Regulation 18 public consultation of the new South Downs Local Plan in early 2025.
- 4.3 This LAA includes:
- The sites identified in the 2015/16 Strategic Housing Land Availability Assessment (SHLAA) which was used to support the preparation of the South Downs Local Plan (adopted July 2019);
  - The sites identified during the 2022 Call for Sites, 2023 Call to Local Authorities, and 2025 Regulation 18 consultation of the new South Downs Local Plan;
  - The sites identified during the Authority's site searches in 2023 and 2025; and
  - The sites identified outside of the above sources between January 2017 and October 2025.
- 4.4 The sites identified for potential economic development have been considered further, as appropriate, in the Employment Land Review (ELR) [January 2026]. In terms of sites identified for biodiversity net gain (BNG) and/or nutrient offsetting, these have all been found to be unsuitable for further consideration in the new South Downs Local Plan.
- 4.5 The sites identified for renewable energy development - and/or for permanent or transit gypsy, traveller, and travelling showpeople accommodation – have been assessed and considered – respectively – in the following:
- The South Downs Renewable Energy Study (*published in 2024 and addendum anticipated for 2026*); and
  - The South Downs Gypsies, Traveller & Travelling Showpeople Site Identification Report (March 2026).

### Stage 1 and Stage 2 Assessments

- 4.6 This LAA has identified **799 sites** for residential and/or economic / commercial development. This does not include sites where planning permission has been implemented.
- 4.7 Stage 1 provided an initial sieve of the identified sites based on site location, site size thresholds, and applicable national and local designations. The sites which met the exclusion criteria in Table 3 / Table A-1 have been “excluded” from detailed assessment.
- 4.8 Stage 2 assessed and considered all sites that were not “excluded” from the initial sieve at Stage 1. These sites have been subject to detailed assessments against the assessment criteria in Tables A-2 to A-8. This process has ensured only deliverable / developable sites have been considered further for potential allocation - subject to further technical work - in the new South Downs Local Plan.
- 4.9 Following Stage 2:
- **121 sites** have been assessed as “has potential” for development and further consideration in the new South Downs Local Plan (**Appendices B(i) to (iii)**);
  - **334 sites** have been “excluded” from detailed assessment (**Appendix C**); and
  - **344 sites** have been “rejected” as being unsuitable, unavailable and/or unachievable for development (**Appendix D**).
- 4.10 The 121 “has potential” sites could, together, provide a theoretical supply of **4,541 (Class C3 equivalent) dwellings, 100,650sqm economic / commercial floorspace, and 2000sqm open storage**. This includes sites that have extant (but not implemented) planning permission and unimplemented allocations in the adopted South Downs Local Plan and made Neighbourhood Development Plans.

### Stage 3 – Windfall Sites

- 4.11 A windfall allowance has been calculated and published in the Site Selection Paper [March 2026]. The Paper has also consider the findings of this LAA.

#### Stage 4 – Assessment Review

- 4.12 The LAA specifically considers sites with potential for development. It does not allocate sites for development. The findings of the LAA have the significant limitation of focusing on each site or location in isolation. Further steps are required in the site selection process to ensure appropriate sites are taken forward for allocation in the new South Downs Local Plan or any future Neighbourhood Development Plans.
- 4.13 The actual supply of development going forward will be based on the development strategy as determined through the preparation of the new South Downs Local Plan which will consider (amongst other considerations) National Park purposes and duties. A Site Selection Paper [March 2026] has been prepared to explain this process.