



# **Adur District Council**

## **Adur Local Plan**

### **Housing Implementation**

### **Strategy**

**October 2014**





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# 1. Introduction

- 1.1.1 This Housing Implementation Strategy has been prepared to support the Adur Local Plan 2011-2031 in accordance with the requirement of the National Planning Policy Framework (NPPF). Paragraph 47 states that local planning authorities should:

*“for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain a delivery of a five year supply of housing land to meet their housing target”.*

- 1.1.2 This Strategy sets out the Council’s proposed approach to managing the delivery of housing over the Local Plan period 2011 to 2031. It includes housing trajectories for both market and affordable housing and also sets out the five year housing land supply position as at 1 April 2014.

## 1.2 Current Housing Position in Adur

- 1.2.1 Table 1 below shows that over the 12 year period 2001-2013 there has been an average of 122 net homes completed in the Local Plan area. This compares favourably with the West Sussex Structure Plan 2001-2016 delivery target of 99 net dwellings per annum (dpa). The Structure Plan was superseded by the South East Plan 2006-2026 which set a target of 105 net dpa (excluding development at Shoreham Harbour). The Council has been using saved Local Plan policies since 2007 and housing delivery has been monitored against the South East Plan requirement until it was revoked in March 2013.

*Table 1. Dwelling Completions 2001-2013*

Year	Total Dwelling Completions		
	Gross	Net	Losses
2001/2002	48	47	1
2002/2003	99	82	17
2003/2004	63	59	4
2004/2005	131	120	11
2005/2006	218	200	18
2006/2007	230	216	14
2007/2008	159	146	13
2008/2009	134	123	11
2009/2010	92	61	31
2010/2011	88	63	25
2011/2012	204	193	11
2012/2013	158	151	7
<b>Total</b>	<b>1624</b>	<b>1461</b>	<b>163</b>
<b>Annual Average</b>	<b>135.3</b>	<b>121.75</b>	<b>13.6</b>

- 1.2.2 The NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirement with a buffer of 5% to ensure choice and competition or a 20% buffer where there is a record of persistent under delivery.
- 1.2.3 The most recent housing supply position is set out in the Adur District Five Year Housing Land Supply Assessment 2013-2018, published in December 2013. This shows that there is a surplus of 164 net dwellings in Adur when measured against the housing requirement set out in the South East Plan.
- 1.2.4 Annual average dwelling completions since monitoring of the South East Plan began in 2006 is 122 net dwellings, well above the annual requirement of 105 dwellings. A buffer of 5% has been applied as there is not a history of persistent under delivery in Adur.

### **1.3 Local Plan Strategy for housing delivery 2011-2031**

- 1.3.1 The base date for the emerging Local Plan housing delivery target is 1 April 2011. The proposed breakdown of housing provision from the different sources of housing supply is set out in Table 2 below. A housing trajectory, setting out the projected annual housing delivery over the Local Plan period 2011-2031 is included in this Housing Implementation Strategy.
- 1.3.2 The Local Plan aims to deliver a minimum of between 3,488 and 3,638 dwellings over the Plan period 2011-2031, equating to an average of 174-182 dwellings per year.<sup>1</sup>
- 1.3.3 The following Local Plan policies relate specifically to housing delivery:
- Policy 3 – sets out the overall target for delivery of a minimum of 3488-3638 homes over the period 2011-2031. It identifies the different sources of housing provision, including the strategic development sites and the broad location for development at Shoreham Harbour.
  - Policies 5 and 6 – allocate strategic sites for development at New Monks Farm, Lancing (for mixed use development to include 450-600 homes) and West Sompting (for 480 homes) which together will deliver 930-1080 homes.
  - Policy 8 – identifies the Shoreham Harbour Regeneration Area as a broad location for change and includes the delivery of approximately 1100 homes.

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<sup>1</sup> Dependent on the amount of development at New Monks Farm (see Policies 5 and 6)

## 2. Sources of Housing Supply

- 2.1.1 This Local Plan target has been informed by a number of studies, evidence documents and monitoring reports.

### 2.2 Strategic Housing Land Availability Assessment 2014

- 2.2.1 A Strategic Housing Land Availability Assessment (SHLAA) was undertaken in 2013/14. The first Adur SHLAA was completed in 2009 and updated in 2012. A full review was completed in 2014 and indicates that 404 dwellings can be delivered on nine sites over the Local Plan period (see Appendix 1 for list of sites). The full SHLAA 2014 document can be viewed [www.adur-worthing.gov.uk/adur-local-plan-2014](http://www.adur-worthing.gov.uk/adur-local-plan-2014)

#### **Risk: Non delivery of these identified SHLAA sites**

- 2.2.2 The SHLAA provides an assessment of risk associated with each site in terms of potential delivery constraints. All sites have been evaluated in terms of suitability, availability and achievability in accordance with the SHLAA practice guidance. Sites that do not have reasonable development potential have been excluded from the housing land supply. For those sites which are assessed as having reasonable development potential, any identified risk, in terms of policy constraints, infrastructure requirements, ownership constraints etc. are reflected in potential delivery rates.
- 2.2.3 Other sources of housing land have been carefully considered in order to determine realistic levels of potential supply:

### 2.3 Housing completions

- 2.3.1 Monitoring indicates that, for the three year period since the base date of the Local Plan, 437 net dwellings have been completed (1 April 2011 and 31 March 2014) equating to approximately 146 dwellings per year.

### 2.4 Commitments

- 2.4.1 These are large sites of 6 or more dwellings and small sites of 5 or fewer dwellings that have extant planning permission and which are either under construction or have not yet started. For small sites a discount of 55% has been applied (in accordance with the West Sussex County Council standard based on historic completion data). The large identified sites are listed in Appendix 2.

## 2.5 Small sites windfall allowance

- 2.5.1 Windfall sites are defined by the NPPF as *“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available”*. It allows local planning authorities to *“make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens”* (para 48).
- 2.5.2 Historically, given the built up nature of Adur, a significant proportion of housing development has come forward on small sites which generally comprise of infill sites, conversions and changes of use. These sites fall below the size threshold for sites to be included in the SHLAA.
- 2.5.3 Appendix 3 sets out in more detail how the projected windfall allowance has been calculated based on historic trends for small site completions from 2004-2013. It shows an average of 32 dwellings being completed on small sites per annum. Whilst the figure fluctuates from year to year, there is no clear trend suggesting an overall decline in completions and it is considered that there is compelling evidence to extrapolate these forward based on past evidence of delivery.

## 2.6 Broad Location: Shoreham Harbour Regeneration Area

- 2.6.1 This is the largest brownfield site in Adur and comprises a number of sites which, together, will potentially accommodate up to 1100 new dwellings up to 2031.<sup>2</sup> It is identified as a broad location for development in this Plan and the detailed development proposals and a planning framework to guide investment and delivery proposals will be addressed in a Joint Area Action Plan (JAAP) currently being prepared by the Shoreham Regeneration Partnership (Adur and Worthing Councils, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority).

## 2.7 Strategic development sites

- 2.7.1 Two large greenfield sites are allocated for housing or mixed use development in the emerging Adur Local Plan. Together these two sites provide a significant proportion of planned new homes and their delivery is critical to achieving the overall strategy of the Plan:

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<sup>2</sup> Shoreham Harbour will deliver 1100 dwellings over the whole Plan period 2011-2031. 132 dwellings have planning permission and to avoid double counting with commitments, the remaining 970 dwellings are shown in Table 2. (figures are rounded)



- New Monks Farm, Lancing – a mixed use development to include the delivery of between 450 and 600 homes. The level of residential development will be dependent on landscape and biodiversity issues.
- Land at West Sompting – 480 homes

**Risk: That delivery of the strategic allocations is delayed, impacting on the five year housing land supply position**

- 2.7.2 As part of the Local Plan preparation process, a detailed analysis of the suitability and deliverability of these sites has been undertaken as part of the Sustainability Appraisal process. A number of evidence studies have informed and addressed key issues such as transport and infrastructure provision, landscape, biodiversity and flood risk. There have been regular and ongoing discussions with the site promoters and their agents, the relevant statutory agencies and service providers.
- 2.7.3 Masterplanning is well underway for both strategic sites and it is anticipated that outline planning applications will be submitted to the local planning authority in spring 2015 for both sites. This will coincide with the formal Submission of the Adur Local Plan to the Secretary of State and demonstrates that the strategic allocations are viable and deliverable
- 2.7.4 Policy 5 and 6 set out the specific requirements for each site, including appropriate mitigation measures to ensure delivery.
- 2.7.5 How this housing is to be delivered is set out in the following table:

*Table 2: Housing Supply Position at 1 April 2014*

Total Housing Provision 2011-2031	3488-3638	
Net housing completion 2011-2014	437	
<b>Remaining Local Plan housing requirement 2014-2031</b>	<b>3051-3201</b>	
<i>Existing sources of housing supply:</i>		
Existing commitments (large and small sites)	299	
Sites identified in the SHLAA 2014	404	
Small sites windfall allowance	448	
<b>Total yield from existing sources</b>	<b>1151</b>	
<i>Sites identified in the Local Plan:</i>		
New Monks Farm, Lancing	450-600	
Land at West Sompting	480	
Shoreham Harbour Broad Location	970	
<b>Total yield from identified sites in the Local Plan</b>	<b>1900-2050</b>	
<b>Total Housing Supply 2014-2031</b>	<b>3051-3201</b>	

### **3. Housing Trajectory for the Plan period 2011-2031**

- 3.1.1 The housing target for Adur is for a minimum of 3488-3638 homes to be delivered between 2011-2031 as set out in the Proposed Submission Adur Local Plan and which results in a trajectory of 174-182 dwellings per annum. The National Planning Policy Framework requires local authorities to prepare a housing trajectory to illustrate the expected rate of delivery for the plan period.
- 3.1.2 The New Monks Farm strategic allocation could potentially accommodate 450 – 600 dwellings, the level of development being dependent on satisfactory mitigation of landscape and biodiversity issues. Two trajectories have been prepared, illustrating these two levels of development. Information contained in the trajectories is based on the most up to date development monitoring data as at 1 April 2014. It shows actual housing delivery in Adur between 2011/12 and 2013/14 and the anticipated delivery from the current year until the end of the Plan period.
- 3.1.3 The trajectories indicate that the Council can meet the overall housing target. However, the majority of housing delivery is planned for 2016/17 to 2023/24 when the strategic allocations are developed. There may be an issue in maintaining a continuous supply of available land for housing towards the latter part of the Plan period. Annual monitoring will highlight any such issue and appropriate intervention measures may be required as set out in the Overall Risk to Housing Delivery in General and Contingencies sections below.

Table 3: Housing Trajectory for Adur 2014: 174 dwellings per annum

	Projected Completions																		Totals		
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	
Gross Completions (large and small sites)	204	158	103	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	465
Commitments (large and small sites with planning permission)				97	35	160	7	0	0	0	0	0	0	0	0	0	0	0	0	0	299
Allowance for small windfall sites				0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	32	448
SHLAA sites 2014 (net)				0	58	104	107	60	38	37	0	0	0	0	0	0	0	0	0	0	404
Broad Location (Shoreham Harbour)				0	0	35	35	0	165	165	165	165	165	37	38	0	0	0	0	0	970
Strategic Allocation (New Monks Farm)				0	0	40	75	75	75	75	75	35	0	0	0	0	0	0	0	0	450
Strategic Allocation (Land at West Sompting)				0	0	0	25	80	80	80	80	80	55	0	0	0	0	0	0	0	480
Total Past Completions	204	158	103																		
<b>Total Projected Completion/Commitmentss</b>	<b>204</b>	<b>158</b>	<b>103</b>	<b>97</b>	<b>93</b>	<b>339</b>	<b>281</b>	<b>247</b>	<b>390</b>	<b>389</b>	<b>352</b>	<b>312</b>	<b>252</b>	<b>69</b>	<b>70</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>3516</b>
Estimated losses on large sites	11	7	10	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30
Past net completions	193	151	93																		437
Projected net completions				95	93	339	281	247	390	389	352	312	252	69	70	32	32	32	32	32	3049
<b>Cumulative net completions</b>	<b>193</b>	<b>344</b>	<b>437</b>	<b>532</b>	<b>625</b>	<b>964</b>	<b>1245</b>	<b>1492</b>	<b>1882</b>	<b>2271</b>	<b>2623</b>	<b>2935</b>	<b>3187</b>	<b>3256</b>	<b>3326</b>	<b>3358</b>	<b>3390</b>	<b>3422</b>	<b>3454</b>	<b>3486</b>	<b>3486</b>
Plan. Annualised net strategic allocation	174	174	174	174	174	174	174	174	174	174	174	174	174	174	174	174	174	174	174	174	3480
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	19	-4	-85	-164	-245	-80	27	100	316	531	709	847	925	820	716	574	432	290	148	6	
<b>Manage. Annual requirement taking into account past/projected completions</b>	<b>174</b>	<b>173</b>	<b>174</b>	<b>179</b>	<b>184</b>	<b>190</b>	<b>180</b>	<b>172</b>	<b>166</b>	<b>145</b>	<b>121</b>	<b>95</b>	<b>68</b>	<b>42</b>	<b>37</b>	<b>31</b>	<b>31</b>	<b>30</b>	<b>29</b>	<b>26</b>	

**Notes:** Completions include sites with planning permission but which have not commenced and sites on which development has commenced. Large sites comprise 6 or more units, small sites comprise 5 or less units. Estimated losses include actual and projected losses that may occur due to demolition, conversion and change of use. Deducting estimated housing losses from gross housing completion figures gives net completions. Source: 2014 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

Figure 1: Housing trajectory for Adur 2014: 174 dwellings per annum.

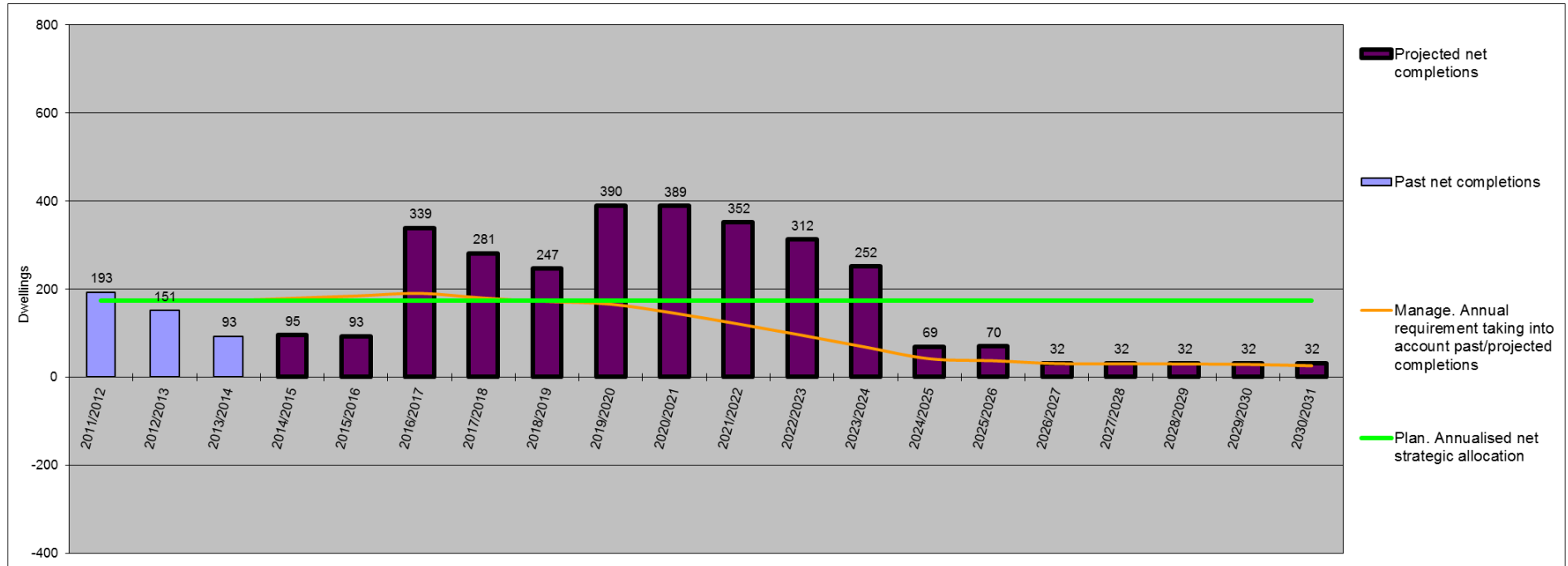
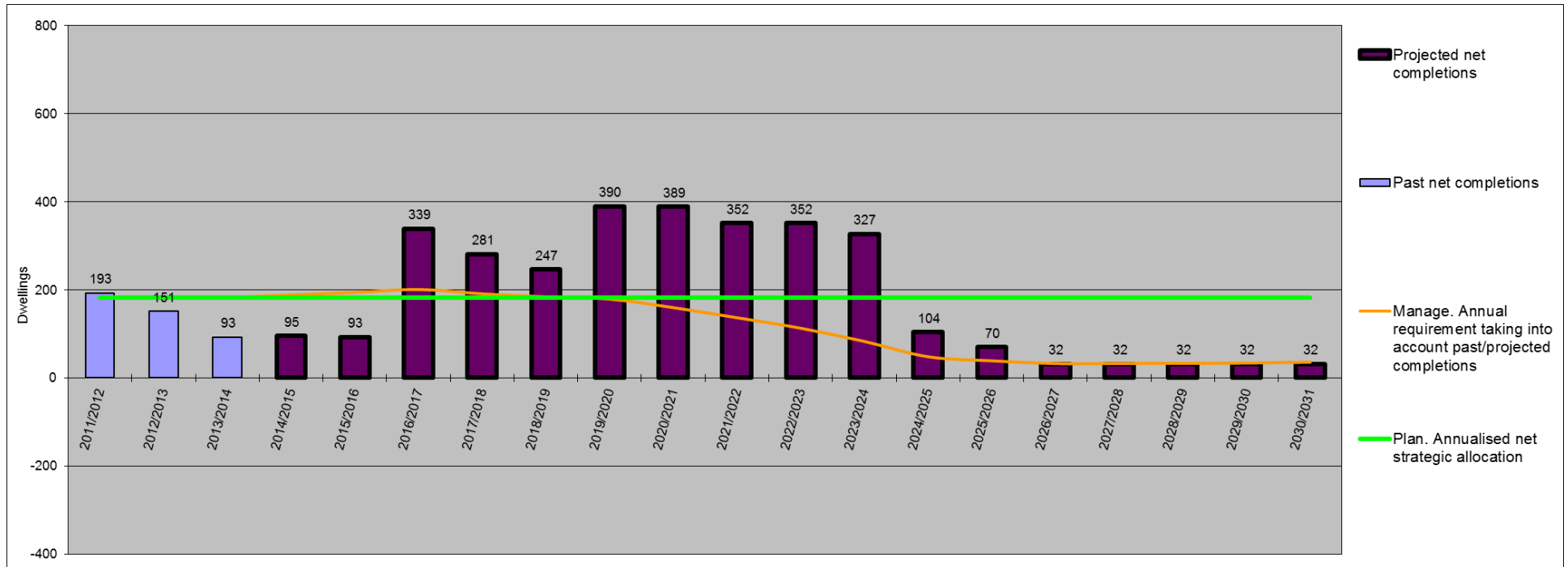


Table 4: Housing Trajectory for Adur 2014: 182 dwellings per annum

	Projected Completions																			Totals	
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030		2030/2031
Gross Completions (large and small sites)	204	158	103	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	465
Commitments (large and small sites with planning permission)(net)				97	35	160	7	0	0	0	0	0	0	0	0	0	0	0	0	0	299
Allowance for small windfall sites				0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	32	448
SHLAA sites 2014 (net)				0	58	104	107	60	38	37	0	0	0	0	0	0	0	0	0	0	404
Broad Location (Shoreham Harbour)				0	0	35	35	0	165	165	165	165	165	37	38	0	0	0	0	0	970
Strategic Allocation (New Monks Farm)				0	0	40	75	75	75	75	75	75	75	35	0	0	0	0	0	0	600
Strategic Allocation (West Sompting)				0	0	0	25	80	80	80	80	80	55	0	0	0	0	0	0	0	480
Total Past Completions	204	158	103																		
<b>Total Projected Completions/Commitments</b>	<b>204</b>	<b>158</b>	<b>103</b>	<b>97</b>	<b>93</b>	<b>339</b>	<b>281</b>	<b>247</b>	<b>390</b>	<b>389</b>	<b>352</b>	<b>352</b>	<b>327</b>	<b>104</b>	<b>70</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>32</b>	<b>3666</b>
Estimated losses	11	7	10	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30
Past net completions	193	151	93																		437
Projected net completions				95	93	339	281	247	390	389	352	352	327	104	70	32	32	32	32	32	3199
<b>Cumulative net completions</b>	<b>193</b>	<b>344</b>	<b>437</b>	<b>532</b>	<b>625</b>	<b>964</b>	<b>1245</b>	<b>1492</b>	<b>1882</b>	<b>2271</b>	<b>2623</b>	<b>2975</b>	<b>3302</b>	<b>3406</b>	<b>3476</b>	<b>3508</b>	<b>3540</b>	<b>3572</b>	<b>3604</b>	<b>3636</b>	<b>3636</b>
Plan. Annualised net strategic allocation	182	182	182	182	182	182	182	182	182	182	182	182	182	182	182	182	182	182	182	182	3640
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	11	-20	-109	-196	-285	-128	-29	36	244	451	621	791	936	858	746	596	446	296	146	-4	
<b>Manage. Annual requirement taking into account past/projected completions</b>	<b>182</b>	<b>181</b>	<b>183</b>	<b>188</b>	<b>194</b>	<b>201</b>	<b>191</b>	<b>184</b>	<b>179</b>	<b>160</b>	<b>137</b>	<b>113</b>	<b>83</b>	<b>48</b>	<b>39</b>	<b>33</b>	<b>33</b>	<b>33</b>	<b>34</b>	<b>36</b>	

**Notes:** Completions include sites with planning permission but which have not commenced and sites on which development has commenced. Large sites comprise 6 or more units, small sites comprise 5 or less units. Estimated losses include actual and projected losses that may occur due to demolition, conversion and change of use. Deducting estimated housing losses from gross housing completion figures gives net completions. Source: 2014 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

Figure 2: Housing Trajectory for Adur 2014: 182 dwellings per annum



## 4. Housing Delivery – Five Year Housing Land Supply

- 4.1.1 The NPPF requires that the Local Plan should identify a continuing five year supply of housing land. This Housing Implementation Strategy identifies a supply of sites which are considered deliverable and developable within the five year timeframe 2014-2019. The trajectories demonstrate that the housing supply is sufficient to meet (and exceed) targets for the five year period with a 5% buffer.
- 4.1.2 Monitoring of housing delivery will be reported through the Council’s Annual Monitoring Report to be published in December each year.
- 4.1.3 Tables 3 and 4 set out the five year housing land supply position for Adur as at 1 April 2014. It is based on the proposed Local Plan housing target of 174-182 homes per year and with a 5% buffer to ensure choice and competition.

*Table 5. Five year housing land supply if delivering 174 dwellings per annum*

<b>Local Plan Housing Requirement 2011-2031</b>	<b>3480</b>	<b>174</b>
Completed 2011-2014	437	
Remaining Requirement 2014-2031 (17 years)	3043	179
Requirement for five years 2014-2019	895	
Additional 5% buffer	45	
Total Requirement for five years 2014-2019	940	188
Supply:		
Commitments at 1 April 2014	299	
SHLAA sites 2014	329	
Windfall Allowance (years 4 and 5)	64	
Local Plan Strategic Allocations	295	
Shoreham Harbour Broad Location	70	
<b>Total Supply 2014-2019</b>	<b>1057</b>	
Projected surplus	117	

A 5.6 year supply of deliverable sites can be demonstrated.

*Table 6. Five year housing land supply if delivering 182 dwellings per annum*

<b>Local Plan Housing Requirement 2011-2031</b>	<b>3640</b>	<b>182</b>
Completed 2011-2014	437	
Remaining Requirement 2014-2031 (17 years)	3203	188
Requirement for five years 2014-2019	940	
Additional 5% buffer	47	
Total Requirement for five years 2014-2019	987	197
Supply		
Commitments at 1 April 2014	299	
SHLAA sites 2014	329	
Windfall Allowance (years 4 and 5)	64	
Local Plan Strategic Allocations	295	
Shoreham Harbour Broad Location	70	
<b>Total Supply 2014-2019</b>	<b>1057</b>	
Projected surplus	70	

A 5.4 year supply of deliverable sites can be demonstrated.

**Risk: Failure to maintain a five year housing land supply due to slow delivery rates or delays in development.**

- 4.1.4 This Housing Implementation Strategy demonstrates that there are no fundamental obstacles to delivering a five year supply of housing land in the early part of the Plan period. It should be acknowledged however, that build rates may be affected by wider housing market conditions over which the Council has no control.



## 5. Affordable Housing Trajectory

5.1.1 The saved 1996 Local Plan Policy AH3 seeks 30% affordable housing on sites of 15 dwellings or more. Table 5 below sets out how much affordable housing has been delivered per annum since 2006. It indicates that 27% of the total housing supply over the last 7 years has been affordable housing with an annual average of 41 affordable homes.

*Table 7: Affordable Housing Completions*

Year	Total Dwellings (gross)	Affordable Housing	% Affordable Housing
2006/2007	230	31	13.5
2007/2008	159	33	20.8
2008/2009	134	14	10.4
2009/2010	92	66	71.7
2010/2011	88	20	22.7
2011/2012	204	91	44.6
2012/2013	151	32	21.2
<b>Total</b>	<b>1058</b>	<b>287</b>	<b>27.1</b>

5.1.2 The Coastal West Sussex Strategic Housing Market Assessment Update 2012 sets out the level of affordable housing need in Adur. Policy 22 of the Proposed Submission Adur Local Plan 2014 sets out the thresholds that all residential development will be required to provide affordable housing either on site or through commuted payments for off- site provision.

5.1.3 The main sources of supply of affordable housing will be through:

- Provision on-site by developers in partnership with Registered Providers
- Registered Providers delivering on sites within their own control
- Adur District Council as part of potential self- build schemes

5.1.4 The following trajectory sets out the likely delivery of affordable housing if the maximum levels of affordable housing are achieved according to policy requirements over the Plan period:

Table 8: Affordable Housing Trajectory 2014

	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031
Strategic Allocations			20	40	40	40	41	41	41	41	20		0	0	0	0	0
Broad Location			29	29	29	29	29	29	29	29	29	30					
The Willows, Irene Avenue, Lancing	23																
Southlands Hospital	12																
79/81 Brighton Road, Shoreham-by-Sea		36															
Southlands Hospital			11	11	12												
Riverside Business Centre, Old Shoreham Road, Shoreham-by-Sea		12	12	12													
<b>Total</b>	<b>35</b>	<b>48</b>	<b>72</b>	<b>92</b>	<b>81</b>	<b>69</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>49</b>	<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Risk: that sufficient affordable housing will not be delivered over the Plan period**

- 5.1.5 The Government has recently consulted on a proposed new 10 unit threshold for section 106 affordable housing contributions (ended on 4 May 2014) to help address the disproportionate burden being placed on small scale developers and which prevents the delivery of small scale housing sites. The outcome of this consultation is currently unknown but should it be adopted as national policy, the Local Plan policy requirement for delivery of affordable housing either on site or via a commuted payment on sites of less than 10 dwellings will be deleted through a proposed modification. Historically a large number of sites coming forward for development in Adur are on sites which could accommodate less than 15 dwellings. Given the need for affordable housing Adur and evidence that indicates it would be viable to ask for affordable housing or financial contribution on such sites, this would impact on the Councils ability to meet its affordable housing target of delivering 50 dwellings per year as set out in the Adur and Worthing Housing Strategy 2012-2017.
- 5.1.6 Given the uncertainty over the national affordable housing policy and future funding mechanisms means it is difficult to assess the delivery of affordable housing.

## 6. Overall Risks to Housing Delivery

- 6.1.1 The Council is confident that the Local Plan strategy is able to deliver sufficient housing to meet the target of 3488-3638 dwellings in the Proposed Submission Adur Local Plan 2014 and ensure a continuous supply of housing throughout the Plan period. However, it is necessary to identify potential risks to delivery, firstly to increase the robustness of this Housing Implementation Strategy and also to ensure that, where possible, potential contingencies are in place to address these risks.
- 6.1.2 The main identified risk to overall housing delivery is the health of the economy, which will be a major factor in the supply of housing throughout the Local Plan period. Whilst the housing market is showing signs of recovery, this has not yet been reflected in the number of housing completions with fewer dwellings (93) being completed in 2013/2014 than in the two previous years. This may, in part, be due to slower build rates, lack of available building materials and smaller sites being put on hold during the recession. Also, there is typically a lag time of around 18 months for small sites to be reflected in completions. However, if the market suffers another downturn, this will have a detrimental effect on housing delivery rates, over which the Local Authority will have little control.
- 6.1.3 The level of development proposed to be delivered in this Plan (174-182 dpa) is considerably higher than has historically been delivered in Adur. The historic build rate over the last 12 years is on average 122 dwellings per year. There is a risk that the high number of completions predicted between 2016 and 2024 will not be achieved. The concern is that the market will not be able to absorb these levels of completions, particularly when other large schemes in adjoining authorities are planned to deliver to similar timescales. Also, it is possible that the building industry will not have the capacity to facilitate the delivery of sites.
- 6.1.4 There is a risk therefore that the Local Plan housing target will not be delivered. The Council is confident that a comprehensive evidence base indicates that sufficient housing will be delivered from the sources identified. The Council has sought to minimise the risk of unforeseen development constraints by undertaking detailed assessments of potential constraints during the Plan preparation process. This has included commissioning a number of background evidence studies and continuous liaison with key statutory agencies and site promoters throughout the local plan process. Overall the risk of non delivery of sites is low although unforeseen barriers to development may occur. The Council will work with developers to help overcome this.

- 6.1.5 The risk of additional Infrastructure requirements, particularly in respect of the strategic allocations, has been minimised through working closely with key infrastructure and service providers throughout Plan preparation process.
- 6.1.6 Viability of individual sites is a key risk. Working with the relevant infrastructure/service providers and site promoters, an Infrastructure Delivery Plan has been prepared alongside this Local Plan. This sets out what infrastructure is required to support specific developments and the costs and sources of funding proposed to deliver this infrastructure.
- 6.1.7 There is a risk that the policies in this Plan will have an adverse impact on the viability of development, thus inhibiting completion rates. A Whole Plan and Community Infrastructure Levy Viability Assessment has been undertaken. It indicates that the policies of the Plan, taken together, do not adversely impact the viability of development.

## 7. Contingencies

- 7.1.1 The Council has been unable to identify contingency sites due to the shortfall in meeting its objectively assessed need for housing, but, in addition to the housing identified, there is likely to be scope for additional housing from other sources:
- Additional housing opportunities from future “windfall “ large sites of 6+ homes which are not currently identified in the SHLAA
  - Sites identified in the SHLAA that are suitable for development but are not currently available (see Appendix 4)
  - Additional housing from current planning applications which were either granted consent after 1 April 2014 or are yet to be determined (see Appendix 5).
- 7.1.2 The Local Plan does not rely on contributions from these additional sources to help meet the housing target as there is uncertainty about how much and when any new homes may be delivered. It does however provide a degree of flexibility in the event of any shortfall arising in identified sites over the Plan period.

## 8. Monitoring and Review of Performance

- 8.1.1 The Council comprehensively monitors housing delivery. The monitoring of planning permissions on all sites involving residential dwellings is undertaken by West Sussex County Council on behalf of the West Sussex Authorities on an annual basis. This has been undertaken since the late 1990s and thus good historical evidence of delivery exists. All sites of 6 or more dwellings are visited and together with information from a variety of other sources, the progress of each site is tracked. This information is checked by the local authority and additional information on site specific delivery rates and phasing is provided. Any lapsed permissions are removed from the database. Together this provides comprehensive information on housing commitments, completions and other identified sites.
- 8.1.2 This information is included in the Councils Annual Monitoring Report (AMR) which will be the main document for monitoring housing delivery. The AMR also shows the 5 year housing land supply position against the housing target set in the Local Plan. The housing trajectory will be updated annually and provides for projected housing supply over the plan period to 2031.
- 8.1.3 The SHLAA will be monitored on an annual basis to ensure that the most up to date site information is incorporated and reflected in an updated housing trajectory. This will be reported through the AMR.
- 8.1.4 If monitoring of the five year housing land supply indicates that targets are not being met in the short term or that strategic sites are not being delivered in the longer term, the Council will seek to address the issues within the framework of this Plan. The Council will continue to work with landowners, developers, and other relevant bodies to identify and resolve obstacles to delivery.
- 8.1.5 If however, the issues surrounding delivery are unable to be resolved then the Council may need to review the Local Plan. This may be the case if:
- New evidence indicates that an unforeseen issue prevents development of a strategic allocation/broad location
  - New evidence results in a significant reduction in the amount of housing able to be delivered on a strategic allocation/broad location and the shortfall is unable to be addressed elsewhere in the Plan
- 8.1.6 Under delivery in any one particular year may not require immediate intervention but prolonged under delivery may have implications for the 5 year supply.

- 8.1.7 Where necessary the Council may produce development briefs/planning briefs/planning statements to increase certainty of sites progressing through planning process.
  
- 8.1.8 The Annual Monitoring Report will be published in December each year and made available on the council's website.



## 9. Appendix 1 – SHLAA Review - as at 1st April 2014

Table 9. SHLAA Review as at 1<sup>st</sup> April 2014

SHLAA / Monitoring Reference	Site	Site Capacity (Net)	Time Frame (Years)			Achievability
			0-5	6 -10	11-15	
ADC/049/13	Riverbank Business Centre & 12/18 Old Shoreham Road, Shoreham-by-Sea	120	120			Planning permission has been granted – awaiting section 106 Agreement to be signed (AWDM/0935/13)
ADC/052/13	Civic Centre Staff Car Park, Ham Road, Shoreham-by-Sea	10	10			Planning Brief has been prepared to support marketing exercise commencing October 2014
ADC/059/13	Adur Civic Centre, Ham Road, Shoreham-by-Sea	75		75		Planning Brief has been prepared to support marketing exercise commencing October 2014
ADC/083/13	Lancing Manor Filling Station, Old Shoreham Road, Lancing	8	8			Planning application decision pending (AWDM/1128/14)
ADC/086/13	Community Buildings, Pond Road, Shoreham-by-Sea	27	27			Site in multiple public ownership. Agreement reached in principle to fund joint feasibility/business plan. Planning application anticipated in 2015.
ADC/090/13	Northbourne Medical Centre, Eastern Avenue, Shoreham-by-Sea	10	10			Site is now vacant. Early pre-application enquiry from agent.
ADC/119/13	Land at Eastbrook Primary School, Manor Hall Road, Southwick	24	24			In public ownership, the site is surplus to requirements and is now vacant. A planning application is anticipated in 2015.
ADC/121/13	Land at Southlands Hospital, Upper Shoreham Road, Shoreham-by-Sea	113	113			Planning application pending decision
ADC/124/13	Land west of Highview, Sompting	17	17			Pre application discussions held with developer – anticipate planning application end of 2014/early 2015

SH/004/13	Land adjacent Ham Business Centre, Brighton Road, Shoreham-by-Sea	70	70			Planning permission has been granted – awaiting section 106 Agreement to be signed (AWDM/0762/13)
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## 10. Appendix 2 – Large Sites with Extant Planning Permission as at 1st April 2014

Table 10. Large Sites with Extant Planning Permission as at 1<sup>st</sup> April 2014

Application Number	Site	Site Capacity (Net)	Time Frame (Years)			Achievability
			0-5	6 -10	11-15	
AWDM/1242/12	Land north of The Globe Primary School, Irene Avenue, Lancing	23	23			Under construction
AWDM/0078/11	Regal House, 45-49 Penhill Road, Lancing	13	13			Agent indicated that site to commence within 5 years.
AWDM/1483/12	136 Upper Shoreham Road, Shoreham-by-Sea	16	16			Under construction
AWDM/0501/12	79/81 Brighton Road, Shoreham-by-Sea	132	132			Demolition complete
AWDM/0871/11	Norfolk House, High Street, Shoreham-by-Sea	9	9			Building now vacant and site fenced.
AWDM/0287/09	Part of Southlands Hospital Site, Upper Shoreham Road, Shoreham-by-Sea	197 (of which 9 remain to complete)	9			Under construction
AWDM/1404/12	Land at 60/66 Busticle Lane, Sompting	6	6			Under construction
AWDM/0334/13	82 & 88 Underdown Road and land r/o 77/83 Southview Road, Southwick	13	13			Under construction

# 11. Appendix 3 – Calculating a Small Sites Windfall Allowance

## 11.1 Introduction

11.1.1 The National Planning Policy Framework (NPPF) 2012 defines windfall sites as:

*“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available”*

11.1.2 It allows local planning authorities to *“make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens” (para 48).*

11.1.3 The Planning Practice Guidance (PPG) 2014, states that “local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance based on a geographical area” (para 24)

11.1.4 A windfall allowance takes account of housing development on sites which it is not possible to identify in advance. To meet the NPPF criteria, a windfall allowance must avoid double counting those sites already identified for housing development and must be supported by evidence.

11.1.5 The purpose of this paper is to provide an assessment of the windfall allowance which will be included in the Proposed Submission Adur Local Plan 2014.

## 11.2 Housing Land Supply

11.2.1 The Local Plan covers the 20 year period 2011 to 2031 and will deliver between 3488 and 3638 new homes at an annual average of 174-182 dwellings.

11.2.2 The housing land supply is comprised of the following sources:

- Housing completions since the 2011 base date of the Local Plan
- Dwellings with planning permission but which have not yet commenced or are under construction

- Sites identified in the Strategic Housing Land Availability Assessment 2014 (sites of 6+ dwellings)
- An allowance for windfall sites (from 2017-2031)
- Strategic allocations to be taken forward in the Local Plan
- Shoreham Harbour Regeneration Area Broad Location

### 11.3 Calculating a Windfall Allowance

11.3.1 The windfall allowance has been calculated using historic data over a nine year period 2004 to 2013 which takes account of a range of market conditions from a buoyant market in 2004 to 2007 to a downturn between 2007 and 2011. The effects of the downturn were not seen in terms of housing delivery until 2010/2011. It is not considered necessary to make any adjustments to allow for different market conditions.

#### Analysis of past trends

11.3.2 Table 9 indicates that over the past 9 years the annual housing completion rate has fluctuated from a high of 200 completions in 2005/06 to a low of 61 completions in 2009/10 which broadly follows the market trends. There has been an average of 141 dwellings completed per annum over this time period.

11.3.3 Housing completions are categorised according to the number of dwellings delivered. Large sites 6+ units make up the Housing Land Supply and small sites of 5 dwellings or less are windfall sites. Between 2005/06 and 2013/14 there were 286 windfall completions, which account for 22% of all completions.

*Table 11. Historic Housing Delivery Rates 2004-2013*

Year (April-March)	Number of Completed Dwellings			Percentage Windfall
	Large Sites (6+) net	Windfall (net)	Total (net)	
2004/05	94	26	120	22%
2005/06	171	29	200	15%
2006/07	174	42	216	19%
2007/08	118	28	146	19%
2008/09	88	35	123	28%
2009/10	47	14	61	23%
2010/11	39	24	63	38%
2011/12	149	44	193	23%
2012/13	107	44	151	29%
	987	286	1273	22%
Total	987	286	1273	
Average	110	32	141	

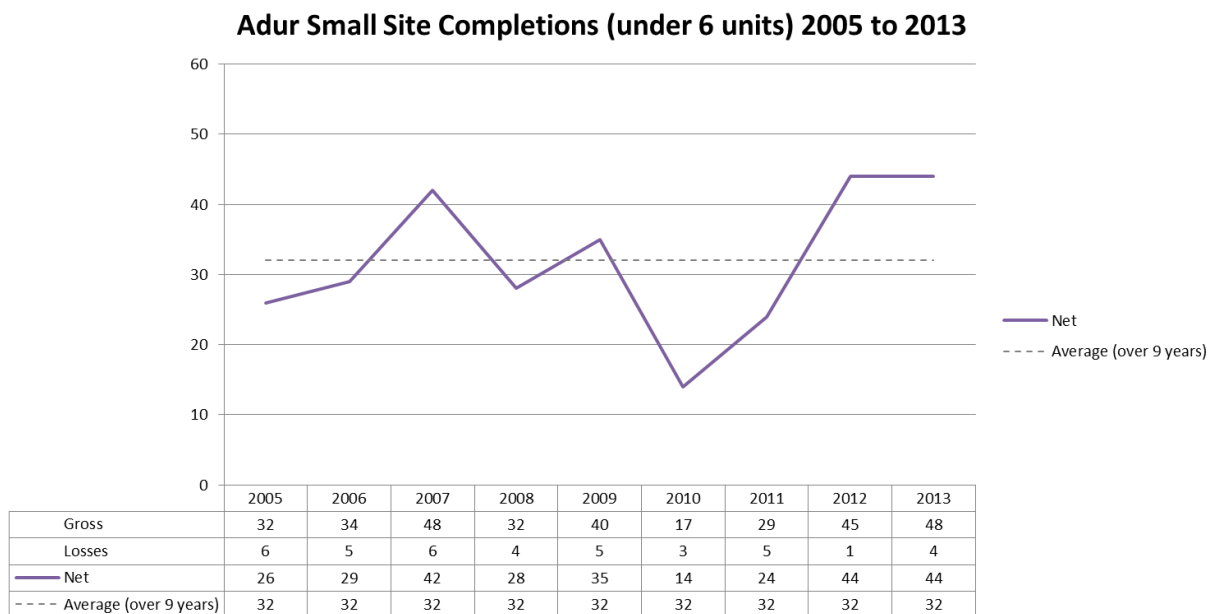
### Avoidance of Double Counting

- 11.3.4 A significant proportion of housing development has historically been delivered on small sites which comprise of infill sites, changes of use and conversions. These sites have not been included in the SHLAA as they fall below the threshold of 6 dwellings. However, it is important to ensure that there is no double counting between historic Housing Land Supply sites and current SHLAA sites.
- 11.3.5 The Adur SHLAA 2014 (published October 2014) identifies all sites which have a potential development capacity of 6+ dwellings (new build, redevelopment, conversion or change of use). It provides a comprehensive assessment of housing potential on these sites and has been prepared to help inform housing delivery in this Local Plan.
- 11.3.6 Historic monitoring data from West Sussex County Council identifies all HLS sites of 6+ dwellings. These sites have been excluded from the analysis.
- 11.3.7 The NPPF does not allow for development on garden land to be included in the windfall allowance. Historic monitoring data from WSCC identifies all development sites on garden land. These have therefore been excluded from the analysis.
- 11.3.8 Table 10 indicates the historic delivery rate for each category of development type which has been used to calculate the windfall allowance.

Table 12. Number of windfall dwellings excluding sites of 6+ dwellings and garden land

Year (April-March)	New Build	% Total Windfall	Conversion/ Change of Use	% Total Windfall	Total Windfall
2004/05	9	35%	17	65%	26
2005/06	8	28%	21	72%	29
2006/07	19	45%	23	55%	42
2007/08	11	39%	17	61%	28
2008/09	14	40%	21	60%	35
2009/10	4	29%	10	71%	14
2010/11	9	38%	15	62%	24
2011/12	14	32%	30	68%	44
2012/13	27	61%	17	39%	44
<b>Total</b>	<b>115</b>	<b>40%</b>	<b>171</b>	<b>60%</b>	<b>286</b>

Figure 3. Adur Small Site Completions (under 6 units) 2005 to 2013



11.3.9 The average annual windfall from these sources is 32 dwellings per annum between 2004 and 2013, with the highest proportions being from conversions/changes of use.

11.3.10 Data from windfall completions from previously developed sites provides robust basis from which to forecast future windfall delivery.

## 11.4 Estimating a windfall allowance

### Large sites

- 11.4.1 The majority of large redevelopment sites have been identified in the SHLAA. Whilst further large sites may come forward during the Local Plan period beyond those currently identified in the SHLAA, an additional windfall allowance for large sites is not considered justified (to avoid double counting). It is not proposed to include a windfall allowance for large sites during the Plan period.

### Small sites

- 11.4.2 Due to the built up nature of Adur, small infill sites, changes of use and conversions of buildings have consistently come forward across the whole of the urban area. It is anticipated that the historic windfall delivery rate for sites of under six dwellings will continue.
- 11.4.3 It is anticipated that the windfall delivery rate for change of use/conversion could increase due to flexible policies in the NPPF regarding the reuse of redundant buildings and changes to permitted development rights. Apart from 2012/2013, the number of changes of use/conversions has been fairly consistent and make up 60% of windfall sites. Whilst this may well increase the number of small windfall sites coming forward in future years, it is not considered necessary or appropriate to make any adjustment to the rate of windfall delivery at this stage although this will be monitored through the Annual Monitoring Report.

### Discounting Planning Permissions in the early part of the Plan period

- 11.4.4 New planning permissions for dwellings on small windfall sites will continue to come forward each year and evidence indicates that these are likely to be completed within 3 years. West Sussex County Council undertakes annual monitoring on behalf of the West Sussex Local Planning Authorities and has historically applied a 55% discount rate for delivery of these sites. This discount rate has been based on many years of monitoring the delivery of small sites across West Sussex. To avoid any double counting of small sites which currently have planning permission and are counted as commitments, an allowance for windfall sites has not been made for the three years of the Plan period ( 2014/15 to 2016/17) but has been applied from 2017 to 2031.

## 11.5 Conclusion

- 11.5.1 The level of housing projected to come forward on small windfall sites is based on historic trends over the past 9 years (2004/05 to 2012/13). The average completion of dwellings on small sites over this period was 32



dwellings (net) per annum. The evidence presented above indicates that there is no real trend to windfall provision and the Council can justify projecting forward on basis of these past figures.

## 12. Appendix 4: List of rejected SHLAA sites to be monitored for their development potential

SHLAA ID	Site Address	SHLAA 2013 Status Conclusion
ADC/018/13	Coastline Caravans, 88 Old Shoreham Road Lancing	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that there was no reasonable prospect that housing will be delivered on the site as the site is not currently available. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study. Although the site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term (particularly if the strategic allocation to the south and east is delivered - ADC/122/13) and, as such, it should be monitored on a regular basis.
ADC/023/13	South Street Car Park, South Street Lancing	This Council owned site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the site is more suitable to be retained as a public car park. The Council decided in June 2007 that this site should remain as a public car park. Following a reassessment in 2013 it is concluded that, pending a review of Council land holdings, the same reasons for rejection still apply and therefore this site is not taken forward in this study. This site is now being considered as having potential for a Council new build scheme. Although this site is not taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.
ADC/025/13	Police Station, 107-111 North Road Lancing	This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is rejected from the scope of this study as it is not considered that there is a reasonable prospect that housing will be delivered on the site as it is not currently available. It is identified in the Sussex Police Estates and Facilities Department Estates Strategy 2013-2017 as a site where the building is not in the right location/under-utilised or in a poor state of repair and where the service could be reprovided in a better location within the area. Whilst the building is not used to its full potential, alternative provision for this service has not yet been provided. Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term and should be monitored on a regular basis.
ADC/036/13	Garage Compound, Gravelly Crescent Lancing	This Council owned site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the site is located within a residential area, the cumulative impact of reducing existing car parking space whilst increasing housing with its potential demand for more parking space would result in increased on street parking within an area with little or no capacity for more parking. Development would have an unacceptable impact on residential amenity and the ability of emergency services to access these residential streets. Part of this site is now being considered as having potential for a Council new build scheme. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.
ADC/053/13	Car Park, Tarmount Lane	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the site is

	Shoreham	<p>required for public car parking in Shoreham town centre and is not considered suitable for housing development. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term (as part of a larger mixed use redevelopment scheme to include Shoreham Police Station (ADC/120/13)) and, as such, it should be monitored on a regular basis.</p>
ADC/075/13	NTL, Gardner Road Southwick	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that there was not a reasonable prospect that housing would be delivered on this site as it is not currently available. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term as, as such, it should be monitored on a regular basis.</p>
ADC/076/13	Land at 7-27 Albion Street Southwick	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it is considered that there is not a reasonable prospect of housing being delivered on this site as it is not currently available. Following a reassessment in 2013 it is concluded that, pending a review of Council land holdings, the same reasons for rejection still apply and therefore this site is not taken forward in this study. Part of this site is now being considered as having potential for a Council new build scheme.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer potential in the longer term and should be monitored on a regular basis.</p>
ADC/082/13	Laundry, Alma Street Lancing	<p>This site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013 it is concluded that the availability of this site is unknown. There was no response at the "Call for Sites" stage of both the 2012 SHLAA update and this SHLAA and it is concluded that the site is no longer available and should not be taken forward in this study and that there is not a reasonable prospect that housing will be delivered on this site. The Council is aware that there has been developer interest in this site and although this site is not being taken forward for residential development at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/084/13	Yard rear of St Peters Place, Western Road Sompting	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that the site is not currently available. The planning application for residential development in 2008 was withdrawn and the site is not being actively promoted for development.. There was no response at the "Call for Sites" stage of both the 2012 SHLAA update and this SHLAA. For this reason the site should not be taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/088/13	Cecil Norris House, Ravens Road Shoreham	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that the site is still in residential use and, pending a review of Council land holdings, this site is not currently available and the</p>

		<p>site should not be taken forward in this study. This site is now being considered as having potential for a Council new build scheme. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/089/13	3 to 15 New Road Shoreham	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that, as the planning consent for residential development has lapsed and the applicant is no longer pursuing its redevelopment, the site is not currently available and the site should not be taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that, as market conditions continue to improve, it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/091/13	412/414 Brighton Road Shoreham	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. A planning application for residential development was withdrawn and the site is no longer being promoted for development. Following a reassessment in 2013, it is concluded that the site should not be taken forward in this study as it is not currently available.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/093/13	Car Park, Beach Green Shoreham	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable subject to the flooding constraints being satisfactorily addressed. Following a reassessment in 2013, it is concluded that, as the flood issues have yet to be addressed, the site should not be taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/095/13	124 Upper Shoreham Road Shoreham	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that there is not a reasonable prospect that housing will be delivered on the site as the site is not currently available. There was no response at the "Call for Sites" stage of both the 2012 Update and this SHLAA and it is concluded that the site is no longer available and should not be taken forward in this study.</p> <p>Although the site is not being taken forward in the SHLAA at this time it is considered that, as market conditions continue to improve, it may offer development potential in the longer term and should be monitored on a regular basis.</p>
ADC/099/13	r/o 53/59 Southview Road Southwick	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. Whilst the agent has confirmed that the site is likely to be delivered 2016-2018, a planning application has yet to be received. Following a reassessment in 2013, this greenfield site comprises the rear garden of a dwelling and the principle of redevelopment has not been established. In addition, it has not been demonstrated that access to the site can be satisfactorily achieved. Therefore it is concluded that this site should not be taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.</p>
ADC/106/13	Land north east of Hasler Estate	<p>This greenfield site was identified through the Local Plan process as a potential strategic allocation for housing development. However,</p>

	Lancing	<p>development of the site is currently not achievable. Various constraints, including flood risk and landscape impact have not been addressed to the satisfaction of the local planning authority. The site has not therefore been included as a strategic allocation in the Revised Draft Adur Local Plan 2013.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/117/13	Lancing Delivery Office, 40 North Road Lancing	<p>This site, that was not previously considered as part of the 2009 SHLAA review, is rejected from the scope of this study. The landowner has indicated that prior to any redevelopment, the current use as a delivery office for the Post Office would need to be relocated within the vicinity and a suitable site has not been identified. The site is therefore not currently available.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>
ADC/120/13	Shoreham Police Station, Ham Road Shoreham	<p>This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is rejected from the scope of this study as it is not considered that there is a reasonable prospect that housing will be delivered on the site as it is not currently available. It has been Identified in the Sussex Police Estates and Facilities Department Estates Strategy 2013-2018 as a site where the building is not in the right location/under-utilised or in a poor state of repair and where the service could be reprovided in a better location within the area.</p> <p>Pending reprovision of this service, the site is not currently available. Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term and should be monitored on a regular basis.</p>
ADC/123/13	Land north of 20/40 Firle Road Lancing	<p>This site was previously within the Area of Outstanding Natural Beauty where development was resisted, but was then excluded from the National Park. The Proposed Submission Adur Local Plan 2014 proposes that the site be included within the built up area boundary. The site has previously been promoted for development by the previous owner. More recently, a pre application enquiry has been made for residential development on this site comprising 5 dwellings. The site is too small for 6 dwellings which is the threshold for this study. Any dwellings that may be delivered on this site will be picked up through other monitoring.</p>
ADC/128/13	Land between Adur Rec and New Salts Farm Road Lancing	<p>This greenfield site was identified through the Local Plan process as a potential strategic allocation for housing development. However, the development of the site is currently not achievable. Various constraints, including flood risk, transport and landscape impact have not been addressed to the satisfaction of the local planning authority. The site has not therefore been included as a strategic allocation in the Proposed Submission Adur Local Plan 2014.</p> <p>Although the site is not being taken forward in the SHLAA at this time as it is considered that it may offer development potential in the longer term and, as such, it should be monitored on a regular basis.</p>
ADC/129/13	Land north west of the Hasler Estate Lancing	<p>This greenfield site was identified through the Local Plan process as a potential strategic allocation for housing development. However, the development of the site is currently not achievable. Various constraints, including flood risk, transport and landscape impact have not been addressed to the satisfaction of the local planning authority. The site has not therefore been included as a strategic allocation in the Proposed Submission Adur Local Plan 2014.</p> <p>Although the site is not being taken forward in the SHLAA at this time as it is considered that it may offer development potential in the longer term and, as such, it should be monitored on a regular basis.</p>
ADC/133/13	St Marys	<p>This site, that was not previously considered as part of the 2009 and</p>

	Church Hall, 24/25 East Street Shoreham	2012 SHLAA review is rejected from the scope of this study as it is not considered that there is a reasonable prospect that housing will be delivered on the site as it is not currently available. Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term and should be monitored on a regular basis.
ADC/137/13	Town Hall Chambers,45/49 High Street, Shoreham	This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is considered to have potential for development. Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term as a planning application is pending (AWDM/0737/14).
ADC/138/13	Land north 123/207 Manor Hall Road Southwick	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the east of the site contains well used allotments which have not been declared surplus to requirements. Whilst the land to the west is vacant, the lack of access, the proximity to the sub station and the location of underground cables makes the site physically constrained. It is considered more appropriate as a possible extension to the current allotments or a community use rather than for housing development. Following a reassessment in 2013 it is concluded that there may be some potential for development in the longer term if alternative access arrangements can be achieved. A development brief is currently being prepared for both this site and ADC/132/13) to help guide development. The site will be monitored on a regular basis.
SH/001/13	5 Brighton Road Shoreham	This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change. The precise form and amount of development has yet to be determined but any residential development delivered on this site in the future will contribute to the housing delivery target in the Local Plan. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.
SH/002/13	Technology House, West Street Southwick	This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change. The precise form and amount of development has yet to be determined but any residential development delivered on this site in the future will contribute to the housing delivery target in the Local Plan. The site is currently in employment use and is not available for development. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.

## 13. Appendix 5: Position since 1 April 2014

13.1.1 Since 1 April 2014, the following large sites have either been granted planning permission for residential development or are yet to be determined:

*Table 13. Planning application granted consent since 1 April 2014*

<b>Site Address</b>	<b>SHLAA ID Number</b>	<b>Number of dwellings (net)</b>
Town Hall Chambers, 45/49 High Street, Shoreham-by-Sea	ADC/137/13	6

*Table 14. Planning applications not yet determined at 1 April 2014*

<b>Site Address</b>	<b>SHLAA ID Number</b>	<b>Number of dwellings (net)</b>
Land adjacent Ham Business Centre, Brighton Road, Shoreham-by-Sea (awaiting s.106 Agreement to be signed)	SH/004/13	70
Riverbank Business Centre, Old Shoreham Road, Shoreham-by-Sea (awaiting s.106 Agreement to be signed)	ADC/049/13	120
Lancing Manor Filling Station, Old Shoreham Road, Lancing	ADC/083/13	6
Southlands Hospital, Upper Shoreham Road, Shoreham-by-Sea	ADC/112/1313	113