

**ADUR DISTRICT COUNCIL
SUBMISSION ADUR LOCAL PLAN 2016**

HOUSING TOPIC PAPER



Contents:

- 1. Current Position**
- 2. Introduction**
- 3. Background**
- 4. National Planning Policy**
- 5. Strategic Context for the Housing Strategy**
- 6. Housing Needs and demands**
- 7. Housing Land Supply**
- 8. Constraints**
- 9. Housing Target**
- 10. Addressing the Shortfall**
- 11. Conclusion**

Appendices

1. Current Position

1.1 Following publication of the Objectively Assessed Needs Housing Update Report (September 2016) which takes account of the 2014 based Sub-National Population Projections and 2014 based Household Projections published in 2016, the Council has proposed Major Modifications which:

- Extends the Local Plan period to 2031 to ensure a 15 year time period from the date of adoption of the Local Plan anticipated in 2017.
- Amend the Objectively Assessed Needs figure to 325 dwellings per annum (6825 dwellings over the Plan period 2011-2032).

1.2 These proposed Major Modifications will impact on the following:

- The annual housing delivery target
- The shortfall when measured against the Local Plan delivery target
- The percentage of the Objectively Assessed Need to be delivered through the Adur Local Plan
- The Adur Housing Trajectory 2016
- The Five Year Housing Land Supply Assessment

1.3 The following documents will be submitted in December 2016, when the most up to date housing monitoring information is available. These will reflect the updated OAN figure and the end date of the Plan period as proposed by the Major Modifications:

- The Strategic Housing Land Availability Assessment Update 2016
- The Five Year Housing Land Supply Assessment
- The Annual Monitoring Report 2016
- The Adur Housing Trajectory

2. Introduction

2.1 The Council considers that its approach to housing delivery in the Adur Local Plan meets the soundness tests set out in paragraph 182 of the National Planning Policy Framework for local plan preparation in that:

- The Plan has been **positively prepared** and has tried to meet objectively assessed housing requirements as far as it is reasonable to do so and is consistent with achieving sustainable development in Adur.
- The delivery strategy and housing target set out in the Local Plan is the most appropriate for Adur and is **justified** when considered against the reasonable alternatives, based on proportionate evidence.

- The housing delivery strategy is **effective** and is deliverable over the Local Plan period to 2031. It has addressed joint working on cross-boundary strategic priorities.
 - The housing delivery strategy is **consistent with national policy** and will enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.
- 2.2 In developing a housing target and delivery strategy, the Council has followed national guidance set out in the National Planning Policy Framework for “sustainable development” and produced appropriate technical studies such as a Strategic Housing Market Assessment (and subsequent assessments of Objectively Assessed Needs) and a Strategic Housing Land Availability Assessment (updated annually through the Annual Monitoring Report).
- 2.3 This Topic Paper will provide the background evidence to support the Council’s approach to housing delivery. It should be read in conjunction with:
- Duty to Co-operate Statement (March 2016)
 - Adur Housing Implementation Strategy (March 2016)
 - Strategic Housing Land Availability Assessment Update 2015 and Methodology (2013)
 - Sustainability Appraisal of the Adur Local Plan (2016)
 - Local Green Gaps Topic Paper 2016
 - Shoreham Harbour Topic Paper
 - Employment Topic Paper
- 2.4 The Council seeks to go as far as possible to meet identified housing needs through delivery of the following policies:
- Policy 2: Spatial Strategy** – sets out the overall spatial strategy for the delivery of development in Adur over the Plan period to 2031. It describes how new development will be distributed in Adur and is supported by the Sustainability Appraisal.
- Policy 3: Housing Provision** – sets a minimum housing delivery target of 3609 new homes to be delivered by 2031 and details as to where these new homes will be delivered.
- Policy 5: New Monks Farm, Lancing** - A mixed use strategic allocation to include 600 dwellings.
- Policy 6: Land at West Sompting** - A strategic allocation of approximately 480 dwellings.

Policy 8: Shoreham Harbour Regeneration Area - A 'broad location' policy addressing mixed use regeneration of the Shoreham Harbour Regeneration Area. This includes 1100 dwellings to be delivered in the Western Harbour Arm. Delivery will be facilitated through the Shoreham Harbour Joint Area Action Plan (see Shoreham Harbour Topic Paper for further details).

Policy 21: Housing Mix and Quality – allows for an appropriate mix and choice of housing in terms of tenure, house type and size in accordance with identified local needs.

Policy 22: Affordable Housing - sets out the Council's policy to achieve the delivery of affordable housing, which will go towards meeting the needs for affordable housing identified in the OAN work.

Policy 23: Density – this policy seeks to achieve efficient use of land by setting a minimum density requirement and encourages higher densities in appropriate locations such as town/ village centres and Shoreham Harbour – therefore maximising opportunities for housing delivery in appropriate locations.

- 2.5 The purpose of this Topic Paper is to demonstrate that, if the housing target required to meet the full objectively assessed need was planned for, there would be significant adverse impacts for Adur which would be in conflict with the policies in the NPPF when taken as a whole.
- 2.6 It will demonstrate that the housing delivery strategy proposed in this Local Plan will boost significantly the supply of new housing to be delivered, taking account of other development needs and the identified constraints of Adur.

3. Background

- 3.1 Adur District is located on the coast between Brighton & Hove City to the east and Worthing Borough to the west. The South Downs National Park lies in the northern part of the District and the English Channel to the south with the low lying land of the Adur Valley separating the settlements of Lancing and Sompting to the west from Shoreham-by-Sea, Southwick and Fishersgate to the east. As a result of this, these landscape constraints, and other factors such as the pattern of existing built development, flood, drainage, and the setting of the South Downs National Park, the Adur Local Plan area is heavily constrained.
- 3.2 It should be noted that this Local Plan does not address that part of Adur which lies within the National Park – this area will be covered by the emerging South Downs Local Plan.

3.3 The current Adur Local Plan was adopted in 1996 with an end date of 2006. Work commenced on the early stages of producing a Core Strategy in 2008.¹ Since then there has been an on-going dialogue with key stakeholders such as West Sussex County Council; infrastructure providers; statutory bodies including the Environment Agency; landowners and developers.

3.4 The key stages of consultation / publication for this Local Plan were as follows:

Stakeholder Issues and Options	June – July 2010
Adur Housing and Employment Options	27 June – 7 August 2011
Draft Adur Local Plan	19 September – 31 October 2012
Revised Draft Adur Local Plan	26 September – 7 November 2013 *
Proposed Submission Adur Local Plan	20 October – 1 December 2014
Amendments to the Proposed Submission Adur Local Plan 2014 (in relation to New Monks Farm strategic allocation) (Reg 18)	9 December 2015 – 4 January 2016
Amendments to the Proposed Submission Adur Local Plan (2016)	31 March 2016 – 11 May 2016

* The deadline for the receipt of representations was extended by a further two weeks.

4. National Planning Policy

4.1 The National Planning Policy Framework (NPPF), sets out the Government’s planning policies and how these are expected to be applied. It provides a framework “*within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities*” (paragraph 1). Its key message is a **presumption in favour of sustainable development** which is described as being a golden thread running through both plan-making and decision-taking. This is set out in paragraph 14 which states that for plan making this means:

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *Specific policies in this Framework indicate development should be restricted.*

4.2 A footnote (9) to this last point gives examples of where development might be restricted and includes designated Sites of Special Scientific Interest, within a

¹ Work commenced on an earlier version of the Core Strategy in 2005 but this document was subsequently withdrawn.

National Park, Local Green Space, designated heritage assets and locations at risk of flooding.

- 4.3 This paragraph makes it clear that local planning authorities should plan positively to meet the development needs of their area and should meet objectively assessed needs unless there are significant adverse impacts of doing so.
- 4.4 Paragraph 17 of the NPPF sets out the government’s twelve core principles for planning which should underpin plan making. These include:
- Be genuinely plan led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up to date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;
 - Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
 - Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
 - Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- 4.5 The NPPF states that *“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development”* (paragraph 151) and should *“seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued”* (paragraph 152).
- 4.6 The principle of sustainable development is embedded throughout the Local Plan. The spatial strategy seeks to balance the development needs in Adur, including for

new homes and jobs, with the need to continue to protect and enhance the high quality built and natural environment.

- 4.7 In preparing its housing delivery strategy, the Council has taken account of guidance in the NPPF (paragraphs 47 to 55) which sets out how local planning authorities should *“boost significantly the supply of housing”* and *“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”* (paragraph 47).
- 4.8 In terms of an evidence base to support housing delivery, the NPPF states that *“local authorities should have a clear understanding of housing needs in their area”* and requires that they should *“assess their full housing needs, working with neighbouring authorities where housing markets cross administrative boundaries”* by preparing a Strategic Housing Market Assessment, and *“establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”* (paragraph 159) through the preparation of a Strategic Housing Land Availability Assessment.
- 4.9 Paragraph 181 of the NPPF states that *“local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.”* To meet these requirements The Council has worked in partnership with other local authorities in the Coastal West Sussex and Greater Brighton strategic housing market area to prepare the Coastal West Sussex Strategic Housing Market Assessment 2012, which has been updated and complemented by studies relating to the objectively assessed housing needs for the sub-region (in addition to those relating only to Adur).
- 4.10 A comprehensive Strategic Housing Land Availability Assessment has also been prepared, following the methodology set out in Planning Practice Guidance *“Housing and Economic Land Availability Assessment”* to inform future housing delivery, and a Housing Implementation Strategy (which sets out the Council’s proposed approach to managing the delivery of housing over the Local Plan period (paragraph 47, NPPF).

5. Strategic Context for the Housing Strategy

- 5.1 The Local Plan seeks to deliver a package of measures over the plan period in order to:
- Work towards meeting the objectively assessed development needs of Adur as far as possible, taking into account environmental assets and constraints and the capacity of infrastructure (which will also entail working with other local authorities in the sub-region, and possibly further afield);

- facilitate the regeneration of Adur; and
- meet the vision and objectives of the Local Plan.

5.2 Many of the core principles of the NPPF are reflected in the Vision and Objectives set out in the Local Plan and which have helped shape the strategy for future development in Adur. These include:

By 2031:

V1: Regeneration benefits for Adur will have been secured, and residents will enjoy an improved quality of life and wellbeing through better access to higher quality jobs, better choice in housing including affordable homes and new and improved local services, community infrastructure, and environmental quality. Inequalities between different parts of Adur will be reduced, uplifting the most disadvantaged neighbourhoods.

V2: Most development will have been focussed around Adur's main communities - Lancing, Sompting, Shoreham-by-Sea, Southwick and Fishersgate, and measures will have been taken to reduce their impact on the environment. Whilst many of Adur's residents will continue to visit Worthing, Brighton and other centres for employment and some retail and leisure functions, Adur and its town and village centres will continue to have an important role in providing retail, employment, leisure and community facilities, whilst also acting as a destination for visitors. Sompting village will have retained its rural village character.

V4: Much of the regeneration of Shoreham Harbour will have been delivered, achieving a mix of residential, employment, community, education, leisure and retail development, affordable housing, and new employment opportunities. The regeneration work will also have provided an opportunity for consolidating, reconfiguring and enhancing activities of the Port of Shoreham, which will continue to play a vital role in the local economy. Relocation of some commercial uses will have resulted in a more attractive urban environment and an improved interface between the Harbour and the rest of Adur.

V11: Development which meets the economic, social and environmental objectives of this plan will have been supported. Change will have been managed through an ambitious yet achievable planning framework (and associated Infrastructure Delivery Plan) which reflects the proposals and priorities of key stakeholders, local authorities and others, and monitored to assess its effectiveness in delivering development and associated infrastructure. This will involve working in partnership, and across boundaries, as necessary.

The Objectives of most relevance to housing delivery are as follows:

O1: To deliver 3609 dwellings up to 2031 to contribute to meeting objectively-assessed needs in Adur in terms of type, size and tenure.

O2: To ensure that local communities will benefit from regeneration through physical and social integration, and the provision of new homes (including affordable housing) which meet identified needs, employment opportunities, social and community facilities, leisure and transport facilities (including sustainable travel measures).

O3: To regenerate Adur through ensuring a range of employment opportunities and through new sustainable development opportunities. In particular, regeneration will seek to:

(a) Achieve strategic development at Shoreham Harbour, delivering housing and jobs; creating social, economic, environmental and infrastructure improvements which benefit Adur, its businesses, residents and visitors and contribute to the prosperity of the wider sub-region.

(b) Increase the role of Shoreham Airport in the local economy and wider area, through the provision of increased employment opportunities, enhancement of its role as an important visitor attraction, and its continued importance as a General Aviation Airport.

(c) Achieve strategic development at New Monks Farm, delivering housing and jobs and creating social, economic, and infrastructure improvements.

5.3 Policy 2 of the Local Plan sets out the spatial strategy for Adur, which reflects the vision and strategic objectives. It aims to balance development needs by proactively seeking to meet the objectively assessed housing need as far as possible, providing employment sites and facilitating the delivery of infrastructure whilst taking into account environmental assets and constraints and infrastructure capacity.

5.4 The Local Plan also guides development to the most appropriate locations. Realistic options for locating development are extremely limited due to the compact size of the local plan area and its constrained location between the South Downs National Park and the sea. There are few real choices in terms of different locations or strategies if the Plan is to go as far as it can to both meet objectively assessed housing needs and to provide sufficient employment floorspace.

6. Housing Needs and Demands

6.1 Following the Government's announcement in 2013 that Regional Spatial Strategies were to be revoked, it became necessary for Local Planning Authorities to develop their own assessment of the amount of housing required, in line with the National Planning Policy Framework.

6.2 Paragraph 47 of the NPPF states that Local Planning Authorities should '*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is*

consistent with the policies in this framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period’.

- 6.3 Clearly an important starting point for determining the housing supply target for the area over the Local Plan period is to establish the need and demand for new houses and the scale of housing supply needed to deliver it. This takes into account population and household projections based on demographic change, including the impact of predicted migration. It is also necessary to consider how future changes to the local economy could influence housing requirements.
- 6.4 A range of work has been commissioned by Adur District Council to assess the Objectively Assessed Need (OAN) for housing in the area covered by the Local Plan (previously the Core Strategy), including a Strategic Housing Market Assessment (as required by paragraph 159 of the NPPF), and subsequent work focussing on housing requirements for Adur in addition to that carried out across the Coastal West Sussex SHMA area. This is summarised in Appendix 1.
- 6.5 The Objectively Assessed Needs figure for housing used in the Submission Adur Local Plan (2016) was taken from the Objectively Assessed Need for Housing: Adur District Study 2015. This study used an updated set of demographic projections. It also took account of the Government’s national Planning Practice Guidance: Housing and Economic Development Needs Assessments published in 2014. This study superseded all previous Objectively Assessed Need Assessments. It took account of a range of factors, including affordability, house prices, rents, overcrowding issues and rates of delivery as well as the demographic projections and factors indicated above.
- 6.6 In terms of Adur’s Objectively Assessed Needs the study recommended the delivery of 5820 dwellings over the period (291 dwellings per annum) over the Local Plan period 2011-2031. These were the figures published in the Amendments to the Proposed Submission Adur Local Plan (2016) and subsequently reproduced in the Submission Adur Local Plan.²

7. Housing Land Supply

- 7.1 Paragraph 47 of the NPPF states *“to boost significantly the supply of housing, local planning authorities should:*

² Subsequent to this, an updated Objectively Assessed Needs Study was produced in September 2016 which takes account of the most recent demographic projections and extends the Plan period to 2032. Major Modifications are proposed which revise the OAN figure to 325dpa. This will be reflected in the Housing Trajectory and Five Year Housing Land Supply Assessment and other monitoring information to be submitted in December 2016 when it becomes available.

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *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 delivery of a five-year supply of housing land to meet their housing target; and*
- *Set out their own approach to housing density to reflect local circumstances.”*

7.2 Encouraging the effective use of previously developed land is one of the core planning principles in the NPPF (Paragraph 17). The Vision and Objectives of the Local Plan seek to maximise development on brownfield land.

7.3 The starting point to assessing housing land supply in Adur therefore has been to determine how much housing to meet Adur’s OAN can be delivered on previously development land (brownfield sites). For monitoring purposes, the base date of the Local Plan is 1 April 2011 which is consistent with the Objectively Assessed Needs evidence. The Submission Local Plan refers to the objectively assessed housing need of 291 dwellings per annum (5,820 homes over the Plan period 2011-2031), representing the demand for new housing.

Strategic Housing Land Availability Assessment (SHLAA)

7.4 In order to test the capacity of the local plan area to accommodate new dwellings a Strategic Housing Land Availability Assessment was undertaken which identifies sites which have potential for residential development and determines when they are likely to be developed. It helps to establish realistic assumptions about the availability, suitability and the likely viability of land to meet the identified need for housing over the Local Plan period.

7.5 The first SHLAA was produced in 2009 and built on both the Urban Housing Potential Study (2005) and the Urban Fringe Study (2006). The table below lists each SHLAA produced and the version of the Core Strategy/Local Plan it informed:

SHLAA		Core Strategy/Local Plan
<p>Adur Strategic Housing Land Availability Assessment 2009: Baker Associates/Adur District Council</p>	<p>Covered the period 2008 – 2023. A comprehensive review of all development opportunities in the District. The methodology used followed the Practice Guidance “Strategic Housing Land Availability Assessment” published by CLG 2007 and was prepared in consultation with a range of local agents, developers and key stakeholders to identify as many potential housing sites in the district. Identified 1147 dwellings that could potentially be delivered on brownfield sites</p>	<p>Draft Adur Local Plan 2012: For the period 2011-2028: Option A: 1785-2835 dwellings (105-167pa) Option B: 2635-3685 dwellings (155-217pa)</p>
<p>SHLAA Update 2012: Adur District Council</p>	<p>Updated to help inform the emerging Adur Local Plan. It reflected current circumstances on sites in the 2009 SHLAA and added new sites that had come forward since that time. Identified 289 dwellings that could potentially be delivered on brownfield sites</p>	<p>Revised Draft Adur Local Plan 2013: For the period 2011-2031: 2797-2947 dwellings (140-147pa)</p>
<p>SHLAA 2014: Adur District Council</p>	<p>It was considered appropriate to undertake a more comprehensive review following changes to the planning system at national level and the publication of other updated housing studies at the local level. It involved a re-assessment of all existing known sites (including those that were</p>	<p>Proposed Submission Adur Local Plan 2014. For the period 2011-2031: 3488-3638 dwellings (174-182dpa)</p>

	<p>rejected as being unsuitable for housing development in 2009) and two further “call for sites” exercises which identified new potential development opportunities. The methodology was again based on the SHLAA Practice Guidance 2007 together with relevant updates from Planning Practice Guidance “Housing and economic land availability assessment” first published in 2014.</p> <p>Identified 404 dwellings that could potentially be delivered on brownfield sites</p>	
SHLAA Update December 2015: Adur District Council	<p>A SHLAA Update was published in December 2015 and this has informed the evidence base of the Amendments to the Submission Adur Local Plan in relation to the potential supply and delivery of housing over the Plan period.</p> <p>Identified 291 dwellings that could potentially be delivered on brownfield sites</p>	<p>Amendments to the Proposed Submission Adur Local Plan (2016).</p> <p>For the period 2011-2031: 3609 dwellings (180dpa)</p>

7.6 The SHLAA only identifies sites that are capable of accommodating six net additional dwellings or more. This reflects the West Sussex County Council residential monitoring data which defines sites of 6 dwellings or more as large sites (whilst Planning Policy Guidance indicates a 5 dwelling threshold should be used, it allows for flexibility where appropriate. Using a threshold of 6 rather than 5 dwellings will avoid any double counting with small identified sites in the West Sussex monitoring data. Other West Sussex local authorities – Crawley, Chichester and Horsham – have used a 6 dwelling threshold at Examination). Each site is assessed for its suitability for development, when/whether it is available and if development is achievable during the Plan period.

7.7 In terms of their suitability, sites have been assessed using the following criteria:

- Current use
- Sustainability (location of site)
- Accessibility (local services and transport)
- Policy restrictions
- Physical constraints (access, contamination, ground conditions, flood risk)
- Potential Impacts (Conservation Area, Listed Building, landscape/local green gap)
- Environmental conditions (noise, pollution)

7.8 Sites were then further evaluated in terms of their availability for development by identifying:

- Control and ownership of site
- Legal constraints
- The intention to develop (and timescales)
- Planning status

7.9 Finally, if sites were assessed as being suitable and available for development, the likelihood of achieving development within the Plan period was assessed.

7.10 Sites were then classified as being either:

Committed sites – development of these sites have either been completed, are under construction or have had planning permission approved before the base date of the annual update. Dwellings delivered on these sites have been accounted for through other monitoring.

Potential sites – these sites have been assessed as being suitable, available and achievable. They have been included in the SHLAA as a potential source of housing delivery.

Rejected-monitor sites – these sites have been assessed as being suitable for residential development but are not currently available. These sites are not currently included in the SHLAA as a potential source of housing delivery but there is good reason to think that they may offer some development potential in the longer term. As such, they will be monitored on a regular basis and any change in circumstances will be reported through the SHLAA update in the Annual Monitoring Report.

Rejected sites – these sites have been rejected as they are either too small to accommodate six (net) homes or more, have been developed for other uses or it has been concluded that there is no reasonable prospect of them coming forward for residential development within the Plan period as they are not suitable.

Potential sites were considered to be deliverable (suitable, available and achievable).

Rejected – monitor sites were considered to be developable (they are suitable but they are either not available or their availability is currently unknown).

- 7.11 The SHLAA helped inform the housing delivery target as set out in Policy 3 of the Submission Adur Local Plan (2016). It identifies sites with a potential capacity to deliver 278³ dwellings by 2031.
- 7.12 Planning Practice Guidance indicates that the SHLAA assessment should consider all sites or broad locations capable of delivering residential development. In order to try and increase supply, a range of other sources of land within the built-up area have been carefully considered in order to determine realistic levels of potential supply.

Broad Location for Development within the Built Up Area

- 7.13 The Shoreham Harbour Regeneration Area is identified as a broad location for change. To maximise development opportunities, the Council is working as part of the Shoreham Harbour Regeneration Partnership (jointly with Brighton & Hove City Council, West Sussex County Council, and the Shoreham Port Authority) to prepare a Joint Area Action Plan detailing proposals to guide development. A minimum of 1100 new homes are proposed as part of the regeneration of the Western Harbour Arm (within the broad location) which will make a significant contribution to the housing requirements of the district. Planning permission has been granted for 132 dwellings (counted as a commitment for monitoring purposes) leaving 968 dwellings to be provided.
- 7.14 Further details of this broad location for development can be found in the Shoreham Harbour Topic Paper.

Other sources of sites are detailed below:

Table 1: Sources of Sites included in the SHLAA Assessment

Source of Information	Data provided
Sites within the planning process	
WSCC Residential Land Availability monitoring information (published on an annual basis)	Sites under construction or completed. Sites with planning permission but not commenced at the base date of the SHLAA
Adopted Adur District Local Plan 1996	Existing housing allocations not yet delivered/land allocated for employment or other land uses which may no longer be required for that use.

³ This figure differs from the Housing Supply Table 2 at this point because a site identified in the SHLAA (Ref: ADC/124/13) is a greenfield site and is referred to later in this paper as part of the Built Up Area Boundary review. This avoids double counting.

Shoreham Renaissance Strategy (2006)	Identifies sites with potential for development (including residential) in Shoreham-by-Sea
Site Specific Development Briefs	Identifies specific sites and constraints to delivery
AWDM list of planning applications refused /withdrawn/permission expired	Identifies potential constraints to delivering sites
Sites not currently in the planning process	
Adur and Worthing Council's Empty Homes Register	Identifies vacant buildings
Adur District Council Asset Management Information	Identifies Council owned land and buildings and background information
Council's GIS system	Contains a large amount of information from both internal and external sources, including contaminated land records, flood risk zones, planning designations.
Aerial Photographs	Helps to identify characteristics of site and surrounding area, topography, site boundaries
Call for Sites exercises (2009, 2012, 2013)	Provided an opportunity for any interested party to put forward site(s) for consideration. Supporting information requested.
National Land Use Database	Provides details of vacant and underused land and buildings and potential constraints on delivery.
Register of Surplus Public Sector Land	Identifies surplus land and buildings owned by public bodies.
Adur District Urban Housing Potential Study 2005 – survey/capacity work	Identified brownfield land with potential for development.
Adur District Urban Fringe Study 2006	Identified potential sites and constraints on the edges of settlements.
Adur Employment Land Review 2014	Assesses the local economy and employment sites and the supply and demand dynamics for employment uses within the District.
Adur and Worthing Open Space Study 2014	Provides a clear vision and recommendations on future provision of open space, sport and recreation.
Adur District Council Commercial Property Register	Identifies vacant buildings

Large sites with Planning Permission

7.15 Sites identified as commitments in the Housing Land Supply Study produced annually by West Sussex County Council are those sites that can accommodate six or more

dwellings which have either planning permission and not commenced or are under construction. These sites will deliver 259 (net) dwellings over the Plan period.

Small sites with Planning Permission

- 7.16 New planning permissions for dwellings on sites too small to be included in the SHLAA will continue to come forward each year. West Sussex County Council undertakes annual monitoring of housing completions on behalf of the West Sussex Local Planning Authorities and applies a 55% discount rate for delivery of these small sites based on historic monitoring of completion rates across the County. However, evidence prepared by West Sussex County Council in 2013 indicates that, for Adur District, approximately 82% of small sites are completed within 3 years (suggesting a lower discount rate could be applied). Whilst the 55% discount rate used is somewhat higher than evidence indicates, it does build in some flexibility. Between 2015-2031, it is forecast that 67 (net) dwellings will be completed on small sites.

Windfall Sites

- 7.17 Windfall sites are defined in paragraph 48 of the NPPF as *“sites which have not been specifically identified as being 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 SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.”*
- 7.18 Given the built up nature of the local plan area, a significant proportion of housing development comes forward on small sites which generally comprise infill sites, conversions and changes of use. These sites have a capacity to accommodate 5 dwellings or less and fall below the capacity threshold for sites to be included in the SHLAA.
- 7.19 To establish a realistic future housing delivery rate on windfall sites, the proportion of net dwelling completions on such sites has been calculated in relation to annual net housing completions using historic monitoring data since 2004/2005.
- 7.20 The detail can be found in the Housing Implementation Strategy 2016 (Appendix 3). Table 2 below indicates that windfall completions over the last 9 years account for 22% of all completions:

Table 2 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%
Total	987	286	1273	22%
Average	110	32	141	

7.21 Evidence from historic monitoring data indicates that housing will continue to be delivered from windfall sites and the Council can justify projecting forward on the basis of these past figures. The windfall allowance is included within the housing delivery target set out in Policy 3 of the Local Plan and has increased the housing supply by 416 dwellings⁴.

7.22 To avoid 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 first three years of the Plan period (2015/16, 2016/17, 2017/18) and has been applied from the monitoring year 2018/19.

Adur Employment Land Review 2014

7.23 The purpose of the Employment Land Review (ELR) 2014 was to understand Adur's economy, its current performance and future demand for employment in the district.

7.24 As a part of this review all employment areas within the Local Plan area were surveyed. The report concluded that the supply of land and premises for employment in Adur is very tight and, despite the majority being assessed as average in terms of quality, the ELR concluded that, other than at Shoreham Harbour, there is no quantitative case for the release of employment land for other uses. The amount of employment floorspace that can be delivered in the local plan area over the next 20 years is likely to be significantly lower than the forecast demand due to the limited capacity and environmental constraints of Adur. An Employment Topic Paper has been prepared which provides more detail.

⁴ Details can be found in the Housing Implementation Strategy 2014

Open Space Study and Playing Pitch Strategy 2014

- 7.25 Work undertaken in relation to open space and playing pitches in Adur has assessed existing sites, and considered needs up to 2031. Although shortfalls were identified in some typologies at ward level, overall Adur has an appropriate amount of open space. No overall surplus was identified which could provide opportunities for residential development.

Council owned land

- 7.26 Whilst previous SHLAA's have included some land within Adur District Council/Adur Homes ownership as having potential for residential development, the majority of these sites have not been progressed for various reasons such as availability.

Conclusion for housing delivery on brownfield sites

- 7.27 Taking the above sources of housing land supply together with 528 dwellings which have already been complete since 2011, a total of 2516 new dwellings can be delivered. This clearly falls significantly short of Adur's objectively assessed housing need of 5820 dwellings by 3304 dwellings. The need for greenfield sites has been apparent throughout the Local Plan process and this is recognised in the spatial strategy which seeks to maximise development on brownfield land while adding sustainable greenfield urban extensions adjacent to the existing urban area.

8. Constraints

Flood Risk

- 8.1 Future housing growth must be considered within the context of flood risk. Significant parts of Adur are affected by tidal, fluvial and groundwater flooding which acts as a significant constraint to housing growth. Information on flood risk which has been used to develop the spatial strategy is contained in the SFRA and the Flood Risk Topic Paper.

Landscape

- 8.2 A core principle in NPPF (paragraph 17) is to *"take account of the different roles and character of different areas.....recognise the intrinsic character and beauty of the countryside* and paragraph 109 states *"the planning system should protect and enhance valued landscapes"*
- 8.3 The Local Plan seeks to deliver a package of measures over the plan period in order to work towards meeting the objectively assessed needs for development in Adur as far as possible, taking into account environmental assets and constraints and the capacity of infrastructure. The plan aims to achieve a balance between providing development whilst also retaining and where possible enhancing Adur's character.

Due to the compact nature of the Adur Local Plan area, the majority of Adur's countryside is designated as Local Green Gap. As such, consideration of potential greenfield housing sites are inextricably linked with landscape and coalescence issues. Further discussion on this can be found in the Local Green Gaps Topic Paper.

- 8.4 To help inform the Local Plan, a study was commissioned in 2012 to undertake landscape and ecological assessments of six greenfield sites in the Adur Local Plan area (which had been put forward to the Council by site promoters) and to assess the extent to which development could be accommodated. Its purpose was not to conclude whether the sites were developable, and did not, in itself, allocate sites⁵. Further landscape work was completed in 2016.⁶

Greenfield sites

- 8.5 In order to maximise housing delivery and meet Adur's OAN as far as possible, a range of greenfield sites have been assessed in order to consider their suitability for allocation in the Local Plan.
- 8.6 The Urban Fringe Study 2006 identified opportunities and constraints in landscape terms for development in the urban fringe. The contribution of specific areas within the gaps to the landscape and its importance to the gap was assessed in order to consider whether there are parts which were not fulfilling their function and could be developed without damaging their integrity. However, it was not the role of this study to review the specific boundaries of the gaps or the principle of the policy approach. A number of sites on the urban fringe were identified with development potential. This study, in addition to other evidence including the Strategic Flood Risk Assessment and the Landscape and Ecology Study, were used to help inform the locations of the strategic allocations.
- 8.7 A total of 28 greenfield sites were identified through the Urban Fringe Study, the SHLAA "Call for Sites" exercises and other evidence based studies (see Appendix 2). Four of these sites were immediately discounted because they lie within the South Downs National Park and outside of the Local Plan area. A further 18 sites were discounted at this stage because they were either assessed as being too small to accommodate 6+ dwellings, were not available for development, or have been redeveloped or identified for uses other than residential.
- 8.8 The remaining 10 sites have been assessed against a number of Sustainability Objectives set out in the Sustainability Appraisal for the Local Plan. Where sites have not conflicted with these objectives they have been included in the Flood Risk Sequential Test and, where necessary the Exceptions Test (see Flood Risk Topic

⁵ Landscape and Ecology of Key Sites Within Adur - Sheils Flynn and the Ecology Consultancy 2012.

⁶ Landscape Study Update, Sheils Flynn, 2016; Assessment of landscape Sensitivity, Sheils Flynn, 2016.

Paper), as well as various evidence studies which take account of a range of identified issues and constraints, including biodiversity, transport and landscape.

8.9 The appraisal of these sites concluded that a number were severely constrained or otherwise inappropriate for development as urban extensions. Six sites were not therefore appraised as part of a spatial strategy option for the Local Plan. Further details can be found in the Sustainability Appraisal of the Local Plan 2014 and are summarised in Appendix 3 of this Topic Paper.

8.10 The remaining four sites were identified as potentially being suitable for residential development because they performed relatively well in the Sustainability Appraisal (see Appendix III of the Sustainability Appraisal of the Local Plan 2014). The four sites were New Monks Farm, Lancing; Hasler, Lancing (also known as Land North West of Hasler/Old Salts Farm, Lancing); Sompting Fringe and Sompting North (now together known as West Sompting) To help develop a spatial strategy, a number of alternative scenarios for development on these sites were tested. (Details can be found in Chapter 10 of the Sustainability Appraisal of the Adur Local Plan 2014.) The alternatives vary in terms of the distribution of development across the four greenfield sites:

	New homes on greenfield land	Total number of new homes
A1	<ul style="list-style-type: none"> • 450 at New Monks Farm, Lancing • 250 at Sompting Fringe • 300 at Hasler, Lancing 	1000
A2	<ul style="list-style-type: none"> • 450 at New Monks Farm, Lancing • 450 at Hasler, Lancing 	900
A3	<ul style="list-style-type: none"> • 450 at New Monks Farm, Lancing • 420 at Sompting Fringe 	870
B	<ul style="list-style-type: none"> • 600 at New Monks Farm, Lancing • 600 at Hasler, Lancing • 420 at Sompting Fringe • 210 at Sompting North 	1830

8.11 In summary, the Hasler, Lancing site option was appraised as performing relatively well in the Draft Adur Core Strategy 2012. However, subsequent consultation with the relevant agencies identified significant concerns relating to flood risk, specifically ground and surface water flooding. At this stage, and in the absence of evidence, it was not clear that these flooding issues could be mitigated without worsening flood

risk elsewhere. However, as there were no other greenfield site options that could replace the Hasler site, **despite major question-marks surrounding deliverability, it remained appropriate to include the Hasler site within the spatial strategy alternatives.** The assumption that it was deliverable enabled the testing of alternative spatial approaches to delivering a low growth approach, and the testing of a high growth approach.

- 8.12 In conclusion, of the four options appraised in the Sustainability Appraisal, overall Option A3 (870 dwellings) was considered preferable, balancing the need to try and meet the objectively assessed housing need against environmental constraints (notably flood risk and landscape issues), the capacity of the infrastructure and the aim of retaining Local Green Gaps to maintain the character and identity of settlements within Adur.
- 8.13 Therefore, two sites at West Sompting and New Monks Farm, Lancing have been identified as having the potential to deliver new homes within the Plan period and have been allocated for development in the Adur Local Plan. The allocation of these sites (formerly within the countryside and Strategic Gap as designated in the adopted Adur Local Plan 1996) demonstrates that the Strategic Gaps have not been used as an absolute constraint but that the Local Plan aims to strike the best possible balance between providing new development to meet the needs of Adur, while at the same time avoiding coalescence in order to maintain and enhance the local character and individual identity of settlements.
- 8.14 Together, the Adur Local Plan facilitates the delivery of 1080 dwellings at these two strategic allocations. Together these two strategic allocations will deliver approximately 30% of the proposed delivery target.

Review of the Built Up Area Boundary

- 8.15 A review of the Built Up Area Boundary has resulted in some changes (as set out in Appendix 6 of the Amendments to the Proposed Submission Adur Local Plan (2016). Some of these amendments have been proposed to reflect the strategic allocations indicated above. Others relate to land that was previously within the Sussex Downs Area of Outstanding Natural Beauty but which is now outside of the South Downs National Park. These sites have been assessed as part of the SHLAA process and one further greenfield site (SHLAA Ref: ADC/124/13) has been assessed as having the potential to deliver 13 dwellings.
- 8.16 Therefore a total of 1093 new dwellings will be delivered on greenfield sites. Together with 2516 new homes on brownfield sites, Adur has the capacity to deliver a total of 3609 new dwellings, leaving a shortfall of 2211 dwellings.

9. Housing Target

- 9.1 When work on the preparation of the Adur Core Strategy commenced in 2008, the policies of the South East Plan identified the scale and distribution of housing that would need to be provided in the district during the period 2006-2026 (excluding development at Shoreham Harbour which was, at that time, ringfenced). This target was set, recognising the strong environmental protection policies included in previous regional and structure plans. However, with the revocation of the South East Plan and the publication of the NPPF, the local planning authority is now required to meet its full objectively assessed needs for market and affordable housing (paragraph 47).
- 9.2 As discussed above, assessments of OAN carried out since 2011 have recommended high levels of delivery which appear unlikely to be achieved; the 2015 Study referred to in the Submission Adur Local Plan refers to 291 dpa whereas the Objectively Assessed Housing Need Update (September 2016) recommends a figure of 325 dpa over the plan period. (See Proposed Major Modifications)
- 9.3 Previous chapters have demonstrated that there are significant constraints on the capacity of Adur to deliver high levels of housing growth, particularly in terms of its impact on the landscape and areas at risk of tidal and fluvial flooding.
- 9.4 A vigorous assessment of Adur's capacity from a range of sources has shown that the amount of residential development that can realistically be achieved on both previously developed land and greenfield urban extensions is 3609 dwellings. This housing target is therefore a 'capacity based' figure, having regard to the identified constraints.
- 9.5 The NPPF emphasises positive plan making and the housing supply detailed in Table 3 below is based primarily on identified sources of housing land supply including sites identified in the SHLAA, two strategic site allocations at New Monks Farm and West Sompting and the broad location at Shoreham Harbour. It also includes an allowance for housing delivery on small windfall sites.
- 9.6 A target of a minimum of 3609 net additional dwellings over the Local Plan period 2011-2031, as set out in Policy 3 of the Submission Adur Local Plan (2016), is considered to be the most sustainable housing delivery target for Adur. This target is considered to be realistic and achievable and will be delivered in the following way:

Table 3: Housing Supply 2011-2031

	Number of dwellings
Sources of Housing Supply:	
Dwellings completed (net) 2011-2015	528
Existing commitments (large and small sites where planning permission has been granted)	326
Sites identified in the SHLAA (net) 2015	291*
Windfall allowance	416
<i>Sites to be identified in Local Plan:</i>	
Shoreham Harbour Broad Location	968**
New Monks Farm Strategic Allocation	600
West Sompting Strategic Allocation	480
Total Housing Supply (Delivery Target) 2011-2031	3609
Annual Target	180

* this figure includes one site identified as part of the built up area boundary review that could potentially deliver 13 dwellings.

** Shoreham Harbour Broad Location will deliver a minimum of 1100 dwellings. 132 dwellings have planning permission and are included as existing commitments, leaving 968 dwellings to be delivered at Shoreham Harbour.

9.7 It is acknowledged that the target falls significantly short of meeting Adur’s predicted level of housing need over the Local Plan period (by 2211 dwellings, against the OAN 2015). However, it reflects the vision and objectives and the spatial strategy of Policy 2 of the Adur Local Plan and the supporting evidence base by focussing as much growth as possible in the most sustainable locations. It is considered to be deliverable without compromising valued environmental assets and takes into account the need to provide for, and protect other land uses.

9.8 The delivery target of 3609 dwellings in Policy 3 is a minimum provision. This equates to 180 dwellings per annum up to 2031 (172 dpa if the plan period is extended to 2032 – see Proposed Main Modifications) and represents a significant increase in the average annual dwelling completion rate of 112 achieved in Adur over the last 19 years as is demonstrated in Table 4 below:

Table 4: Dwelling Completions 1996-2015

Year	Number of housing completions (gross)	Number of housing completions (net)
1996/1997	71	66
1997/1998	95	89
1998/1999	161	153
1999/2000	136	128
2000/2001	61	54
2001/2002	48	47
2002/2003	99	82

2003/2004	63	59
2004/2005	131	120
2005/2006	218	200
2006/2007	230	216
2007/2008	159	146
2008/2009	134	123
2009.2010	92	61
2010/2011	88	63
2011/2012	204	193
2012/2013	158	146
2013/2014	103	93
2014/2015	105	96
TOTAL	2356	2135
Annual Average	124	112.4

- 9.9 It can be seen that completion rates in Adur have varied considerably over time, with the lowest recorded delivery of just 47 dwellings in 2001/2002 and the highest recorded delivery of 216 dwellings in 2006/2007. Whilst these fluctuations can in part be attributed to economic conditions, the location and size of sites coming forward also plays a role. Much of Adur's new development has been on smaller brownfield sites. With only a limited number of large brownfield sites available for development, delivery on just one of these sites makes a significant difference to the housing delivery rate. The table clearly demonstrates that, in the last 19 years, annual housing delivery in Adur has never approached the objectively assessed housing need figure of 291 dpa.
- 9.10 For the early part of the Plan period between 2011 and 2015, 528 net additional dwellings have been completed. There are also 326 dwellings already committed through dwellings with planning permission but not yet started and dwellings currently under construction. This includes an assumed rate of 45% net completions (55% discount) on small sites delivering 5 dwellings or less where development has not yet commenced. This assumed completion rate for small sites has been used for many years and is based on analysis of past completions by West Sussex County Council who prepares the monitoring data. The projected yield from small sites not yet started is then added to the net figure for sites where development has already commenced to give the total expected yield from small sites.
- 9.11 The expected rate of delivery over the plan period is illustrated through the housing trajectory, which can be found in Appendix 4. It shows both the dwellings that have been built since the base date of the Local Plan (2011) and the projected completion rates for development over the remaining plan period to 2031. The trajectory will be monitored and updated annually through the Council's Annual Monitoring Report (AMR) which will also reflect the annual SHLAA Update.

- 9.12 The housing trajectory indicates how and when the planned level of housing growth of 3609 dwellings over the period 2011-2031 will be delivered. It shows that the Council can meet the overall housing target with a continuous supply of land coming forward for development for the first 10 years of the Plan period following adoption in 2017. There is an anticipated drop in delivery for the current year, with delivery rates projected to be highest over the 9 year period 2016/17 to 2025/26. This is when the strategic allocations and sites within the Shoreham Harbour Regeneration Area broad location are expected to deliver. Delivery rates will reduce considerably during the latter part of the plan period
- 9.13 The trajectory also demonstrates that there will be a sufficient supply of land to meet the first five years of the housing target from the anticipated point of adoption in 2017. House prices and land values remain buoyant indicating that site viability issues may generally become less significant in the future. There does however remain a risk that the recovery of the housing market may continue to impact upon the construction industry and the housing market, in terms of the supply of materials in the short term. The impact of Brexit on the housebuilding industry is also unknown.
- 9.14 The housing land supply position will be monitored through annual updates of the SHLAA and maintaining continuous dialogue with infrastructure providers to ensure that necessary services and facilities can be delivered to support new housing development.

10 Addressing the shortfall

- 10.1 Following assessment of the amount of residential development that can realistically be developed on previously developed land within the Plan period, when measured against Adur's OAN 2015 there remains a considerable shortfall of 2211⁷ dwellings. Clearly there are significant constraints on the capacity of the Local Plan area to accommodate high levels of housing growth, particularly in terms of its impact on the landscape and areas at risk of tidal and fluvial flooding.
- 10.2 The Council has made every effort to rigorously investigate the potential for the Adur's objectively assessed housing need to be met by further testing the capacity of the local plan area to accommodate development:

Sites in the Employment Land Review

- 10.3 There were 10 sites identified in the Employment Land Review 2014 where the recommendation was that they should be retained for employment use given that

⁷ The shortfall will be 3216 dwellings based on the OAN 2016 – see major modifications

the supply of land and premises for employment in Adur is very tight and, as a result, there is no quantitative case for the release of employment land for other uses.

- 10.4 Of these, one site (SHLAA Ref ADC/49/13) already has planning permission for a mixed use development, to include 120 dwellings and employment floorspace). These dwellings have been counted as a commitment and the site has not formed part of this reassessment.
- 10.5 The remaining 9 sites have been reassessed, disregarding policy constraints. The detailed assessment can be found in Appendix 5.
- 10.6 To summarise, if employment protection policies were disregarded and the suitability of these sites for residential development was reassessed, potentially 3 sites could be suitable for residential development. Theoretically, if residential development at a range of densities is considered (40dph, 50dph and 100dph), between 96 and 240 new dwellings could potentially be accommodated.
- 10.7 By relaxing other constraints such as access issues and poor living conditions, a further site could potentially be suitable for residential development, yielding an additional 76 to 190 dwellings.
- 10.8 In conclusion an additional 172 to 430 additional dwellings could potentially be developed on employment sites.

Open Space Study

- 10.9 An Open Space Study (2014) has been produced which surveyed all of the open spaces (parks and gardens, natural and semi-natural space, amenity green space, provision for children and young people, allotments, cemeteries and churchyards, civic space) with specific regard to quantity and quality. The study concluded that the quantity of open space is satisfactory; however, there are some wards which fall short of the minimum provision standards for certain open space typologies and this shortfall should be addressed where possible over the plan period.

Additional work to be undertaken

- 10.10 The following additional work is currently being undertaken to ensure 'no stone is left unturned' when assessing the capacity Adur to accommodate new housing. The conclusions reached will be reflected in the SHLAA Interim Review Paper and will be taken into account in the forthcoming housing trajectory and five year housing land supply assessment to be published in December 2016:

- *SHLAA Update 2016* – the SHLAA is reviewed annually (with a base date of 1 April each year) and reassessed all existing sites with the addition and assessment of

new opportunities. This document will be published in December 2016 alongside the Annual Monitoring Report 2016.

- *SHLAA Update 2016: Interim Review Table* - Between the base date of the SHLAA Update and the Examination of the Local Plan, further progress will have been made on some sites and it is appropriate to set these out in an Interim Review Table to be produced prior to Examination.
- *SHLAA sites previously assessed as not being suitable for development (Rejected Sites)* - A further assessment of brownfield SHLAA sites considered not suitable for housing and therefore rejected in the SHLAA is being undertaken. This will consider the extent to which it would be possible to meet the OAN through discounting one or more of the physical or sustainability constraints used by the SHLAA to test the suitability of sites.
- *Sites assessed as being developable in the SHLAA 2016 Update (Rejected Sites – Monitor)* - A number of brownfield sites have been identified as being suitable for residential development but are not currently available. They are classified as being developable but not currently deliverable and have not been included as part of the housing delivery figure. These sites will be reassessed to identify and consider how potential barriers to delivery can be overcome.
- *Review of Council Owned Sites* – A survey of land owned by Adur Homes (the Council's local authority housing service) and land and property assets owned by Adur District Council is currently being undertaken. Sites identified as being surplus to requirements for their existing use are being assessed for their housing development potential.
- *Omission greenfield sites* - Further landscape work is being undertaken on four greenfield sites which have not been allocated for housing development in the Local Plan.

11. Conclusion

- 11.1 This paper demonstrates that the District Council has an up to date, proportionate and robust evidence base and can demonstrate a clear understanding of the housing needs of Adur. It is concluded that, for the Local Plan period 2011-2031 an appropriate overall housing target should be 3609 dwellings, an average of 180 dwellings per year. This equates to 62% of the OAN 2015 being delivered.
- 11.2 Evidence clearly indicates that there are significant constraints to the identification and delivery of sustainable sites for new housing development. Consequently, the

full objectively assessed housing needs of Adur cannot be accommodated without unduly compromising the vision and strategic objectives of the Local Plan which have been developed in consultation with the local community and other stakeholders.

- 11.3 The Local Plan has, however, sought to maximise housing delivery so far as is consistent with other key strategic policies and development needs of the district and will significantly increase the supply of housing delivered in the district over the plan period when compared with the average rate of housing completions over the previous 19 years.
- 11.4 It is considered that this approach accords with paragraphs 14 and 47 of the NPPF which sets out the governments planning guidance for achieving sustainable development.
- 11.5 The Local Plan housing delivery target is less than the objectively assessed housing needs of the local plan area. Adur District Council has been and continues to be actively engaged with neighbouring authorities throughout the preparation of this Plan to address whether the shortfall in the planned housing provision could be met elsewhere. Most of these areas face similar challenges in meeting their own housing requirements. Approaches have been made to other neighbouring authorities to explore their potential for meeting some, or all, of Adur's housing land supply shortfall. Work is continuing by the Coastal West Sussex Strategic Partnership Board to address this issue. (Further details can be found in the Adur Duty to Co-operate Statement 2016)
- 11.6 It is clear through the findings of the Duty to Co-operate Housing Study 2013 that the housing shortfall in Adur cannot be met elsewhere within the Sussex Coast Housing Market Area. However, this Study identifies a number of longer term strategic development options, some of which are at a sub-regional level, which could help meet requirements in the future. Many of these options will need to be considered through working in partnership with other local authorities and agencies. A Local Strategic Statement (LSS) has been produced and signed up to by the authorities within the Sussex Coast Housing Market Area (Arun, Adur, Worthing, Chichester, Brighton & Hove and Lewes) together with the Northern West Sussex Authorities (Crawley, Horsham and Mid Sussex). This LSS commits the authorities to work together looking at longer term solutions for housing delivery.
- 11.7 It is considered that the evidence base for the Adur Local Plan has undertaken appropriate assessment of Adur's OAN; have rigorously assessed the capacity of brownfield sites to deliver housing during the plan period; has reassessed a range of other potential sources including employment and open space typologies; and taken an open-minded approach to allocating sites within the Local Green Gaps where considered appropriate; and that therefore 'no stone has been left unturned' in

order to deliver as much of Adur's objectively assessed need as is realistic and deliverable.

- 11.8 Conclude that allocating sufficient sites to meet Adur's objectively assessed housing needs would mean that the Local Plan would be in substantial conflict with many of the governments core land-use planning principles as set out in paragraph 17 of the NPPF.

Appendix 1: OAN work since 2011, including Strategic Housing Market Assessment

Title of Study	Objectively Assessed Need Figure (PA)	Time Period	Adur Local Plan (if relevant)	Shortfall	Comments
Locally Generated Housing Needs Study GL Hearn 2011	235-255 dp 2006-2026 or 270-320 pa 2011-2031 (In addition to development at Shoreham Harbour)	2006-26 and 2011-31	N/A	N/A	PROJ 1: 270 pa: Net in-migration is key driver of growth - without this population would decline marginally and age more rapidly; even without net in-migration there will still be requirement for new homes due to age structure and household sizes. Higher figure from economic projections
Coastal West Sussex SHMA November 2012 GL Hearn	186-215 pa	2011-2031	Two options for development were proposed: Option A 1785, Option B 2635 dwellings.	1085-2515 dwellings	Range based on PROJ 1 household growth (10 year trend projection) and PROJ2 (5 year trend projection). (PROJ5 economic growth projection is near top of this range at 213 pa). SHMA also indicates high need for affordable homes – 514 per annum At this point the Draft Adur Local Plan 2012 ‘ringfenced’ proposed housing at Shoreham Harbour. The proposed provision in the Local Plan at the time is therefore <i>in addition</i> to housing proposed at that location at that time.
Housing Study (Duty to Co-operate) Sussex Coast HMA partners 2013 GL Hearn	Assessed needs = 215-245 pa		RDALP 2013 proposes 140-147 pa (taking account of constraints).	68-105 pa	215 dpa reflects both recent population trends and economic evidence. However upper end of range takes account of high evidence of housing need and significant affordability

					pressures in Adur (therefore takes account of affordable housing backlog). Study views 180-200 pa as a more achievable, yet still ambitious, figure for the Local Plan due to the constraints in Adur.
Assessment of Housing Development Needs Study: Sussex Coast HMA April 2014	180-240dpa (need=3,600-4,800 over plan period)	2011-2031			Commissioned in context of Housing Study (Duty to Co-operate) report 2013, as well as other work . This study revises assessment of housing needs in the Housing Study 2013 taking account of updated demographic information including 2011-based Sub-National Population Projections, 2011 census and revisions and rebasing of Mid-Year Population Estimates; also takes account of Planning Practice Guidance published in March 2014 – including analysis of housing market indicators and signals. Assessment for Adur uses PROJ 2 (updated version of PROJ1) to take account of revised data on components of population change – which gives a starting point of 141 homes per annum. Looking at market indicators and signals, and other factors such as household suppression, affordable housing need, and forecast economic growth the objective assessment of housing needs for Adur is 180-240 homes per annum. The lower end of this range reflects adjustment to take account of household suppression due to declining affordability and the impact of the recession (also that the figure of 140 per annum is strongly influenced by past levels of development.

					<p>However there is evidence that the figure of 180 pa might restrict employment growth; the upper figure of 240 pa supports stronger delivery of affordable homes and growth in labour supply.</p> <p>Should also note study points out the strong relationship between Adur and Brighton/Worthing in terms of the economic and labour market.</p>
Objectively Assessed Needs for Housing: Adur. (2015)	291 dwellings per annum	2011-2031	Study and OAN used in the Amendments to the Proposed Submission Adur Local Plan (2016) and Submission Adur Local Plan 2016.	Shortfall: 2211 dwellings over plan period.	This report takes account of the 2012-based Sub-National Population Projections issues by ONS in March 2014, and the 2012-based household projections published by Government in February 2015. Projections include a downward adjustment to Unattributed Population Change (UPC) equal to 50% of UPC. By applying the 2012-based household formulation rates there would be a need for 286 dpa. Using the projection with a 50% adjustment for UPC, the figure is 276 dpa. This latter figure is used as a starting point for considering need. An uplift of 5dpa is proposed to support economic growth; together with an uplift of 10 dpa to account for affordability and market signals. This results in a need for 291 dpa from 2011-2031.
Objectively Assessed Housing Need Update September 2016	325 dwellings per annum (rounded); 6,825 dwellings over plan		Please note that this Study/ OAN used in the Proposed Major Modification	3,216 dwellings	Undertaken to account for the publication of the 2014 –based Sub-national Population Projections and 2014-based Household Projections. It carries out sensitivity testing in relation to migration and household

	period.		s accompanyin g the Submission Adur Local Plan 2016.	<p>formation rates. Starting point demographic need is for 294 dpa..</p> <p>No adjustments are made for household formation issues, or economic growth, due to changing evidence. However, a 10% increase is made due to market signals/ affordability, resulting in an OAN of 325 dpa. <i>Please note that this OAN figure is referred to in the Proposed Major Modifications accompanying the Submission Adur Local Plan 2016.</i></p> <p>The report also assesses potential need for Starter Homes.</p>
--	---------	--	---	---

Appendix 2: Greenfield sites identified through various sources of evidence

SHLAA REF	SA SITE REF	LOCATION	SHLAA ASSESSMENT CONCLUSION SUMMARY
073/13		Downland North East Hillside Avenue, Southwick	National Park
109/13		Halewick Farm, Sompting	National Park
110/13		Land north Holmbush Close, Shoreham-by-Sea	National Park
140/13		Halewick Refuse Destructor Site, Halewick Lane, Sompting	National Park
079/13		The Gardens, Shoreham-by-Sea	Allotments, access issues
132/13		Eastbrook Allotments, Southwick	Allotments, Development Brief allocates for alternative use
138/13		Land north 123/207 Manor Hall Road, Southwick	Allotments, access issues, proximity to electricity sub-station, major underground cables.
027/13		Land west of Penncroft, Lancing	Completed
034/13		r/o 146 First Avenue, Lancing	Not available
099/13		r/o 53/59 Southview Road, Southwick	Garden land – too small for 6 dwellings
123/13		r/o 20/40 Firl Road, Lancing	Not available
124/13	4	Land west of Highview, Lancing	Has the potential to deliver 13 net dwellings
108/13		Stocks House and Garden, West Street, Sompting	Garden land, impact on historic character of Sompting village, impact on Local Green Gap
116/13		1/3 Steyning Road, Shoreham-by-Sea	Garden land, impact on Local Green Gap – too small for 6+ dwellings
101/13		Land east of Adur Close, Lancing	Impact on Local Green Gap
104/13		Land at junction of Saltings Roundabout, Lancing	Impact on Local Green Gap
105/13		South west of New Monks Farm, Lancing	Developed for alternative use
106/13	7	North East of Hasler (now known as New Salts Farm, Lancing)	Surface water and groundwater issues and impact on Local Green Gap
107/13		West Street Nursery, West Street, Sompting	Impact on historic character of Sompting village, impact on Local Green Gap.
111/13	9	Steyning Road (Gateway site), Shoreham-by-Sea	Landscape sensitivity and prominent location , impact on Local Green Gap
113/13		Adur Recreation Ground	Impact on Local Green Gap, Public Open Space
122/13	5	New Monks Farm, Lancing	Local Plan Allocation for 600 dwellings.

125/13	2 & 3	West Sompting (formerly Sompting Fringe and North Sompting)	Local Plan allocation for 480 dwellings.
126/13	10	Land at Mill Hill, Shoreham-by-Sea	High landscape sensitivity and impact on Local Green Gap
128/13		Land between Adur Recreation Ground and New Salts Farm Road, Lancing	Impact on Local Green Gap
129/13	6	North West Hasler, Lancing (now known as Old Salts Farm, Lancing)	Surface and groundwater issues, access issues.
130/13		New Monks Farm proposed country park, Lancing	Local Plan allocation for a country park.
139/13	1	Land at Upton Farmhouse, north of Upper Brighton Road, Sompting	Impact on historic character of Sompting village, impact on Local Green Gap.

Appendix 3: Greenfield sites not appraised as part of the spatial strategy options

Location	Sustainability Appraisal Summary
Land to North East of Hasler Estate, Lancing (now known as New Salts Farm, Lancing)	In addition to the significant flood risk issues that this site shares with the Hasler site included in the spatial strategy alternatives, this site makes a significant contribution to the Shoreham-Lancing gap and development in this location could compromise the integrity of the gap as well as having an impact on views across the gap north-south and east-west.
Land North of Upper Brighton Road, Sompting Village	The site is located within the Sompting Village Conservation Area which is also within the Sompting/Lancing & Worthing Local Green Gap and designated as Countryside. As a result, development of the site would have a negative impact on both the Local Green Gap and the rural and historic character of the Conservation Area.
Shoreham Gateway	The site is located within the Shoreham-Lancing Gap. Although the site is on the edge of the gap, it makes a significant contribution to the setting of the River Adur and acts as a gateway to both Shoreham and the National Park. The site is an important part of the gateway sequence of views and spaces on the northern edge of Shoreham and the development of the site would be an unwelcome urbanisation. Also, the majority of the site is located within Flood Zone 3a and there are surface water and potentially significant groundwater flooding issues.
Mill Hill Site, Shoreham-by-Sea	The site is greenfield, located within the countryside, is of high overall landscape sensitivity and is clearly visible from sensitive views in the National Park.
Eastbrook Allotments Site, Southwick	This is a greenfield site within the Built Up Area Boundary that actually performs quite well in terms of sustainability objectives, although there are potential deliverability issues. It is not reflected in the spatial strategy alternatives because it is a small site primarily allocated for new employment development. The number of houses likely to be provided on the site would be fairly negligible.
Land to West of Highview, Mount Way, Lancing	Although this site is greenfield, it is located within the Built Up Area Boundary and development is assumed to be a 'given'. As a result, it has not been reflected in the spatial strategy alternatives.

Appendix 4: Housing Trajectory for Adur District (March 2015)

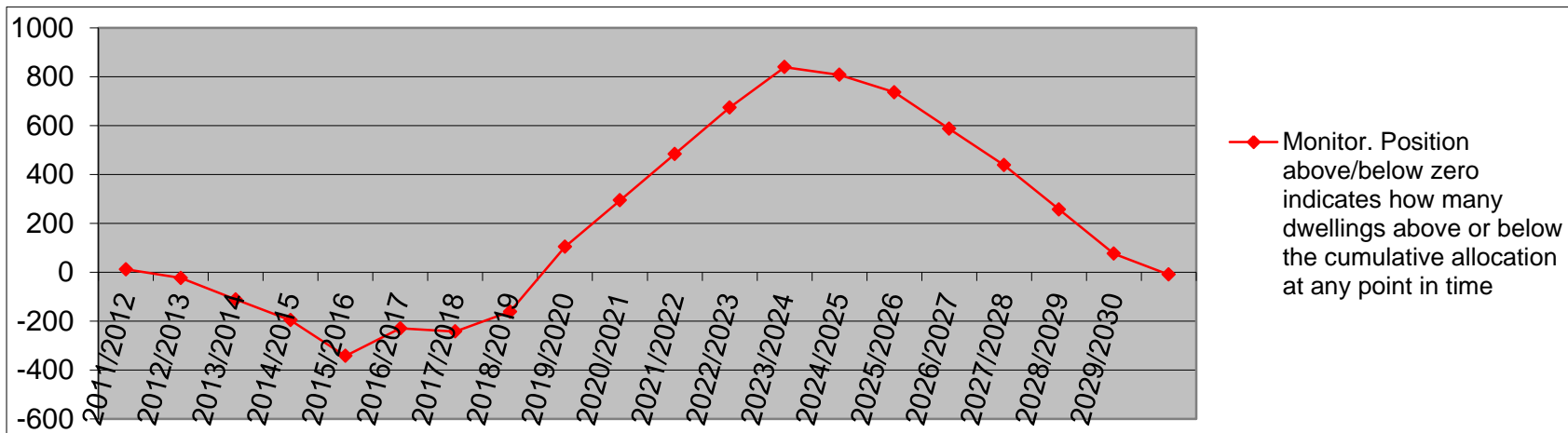
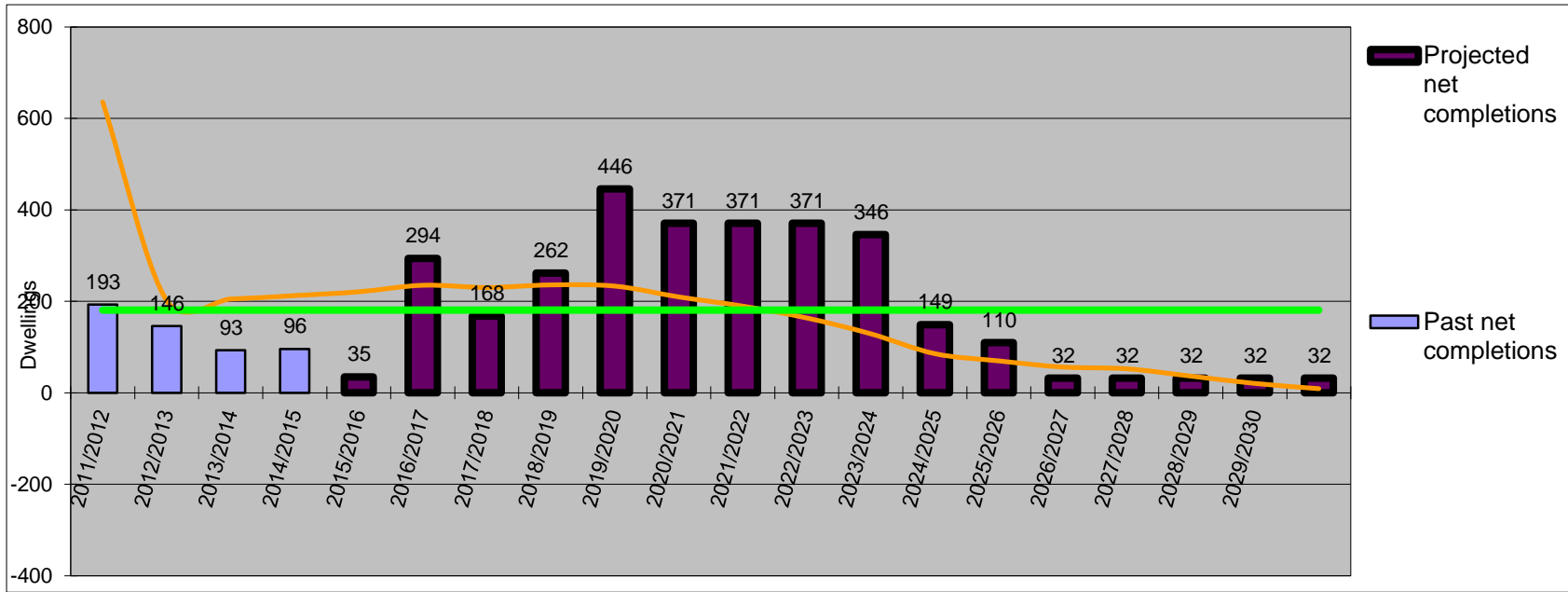
Housing Trajectory for Adur District Council 2015

	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	153	103	105	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	565
Commitments (large and small sites with planning permission)(net)					35	212	76	3	0	0	0	0	0	0	0	0	0	0	0	0	326
Allowance for small windfall sites					0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	416
SHLAA sites 2015 (net)					0	82	67	67	75	0	0	0	0	0	0	0	0	0	0	0	291
Broad Location (Shoreham Harbour)					0	0	0	0	179	179	179	179	179	37	38	0	0	0	0	0	970
Strategic Allocation (New Monks Farm)					0	0	0	80	80	80	80	80	80	80	40	0	0	0	0	0	600
Strategic Allocation (West Sompting)					0	0	25	80	80	80	80	80	55								480
Total Past Completions	204	153	103	105																	
Total Projected Completions/Commitments	204	153	103	105	35	294	168	262	446	371	371	371	346	149	110	32	32	32	32	32	3648
Losses	11	7	10	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	37
Past net completions	193	146	93	96																	528
Projected net completions					35	294	168	262	446	371	371	371	346	149	110	32	32	32	32	32	3083
Cumulative net completions	193	339	432	528	563	857	1025	1287	1733	2104	2475	2846	3192	3341	3451	3483	3515	3547	3579	3611	3611
Annualised housing target	181	181	181	181	181	181	181	181	181	181	181	181	181	181	181	181	181	181	181	181	3620
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	12	-23	-111	-196	-342	-229	-242	-161	104	294	484	674	839	807	736	587	438	257	76	-9	
Manage. Annual requirement taking into account past/projected completions	636	202	205	213	221	235	230	236	233	210	190	164	129	86	70	56	53	37	21	9	

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 completion figures gives net completions.

Source: 2015 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex. **01/10/2015**



Appendix 5: Assessment of the suitability for residential use of the sites identified in the Employment Land Review 2014

The sites listed in the table below have been identified in the Employment Land Review 2014 with a recommendation to be retained in employment use.

In order to help meet the shortfall in housing, and leaving no stone unturned, these sites have been reassessed for their suitability for residential development with their policy protection removed.

For those sites which are considered to be suitable for residential development, the number of dwellings that could potentially be accommodated has been estimated using medium density (40dph), high density (50dph) and flatted development (100dpa) in accordance with densities used in the SHLAA. These are expressed as a range in the table below.

Location	Employment Land Review 2014	Assessed in the SHLAA	Reassessment – is the site suitable for residential development?	Area (ha)	Potential number of dwellings (dph)
Rectory Farm Industrial Estate, Sompting	Recommendation: Retain in employment use.	SHLAA Ref: ADC/085/13 This site was assessed as having potential for residential development as part of the SHLAA 2009 and was being promoted by the site owner. At that time it was considered suitable for development and could potentially deliver 70 dwellings. The Employment Land Reviews undertaken in 2011 and 2014 recommended that this site be retained for employment use given the	The site is located within a residential area. There are significant contamination issues which would require remediation. There may also be groundwater issues. The single access point on to Rectory Farm Road is sub-standard and would require improvement. Subject to contamination and access issues being satisfactorily addressed, the site offers a suitable location	1.0	40 - 100

		limited supply of land for such use in Adur. The site is now protected for employment use in the Submission Adur Local Plan 2016 and its loss to residential uses would be contrary to policy.	for residential development. Recommendation: Suitable for residential development		
Lancing Business Park	Recommendation: Planning policy should support continued employment use of the Lancing Business Park, and progressive development for B1, B2 and B8 use. It should encourage investment in the estate, including environmental improvements and improved provision of services, and intensification of employment use. The vacant Graham Wood unit located on the south side of Chartwell Road (1.7ha) should be allocated for redevelopment for B1, B2 and B8 use.	SHLAA Ref ADC/033/13 One small site (a car park in Marlborough Road) on the edge of this large business park was rejected as not being suitable for residential development as it was within an area allocated for employment use in the saved policies of the Adur Local Plan 1996 and there was no evidence that the site was not suitable for employment purposes. The site has now been redeveloped for employment use.	One of the largest employment sites in the district comprising 37 hectares of land. One of the higher quality employment sites in the district, it is also a Business Improvement District. Recommendation: Not suitable for residential development.	37	0

Shoreham Airport (developed area)	Recommendation: Planning policy should support continued employment use of this site for B1, B2, B8 and sui generis uses. The small development site within the existing developed area on the south side of the airport, of 0.1ha and, should be allocated for B1, B2 and B8 uses.	No	This employment area is located on the southern side of the airfield and accommodates over 50 businesses, the majority of which are aviation related. Given its airport location and the proximity of the airport runway, the site is not suitable for residential development. Recommendation: Not suitable for residential development.	0.7	
Dolphin Road Industrial Estate	Recommendation: Retain in employment use.	No	Provides 12% of Adur’s employment floorspace comprising a number of units. Whilst adjacent to residential areas, it offers a poor location for residential development being adjacent to the railway line, an electricity transformer and overhead power lines. Recommendation: Not suitable for residential development.	11.3	0
Gardner Road (formerly NTL and Virgin Media), Southwick	Recommendation: Retain site for provision of B1 employment floorspace.	SHLAA Ref: ADC/075/13 The site is within the built up area and is not identified for any particular use. It is in a sustainable location and there appears to be no major	The site is situated in a primarily residential area, close to Fishersgate Station. There are no known constraints which may affect the redevelopment of this site.	0.8	32-80

		constraints to the development of this site for housing.	The site offers a suitable location for residential development. Recommendation: Suitable for residential development.		
Chalex Industrial Estate, Manor Hall Road, Southwick (also known as Chalex Works)	Recommendation: Retain identification of site for employment uses, in use class B1.	SHLAA Ref: ADC/074/13 Rejected because a significant part of the site was being redeveloped for 15 B1/B8 units. The remaining part of the site, which shares a sub standard access with the adjoining industrial units would be a suitable location for residential development given the new adjacent employment uses. In addition the site was protected for employment uses in the Proposed Submission Adur Local Plan and its loss to residential would be contrary to policy.	The majority of the site has now been redeveloped for employment use. The remaining part of the site is not considered suitable for residential development given its location adjacent employment uses, a major electricity sub-station and the need to share a sub-standard access. Recommendation: Not suitable for residential development. However, if constraints such as poor living conditions and access arrangements are ignored, between 76 and 190 dwellings could potentially be accommodated.	1.9	0
Mill Road/ Chapel Road, Fishersgate	Recommendation: Planning policy should support continued	No	A small local industrial estate comprising a number of units. The site lies within a blast	3.0	0

	employment use of this site for use classes B1, B2 and B8.		zone (development proximity zone, inner zone and middle zone) and, despite its location in a residential area, it is not appropriate for residential development. Recommendation: Not suitable for residential development.		
Riverbank Business Centre, Old Shoreham Road, Shoreham-by-Sea (also known as Ropetackle North)	Recommendation: Support the provision of B1 office/light industrial accommodation as part of the mixed use redevelopment of this site.	SHLAA Ref: ADC/049/13 This site is considered as having potential for redevelopment.	A planning application for mixed use development has been approved, to include 120 new homes. These homes have been counted as a commitment and do not constitute additional dwellings for the purposes of this reassessment exercise. Recommendation: Suitable for residential development.	2.69	0
Harbour Way Industrial Estate, Shoreham Beach	Recommendation: Planning policy should support continued employment use of this site for use classes B1, B2 and B8.	No	This site comprises a small local industrial estate. Although not particularly close to local facilities, it lies within a residential area and is considered suitable for residential development. Recommendation: Suitable for residential development.	0.6	24 - 60

<p>Ricardo Site, Old Shoreham Road, Shoreham-by-Sea</p>	<p>Recommendation: Planning policy should continue to support use of this site for employment activities in use classes B1, B2 and B8 uses. Consideration should be given to the allocation of the adjacent car/lorry park for further B1, B2 and B8 development.</p>	<p>No</p>	<p>This site is occupied by a global engineering firm and is a major employer in Adur with approximately 3000 employees. Its location, within the boundary of Shoreham Airport, and close to the runway, does not offer a suitable location for residential development.</p> <p>Recommendation: Not suitable for residential development.</p>	<p>4.6</p>	<p>0</p>
--	---	-----------	--	------------	----------