



Adur District Council

Adur Local Plan

Housing Implementation Strategy

November 2016



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1. Introduction

Note: Housing monitoring data recently received has indicated that a minimum of 3718 dwellings can be delivered over the extended Local Plan period 2011-2032. This compares to 3609 dwellings indicated in Policy 3 of the Submitted Adur Local Plan 2016. This increase is due to additional sites being identified in the SHLAA and an update of housing commitments and completions on large and small sites resulting from the most recent monitoring data. It is proposed to amend Policy 3 with this new updated delivery figure.

All of the calculations in this Housing Implementation Strategy are therefore based on the delivery of 3718 dwellings over the period 2011-2032.

- 1.1.1 This Housing Implementation Strategy has been prepared to support the Adur Local Plan 2011-2032¹ 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 2032 in order to support the housing delivery target set out in the Adur Local Plan for a minimum of 3718 dwellings (updated figure).
- 1.1.3 The document includes the housing trajectory for both market and affordable housing, identifies the sources of housing supply for the Plan period and the five year housing land supply position as at 1 April 2016 for housing completions and commitments and the position at 31st October 2016 for the Strategic Housing Land Availability Assessment.
- 1.1.4 It also assesses the risk to housing delivery and how any risk can be managed and mitigated as well as setting out the framework for monitoring and reviewing delivery of housing.

1.2 Current Housing Position in Adur (at 31st October 2016)

- 1.2.1 The Council has been using saved Local Plan 1996 housing policies since 2007 and housing delivery has been monitored against the South East Plan

¹ To ensure that the Local Plan has a 15 year time span post anticipated adoption in 2017 a modification has been proposed to extend the end date of the Plan to 2032 (MM2)

requirement from 2006 until its revocation in 2013. The South East Plan set a target of 105 net dwellings to be delivered per annum (dpa) and housing completions in Adur between 2006 and 2013 averaged 135 dpa, exceeding this target.

- 1.2.2 In the last three recorded monitoring years (2013/14, 2014/15 and 2015/16) housing completions in Adur have been low, with 93, 96 and 31 dwellings completed respectively. This is attributed to market conditions and limited availability of land together a delay in the delivery of a key site with planning permission. This was anticipated in the housing trajectory (2015) and it is expected that delivery will increase considerably in future monitoring years until the latter part of the Plan period.
- 1.2.3 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. In accordance with Government advice, the most up to date housing land supply position at 31st October 2016² was measured against the objectively assessed need (OAN) figure of 325 dwellings per annum in the most recent Objectively Assessed Needs Housing Update 2016 study (CD08/1). This is seen as an interim position until the Local Plan target for housing delivery is adopted.
- 1.2.4 The most recent housing supply position is set out in the Adur District Five Year Housing Land Supply Assessment 2016-2021, published in December 2016. It can be seen that the Council is unable to demonstrate a five year supply of deliverable land when measured against the OAN.
- 1.2.5 The Adur Local Plan sets a capacity based target for housing delivery. This Housing Implementation Strategy demonstrates that a five year supply of deliverable land can be achieved if measured against this target.

1.3 Local Plan Strategy for housing delivery 2011-2032

- 1.3.1 The base date for the Submission Adur Local Plan housing delivery target is 1st April 2011. The proposed breakdown of housing provision from the different sources of housing supply is discussed below and set out in Table1. A housing trajectory, setting out the projected annual housing delivery over the Local Plan period 2011-2032 is included in this Housing Implementation Strategy.
- 1.3.2 The Local Plan aims to deliver a minimum of 3718 dwellings over the Plan period 2011-2032, equating to an average of 177 dwellings per year. Whilst this planned housing target does not meet the objectively assessed need requirement of 6825 homes, it is considered to be a realistic and deliverable figure given the genuine constraints of the area.

² The base date of the WSCC monitoring data for Completions and Commitments is 1 April 2016. The base date for the SHLAA is 31st October 2016.

1.3.3 The following emerging policies in the Adur Local Plan 2016 document relate specifically to housing delivery:

- Policy 3 – sets out the overall target for delivery of a minimum of 3718 homes over the period 2011-2032 (as proposed to be modified). 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 600 homes) and West Sompting (for 480 homes) which together will deliver 1080 homes.
- Policy 8 – identifies the Shoreham Harbour Regeneration Area as a broad location for change and includes the delivery of a minimum of 1100 homes.

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

2.2.1 The first Adur Strategic Housing Land Availability Assessment (SHLAA) was completed in 2009 and updated in 2012. A full review of the SHLAA was undertaken in 2013/14 (published October 2014). The SHLAA is updated on an annual basis and reported through the Council's Annual Monitoring Report. The most recent SHLAA Update covers the period from 1 April 2015 to 31 October 2016 in order to provide the most up to date position with regard to housing provision in Adur prior to examination of the Local Plan in early 2017. The SHLAA update 2016 indicates that 254 dwellings can be delivered on 10 sites, with an additional 460 dwellings on 3 sites now identified within the Shoreham Harbour Broad Location (Western Harbour Arm). This gives a total of 714 dwellings. The SHLAA Update 2016 can be viewed at:

<https://www.adur-worthing.gov.uk/media/media,142487,en.pdf>

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. The SHLAA methodology can be viewed at:

<https://www.adur-worthing.gov.uk/media/media,141905,en.pdf>

- 2.2.3 To ensure that 'no stone is left unturned' when assessing the capacity of Adur to accommodate new housing, the following re-assessment of SHLAA sites, together with a review of Council owned sites has been undertaken. The conclusions reached have been reflected in the SHLAA Update October 2016 and in the trajectories and five year housing land supply assessments included in this Housing Implementation Strategy:

SHLAA Update 2016

- 2.2.4 The SHLAA is reviewed annually (usually with a base date of 1 April each year) and reassesses all existing sites with the addition and assessment of new opportunities. **However, to reflect the most up to date position prior to the Local Plan examination in early 2017 it is considered prudent to incorporate all changes in circumstances and new opportunities up to 31st October 2016, which will be the base date of the SHLAA Update 2016.**

SHLAA Update 2016: Interim Review Table

- 2.2.5 Between the base date of the SHLAA Update (31st October 2016) and the Examination of the Local Plan, further progress will have been made on some sites and new sites may come forward. It is appropriate to set these out in an Interim Review Table to be produced immediately prior to the Examination for information.

SHLAA sites previously assessed as not being suitable for development (Rejected Sites)

- 2.2.6 A further assessment of SHLAA sites considered not suitable or available for housing and therefore rejected in the SHLAA has been undertaken. This considers 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 that have been assessed as not suitable for development and which are currently in employment use are considered in Appendix 7 of the Housing Topic Paper – CD07/16). Just one site has been re-classified as being 'developable' and could potentially deliver 11 dwellings. The assessment can be found in Appendix 1 of this document.

Sites assessed as being developable in the SHLAA 2016 Update (Rejected Site – Monitor)

- 2.2.7 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 have been reassessed to update their SHLAA status in terms of availability and to identify and consider how potential barriers to delivery can be overcome. They do however offer potential in the longer term and could deliver an additional **107** dwellings. The assessment can be found in Appendix 2.

Review of Council Owned Sites

- 2.2.8 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. Further feasibility work is currently ongoing and, at this stage, two sites have been identified as being available for development and could potentially accommodate 53(net) dwellings. A further site is not currently available but is considered developable and could potentially deliver an additional 10 (net) dwellings. Work is continuing to identify further sites which will be assessed for their development potential through the SHLAA process. The detailed assessment can be found in Appendix 3.
- 2.2.9 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 five year period since the base date of the Local Plan, 559 net dwellings have been completed (1 April 2011 to 31 March 2016) equating to approximately 112 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 4.

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 5 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 (Western Harbour Arm)

- 2.6.1 This area comprises a number of sites which, together, will potentially accommodate a minimum of 1100 new dwellings up to 2031.³ 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 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 greenfield sites are allocated for housing or mixed use development (including housing) in the Adur Local Plan at New Monks Farm in Lancing and at West Sompting. 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:
- New Monks Farm, Lancing – a mixed use development which includes the delivery of 600 homes.
 - Land at West Sompting – 480 homes
- 2.7.2 There is a risk that if delivery of one or more of these sites is delayed, this will impact on the Council's ability to demonstrate a five year housing land supply. As part of the Local Plan preparation, a detailed analysis of the suitability and

³ Shoreham Harbour will deliver a minimum of 1100 dwellings over the whole Plan period 2011-2032. 132 dwellings have planning permission and to avoid double counting with commitments, the remaining 970 (rounded) dwellings are shown in Table 1.

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 2017 for both sites. This is likely to coincide with the Examination of the Local Plan in early 2017 and helps to demonstrate 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 all sources of housing are to be delivered is set out in the following table:

Table 1: Housing Supply Position at 31 October 2016

Source	Number of dwellings
Net housing completion 2011-2016	559
<i>Existing sources of housing supply:</i>	
Existing commitments (large and small sites) at 1 April 2016	439
Sites identified in the SHLAA Update at 31 st October 2016 (excluding Strategic Sites and Broad Location)	254
Small sites windfall allowance	416
<i>Sites identified in the Local Plan:</i>	
New Monks Farm, Lancing	600
Land at West Sompting	480
Remainder of Shoreham Harbour Broad Location	970
Total Housing Supply 2011-2032	3718

3. Housing Trajectory for the Plan period 2011-2032

- 3.1.1 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 This Housing Implementation Strategy accompanies the Submission Adur Local Plan 2016 document and includes the housing trajectory for the Local Plan

period 2011-2032. This trajectory, in Table 2 has a base date of 31st October 2016⁴. The housing trajectory will be monitored and updated on an annual basis through the Council's Annual Monitoring Report (AMR). The annual update of the Adur Strategic Housing Land Availability Assessment (SHLAA) will also be reported through the AMR.

- 3.1.3 The trajectory included in this Housing Implementation Strategy is based on the housing monitoring position at 1st April 2016 (completions and commitments) and the SHLAA Update 31st October 2016, and sets out the expected rate of delivery over the Plan period. It indicates the amount of housing already delivered since 2011 and the anticipated delivery of both market and affordable housing from the current year to the end of the Plan period. It is based on actual completions for the first five years of the Plan period, current commitments on both large and small sites, potential strategic allocations, the Shoreham Harbour Regeneration Area broad location and an allowance for small windfall sites. It also takes into account the backlog in past completions since 2011 (as calculated in the five year housing land supply tables below).
- 3.1.4 The housing target for Adur (as proposed to be revised) is for a minimum of 3718 dwellings to be delivered between 2011 and 2032 as set out in Policy 3 of the Adur Local Plan 2016 and which results in an annual average of 177 net dwellings.
- 3.1.5 The trajectory indicates that the Council can meet the overall housing target with a continuous supply of land coming forward for development. Following three years of low housing delivery, housing completions are expected to increase considerably in 2016/2017. Delivery rates are projected to be highest over the six year period to 2021/2022, when the strategic greenfield allocations and sites within the Shoreham Harbour Regeneration Area broad location are expected to come forward. Delivery rates will then reduce during the latter part of the Plan period. This is in part due to the reduced certainty of identifying sites that far into the future and 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 and Contingencies sections below.
- 3.1.6 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. The Objectively Assessed Need target for Adur is 6825 dwellings for the period 2011-2032, with an annual delivery requirement of 325 dpa. As illustrated on the trajectory in Table 3 that this cannot be met and is an unrealistic target.

⁴ The base date of the WSCC monitoring data for Completions and Commitments is 1 April 2016. The base date for the SHLAA is 31st October 2016.

Table 2: Adur Housing Trajectory 2016 – Local Plan Annualised Housing Figure of 177dpa

						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	2031/2032	
Gross Completions at 1 April 2016 (large and small sites)	204	153	103	105	38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	603
Commitments at 1 April 2016 (large and small sites with planning permission)(net)						165	111	120	43	0	0	0	0	0	0	0	0	0	0	0	0	439
Allowance for small windfall sites						0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	416
SHLAA sites at 31st October 2016 (net)						0	0	144	21	89	0	0	0	0	0	0	0	0	0	0	0	254
Broad Location (Shoreham Harbour)						0	0	90	90	130	190	0	40	40	50	50	80	80	80	50	0	970
Strategic Allocation (New Monks Farm)						0	0	65	65	65	65	65	65	65	65	65	15	0	0	0	0	600
Strategic Allocation (West Sompting)						0	100	100	50	50	50	50	50	30	0	0	0	0	0	0	0	480
Total Past Completions	204	153	103	105	38																	
Total Projected Completions/Commitments	204	153	103	105	38	165	211	519	301	366	337	147	187	167	147	147	127	112	112	82	32	3762
Losses	11	7	10	9	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44
Past net completions	193	146	93	96	31																	559
Projected net completions						165	211	519	301	366	337	147	187	167	147	147	127	112	112	82	32	3159
Cumulative net completions	193	339	432	528	559	724	935	1454	1755	2121	2458	2605	2792	2959	3106	3253	3380	3492	3604	3686	3718	
Annualised housing target	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	177	3717
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	16	15	99	180	326	338	304	38	162	351	511	481	491	481	451	421	371	306	241	146	1	
Manage. Annual requirement taking into account past/projected completions	182	176	178	183	188	197	200	199	174	164	145	126	124	116	108	102	93	84	75	57	31	

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: 2016 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

Figure 1: Adur Housing Trajectory 2016 - Local Plan Annualised Housing Figure of 177dpa

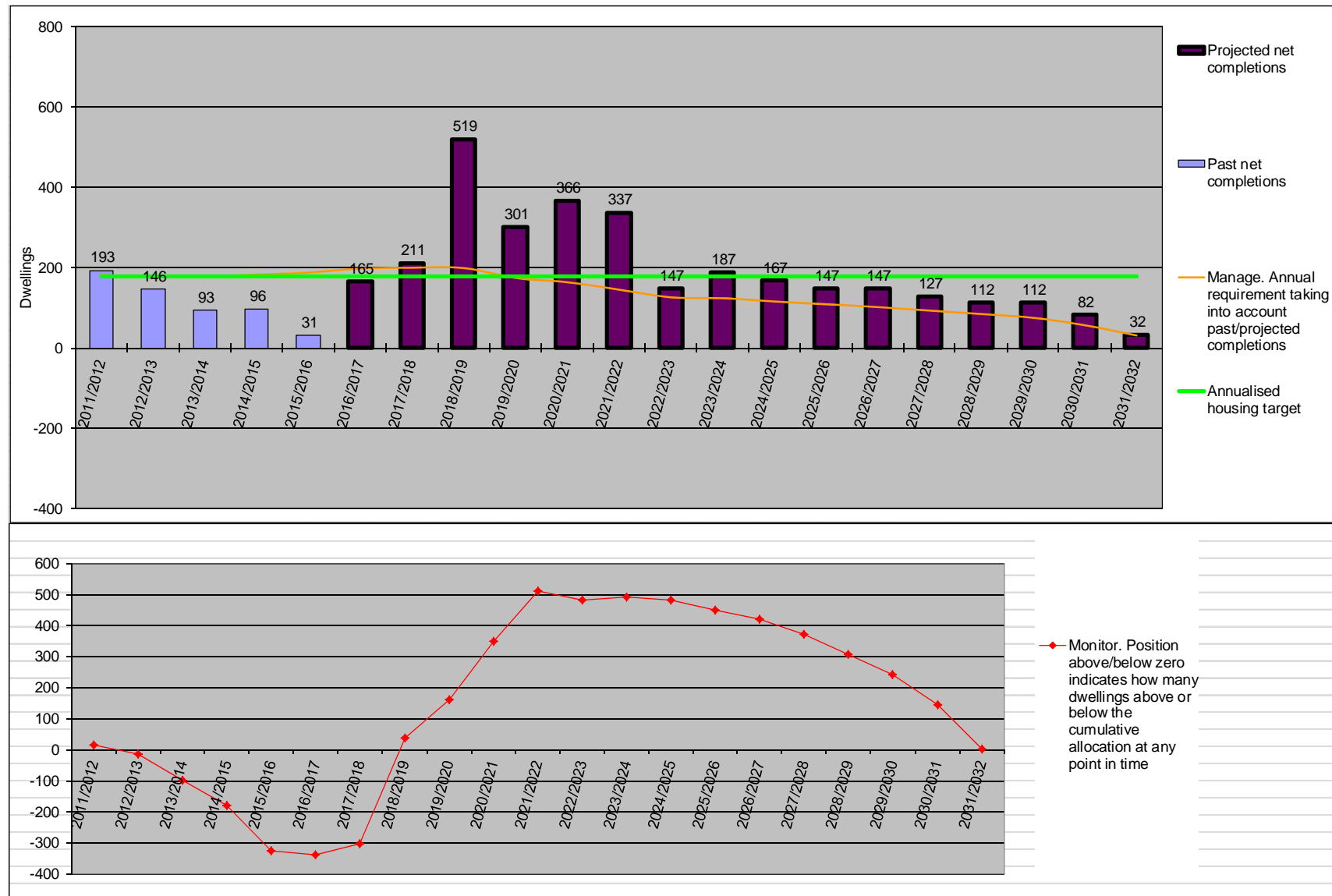


Table 3: Adur Housing Trajectory 2016 – Objectively Assessed Need Annualised Housing Figure of 325 dpa

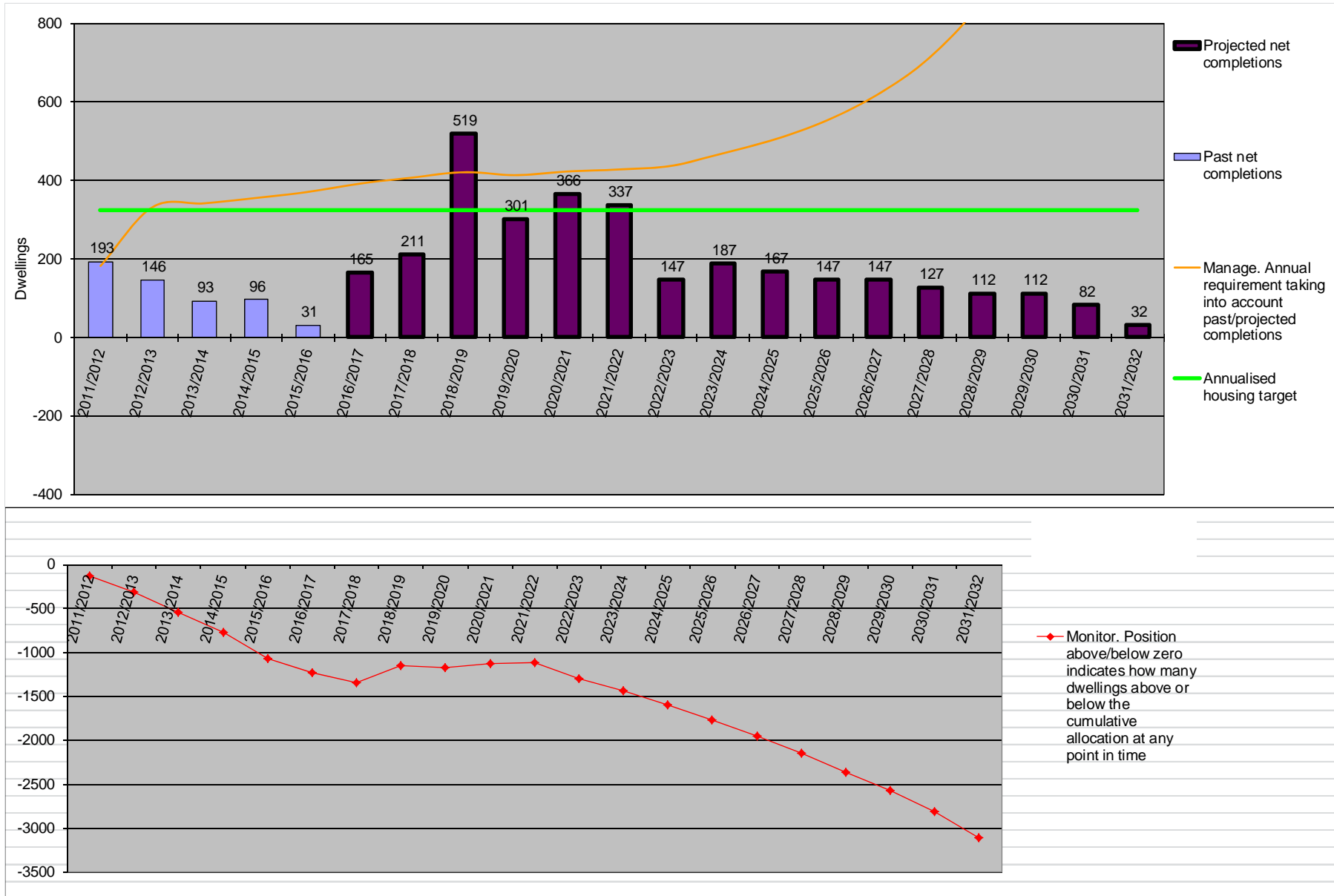
						Projected Completions																Totals
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	
Gross Completions at 1 April 2016 (large and small sites)	204	153	103	105	38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	603
Commitments at 1 April 2016 (large and small sites with planning permission)(net)						165	111	120	43	0	0	0	0	0	0	0	0	0	0	0	0	439
Allowance for small windfall sites						0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	416
SHLAA sites at 31 October 2016 (net)						0	0	144	21	89	0	0	0	0	0	0	0	0	0	0	0	254
Broad Location (Shoreham Harbour)						0	0	90	90	130	190	0	40	40	50	50	80	80	80	50	0	970
Strategic Allocation (New Monks Farm)						0	0	65	65	65	65	65	65	65	65	65	15	0	0	0	0	600
Strategic Allocation (West Sompting)						0	100	100	50	50	50	50	50	30	0	0	0	0	0	0	0	480
Total Past Completions	204	153	103	105	38																	
Total Projected Completions/Commitments	204	153	103	105	38	165	211	519	301	366	337	147	187	167	147	147	127	112	112	82	32	3762
Losses	11	7	10	9	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44
Past net completions	193	146	93	96	31																	559
Projected net completions						165	211	519	301	366	337	147	187	167	147	147	127	112	112	82	32	3159
Cumulative net completions	193	339	432	528	559	724	935	1454	1755	2121	2458	2605	2792	2959	3106	3253	3380	3492	3604	3686	3718	
Annualised housing target	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	325	6825
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	132	311	543	772	1066	1226	1340	1146	1170	1129	1117	1295	1433	1591	1769	1947	2145	2358	2571	2814	3107	
Manage. Annual requirement taking into account past/projected completions	182	332	341	355	370	392	407	421	413	423	428	437	469	504	552	620	714	861	1111	1611	3139	

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: 2016 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

Figure 2: Adur Housing Trajectory 2016 (OAN)



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 deliverable housing sites 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.
- 4.1.2 Since the revocation of the South East Plan and in the absence of an adopted local plan, Adur has measured its housing delivery against its Objectively Assessed Housing Need figure.
- 4.1.3 In determining whether a 5% or 20% buffer is appropriate, National Planning Guidance advice is that any assessment of local delivery is likely to be more robust if a longer term view is taken.
- 4.1.4 Historically there has never been a strong relationship between housing targets set for Adur in Structure and Regional Plans and the need and demand for new dwellings in the Local Plan area. Previous targets have been strongly influenced by the capacity of the Local Plan area to accommodate new dwellings in terms of its physical and environmental characteristics – the sea to the south, the South Downs National Park to the north, flooding and key infrastructure constraints, including transport.
- 4.1.5 Table 4 indicates that annual average dwelling completions since monitoring of the South East Plan began in 2006 until its revocation in 2013 is 135 dwellings (net). This exceeds the annualised South East Plan target of 105 dpa (excluding development at Shoreham Harbour which was ring-fenced). Taking a longer term view, annual average completions also compares favourably with the last West Sussex Structure Plan 2001-2016 delivery target of 99 net dwellings per annum (dpa) with an annual average of 102dpa delivered. Monitoring figures are available from 1996 to 2016 and overall, for this 20 year period, Adur has delivered an average of 108 dwellings per year.
- 4.1.6 It can be seen in Table 4 that completion rates in Adur have varied considerably over time, with the lowest recorded delivery of just 31 dwellings occurring in the last monitoring year 2015/2016 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 play a role. In previous years 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.

4.1.7 Over the whole period for which monitoring figures are available (1996 – 2016) the annual average delivery rate has been 108dpa (net). Adur has therefore consistently delivered sufficient new homes to meet previous housing targets. The Council's view is that in calculating the five year housing land supply a buffer of 5% is considered appropriate as there is not considered to be a history of persistent under delivery against targets set in previous Structure and Regional Plans.

4.1.8 As stated above, it is the Council's view that, to be robust, delivery rates need to be considered over a reasonable period of time. Despite this, it is acknowledged that in the last three monitoring years, delivery has been lower than any target set in previous Structure and Regional Plans. However, in this regard, delivery over the next 10 years is expected to exceed all previous targets. Whilst the Council is firmly of the view that the use of a 5% buffer is appropriate for the District the five year housing land supply position with a 20% buffer has also been calculated to provide a comparison (see Tables 5 and 6 below).

Table 4: Dwelling Completions 1996 - 2016

	Year	Total Dwelling Completions			Time Periods		Annual Average	
		Gross	Net	Losses	Gross	Net	Gross	Net
West Sussex Structure Plan 1989-2006 Annual delivery rate 100dpa (gross)	1996/1997	71	66	5	524	490	105	98
	1997/1998	95	89	6				
	1998/1999	161	153	8				
	1999/2000	136	128	8				
	2000/2001	61	54	7				
West Sussex Structure Plan 2001-2016 Annual delivery rate 99dpa (net)	2001/2002	48	47	1	559	508	112	102
	2002/2003	99	82	17				
	2003/2004	63	59	4				
	2004/2005	131	120	11				
	2005/2006	218	200	18				
South East Plan 2006-2026 Annual delivery rate 105 dpa(net)	2006/2007	230	216	14	1065	948	152	135
	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	146	12				
Adur OAN 291dpa	2013/2014	103	93	10	208	189	104	95
	2014/2015	105	96	9				
Adur OAN 325dpa	2015/2016	38	31	7	38	31	38	31

	Total	2394	2166	228	2394	2166		
	Annual Average	119.7	108.3	11.4				

4.1.9 There has however, clearly been a shortfall against the Local Plan's own annualised delivery target of 177dpa over the past 5 years since the start of the Plan period. When calculating the five year housing land supply, the NPPF indicates that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible. Since 2011, when measured against the Local Plan target, there has been an undersupply of 326 homes and the five year housing land supply calculation in Tables 5 and 6 have been adjusted to reflect this.

4.1.10 The Local Plan trajectory demonstrates that this shortfall can be addressed in the first five years of the Plan period after adoption. This is due to the strategic allocations at New Monks Farm (Policy 5) and West Sompting (Policy 6) and sites within the Shoreham Harbour Broad Location (Policy 8), together with some SHLAA sites, starting to deliver from 2017.

4.1.11 This Housing Implementation Strategy identifies a supply of sites which are considered deliverable and developable within the five year timeframe 2016-2021. The trajectory demonstrates that the housing supply is sufficient to meet (and exceed) targets for the five year period with a 5% or a 20% buffer.

Table 5: Five year housing land supply 2016-2021 with a 5% buffer (Local Plan capacity based housing target)

		Dwellings (net)	Annual Average
a	Local Plan Housing Target 2011-2032	3718	177
b	Completed 2011-2016 (net)	559	
c	Number of years left in plan period = 16		
d	Remaining requirement 2016-2032 (a-b)	3159	
e	Five year target with no adjustment (177x5)	885	
f	Shortfall of housing provision from 2011 (177x5 years = 885) minus completions (f – b)	326	
g	Five year target including shortfall (e+f)	1211	
h	5% Buffer (1211/100x5)	61	
i	Requirement for five years 2016-2021 with 5% buffer (g+h)	1272	254
	Supply:		
j	Commitments (large and small sites) at 1 April 2016	439	
k	SHLAA sites 2016	254	
l	Windfall allowance (32x2 years)	64	
m	Local Plan Strategic Allocations	495	
n	Shoreham Harbour Broad Location	310	

o	Total Commitments	1562	
p	Surplus (o-i) (1562-1272)	290	

4.1.12 This table demonstrates a 6.1 year supply of deliverable sites (o/254) from the current monitoring year 2016.

Table 6: Five year housing land supply 2016-2021 with a 20% buffer (Local Plan capacity based housing target)

		Dwellings (net)	Annual Average
a	Local Plan Housing Target 2011-2032	3718	177
b	Completed 2011-2016 (net)	559	
c	Number of years left in plan period = 16		
d	Remaining requirement 2016-2032 (a-b)	3159	
e	Five year target with no adjustment (177x5)	885	
f	Shortfall of housing provision from 2011 (177x5 years = 885) minus completions (f – b)	326	
g	Five year target including shortfall (e+f)	1211	
h	20% Buffer (1211/100x20)	242	
i	Requirement for five years 2016-2021 with 20% buffer (g+h)	1453	291
	Supply:		
j	Commitments (large and small sites) at 1 April 2016	439	
k	SHLAA sites 2016	254	
l	Windfall allowance (32x2 years)	64	
m	Local Plan Strategic Allocations	495	
n	Shoreham Harbour Broad Location	310	
o	Total Commitments	1562	
p	Surplus (o-i) (1562-1453)	109	

4.1.13 This table demonstrates a 5.4 year supply of deliverable sites (o/291) from the current monitoring year 2016.

4.1.14 Tables 7 and 8 demonstrate that when measured against the Objectively Assessed Need figure of 325dpa, with a 5% and 20% buffer, a five year housing land supply cannot be demonstrated:

Table 7: Five year housing land supply 2016-2021 with a 5% buffer (Objectively Assessed Housing Need target)

		Dwellings (net)	Annual Average
a	Objectively Assessed Need 2011-2032	6825	325
b	Completed 2011-2016 (net)	559	
c	Number of years left in plan period = 16		
d	Remaining requirement 2016-2032 (a-b)	6266	
e	Five year target with no adjustment (325x5)	1625	
f	Shortfall of housing provision from 2011 (325x5 years = 1625) minus completions (f – b)	1066	
g	Five year target including shortfall (e+f)	2691	
h	5% Buffer (2691/100x5)	135	
i	Requirement for five years 2016-2021 with 5% buffer (g+h)	2826	565
	Supply:		
j	Commitments (large and small sites) at 1 April 2016	439	
k	SHLAA sites 2016	254	
l	Windfall allowance (32x2 years)	64	
m	Local Plan Strategic Allocations	495	
n	Shoreham Harbour Broad Location	310	
o	Total Commitments	1562	
p	Shortfall (o-i) (1562-2826)	1264	

4.1.15 This table demonstrates a 2.8 year supply of deliverable sites (o/565) from the current monitoring year 2016.

Table 8: Five year housing land supply 2016-2021 with a 20% buffer (Objectively Assessed Housing Need target)

		Dwellings (net)	Annual Average
a	Objectively Assessed Need 2011-2032	6825	325
b	Completed 2011-2016 (net)	559	
c	Number of years left in plan period = 16		
d	Remaining requirement 2016-2032 (a-b)	6266	
e	Five year target with no adjustment (325x5)	1625	
f	Shortfall of housing provision from 2011 (325x5 years = 1625) minus completions (f – b)	1066	
g	Five year target including shortfall (e+f)	2691	
h	20% Buffer (2691/100x20)	538	
i	Requirement for five years 2016-2021 with 20% buffer (g+h)	3229	646
	Supply:		
j	Commitments (large and small sites) at 1 April 2016	439	
k	SHLAA sites 2016	254	
l	Windfall allowance (32x2 years)	64	
m	Local Plan Strategic Allocations	495	
n	Shoreham Harbour Broad Location	310	
o	Total Commitments	1562	
p	Shortfall (o-i) (1562-3229)	1667	

4.1.16 This table demonstrates a 2.4 year supply of deliverable sites (o/646) from the current monitoring year 2016.

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 9 below sets out how much affordable housing has been delivered per annum since 2011 (the base date of the new Adur Local Plan). It indicates that 26% of the total housing supply over the last 5 years has been affordable housing with an annual average of 32 affordable homes.

Table 9: Affordable Housing Completions

Year	Total Dwellings (gross)	Affordable Housing	% Affordable Housing
2011/2012	204	91	44.6
2012/2013	151	32	21.2
2013/2014	103	12	12.0
2014/2015	105	23	21.9
2015/2016	38	0	00.0
Total	601	158	26.3

5.1.2 Objectively Assessed Needs Housing Update 2016 study for Adur sets out the level of affordable housing need in Adur and identifies a need for 141(net) homes per annum over the Plan period. Policy 22 of the Submission Adur Local Plan 2016 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 Council is seeking to maximise the amount of affordable housing delivered by expecting either a financial contribution or on site provision for all sites coming forward for residential development. Given the uncertainty over future funding mechanisms and viability issues that may be relevant for individual sites it is difficult to assess the delivery of affordable housing. The Governments proposed change to the definition of affordable housing to include starter homes may also impact on delivery.

5.1.5 The following trajectory sets out the likely delivery of affordable housing on sites with planning permission and where affordable housing provision has been negotiated. It also sets out the likely affordable housing provision to be delivered by the strategic allocations and broad location if the maximum levels of affordable housing are achieved according to policy requirements over the Plan period:

Table 10: Affordable Housing Trajectory 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	2031/2032
Strategic Allocations	0	30	50	35	35	35	35	35	29	20	20	5	0	0	0	0
Broad Location	0	0	27	27	39	57	0	12	12	15	15	24	24	24	15	0
79/81 Brighton Road, Shoreham-by-Sea	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Southlands Hospital, Upper Shoreham Road, Shoreham-by-Sea	0	12	7	13	0	0	0	0	0	0	0	0	0	0	0	0
Riverside Business Centre, Old Shoreham Road, Shoreham-by-Sea	0	7	7	7	0	0	0	0	0	0	0	0	0	0	0	0
Total	36	49	91	82	74	92	35	47	41	35	35	29	24	24	15	0

6. Overall Risks to Housing Delivery

- 6.1.1 Throughout the production of this Local Plan there has been ongoing engagement with key stakeholders and local communities. The process of this engagement is set out in the Adur and Worthing Statement of Community Involvement (CD24/6).
- 6.1.2 A consultation database specifically for the Local Plan has been maintained and used to engage with all parties with an interest throughout the whole Local Plan production process. A Statement of Consultation (2016) accompanies the Submission Adur Local Plan 2016 document and sets out details of the engagement undertaken and how it has been used to inform the Local Plan policies (CD07/10).
- 6.1.3 Overall, risks to delivery are considered low. A raft of background evidence, together with continuous engagement, the encouragement for pre-application discussions with developers and landowners gives the Council confidence that the Local Plan strategy is able to deliver sufficient housing to meet the target of a minimum of 3718 dwellings in the Adur Local Plan 2016 and ensure a continuous supply of housing throughout the Plan period.
- 6.1.4 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 mitigation measures are identified to address these risks.
- 6.1.5 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 just 93, 96 and 31 net dwellings being completed in the last three monitoring years respectively. 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 time lag of around 18 months for small sites to be reflected in completions. The ability of developers to access finance and the availability of mortgage products to prospective purchasers have also had an impact. If there is another downturn, and the effects of Brexit on the housebuilding industry are as yet unknown, this will have a detrimental effect on housing delivery rates, over which the Local Authority will have little control. There is a risk therefore that the Local Plan housing target will not be delivered.
- 6.1.6 However, the Council is confident that the 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. 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. 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. Working with the relevant infrastructure/service providers and site promoters, an Infrastructure Delivery Plan (CD07/18) 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 The level of development proposed to be delivered in this Plan (177dpa) is considerably higher than has historically been delivered in Adur. The historic build rate over the last 20 years is on average 108 net dwellings per year. The delivery rate of 177dpa has only been achieved three times in the last twenty years. There is a risk that the high number of completions predicted in the ten years between 2016 and 2026 will not be achieved. It is possible that the building industry will not have the capacity to facilitate the delivery of sites.
- 6.1.8 Viability of individual sites is a key risk. There is a theoretical risk that the policies in this Plan will have an adverse impact on the viability of development, thus inhibiting completion rates. However, a Whole Plan Viability Assessment has been undertaken (to be published in December 2017). It indicates that the policies of the Plan, taken together, do not adversely impact the viability of development.

7. Contingencies

7.1.1 The Local Plan includes a Monitoring and Delivery Framework which will assess the overall impact of the strategy and whether or not the vision and strategic objectives are being delivered. Housing delivery will continue to be measured as part of this.

7.1.2 The Council has been unable to identify contingency sites and build in flexibility to help address the shortfall in meeting its objectively assessed need for housing. Given the lack of land available and the sensitive character of Adur, means that there simply are no reasonable and sustainable alternatives for development. Therefore, every effort will be made to facilitate and support the strategy for delivery set out in the Local Plan. In addition to the housing identified, there is likely to be scope for additional housing, as yet unidentified, from other sources over the Plan period:

- 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 2)
- Additional housing from current planning applications which were either granted consent after 1 April 2016 or are yet to be determined.

7.1.3 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.

7.1.4 The Council has identified potential measures to encourage the delivery of sites:

- Consideration will be given to the redevelopment for housing of any Council owned land identified through a review of assets currently being undertaken.
- Developers/landowners will be contacted to identify and understand reasons for delay or non-delivery of sites and find ways to help.
- Developers/landowners will be encouraged to hold pre-application discussions.
- A flexible policy approach will be taken where it can be demonstrated that viability is an issue.
- Alternative/additional funding streams e.g. Local Growth Fund, to help with bids as appropriate.
- The Council's recently appointed project managers will help co-ordinate inputs from relevant stakeholders etc. on major sites

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 Council's 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 2032.
- 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. Conclusion

- 9.1.1 A significant increase in the housing delivery rate has been planned for in this Local Plan. Adur District Council is confident that the housing delivery target set out in Policy 3 of the Adur Local Plan 2016 can be delivered. Given the very real constraints in Adur and very limited options for growth, the Adur Local Plan is proposing a realistic and sustainable development strategy that would deliver a minimum of 3718 new homes (177dpa). Against this target the Adur Local Plan has a robust and deliverable five year housing land supply.
- 9.1.2 The two strategic sites and the broad location at Shoreham Harbour are essential to the delivery of the overall strategy. However, the delivery of small and unidentified sites will continue to make a significant contribution to the housing supply.
- 9.1.3 Extensive and continuous stakeholder engagement has taken place throughout the process of developing policies in this Local Plan. The risks to the delivery of the components of the housing delivery strategy, together with the mitigation required have been identified and the overall risk to the housing delivery strategy is low.

Appendix 1: Reassessment of Rejected SHLAA sites at 31st October 2016

The sites listed in the table below have been identified in the 2015 SHLAA Update as Rejected Sites. They have previously been assessed as being not suitable for residential development/redeveloped for a non-residential use or too small to accommodate 6+ dwellings. The most recent SHLAA Update 2016 has a base date of 1 April each year to reflect the base date of the West Sussex County Council monitoring data. Between this date and the Examination of the Local Plan, further progress has/ and will continue to be made on sites. The table below sets out the most up to date position at 31st October 2016.

Any further changes between October 2016 and the Examination will be set out in an Interim Review Table which will provide the most up to date position in terms of housing delivery.

SHLAA REF	SITE ADDRESS	SHLAA 2015 UPDATE CONCLUSION	2016 SHLAA UPDATE STATUS (1/4/2015-31/3/2016)	2016 SHLAA STATUS REVIEW (at 31 st October 2016)	SHLAA REASSESSMENT 31 ST OCTOBER 2016
001/13	Kingdom Hall, Wembley Gardens, Lancing	Development on this site has been completed	N/A	N/A	N/A
019/13	337 Brighton Road, Lancing	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 accounted for through other monitoring.	Rejected Site	Rejected Site	This site comprises an area of hardstanding adjacent a retail/residential use. An appropriate density for development would be 40dph and the site could potentially accommodate 4 dwellings. It therefore falls below the threshold of sites to be included in the SHLAA.

020/13	Land at 2/4 North Road, Lancing	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 accounted for through other monitoring.	Rejected Site	Rejected Site	The site comprises a pair of semi-detached dwellings. The change of ownership and subsequent conversion of one dwelling into flats suggests that comprehensive redevelopment of this site is unlikely. The site is no longer available for development. The remainder of the site is too small to accommodate 6 dwellings.
021/13	16a to 18a North Road, Lancing	The site is too small for 6 dwellings which is the threshold for this study. Development on this site has been completed.	N/A	N/A	N/A
024/13	Garage and Offices, 120 High Street, Shoreham	This site has been redeveloped for retail use and is not available for residential development.	N/A	N/A	N/A
026/13	Eastern Sands Caravan Park, Lancing	This site is in use as a holiday caravan park and is not available for development. There are also significant mitigation costs associated with flood risk which would make residential development unviable. In the last few years there has been significant investment in terms of replacement accommodation, consolidating its use as a holiday caravan park.	Rejected Site	Rejected Site	This site is not available for development. It is in Flood Zone 3; a major constraint to the development of this site. It lies at a lower level than the adjacent beach to the south and A259 coast road to the north and acts as a secondary flood defence for this main road and the properties beyond. There are significant infrastructure costs associated with flood risk which could make the site unviable for residential development. There has been significant investment in term of replacement accommodation for its use as a holiday park which has consolidated this use.

029/13	Elm Grove Lodge, Elm Grove, Lancing	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.	Rejected Site	Rejected Site	This site comprises a single dwelling. It has planning consent for one dwelling (July 2011) which has not been implemented. The site is suitable for residential development. It lies within a residential area and there could be potential to increase the number of dwellings on site. An appropriate density for development would be 40dph and the site could therefore potentially accommodate 4 dwellings. It therefore falls below the threshold of sites to be included in the SHLAA.
030/13	Car Park, Asda, 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 the site appears well used as a retail car park and development for residential use would affect the proper functioning of the adjacent retail use. Following a reassessment in 2013 it is concluded that the same reason for rejection still applies and therefore this site is not taken forward in this study.	Rejected Site	Rejected Site	This site is not available for development. Any development for residential purposes would affect the function of the adjacent retail use.
033/13	Car Park, Marlborough Road, Lancing	This site was considered as part of the 2009 and 2012 SHLAA review. At that time it was rejected as it was concluded that the site is within an employment area	N/A	N/A	N/A

		allocated for employment uses in the saved policies of the Adur Local Plan 1996 and there is no evidence that the site is unsuitable for employment purposes. The site has now been redeveloped for employment use and is not available for residential development.			
034/13	146 First Avenue, 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 the site is not currently available. Following a reassessment in 2013 it is concluded that the same reason for rejection still applies and therefore this site is not taken forward in this study.	Rejected Site	Rejected Site	This site is not available for development. It comprises a single dwelling house with a large garden and is suitable for housing. It lies within the North Lancing Conservation Area and any development would need to take account of this in terms of design and density. At 30dph the site could potentially accommodate 10 dwellings. The current owners of this property have stated that they have no intention of redeveloping this site and do not wish it to be included in the SHLAA.
035/13	Telephone Exchange, 6 South Street, 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 the site is not currently available. Following a reassessment in 2013 it is concluded that the same reason for rejection still applies and therefore	Rejected Site	Rejected Site	This site is not available for development. It is to remain in use as a telephone exchange.

		this site is not taken forward in this study.			
037/13	Garage Compound, 88/163 Daniel Close, 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 although 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. Following a reassessment in 2013 it is concluded that the same reason for rejection still applies and therefore this site is not taken forward in this study	Rejected Site	Potential Site	<p>As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that 11 dwellings could be accommodated. Pending further work on the impact of loss of car parking, the site is suitable for residential development.</p> <p>Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.</p>
038/13	Land north 41/42 The Paddocks,	The site was considered in 2009 and 2012 as part of the	Rejected Site	Rejected Site	This council owned site is not available for development. It is within flood zone 3 and is heavily

	Lancing	SHLAA review. At that time it was rejected as the site is not considered suitable as it is within flood zone 3 and constitutes a heavily wooded amenity space on the edge of Lancing. Following a reassessment in 2013 it is concluded that the same reason for rejection still applies and therefore this site is not taken forward in this study.			wooded. Satisfactory access would be difficult to achieve.
039/13	Freshbrook First School, Grinstead Lane, 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 is not a reasonable prospect that housing will be delivered on the site as it is currently not available. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore the site is not being taken forward in this study. The site remains part in education use and part as a Children and Family Centre.	Rejected Site	Rejected Site	This site is in education/community use and is not available.
040/13	42/44 Leconfield Road, Lancing	The site is too small for 6 dwellings which is the	N/A	N/A	N/A

		threshold for this study. Any dwellings that may be delivered on this site will be picked up through other monitoring. The site has now been developed for a community use.			
041/13	Brethrens Meeting Room, First Avenue, Lancing	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. The site has now been redeveloped for a community use.	N/A	N/A	N/A
042/13	Sompting Village Primary School, Whitestyles Road, Sompting	The site was considered in 2009 and 2012 as part of the SHLAA review. A review of school provision by West Sussex County Council concluded this site is not surplus to requirements and at that time it was rejected as there was not a reasonable prospect that housing will be delivered on this site as it was not currently available. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and this site is not	Rejected Site	Rejected Site	The site is in education use and is not available.

		being taken forward in this study.			
043/13	57 Boundstone Lane, Lancing	The site is too small for 6 dwellings which is the threshold of this study. Any dwellings that may be delivered on this site will be picked up through other monitoring.	Rejected Site	Rejected Site	This site is suitable for development. The previous application for 13 dwellings was refused on grounds of overdevelopment/design and scale/ unneighbourly/ detrimental to residential amenity. Current site density is approximately 20dph. There could be potential to increase the number of dwellings on site and an appropriate density for development would be 40dph. The site could therefore potentially accommodate 4 dwellings. It falls below the threshold of sites to be included in the SHLAA.
045/13	Amenity Open Space, Williams Road, Shoreham-by-Sea	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as there is no reasonable prospect that housing will be delivered on the site as it is not currently available. Following a reassessment in 2013 it is considered that the site is still in leisure/recreation use and given that it has now been formally designated a village green, in line with Policy, its loss would be resisted.	Rejected Site	Rejected Site	This council owned site is not available for development. It has Village Green status. It was designated in 2008 to replace deregistered village green land at Kingston Beach which was required for a new Lifeboat Station..
047/13	Car Park, Lower Beach Road, Shoreham-by-Sea	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was	Rejected Site	Rejected Site	This site is not available for development. It is not considered suitable for development as it lies within Flood Zone 3b. It is well used as a public car park for the town centre

		concluded that the site is required for public car parking and is well placed in relation to the new river crossing from Shoreham Beach into the town centre (now completed). The site is within flood zone 3 and is not considered suitable for 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.			
048/13	The Longshore PH, 153 Brighton Road, Shoreham-by-Sea (formerly The Royal Coach)	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 in active use as a car park for the public house (recently refurbished); the site is located in flood zone 3 and is not considered suitable for 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.	Rejected Site	Rejected Site	This site is not available for development. The site is in Flood Zone 3b and is not suitable for residential development. It is in use as a car park for the adjoining use. The recent refurbishment has consolidated its use as a public house.

050/13	Playing Field, Middle Road, Shoreham-by-Sea	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 is not a reasonable prospect that housing will be delivered on this site as it is not currently available. A review of school provision by West Sussex County Council concluded this site is not surplus to requirements and is part of the Shoreham Academy. Following a reassessment in 2013 it is considered that the same reasons for rejection still apply and therefore is not taken forward in this study.	Rejected Site	Rejected Site	This site is not available for development. It is suitable for residential development, given its location in a mixed use area. However, it is used for education purposes in connection with The Shoreham Academy.
051/13	Community Halls, Eastern Close, Shoreham-by-Sea	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was considered that there is not a reasonable prospect that housing will be delivered on this site as it is not currently available. Following a reassessment in 2013 it is concluded that the site is still in use as a community facility, and, in line with	Rejected Site	Rejected Site	This site is not available for development. The site comprises three separate buildings and associated parking areas, together with an electricity sub-station. There appears to be no major constraints to the development of this site for housing, providing any layout accounted for the location of the substation. An appropriate density for development would be 40dph. The site could therefore potentially accommodate 5 dwellings. It falls below the threshold of sites to be included in the SHLAA.

		policy (in most circumstances) its loss would be resisted. The same reasons for rejection still apply and therefore this site is not taken forward in this study.			
054/13	Telephone Exchange, 1 Tarmount Lane, Shoreham-by-Sea	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 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. 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	Rejected Site	Rejected Site	This site is not available for redevelopment. It is to remain in use as a telephone exchange.

		monitored on a regular basis.			
055/13	Station Car Park, Buckingham Road, Shoreham-by-Sea	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 redevelopment of part of the station car park for housing may be appropriate as part of a new parking strategy for the town centre. However at that stage loss of railway parking without suitable replacement was not considered appropriate. 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.	Rejected Site	Rejected Site	This site is not available for development. A town centre car parking strategy has not been undertaken. Its use as a commuter car park adjacent to the railway station encourages use of sustainable transport and it could not be replaced elsewhere in the town centre.
056/13	Dunelm Mill, Ham Road, Shoreham-by-Sea	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 of housing being delivered on this site as was not currently available. Following a reassessment in 2013 it is	Rejected Site	Rejected Site	This site is not available for development. It lies within the Shoreham Harbour Broad Location Regeneration Area. Any future development potential will be addressed through the Joint Area Action Plan.

		concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study.			
057/13	The Ham, Eastern Avenue, Shoreham-by-Sea	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 was safeguarded as a public open space. A new skateboard park has recently been constructed on part of the site. The site is not considered suitable for housing development and should be retained for public open space/amenity. 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 stud	Rejected Site	Rejected Site	This Council owned site is not available for development. It is a triangular shaped area of land surrounded on all sides by roads and providing a suitable access would be an issue. A well-used skateboard park has been constructed at the widest part of the site. Given its location and its use for recreation purposes, this site is not suitable for residential development.
060/13	Kingston Buci Family and Childrens Centre, Middle Road, Shoreham-by-Sea (Formerly Kingston Buci First School).	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 is not a reasonable prospect that housing will be delivered on this site as it is not currently	Rejected Site	Rejected Site	The site is in education use and is not available.

		available. A review of school provision by West Sussex County Council concluded this site is not surplus to requirements and is in use part as a Children and Family Centre and part for education use. 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.			
061/13	Land to south at junction of Chanctonbury Drive, Shoreham-by-Sea	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 whilst this site is currently underused as an amenity space, there is potential with adjoining land containing the listed building, for this area to contribute significantly for meeting the open space needs of this area. The site is considered unsuitable for housing development. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this	Rejected Site	Rejected Site	This grassed area of land forms part of the setting of a listed building and functions as an amenity area within an urban area. It is not considered suitable for residential development.

		site is not taken forward in this study.			
066/13	Former Railway Sidings, Brunswick Road, Shoreham-by-Sea	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected. The Shoreham Renaissance Strategy 2006 identified this site to be retained for railway uses and the site is not considered suitable for redevelopment for housing. 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.	Rejected Site	Rejected Site	The Shoreham Renaissance Strategy 2006 identified this site to be retained for railway uses. It is a narrow backland site between the railway line and station to the north and residential/employment uses to the south. It is used for storage and car parking. Access is via the station forecourt/taxi rank. The site is not considered suitable for residential development. Given its location, a satisfactory residential layout would be difficult to achieve
067/13	Play Area, Prince Charles Close, Southwick	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was considered that there was not a reasonable prospect that housing would be delivered on the site as it is not currently available. Subsequently a decision has been taken on this Council owned site that it is to be retained as a childrens play area. Following a reassessment in 2013 it is	Rejected Site	Rejected Site	This Council owned site is not available for development. Its potential for residential development has been considered previously by Members. The presence of overhead power lines are a major constraint to the development of this site and it is not considered suitable for residential development. The site would be too small to accommodate 6 dwellings.

		concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study			
068/13	Ridgeway Allotments and adjoining grazing land, 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 site has poor access and major physical constraints in the form of power lines. The presence of overhead power lines means that the majority of the site is not considered suitable for housing. The rest of the site contains well used allotments which have not been declared surplus to requirements. The site 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.	Rejected Site	Rejected Site	This site is not available for development. It has poor access and major physical constraints in the form of over-head power lines. The presence of overhead power lines means that the majority of the site is not considered suitable for housing. The rest of the site contains well used allotments which have not been declared surplus to requirements.
070/13	12/14 Southdown Road, Southwick	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time	Rejected Site	Rejected Site	The site is not available. It comprises two detached dwellings and is suitable for residential development. An appeal for 12 flats was dismissed

		it was rejected as it was considered that there is not a reasonable prospect that housing will 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.			in 2008 on grounds of over development. The site is adjacent a Conservation Area and any design and layout would need to reflect this. An appropriate density for development would be 30dph. The site could therefore potentially accommodate 4 dwellings. It falls below the threshold of sites to be included in the SHLAA. Planning permission for two extensions granted in 2013 at 14 Southdown Road has been implemented, consolidating the use as a residential dwelling.
071/13	Manor Hall Nursery, Gardner Street, Southwick	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.	Rejected Site	Rejected Site	The potential to develop this site has been explored through the Eastbrook Allotments Development Brief (2015) which indicates that the most suitable use for this site is a community use. There is no satisfactory access to this site to serve residential development.
072/13	Emblem House, 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 presence of overhead powerlines and the noise from the adjacent sub-station makes the site unsuitable for residential development. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site	Rejected Site	Rejected Site	This site is not available for development. The presence of overhead power lines and noise from the adjacent sub-station makes the site unsuitable for residential development.

		is not taken forward in this study.			
074/13	Chalex Works, 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 a significant part of this site was being redeveloped for 15 B1/B8 units. It is not considered that the remaining part of this 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. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply. In addition, the site is now protected for employment uses in the Proposed Submission Adur Local Plan 2014 and its loss to residential use would be contrary to policy and therefore this site is not taken forward in this study.	Rejected Site	Rejected Site	This site is not available for development. It is identified in the Employment Land Review 2014 to be protected for employment use. This assessment concluded that 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.
078/13	Land SW corner Southwick Recreation Ground,	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time	Rejected Site	Rejected Site	This Council owned site is not considered suitable or available for residential development. It is adjacent to Southwick Leisure Centre and forms part of the

	Southwick	it was rejected as it was concluded the site forms part of an attractive public open space, providing informal amenity space. The site 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.			recreation ground. It is heavily treed and whilst it is not laid out as a formal recreation space, it does contain a skateboard area.
079/13	East Allotments, The Gardens, 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 site contains well used allotments which have not been declared surplus to requirements. Satisfactory access to the site would be difficult to achieve without the demolition of a dwelling. The site 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	Rejected Site	Rejected Site	This Council owned site is not considered suitable or available for residential development. It is surrounded on all sides by residential development with a narrow access. A satisfactory access to serve residential development could not be achieved without the demolition of a dwelling. The site contains well uses allotments which have not been declared surplus to requirements.

		site is not taken forward in this stud			
080/13	Quayside Recreation Ground, Upper Kingston Lane, 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 site is public open space and recent assessments have identified continued use for open space to be appropriate. Potential contamination and ground subsidence are also major constraints to development and the site 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.	Rejected Site	Rejected Site	This site is not available for development. It is used for recreation purposes in conjunction with the adjacent WSCC owned Youth Centre. This, together with the potential for land subsidence makes the site unsuitable for residential development.
081/13	4 Old Shoreham Road, Lancing	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. Subsequently, several planning applications have been refused and an appeal	Rejected Site	Rejected Site	This site is considered suitable for residential development. However, several planning applications have been refused and an appeal for 13 dwellings dismissed on grounds of overdevelopment, flood risk and highway issues. The most recent application for two dwellings has been refused and it is considered that the site is not able to accommodate 6 dwellings in a satisfactory manner. Any dwellings that may be delivered on this

		dismissed on grounds of over development and flood risk. Following a reassessment in 2013, it is concluded that the site could potentially accommodate less than 6 units and the site should not be taken forward in this study. Any dwellings that may be delivered on this site will be picked up through other monitoring. (A current planning application (AWDM/0829) for redevelopment with 4 dwellings is pending a decision)			site will be picked up through other monitoring.
085/13	Rectory Farm Industrial Estate, Rectory Farm Road, Sompting	The site was considered in 2009 as part of the SHLAA. At that time it was considered to be suitable, achievable and deliverable. However, the Employment Land Review 2011 and 2014 recommended that this site be retained for employment use given the limited supply of land for employment use in the District. Following a reassessment in 2013, the site is now protected for employment uses in the	Rejected Site	Rejected Site	The site is located within a residential area and has been previously promoted for residential development through the SHLAA process. This site is identified in the Employment Land Review 2014 to be protected for employment use. This assessment concluded that 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 addressed, the site is suitable for residential development.

		Proposed Submission Adur Local Plan 2014 and its loss to residential use would be contrary to policy and therefore this site is not taken forward in this study.			
092/13	Garage compound, r/o Kingston Broadway, Shoreham-by-Sea	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 refused on the grounds of the backland nature of the site, the unneighbourly form of development and inadequate standards of residential amenity. Following a reassessment in 2013, it is concluded that the site does not offer a suitable location for residential development as it would result in a poor environment for potential residents and the site should not be taken forward in this study	Rejected Site	Rejected Site	The site has previously been considered as having potential for residential development. A planning application for residential development was refused on the grounds of the backland nature of the site, the unneighbourly form of development and inadequate standards of residential amenity. It is concluded that the site does not offer a suitable location for residential development as it would result in a poor environment for potential residents. This backland site is not considered suitable for residential development. Access to the site is via a single lane road which serves the garages as well as providing a loading and unloading area for the adjacent retail parade. A satisfactory access to serve a residential development could not be achieved.
094/13	2-8 Tarmount Lane, Shoreham-by-Sea	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time	N/A	N/A	N/A

		it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that the site is no longer available as it has now been redeveloped for an alternative use and the site should not be taken forward in this study.			
097/13	Grazing Land, Overhill	The site was considered in 2009 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. This is a Council owned site and a Member decision was taken on 30th August 2011 not to proceed with the residential development of this site. Following a reassessment in 2013, it is concluded that the site should not be taken forward in this study.	Rejected Site	Rejected Site	This Council owned site is not available for development. It is currently used for as grazing land and is considered suitable for residential development. There is a restrictive covenant on which restricts use of the land for cemetery purposes. This covenant would need to be lifted if residential development was to be considered. An application to the Lands Tribunal was made in 2010/11 but was withdrawn by the Council prior to a decision being made. A subsequent decision was taken by the Council in 2011 not to proceed with the residential development of this site.
100/13	Europa House, 46/50 Southwick Square, Southwick	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	Rejected Site	Rejected Site	N/A

		2013, the site is now in an alternative use for employment and it is concluded that it should not be taken forward in this study.			
101/13	Land east of Adur Close, Lancing	This greenfield site which lies outside but adjacent to the the built up area boundary was rejected in the 2009 and 2012 SHLAA update on the grounds that development of the site would contravene policy. It forms part of an area identified in the Urban Fringe Study as making a significant contribution to the Strategic Gap both in views east-west and north-south and as a prominent feature contributing to the setting of the nearby settlements. Following a further assessment of the built up area/local green gap boundary in 2013 the same reasons for rejection still apply and therefore this site is not taken forward in this study.	Rejected Site	Rejected Site	This site lies within Flood Zone 3. Together with land to the east, it makes a significant contribution to the Local Green Gap. Development would result in a reduction in the quality and character of the gap landscape and would reduce the perceived north-south extent of the undeveloped green landscape of the gap in the sensitive views from the South Downs National Park.
102/13	The Minstrels Gallery, Old Salts	This building lies within the Lancing-Shoreham-by-Sea	Rejected Site	Rejected Site	This Grade II Listed Building has previously been used as a restaurant. Its current use is unknown. Its

	Farm Road, Lancing	Local Green Gap. It had a planning consent (for change of use to residential development) dating from before the base date of the 2009 SHLAA. The consent was never implemented and has now expired. There was no response at the "Call for Sites" stage of both the 2012 Update and this SHLAA and therefore it is concluded that the site is no longer available and should not be taken forward in this study.			demolition would be resisted but it is suitable for conversion to a residential use and a previous planning consent (unimplemented) allowed its conversion to 6 flats. However, there had been no change in at least 3 years and no indication that the site is to be promoted for residential redevelopment and therefore it is concluded that the site is no longer available.
104/13	Land at junction of Saltings Roundabout, Lancing	This greenfield site which lies outside but adjacent to the the built up area boundary was rejected in the 2009 and 2012 SHLAA on the grounds that development of the site would contravene policy and is a fundamental part of the Local Green Gap between settlements. The availability of this site is unknown and there has been no suggestion by the landowner or any developer that this site may be promoted for residential development in the future.	Rejected Site	Rejected Site	This site has not been promoted for development and is not available. It forms a fundamental part of the Local green Gap between settlements, has access and flooding issues and is not suitable for development.

		Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore the site is not being taken forward in this study.			
105/13	Land south west of New Monks Farm, Lancing	This site, which was not previously considered as part of the 2009 and 2012 SHLAA review is rejected from the scope of this study as the site has been developed as the Brighton and Hove Albion Football Academy.	N/A	N/A	N/A
107/13	West Street Nursery, West Street, Sompting	This greenfield site, in Sompting Village, was rejected in the 2009 and 2012 SHLAA. It lies within the Local Green Gap and development would contravene policy. It has an important role in maintaining the integrity of the Gap in landscape terms. Its development for housing would also change the linear character of the Village and be detrimental to the character of the conservation area. These reasons for rejection have been supported by an	Rejected Site	Rejected Site	Development of this site has been tested at appeal and the reasons for rejection were supported by the Inspector. It has an important role in maintaining the integrity of the Gap in landscape terms. Its development for housing would also change the linear character of the Village and be detrimental to the character of the conservation area. The landowner continues to promote the site for development through pre application discussions and has indicated that a development of 5 dwellings might be appropriate which is below the threshold of this study. Any dwellings that may be delivered on this site will be picked up through other monitoring.

		<p>Inspector at appeal.</p> <p>Following a reassessment in 2013 it is considered that the same reasons for rejection still apply and therefore this site is not taken forward in this study.</p> <p>The landowner continues to promote the site for development through pre application discussions and has indicated that a development of 5 dwellings might be appropriate which is below the threshold of this study. Any dwellings delivered on this site will be picked up through other monitoring.</p>			
108/13	Stocks Garden, Stocks House, West Street, Sompting	<p>This greenfield site, in Sompting Village, was rejected in the 2009 and 2012 SHLAA. It lies within the Worthing-Lancing/Sompting Local Green Gap and development would contravene policy. It has an important role in maintaining the integrity of the Gap in landscape terms. Its development for housing would also change the linear</p>	Rejected Site	Rejected Site	<p>The site has an important role in maintaining the integrity of the Gap in landscape terms. There may be some potential to redevelop the front part of the site containing the existing building, but given the linear character of the Village and impact on the character of the Conservation Area, the site is too small to accommodate 6 dwellings</p>

		character of the Village and be detrimental to the character of the conservation area. Following a reassessment in 2013 it is considered that the same reasons for rejection still apply and therefore this site is not taken forward in this study.			
111/13	Shoreham Gateway Site, Shoreham-by-Sea (Also known as Grazing land south west of flyover, Steyning Road, Shoreham-by-Sea)	This greenfield site, within the Lancing-Shoreham-by-Sea Local Green Gap, was rejected in the 2009 and 2012 SHLAA. The intrusive nature of the A27 and the junction to the north coupled with traffic noise, suggests the site would not be suitable for residential purposes although other uses might be acceptable. Following a reassessment in 2013 it is concluded that, although the site is on the very 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. It is an important part of the gateway sequence of	Rejected Site	Rejected Site	This site is not suitable for development. It makes a strong contribution to the landscape setting of the River Adur. It is located at one of the principal gateways to the South Downs National Park and contributes both to the Parks landscape setting and that of Shoreham-by-Sea. The construction of the Shoreham Adur Tidal Scheme will impact on this site, to be assessed during the planning application process for the Tidal walls. Note: this site will be considered by the appointed Inspector at the Local Plan examination.

		views and spaces on the northern edge of Shoreham and the development of the site would be an unwelcome urbanisation. The majority of the site is located within Flood Zone 3a and there are surface water and potentially significant groundwater flooding issues. There is also potential for significant noise issues given the proximity of the site to the A27 and A283. It is for these reasons that the site is rejected and is not taken forward in this study.			
113/13	Adur Recreation Ground, Brighton Road, Shoreham-by-Sea	This greenfield site, within the Lancing-Shoreham-by-Sea Local Green Gap, was rejected in the 2009 and 2012 SHLAA. The site, which contains some built recreation facilities, is protected as public open space. Although visually separated from other parts of the Local Green Gap, development of the site would encroach upon the perception of a gap between Lancing and Shoreham.	Rejected Site	Rejected Site	This is a Council owned site and is not available for 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.			
115/13	Private playing field east 70/104 Downsway, Southwick	This greenfield site, formally within the Area of Outstanding Beauty but now excluded from the National Park was rejected in the 2009 and 2012 SHLAA. This sports field is proposed to be included within the built up area boundary in the Proposed Submission Adur Local Plan. It is owned by Brighton & Hove City Council and leased to Portslade and Aldridge Community Academy for use as a sports field. The site is crossed by overhead power lines and does not offer a suitable location for residential development. In addition access to the site cannot be demonstrably achieved. Following reassessment in 2013 it is concluded that the site is not available, the same reasons for rejection still	Rejected Site	Rejected Site	This site is in use for educational purposes and is not available for development. It is crossed by overhead power lines and does not offer a suitable location for residential development. In addition access to the site cannot be demonstrably achieved.

		apply, and the site is not being taken forward in this study.			
116/13	1/3 Steyning Road, Shoreham-by-Sea	This greenfield site was not previously considered as part of the 2009 and 2012 SHLAA review. The site is too small for 6 dwellings which is the threshold of this study. Any dwellings that may be delivered on this site will be picked up through other monitoring.	Rejected Site	Rejected Site	This site is a single dwelling plot adjacent to an existing property and is too small to accommodate 6 dwellings.
126/13	Land at Mill Hill, Shoreham-by-Sea	This site, which was not previously considered as part of the 2009 and 2012 SHLAA review, is rejected from the scope of this study because it is not considered that there is a reasonable prospect that housing will be delivered on the site as the site (owned by Brighton & Hove City Council) is not currently available.	Rejected Site	Rejected Site	Brighton & Hove City Council has confirmed that this site is now available for development. However, the elevated, open farmland on the slopes of this site is assessed as an area of high overall landscape sensitivity which makes an important and highly valued contribution to the landscape of the Lancing-Shoreham Gap and to the setting of the South Downs National Park. In addition, it has not been demonstrated that a satisfactory access can be achieved. The site is not suitable for development. Note: this site will be considered by the appointed Inspector at the Local Plan examination.
127/13	25 Beach Green, Shoreham-by-Sea	This site, that was not previously considered as part of the 2009 and 2012 SHLAA review, is rejected from the scope of this study because it is not considered	Rejected Site	Rejected Site	This site is in flood Zone 3. This will be mitigated once the Shoreham Adur Tidal Walls Scheme has been completed in this area. The single dwelling sits in a corner plot; however, redevelopment with 7 dwellings has been refused planning permission on the grounds of excessive overdevelopment. An

		that there is a reasonable prospect that housing will be delivered on the site as the site is not currently available. A planning application has been refused for 7 dwellings on this site on the grounds of excessive overdevelopment. Following a reassessment in 2013 it is considered that the site is too small to accommodate 6 dwellings and should not be taken forward in this study. Any dwellings delivered on this site will be picked up through other monitoring.			appropriate density for development would be 35dph. The site could therefore potentially accommodate 3 dwellings. It falls below the threshold of sites to be included in the SHLAA.
130/13	New Monks Farm (proposed country park)	This greenfield site was identified through the Local Plan process as part of a potential strategic allocation for a residential led mixed use development and is being actively promoted by the landowner (see ADC/122/13). It is being treated as a separate site in the SHLAA as it is identified in the Proposed Submission Adur Local Plan (and being promoted by the landowner) as a Country	Rejected Site	Rejected Site	This site forms part of the proposed Strategic Allocation in the Submission Adur Local Plan 2016 and will be considered at the Local Plan examination.

		<p>Park and would remain in the countryside. It is considered that residential development on this site is not appropriate. The Landscape and Ecological Survey (2012) indicate that this area of land forms part of the central landscape of the Local Green Gap and makes an important contribution to its sense of openness and "greenness". The principle of the use of this site will be considered at the Local Plan Public Examination.</p>			
131/13	Transmitter Station and Mast, Church Green Shoreham-by-Sea	<p>This site has not previously been considered as part of the 2009 and 2012 SHLAA review. However, an assessment in 2013 has concluded that this site is required for use as a transmission station and is not available for development. The site is therefore rejected and is not taken forward in this SHLAA</p>	Rejected Site	Rejected Site	<p>Recent discussions suggest that these masts and associated structures and land, will probably be redundant in the near future. An early pre-application discussion has been held with the adjacent business use to use this land for employment purposes. There is no obvious means of providing a satisfactory access to serve a residential development and for this reason the site is not considered suitable for residential development.</p>

132/13	Eastbrook Allotments, Old Shoreham Road, Southwick	This site, owned by Brighton & Hove City Council, is the subject of a Supplementary Planning Document currently being prepared. Part of the site is to be retained for allotment use; the remainder does not offer a suitable location for residential development given its proximity to the electricity substation and the overhead and underground power lines which would result in a poor environment for potential residents. The site must be developed for the purposes of "business development" in line with the conditions imposed by the Secretary of State in 2005 when releasing the land for development. It is therefore rejected from the scope of this study.	Rejected Site	Rejected Site	This site has been sold for business use and is not available for development.
134/13	Queens Parade, 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. The site is not suitable to accommodate 6 additional	Rejected Site	Rejected Site	This site comprises retail uses at ground floor with flats on the first floor. Any increase in dwelling numbers would require the addition of another storey. There have been several planning applications to this effect, all being refused on grounds of overdevelopment, poor access, lack of amenity and an unsatisfactory form of

		flats. Such development would constitute an over intensive use of the site and would provide an unacceptably poor standard of accommodation, with a lack of external amenity space, poor means of access and inadequate storage facilities. Any dwellings that may be delivered on this site will be picked up through other monitoring.			accommodation. It is concluded that the site is not suitable for residential development.
135/13	147 Brighton 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. The site is not suitable to accommodate 9 flats. Such development would constitute an over intensive use of the site and would provide an unacceptably poor standard of accommodation, with a lack of external amenity space and poor means of access.	Rejected Site	Rejected Site	The site comprises a two storey dwelling. An appeal was dismissed in 2012 for redevelopment with 9 flats on the grounds that it would constitute an over intensive use of the site and would provide an unacceptably poor standard of accommodation, with a lack of external amenity space and poor means of access. Taking account of the surrounding development (flats and bungalows), an appropriate density for development would be 40dph. The site could therefore potentially accommodate 2 dwellings. It falls below the threshold of sites to be included in the SHLAA.
136/13	The Pilot, Station Road, Southwick	This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is rejected	N/A	N/A	N/A

		from the scope of this study. The site has been developed for an alternative use.			
139/13	Land at Upton Farmhouse, Upper Brighton Road, Sompting	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 the site is not considered suitable for development. There are likely to be severe impacts on the highway and in addition, any development on this site would detract from the historic character of Sompting and have a detrimental impact on the integrity of the gap.	Rejected Site	Rejected Site	This site forms part of the grounds of Upton Farmhouse, a Listed Building. The site lies within the Worthing – Sompting/Lancing Local Green Gap. Part of it also falls within the Sompting Conservation Area. Providing a safe and suitable access to this site may be difficult to achieve. There may be some potential for very limited development on the front part of the site fronting West Street, but given the linear character of the Village, impact on the character of the Conservation Area and the setting of the Listed Building, the site is too small to accommodate 6 dwellings.
SH/003/13	Lady Bee Marina	This site lies within the Shoreham Harbour Regeneration Area and is identified as a broad location for change. The site is to be used for employment purposes as proposed in the Shoreham Port Authority Masterplan 2010. The site is not available for residential development and therefore is not taken forward in this study.	Rejected Site	Rejected Site	This site is not available for development. It lies within the Shoreham Harbour Regeneration Area and identified for employment purposes in the Shoreham Port Masterplan 2010.

Appendix 2: Re assessment of SHLAA Rejected Site - Monitor at 31st October 2016

The sites listed in the table below have been identified in the 2015 SHLAA Update as Rejected Sites-Monitor. They have previously been assessed as being suitable for residential development, but not currently available for development. The most recent SHLAA Update 2016 has a base date of 1 April each year to reflect the base date of the West Sussex County Council monitoring data. Between this date and the Examination of the Local Plan, further progress has/ and will continue to be made on sites. The table below sets out the most up to date position at 31st October 2016.

Any further changes between October 2016 and the Examination will be set out in an Interim Review Table which will provide the most up to date position in terms of housing delivery.

Rejected –Monitor Sites							
SHLAA REF	SITE ADDRESS	SHLAA 2015 UPDATE CONCLUSION	2015 SHLAA UPDATE STATUS (1/4/2014-31/3/2015)	2016 SHLAA UPDATE STATUS (1/4/2015-31/3/2016)	2016 SHLAA STATUS REVIEW 31/10/2016	CURRENT POSITION AT 31st OCTOBER 2016	POTENTIAL NUMBER OF DWELLINGS
018/13	Coastline Caravans, 88 Old Shoreham Road, Lancing	No response to "Call for Sites" letters, but the site has been monitored on a regular basis since its inclusion in the SHLAA in 2009. It was considered that there may be potential to redevelop the site as part of the Local Plan strategic allocation at New Monks Farm	Rejected Site - Monitor	Rejected Site	Rejected Site	Work is progressing on a masterplan for the strategic allocation at New Monks Farm to the east of this site and there is no interest in this site from the site promoters. The site is in use as a used caravan and servicing facility and is not available for development. No response was received from the 'Call for Sites' exercises and there had been no change in at least 3 years and no indication that the site is to be promoted for residential redevelopment. From the information available, it is	0

						considered that there is not a reasonable prospect that housing will be delivered on the site. and therefore the site has been reassessed as a 'Rejected Site'	
023/13	South Street Car Park, Lancing	The site is owned by Adur District Council and a decision was taken in June 2007 to retain this site as a public car park. The Council is currently reviewing its land holdings and consideration is being given to the potential for residential development on the site. The site will be monitored on a regular basis.	Rejected Site - Monitor	Rejected Site	Rejected Site	Site is currently not available as it is in use as a public car park. The Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that 5 dwellings could be accommodated. Therefore the site is too small to accommodate 6 dwellings, the threshold of this study, and any dwellings delivered will be accounted for through other monitoring.	0
025/13	Police Station, 107/111 North Road, Lancing	The site is considered suitable for residential development but is not currently available. The site is identified in the Sussex Police Estates and Facilities Strategy 2013-2017 as a site where the building is not in the right location/under-used to its full potential or in a poor state of repair and where the service could be	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site - Monitor	Remains in the Sussex Police Estates and Facilities Strategy 2013-2017. The site will be monitored on a regular basis and the Council will be proactive in seeking opportunities for suitable alternative provision.	12

		re-provided in a better location within the area. Alternative provision for this service has not yet been provided.					
036/13	Garage Compound, Gravelly Crescent, Lancing	The site is located within a residential area, but the cumulative impact of reducing existing car parking space and increasing housing with potential demand for more car parking, would result in increased on-street parking within an area with little or no capacity for more parking. Development would therefore have an unacceptable impact on residential amenity and the ability of emergency vehicles to access these residential streets. The site is within the ownership of Adur Council and as part of its review of land holdings, consideration is being given to residential development.	Rejected Site - Monitor	Rejected Site	Rejected Site	The Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that 5 dwellings could be accommodated. Therefore the site is too small to accommodate 6 dwellings, the threshold of this study, and any dwellings delivered will be accounted for through other monitoring.	5
053/13	Car Park, Tarmount Lane, Shoreham-by-Sea	The site is required for public car parking in Shoreham town centre. It is within the ownership of Adur District	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site - Monitor	The site is currently required as a public car park for both the adjacent retail store and general town centre use. However, the	16

		Council. The site may have development potential in the future as part of a comprehensive development scheme with Shoreham Police Station which should include the re-provision of public car parking.				site is owned by Adur District Council and if an opportunity to redevelop the adjacent Shoreham Police Station (ADC/120/13) arises, consideration will be given for a comprehensive redevelopment of the two sites which should include the provision of public car parking.	
075/13	Ocean View Business Park, Gardner Road, Southwick (formally NTL/Nynex)	This site is considered suitable for residential development but is not currently available and will continue to be monitored on a regular basis. (A Planning Application was submitted for a change of use to D1 (non-residential institution) and D2 (Assembly and Leisure, but was subsequently withdrawn in February 2015).	Rejected Site - Monitor	Rejected Site	Rejected Site	A Lawful Development Certificate has been granted for B1 and B8 uses which has been implemented. Subsequently a planning application was approved in January 2016 (AWDM/1673/15) - part C/U from mixed Use Classes B1 (business) and B8 (storage or distribution) to mixed Use Classes B1, B2 and B8 in addition to part internal change of use to MOT testing of applicants own motorcycles (formerly Nynex House). The site is therefore no longer available for residential development.	0
076/13	Land at 7-27 Albion Street, Southwick	The site is within the ownership of Adur Council and as part of its review of land holdings, consideration being given to residential development. The site is	Rejected Site - Monitor	Potential Site	Potential Site	As part of a review of Council land holdings this site is now considered as having potential for residential development. Part of the site is in private ownership The Council has resolved to enter	42

		currently in use as social housing/hostel. The site will be monitored on a regular basis.				<p>into an agreement with a local developer to deliver a comprehensive scheme on the whole site which will include a minimum of 15 affordable dwellings for rent. A planning application will be submitted in 2017.</p> <p>Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.</p>	
082/13	Laundry, Alma Street, Lancing	This site, comprising a former commercial laundry and adjacent residential dwelling, is suitable for residential development, but no response was received from the various Call for Sites exercises and it was concluded that the site was not available.	Rejected Site - Monitor	Potential Site	Potential Site	<p>The use has now been relocated and the site is available for development. A planning application for residential development has been submitted but not yet determined.</p> <p>Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.</p>	13
084/13	Yard rear of St Peters Place, Western Road,	There has been no interest in developing this site since the planning application was	Rejected Site - Monitor	Rejected Site	Rejected Site	The planning application for residential development in 2008 was withdrawn. Two further	0

	Sompting	withdrawn in 2008. There was no response to the various Call for Sites exercises and it was concluded that the site was not available. The Council continues to monitor the site.				planning applications to change the use of the site from a caravan sales area to a storage yard (for building materials) were refused in 2010 and 2011. The site appears to be in use for car storage/ sales and is not being actively promoted for development. There was no response at the "Call for Sites" stage of both the 2012 SHLAA update and the 2014 SHLAA. It is concluded that the site is not available for development.	
088/13	Cecil Norris House, Ravens Road, Shoreham-by-Sea	This site is considered to be suitable for residential development. It is currently in residential use and not available for development. The Council is currently considering the site for a Council new build scheme.	Rejected Site - Monitor	Rejected Site	Rejected Site	This site comprises Council owned sheltered housing but is considered not fit for purpose. The Council, as part of a review of its land holdings is to redevelop this sheltered housing scheme to create a modern scheme specifically for older people. Members took the decision to redevelop in October 2015. It is anticipated that development will commence in 2018/19. However, the proposed scheme involves the demolition of the existing dwellings and replacement with a similar number of units, giving no net gain in supply. The site is therefore rejected from this study	0

						as it will not deliver a net gain of dwellings.	
089/13	3/15 New Road, Shoreham-by-Sea	The planning application has lapsed and the owner is no longer pursuing development on this mixed use site. Given previous interest in developing the site it will continue to be monitored.	Rejected Site - Monitor	Rejected Site	Rejected Site	The planning consent for residential development has lapsed. No response was received from the 'Call for Sites' exercises and there had been no change in at least 3 years and no indication that the site is to be promoted for residential redevelopment. From the information available, it is considered that there is not a reasonable prospect that housing will be delivered on the site and therefore the site has been reassessed as a 'Rejected Site'	0
091/13	412/414 Brighton Road, Shoreham-by-Sea	The site in use as a petrol filling station. There has been no interest in developing this site since the planning application was withdrawn in 2007.	Rejected Site - Monitor	Rejected Site	Rejected Site	A planning application for residential development was withdrawn and the site is no longer being promoted for development. It remains in use as a petrol filling station and is not available.	0
093/13	Car Park, Beach Green, Shoreham-by-Sea	This site was considered suitable for residential development, subject to flooding constraints being satisfactorily addressed. The site will be monitored on a	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site - Monitor	This Council owned site is considered suitable for residential development. It is currently in use as a public car park but is not particularly well used. Part of the site would need	40

		regular basis.				to be retained for public car parking. The pumping station and access to it at the western end of the site would also need to be retained. The construction of the Shoreham Adur Tidal Walls (due for completion in 2018) would help address the flooding issues on this site. The suitability of this site for an expansion of Shoreham Beach Primary School is currently being investigated by WSCC and ADC. This site will be monitored, pending the outcome of these discussions.	
095/13	124 Upper Brighton Road, Shoreham-by-Sea	The site is considered suitable for development. There was no response at the various Call for Sites stages and it is concluded that the site is no longer available.	Rejected Site - Monitor	Rejected Site	Rejected Site	There has been no interest in redeveloping this site since an appeal for a block of 11 flats was dismissed in October 2008. An application to build a two storey extension was approved in April 2016. Its use as a residential dwelling has been consolidated and it is concluded that this site is not available for development.	0
099/13	Rear of 53/59 Southview Road, Southwick	This site was promoted for development through the Call for Sites exercises. However, this is a greenfield site comprising the rear gardens of 55-59 Southview	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site	Although the site has previously been promoted for development through the Call for Sites exercises, a planning application has not been forthcoming and it has not been demonstrated that	0

		Road and the principle of development has not been established.				access constraints can be overcome in a satisfactory manner. The site is also vulnerable to groundwater flooding and this would need to be mitigated. The site is too small to accommodate six dwellings.	
106/13	Land North East of Hasler, Lancing	This site is being promoted for residential development through the Local Plan process. It has not been identified as a strategic allocation as it has not been demonstrated that constraints such as landscape impact, access and flooding issues can be satisfactorily mitigated.	Rejected Site - Monitor	Rejected Site	Rejected Site	This greenfield site lies within the Lancing/Shoreham-by-Sea Local Green Gap. Various constraints, including flood risk and landscape impact have not been addressed to the satisfaction of the local planning authority. The Local Green Gap is a critically important component of the landscape setting of both Shoreham-by-Sea and Lancing which border the gap, contributing to their individual, distinctive character and local identity. This area forms a key part of the landscape setting for the local landmarks of New Salts Farm and Shoreham Airport Terminal tower (which is Grade 2* listed) and makes an important contribution to the landscape settings of Shoreham and Lancing and to the sense of openness and greenness in the views across the Lancing Gap from the A259 and from the	0

						<p>railway. There are significant concerns regarding flood risk on the site, particularly with regard to surface water and groundwater (and the degree that groundwater is influenced by the tide). Until it has been demonstrated that these issues can be overcome to the satisfaction of Adur District Council, West Sussex County Council (as Lead Local Flood Authority) and the Environment Agency, the site is not considered suitable for residential development.</p> <p>Note: This site will be considered by the appointed Inspector at the Local Plan Examination.</p>	
117/13	Lancing Delivery Office, 40 North Road, Lancing	This site has been promoted for development through the Call for Sites exercises. However, the landowner has indicated that prior to any redevelopment, the current use as a post office delivery office would need to be relocated in the vicinity.	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site - Monitor	Alternative premises have not yet been found to relocate the delivery office. The site will be monitored on a regular basis and the Council will be proactive in seeking opportunities for suitable alternative provision.	9
120/13	Shoreham Police Station, Ham Road, Shoreham-	The site is identified in the Sussex Police Estates and Facilities Strategy 2013-2017	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site - Monitor	Remains in the Sussex Police Estates and Facilities Strategy 2013-2017. The site will be	30

	by-Sea	as a site where the building is not in the right location/under-used to its full potential or in a poor state of repair and where the service could be re-provided in a better location within the area. Alternative provision for this service has not yet been provided.				monitored on a regular basis and the Council will be proactive in seeking opportunities for suitable alternative provision Should the site become available for development, there may be opportunities for a comprehensive development scheme together with the Car Park, Tarmount Lane site (ADC/053/13)	
123/13	Land north of 20/40 Firle Road, Lancing	This site was previously within an Area of Outstanding Natural Beauty where development was resisted, but was then excluded from the South Downs National Park when it was designated. It comprises a large garden and the Submission Adur Local Plan proposes that it is included within the built up area boundary. The site has been promoted for development for many years.	Rejected Site - Monitor	Potential Site	Potential Site	Pre application discussions are currently progressing with the owner of the site for residential development and a planning application is anticipated in 2017. Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.	8
128/13	Land between Adur Rec and New Salts Farm Road, Lancing	This site, which lies within the Lancing-Shoreham-by-Sea Local Green Gap was previously promoted for	Rejected Site - Monitor	Rejected Site	Rejected Site	The site is not available for development. It has been purchased by the Dogs Trust who own adjacent land and it is used	0

		residential development through the Local Plan process. The site is not allocated in the Local Plan as various constraints, including impact on the landscape, access and transport issues and flood risk issues have not been addressed in a satisfactory manner.				as an exercise area for dogs.	
129/13	Land north west of Hasler Estate, Lancing	This site is being promoted for residential development through the Local Plan process. It has not been identified as a strategic allocation as it has not been demonstrated that constraints such as landscape impact, access and flooding issues can be satisfactorily mitigated.	Rejected Site - Monitor	Rejected Site	Rejected Site	This greenfield site lies within the Lancing/Shoreham-by-Sea Local Green Gap. Various constraints, including flood risk, transport and landscape impact have not been addressed to the satisfaction of the local planning authority. While it is accepted that tidal flood risk will be improved as a result of the construction of the Shoreham Adur Tidal Walls, there are significant surface water and groundwater issues in the area as documented in the Lancing Surface Water Management Plan. In addition, groundwater levels in the area are also influenced by the tide and high tides may cause groundwater to back up and maintain high groundwater levels. Until it has been demonstrated that these issues	0

						<p>can be overcome to the satisfaction of Adur District Council, West Sussex County Council (as Lead Local Flood Authority) and the Environment Agency, the site is not considered suitable for residential development.</p> <p>Note: this site will be considered by the Inspector at the Local Plan examination.</p>	
133/13	St Marys Church Hall, 24/25 East Street, Shoreham-by-Sea	This site has not been considered in earlier SHLAA's. It is not currently available but given previous interest in developing the site it will continue to be monitored on a regular basis.	Rejected Site - Monitor	Rejected Site	Rejected Site	<p>A planning application for part demolition and mixed use development to provide 10 flats and retail floorspace was dismissed at appeal in 2010. There had been no change in at least 3 years and no indication that there are any plans to submit a revised scheme. The site is in use as a community facility and is not available for development. It has therefore been reassessed as a 'Rejected Site'</p>	0
138/13	Land north of 123/207 Manor Hall Road, Southwick	The east part of this site comprises well used allotments; the west part was previously used as a market garden but is now vacant. The site is physically constrained by a lack of	Rejected Site - Monitor	Rejected Site - Monitor	Rejected Site - Monitor	<p>Major constraints would have to be overcome if this site is to be developed for residential use and it is unlikely that this could be achieved. Satisfactory access can only be gained by either the demolition of a dwelling or across</p>	Cannot be estimated at this time.

		<p>suitable access, the proximity of a major electricity sub-station and the presence of large underground cables crossing the site. It is considered more appropriate as a possible extension to the current allotments or a community use rather than for housing development. 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 and ADC/071/13 to help guide development.</p>				<p>the land to the north (Eastbrook Allotments), part of which is in allotment use and the remainder of which has recently been sold for employment purposes. The Eastbrook Allotments Development Brief (2015) identifies this site as being suitable for an extension to the allotments or for a community use. However, it does not rule out the option for residential development and the site will continue to be monitored.</p>	
SH/001/13	5 Brighton Road, Shoreham-by-Sea	<p>This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change in the Submission Adur Local Plan.</p>	Rejected Site - Monitor	Rejected Site - Monitor	Potential Site	<p>This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change. The regeneration of Shoreham Harbour has been a long term aspiration and the redevelopment of the Western Harbour Arm is recognised as a priority for the Shoreham Harbour Partnership. The principle of redeveloping this site for a residential use is consistent</p>	60

						<p>with emerging policies. Early pre-application discussions were held in February 2016 for residential development on this site.</p> <p>Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.</p>	
SH/002/13	Technology House, West Street, Southwick	This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change in the Submission Adur Local Plan. It is in employment use and not available for development.	Rejected Site - Monitor	Rejected Site	Rejected Site	The site remains in employment use and is not available for development.	0
SH/004/13	Land adjacent Ham Business Centre, Brighton Road, Shoreham-by-Sea	This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change in the Submission Adur Local Plan. A planning application for a mixed use development (supermarket and residential) has been approved subject to a S.106 Agreement being signed.	Rejected Site - Monitor	Rejected Site	Rejected Site	The site was put back on the market and has now been sold. This development will not be progressed. An alternative proposal for residential use, with an amended site boundary has been the subject of pre application discussions (SH/001/15)	0

Appendix 3 Review of Council Owned Sites – Land owned by Adur District Council and Adur Homes at 31st October 2016

A survey of land owned by Adur Homes (the Council's local authority housing service) is currently being undertaken to consider potential development options on small in fill sites, garage compounds, redevelopment of existing housing and estate renewal. Further, more detailed feasibility work is currently ongoing. Corporate assets are also being considered for their development potential, and any land or building considered surplus to requirement in their current use will be assessed.

SHLAA REF	SITE ADDRESS	DESCRIPTION	ASSESSMENT	
023/13	South Street Car Park, Lancing	This is a flat, surfaced public car park servicing Lancing Village Centre. It is a backland site and lies behind properties fronting South Street. There is a narrow single lane access from South Street and egress onto Penhill Road.	Site is currently not available as it is in use as a public car park. The Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that 5 dwellings could be accommodated. Therefore the site is too small to accommodate 6 dwellings, the threshold of this study, and any dwellings delivered will be accounted for through other monitoring.	5
	Daniel Close	A block of domestic garages within a residential area. Access is currently from Daniel Close although the site has a frontage to Mash Barn Lane.	As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that 11 dwellings could be accommodated. Pending further work on the impact of loss of car parking, the site is suitable for residential development. Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be	11

			deliverable in the next 5 years.	
	Gravelly Crescent	A block of domestic garages within a residential area. Access is from Gravelly Crescent.	As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that 5 dwellings could be accommodated. Pending further work on the impact of loss of car parking, the site is suitable for residential development. Therefore the site is too small to accommodate 6 dwellings, the threshold of this study, and any dwellings delivered will be accounted for through other monitoring.	5
088/13	Cecil Norris House	A block of sheltered flats in a residential area.	This site comprises Council owned sheltered housing but is considered not fit for purpose. The Council, as part of a review of its land holdings is to redevelop this sheltered housing scheme to create a modern scheme specifically for older people. Members took the decision to redevelop in October 2015. It is anticipated that development will commence in 2018/19. However, the proposed scheme involves the demolition of the existing dwellings and replacement with a similar number of units, giving no net gain in supply.	0
052/13	Civic Centre Car Park	Flat surfaced car park associated with former civic building on the opposite side of Ham Road	The Council, as landowner, is keen to see the site developed at the earliest opportunity as Phase 1 of a wider scheme together with the former Civic Centre on the south side of Ham	0

			Road (SHLAA Ref: ADC/059/13). However the site is to be redeveloped for employment use to meet the business expansion requirements of local businesses and is no longer available for residential development.	
059/13	Civic Centre	Three storey building within Shoreham Town Centre.	<p>The Council, as landowner, is actively promoting the redevelopment of this former Civic Office site which is now vacant and available. It is seen as a development opportunity together with the associated staff car park on the north side of Ham Road (SHLAA Ref: ADC/052/13). Development is likely to be in two phases, with this site being Phase 2 of the scheme. The Council has committed funding for the demolition of the building and for consultancy and design stages of the redevelopment of this site.</p> <p>Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.</p>	75
076/13	7-27 Albion Street	Mix of detached, semi-detached and terraced houses fronting Albion Street (A259) and with the railway line to the north	As part of a review of Council land holdings this site is now considered as having potential for residential development. Part of the site is in private ownership The Council has resolved to enter into an agreement with a local developer to deliver a comprehensive scheme on the whole site which will include a minimum of 15 affordable dwellings for rent. A planning application will be submitted in 2017.	42

			Note: The housing likely to be delivered on this site has been included in the housing trajectory as the site is considered to be deliverable in the next 5 years.	
N/A	Leconfield Road	This site, within a residential area, is currently used for storage. It has a frontage to Leconfield Road.	As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that it is suitable for redevelopment and could potentially accommodate 2 dwellings. Therefore the site is too small to accommodate 6 dwellings, the threshold of this study, and any dwellings delivered will be accounted for through other monitoring.	2
N/A	Laylands Road	Site is adjacent a block of 4 shops with residential above. Contains a store and car parking spaces.	As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that the site is not suitable for development as it is too small to accommodate an additional dwelling.	0
143/15	Warren Court	Site comprised of several blocks of flats within a residential area.	As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that it is suitable for redevelopment with a higher density scheme. 22 flats could be demolished and replaced with 32 flats giving a net gain of 10 flats. However, it is not currently available as a programme to decant existing residents to alternative	10

			<p>accommodation to allow demolition and rebuilding to take place has yet to be agreed. It is likely to come forward in the medium term (years 6-10).</p> <p>Note: This site has been assessed as a Rejected site – Monitor in the SHLAA as it is not currently available for development.</p>	
N/A	Beachcroft, Lancing	Site comprised of several blocks of flats within a residential area.	<p>As part of its land holdings the Council is considering the potential of this site for residential development and a feasibility study has been completed which indicates that an additional block of 4 flats could be accommodated on the site.</p> <p>Therefore the site is too small to accommodate 6 dwellings, the threshold of this study, and any dwellings delivered will be accounted for through other monitoring.</p>	4

Appendix 4 – Large Sites with Extant Planning Permission as at 1st April 2016

Application Number	Site	Site Capacity (Net)	Time Frame (Years)			Achievability
			0-5	6 -10	11-15	
ADC/0334/06	22-26 West Lane, Lancing	10 (7 complete)	3	0	0	Remaining houses not yet demolished
AWDM/0501/12	79/81 Brighton Road, Shoreham-by-Sea	132	132	0	0	Under construction
AWDM/0871/11	Norfolk House, High Street, Shoreham-by-Sea	9	9	0	0	Under construction
AWDM/0287/09	Southlands Hospital Site, Upper Shoreham Road, Shoreham-by-Sea	106	106	0	0	Demolition commenced
AWDM/0737/14	Town Hall Chambers, 45-49 High Street, Shoreham-by-Sea	6	6	0	0	To be delivered within the first five years.
AWDM/0953/13	Riverbank Business Centre, and 12/18 Old Shoreham Road, Shoreham-by-Sea	120	120	0	0	Development of the flood defence associated with this development has commenced.
AWDM/0983/15	17 Ham Road, Shoreham-by-Sea	6	6	0	0	To be delivered within the first five years.
	Total (net)	389	382	0	0	

Appendix 5 – Calculating a Small Sites Windfall Allowance

1. Introduction

- 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.”

- 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).
- 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).
- 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.
- 1.5 The purpose of this paper is to provide an assessment of the windfall allowance which will be included in the Submission Adur Local Plan 2016.

2. Housing Land Supply

- 2.1 The Local Plan covers the 21 year period 2011 to 2032 and will deliver a minimum of 3718 new homes at an annual average of 177 dwellings.

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 Update 2016 (sites of 6+ dwellings)
- An allowance for windfall sites (from 2018-2032)
- Strategic allocations to be taken forward in the Local Plan
- Shoreham Harbour Regeneration Area Broad Location

3. Calculating a Windfall Allowance

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

3.2 Table 11 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.

3.3 Housing completions are categorised according to the number of dwellings delivered. Large sites of 6 dwellings or more 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%
		286	1273	22%
Total	987	286	1273	
Average	110	32	141	

Avoidance of Double Counting

- 3.4 A significant proportion⁹⁸⁷ 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.
- 3.5 The Adur SHLAA Update 2016 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.
- 3.6 Historic monitoring data from West Sussex County Council identifies all HLS sites of 6+ dwellings. These sites have been excluded from this analysis.

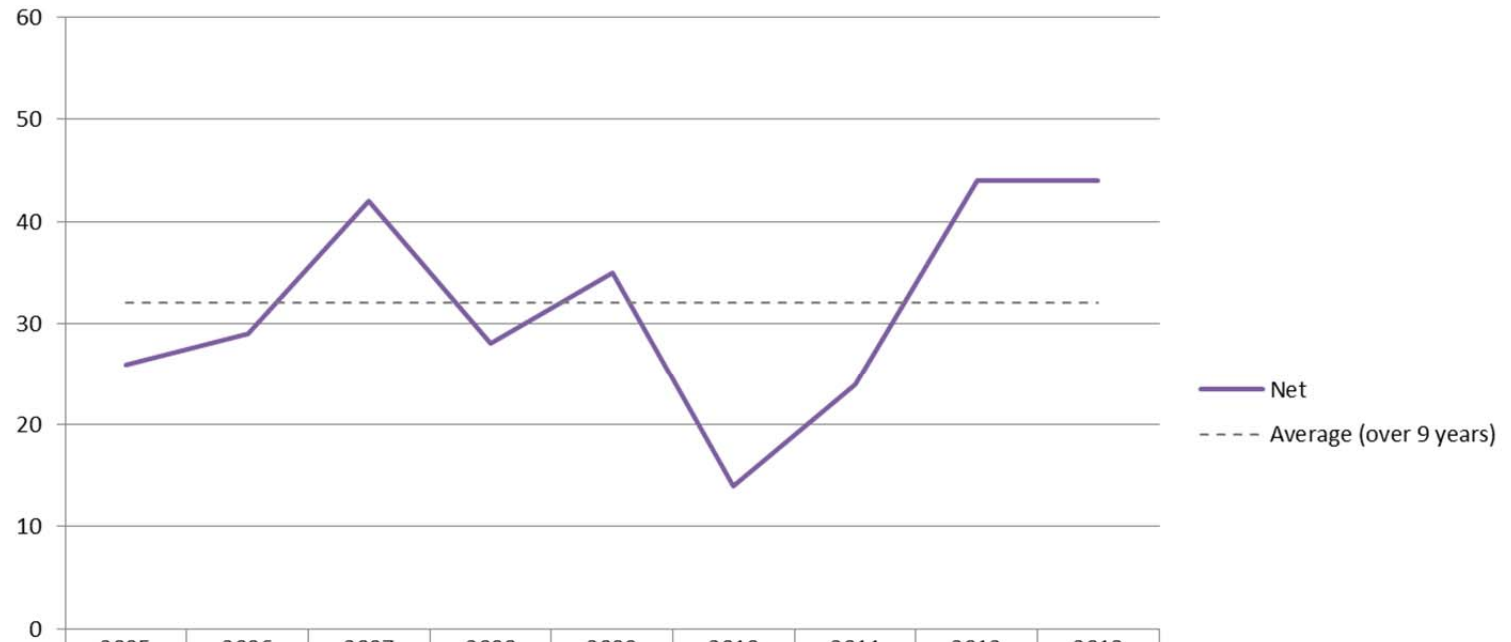
- 3.7 The NPPF does not allow for development on garden land to be included in the windfall allowance. Historic monitoring data from WSCC identifies all development sites on garden land. These have therefore been excluded from this analysis.
- 3.8 Table 12 indicates the historic delivery rate for each 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
Total	115	40%	171	60%	286

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

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



	2005	2006	2007	2008	2009	2010	2011	2012	2013
Gross	32	34	48	32	40	17	29	45	48
Losses	6	5	6	4	5	3	5	1	4
Net	26	29	42	28	35	14	24	44	44
Average (over 9 years)	32	32	32	32	32	32	32	32	32

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

4. Estimating a windfall allowance

Large sites

- 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

- 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.
- 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

- 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 (2016/17 to 2018/19) but has only been applied from 2019 to 2032.**

5. Conclusion

- 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 windfall sites consistently come forward and the Council can justify projecting forward on basis of these past figures.

