

Adur Local Plan Examination

Issue 3 – Housing Provision (policy 3); Housing Mix and Quality (Policy 21); Affordable Housing (Policy 22); Density (Policy 23) and provision for Gypsies Travellers and Travelling Showpeople (policies 24 and 25).

- 1.1 This hearing statement is prepared by Boyer on behalf of Hyde New Homes who own the site known as New Salts Farm to the east of Lancing. This site is an omission site. This statement should be read in conjunction with our Regulation 19 Representations (Reps) (Representation No. 61), Hearing Statement Issue 1 and Hearing Statement Issue 7.

Question 3.1 Does the Figure of 6,825 dwellings (325 dwellings a year) for the period 2011 – 2032 accurately reflect the full objectively assessed needs for market and affordable housing? Is the figure based on up-to-date and reliable evidence?

- 1.2 We have carried out a further review of the Objectively Assessed Needs (OAN) Update 2016 (CD08/1) (see Appendix 1). In summary, although the updated OAN of 325 dwellings per year is more robust than the 2015 OAN, we conclude that it may still be higher due to the continued suppression of household formation rates for 25 to 34 years old, the high number of affordable homes needed and affordability issues in Adur.
- 1.3 We are of the opinion that an uplift of 15% is appropriate and necessary which would result in an OAN of 338 dwellings per annum. However it is noteworthy that based on the proposed LPEG methodology the uplift could be as high as 25% resulting in an OAN of 368 dwellings per annum.
- 1.4 We are therefore of the view that the figure of 325 dwellings per year still does not accurately reflect the full objectively assessed needs for market and affordable housing and could be at least 338 dwellings per year if not 368.

Question 3.2 Having identified the need for housing over the plan period (6,825 dwellings), has the Council undertaken the appropriate assessments in order to justify its conclusion that the District cannot meet all that need (or a greater proportion than the 3,609 dwellings proposed) within its own boundary?

- 1.5 For the reasons set out in our Reps and our Hearing Statement Issue 1 we submit that the assessments carried out by the District do not justify its conclusion that the District cannot meet a greater proportion of its housing need within its own boundary.
- 1.6 The reasons the Council have given for not meeting its objectively assessed housing needs relate to flood risk and landscape constraints. We submit that the Council has been overly cautious in its assessment of sites in the SHLAA and that its assessments have been based on flawed evidence and approached inconsistently. As a result the Council has not left every stone unturned in seeking sites that are deliverable and developable to provide new homes.

1.7 We consider that where the council are falling so far short of meeting its OAN – indeed would only be meeting just over 50% – it has not demonstrated every effort to meet housing need.

Have those sites identified in the SHLAA, that were rejected by the Council, been appropriately assessed? (see also question 7.1)

1.8 We have identified significant concerns with the Councils approach to assessment of the SHLAA sites and the omission of certain sites from being allocated for residential development, specifically New Salts Farm. As set out in our Reps we submit that flood risk and landscape are not constraints which cannot be overcome in respect of New Salts Farm.

1.9 Further to our Reps we have reviewed the SHLAA Update (CD07/22) and note that New Salts Farm (106/13) has been identified as 'Rejected' when it was previously identified as 'Rejected – Monitor'. The reason for this change in status of the site is not clear.

1.10 In our opinion, the site has not been appropriately assessed and had it been, it would have been demonstrated to be available, achievable and suitable for residential development.

1.11 We consider sufficient information has been provided to demonstrate that there are no constraints to development of the site and that the site should be allocated to deliver much needed new homes in the District.

Landscape

1.12 One of the reasons given for rejection of New Salts Farm in the SHLAA was the impact on landscape and the local green gap.

1.13 As set out in our Reps we are of the view that the assessment of sites has not been consistent and had the Council's evidence been appropriately considered it would demonstrate that New Salts Farm is capable of being allocated for residential development without landscape constraint.

1.14 In addition we have raised significant concerns about the reliability of the Council's own landscape evidence.

1.15 In light of this we commissioned and submitted with our Reps evidence which demonstrated that there are a number of sites within the local green gap with the potential to accommodate change, specifically New Salts Farm, and which would not result in coalescence.

1.16 In response to our Reps, Adur has commissioned additional work including an Adur Landscape Study Update – New Salts Farm October 2016 (CD14/22) and Local Green Gaps Topic Paper (CD07/14) and submitted these as evidence to the ALP to support the omission of the site.

1.17 Our clients have engaged Huskisson Brown Associates (HBA) to review these documents and their report is attached at Appendix 1 to our Hearing Statement Issue 1. The report is highly critical of CD14/22, on issues of the soundness and appropriateness of the methodology, approach and criteria used, the incorrect interpretation and therefore wrong assessment of the development proposal and the consistency of the approach when considered against other evidence base documents. In particular:

- There is a lack of detailed methodology and the presence of errors and conflicts with the widely recognised guidance in GLVIA3. This results in unclear assessment criteria and flawed, incorrect and inappropriately assessed landscape evidence;
- The Illustrative Masterplan is misinterpreted and incorrectly indicated throughout the New Salts Farm Report. This results in seriously flawed evidence; the assessments being made against wrong and inaccurate data that is carried through into the analysis, effects appraisal/assessment and consideration of mitigation;
- Visual effects are assessed against viewpoints that are mapped in the wrong locations and visibility assessed on this basis;
- The findings of the New Salts Farm Report contradict earlier recommendations made to Adur DC in the Landscape Study 2012 including omitting to address the range of positive effects highlighted in the Landscape Study 2012 and despite design amendments that have taken place. This cannot be considered to represent an objective approach to assessment;
- The New Salts Farm Report demonstrates an inconsistent approach when compared to the New Monks Farm Report, in particular in relation to the consideration of views across the Gap, mitigation opportunities and assessment

- 1.18 The Local Green Gaps Topic Paper references the Landscape Study 2012 and Landscape Study Update 2016, neither of which specifically address the role that the existing Gap and its constituent components play in meeting the policy function of providing physical settlement separation and preventing coalescence. The Topic Paper fails to expand this evidence in this regard. Whilst quoting the requirement for “necessary separation”, it fails to identify or quantify what this is in real or physical terms.
- 1.19 Evidence included in support of the site allocations includes the visibility of the site in relation to the identified key viewpoints from the Landscape Study 2012 and Landscape Study Update 2016. This contrasts with the approach taken in the New Salts Farm Report which bases visibility upon two identified key viewpoints and two additional viewpoints. Other evidence analysis that has informed the West Sompting allocation such as the improvement of existing stark development edge equally applies to the New Salts Farm site but has been omitted from the New Salts Farm Report, suggesting a lack of consistency and objectivity in this regard.
- 1.20 This further bolsters the significant concerns that we raised in our Reps about reliability of the landscape evidence. These concerns about reliability were raised at Reps stage but have not been addressed or responded to appropriately in the Councils Statement of Consultation (CD07/11) which simply reiterates its concerns about the impact of the proposed development on the gap. If the conclusion from the Council is based on the abovementioned evidence it is inherently flawed.
- 1.21 We submit that given the notable errors and inconsistencies the New Salts Farm Report (CD14/22) and Local Green Gap Topic Paper (CD07/14) fail to provide sound and objective evidence to the ALP.
- 1.22 All of the above demonstrates that, in respect of assessment of landscape impact, New Salts Farm, being one of those sites rejected, has not been appropriately assessed.

Flood Risk

- 1.23 In respect of Flood Risk, we have set out our concerns with the inconsistent approach by the council to site assessment and evidence in our Reps and we submitted with our Reps a site specific Flood Risk Assessment and Sequential and Exception Test.
- 1.24 We now understand that Adur agree that the site specific Sequential Test submitted is acceptable (Regulation 22 Statement CD07/10). Given this we submit that New Salts Farm should have been included in the Council's Sequential and Exception Test and if it had been it would have passed both elements as it would undoubtedly score positively in relation to sustainability benefits given the benefits of delivering additional homes, including affordable housing, in a sustainable location. Furthermore the second part of the exceptions test carried out by the Council was based on the Strategic Flood Risk Assessment (CD15/1) which suggested potential measures to address flood risk at New Salts Farm, similar to New Monks Farm which has been allocated as a strategic site allocation for housing. Evidently this would not remove the need for site specific Flood Risk Assessments to be carried out; which is not dissimilar to the approach for New Monks Farm.
- 1.25 The Council state in CD07/10 that further detail is required in the FRA submitted with our Reps to support the Exception test. We met with the EA, WSCC and Adur District Council in Summer 2016 to discuss the Flood Risk Assessment for the site. The minutes of the meeting and requests for clarification from the EA in respect of our FRA are at Appendix 2
- 1.26 Further detail was requested on a number of elements of the FRA including further modelling to take account of new climate change allowances. This work has now been completed and an updated FRA to address all comments from the EA, Adur and WSCC has been submitted to all parties and is attached at Appendix 2 to our Issue 1 Hearing Statement⁴. We would note that this is over and above the level of detail that has been requested from other sites allocated in the ALP. Indeed it is noted in the flood Risk Topic Paper (CD07/15) that such modelling would need to be carried out at application stage for those sites which have been allocated. Again New Salts Farm has been treated inconsistently.
- 1.27 There is no clear reason why, similar to New Monks Farm, the site could not have been allocated in the ALP and further details in respect of flood mitigation developed over the course of the preparation of the ALP. Indeed to date, as far as we are aware there is more information available to the council on New Salts Farm on Flood Risk Assessment than New Monks Farm (to our knowledge).

Summary

- 1.28 In summary we consider that New Salts Farm, being one of those sites identified in the SHLAA which have been rejected by the Council, has not been appropriately assessed in the SHLAA. The assessment has been inconsistent to other sites which have been allocated in the ALP, and is in some instances, based on flawed evidence.
- 1.29 We consider that New Salts Farm is available, achievable and capable of delivering new homes to contribute towards housing need in the District.

Question 3.4 Does the plan identify a supply of deliverable sites, sufficient to provide 5 years' worth of housing, with an additional buffer of 5% (or 20% as appropriate)?

1.30 Table 5 of the Housing Implementation Strategy sets out that the Council can demonstrate a 6.1 year supply of housing for the period 2016 – 2021 based on a proposed housing target of 3718 dwellings over the plan period.

1.31 We submit, as set out in our Reps, that the housing trajectory on which this calculation is based is overly optimistic and have drawn up what we consider to be a more realistic trajectory below in Table 1. Taking these adjustments into account the Councils 5yhls would be reduced to 5.4 based on a 5% buffer.

1.32 However as set out in our Reps we are of the view that given consistent under delivery a 20% buffer should be applied, indeed this approach was adopted by the Council themselves in preceding 5yhls calculations and we query why this approach has changed. If a 20% buffer is included the Councils 5yhls position falls to just 4.7.

1.33 We therefore submit that the Council does not identify a supply of deliverable sites sufficient to provide 5 years worth of housing with a 20% buffer, which should be applied given the persistent under delivery and the Council's acknowledgement of this in previous 5yhls calculations.

Table 1: Site Allocation Proposed Housing Trajectory 2016/2017 to 2031/2032 (Adur Housing Trajectory in Red, Boyer in Black)

	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	Total
Shoreham Harbour	0	0	90	90	130	190	0	40	40	50	50	80	80	80	50	0	970
Shoreham Harbour	0	0	0	90	90	130	190	0	40	40	50	50	80	80	80	50	970
New Monks	0	0	65	65	65	65	65	65	65	65	65	15	0	0	0	0	600
New Monks	0	0	65	65	65	65	65	65	65	65	65	15	0	0	0	0	600
West Sompting	0	100	100	50	50	50	50	50	30	0	0	0	0	0	0	0	480
West Sompting	0	0	65	85	100	50	50	50	50	30	0	0	0	0	0	0	480

New Salts Farm	0	0	25	75	55	75	75	75	75	0	0	0	0	0	0	0	455
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Question 3.5 Does the plan identify a supply of deliverable sites for years 6 to 10 and where possible for years 11 to 15?

1.34 The Councils Housing Trajectory is largely reliant on the strategic allocations to deliver housing over the medium to long term. However we would maintain that the Council can do more to meet its housing need by allocating additional deliverable sites within the District for residential development. This would not only contribute towards the 5yHls but also to housing delivery in the medium to long term.

Question 3.8 Is there enough flexibility embodied in the Council’s approach so that it could react quickly to any unforeseen change in circumstances?

1.35 As set out in our Reps we submit that the ALP is overly reliant on the delivery of the strategic site allocations to meet their proposed housing target (let alone the actual OAN identified) and there is no flexibility to account for any potential problems that might arise from this strategy. We submit that additional sites should be allocated for residential development in order to build in adequate flexibility in the Council strategy and to help to contribute towards housing need in the district.

Question 3.11 Does the plan make appropriate provision for affordable housing in accordance with national policy?

1.36 As set out in our Reps, given the significant shortfall of the proposed housing target in meeting housing need there is evidently a greater impact on affordable housing. We consider that where Adur are falling so far short of their objectively assessed housing needs it has not demonstrated that it has made every effort to meet housing need, including affordable housing need, and therefore is not in line with national policy. By allocating additional sites for residential development the Council will assist in delivering additional homes, including affordable housing, to meet the districts need.

Conclusion

- 1.37 For the reasons set out above, and in our Reps, we submit that the Plan is unsound as:
- It is not positively prepared, given it does not meet its OAN and has not engage every effort to meet those needs;
 - Is not justified as the plan has not considered all reasonable alternatives to meet OAN;
 - It is not effective as the ALP is over reliant on delivery of the proposed site allocations and SHLAA sites to meets its proposed housing target and providing a 5yHls and is well short of meeting its OAN;
 - Is not consistent with the policies in the NPPF, namely paras 14, 17, 47 and 152, as it has not struck the right balance in terms of sustainable development given the shortfall in meeting its OAN.

1.38 We submit that the land at New Salts Farm should be allocated within the Local Plan to deliver additional homes in order to address the deficiencies in the ALP and to make the plan sound. We set out at Part 6.7 of our Reps how the ALP should be amended in order to be found sound. We note that this would need to be updated to reflect the most recent evidence in regards to the OAN for the district.

Appendix One – OAN Review

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Adur OAN Review Addendum

New Salts Farm, Shoreham by Sea

Boyer

1. ADUR OAN REVIEW – UPDATE

Introduction

- 1.1 In April 2016, Boyer (Development Economics) was instructed to review the Adur Objective Assessment of Need (OAN) 2015 on behalf of Hyde New Homes in relation to the promotion of land for residential development at New Salts Farm in Adur District.
- 1.2 The Adur OAN Assessment was undertaken by consultants GL Hearn and identified an OAN of 291 dwellings per year for the District for the period 2011 to 2031.
- 1.3 We reviewed the methodology used to identify the OAN and outlined a number of concerns. These included:
 - The downward adjustment of the demographic starting point to take into account ‘Unattributable Population Change’ (UPC) which is contrary to the advice of ONS and was not consistent with the latest ONS mid-year estimates which were showing higher growth than projected in 2012.
 - A very small market signals adjustment of 4% which is equivalent to around 10 dwellings per annum had been applied which we believed was not sufficient for an area with very high property prices and worsening affordability. We argued that this 4% increase was linked to household formation rates therefore should form part of the demographic adjustment and that a further market signals uplift was required in line with the NPPG.
 - Economic scenarios were showing much higher levels of growth (around 362 dwellings per annum) meaning that potential for economic growth may be constrained if a lower target is used.
 - Issues relating to the methodology and availability of data used to calculate affordable housing need which meant that the figures may be unreliable.
- 1.4 Our own analysis based on the above suggested that the OAN should be no less than 324 dwellings per annum.
- 1.5 In September 2016, GL Hearn published an update to the Adur OAN Assessment which concluded that OAN in Adur was 325 dwellings pa. This is clearly very closely aligned with our original assessment and we are encouraged to see that some of the suggestions made have been taken on board.
- 1.6 This report forms an addendum to our original OAN review.

- 1.7 Our addendum reviews the methodology used in the update to check that it is now consistent with the NPPF and NPPG and whether 325 dwellings pa is an appropriate OAN for Adur given updated data and any other changes since our original assessment.

Demographics

- 1.8 As set out in our original report, the National Planning Practice Guidance (NPPG) states that the starting point for establishing the need for housing should be the latest household projections published by the Department for Communities and Local Government (CLG). At the time of the original report, the 2012 based projections were the latest available published projections. However the 2014 based projections have since been published.
- 1.9 The 2012 based projections estimated an increase of 5,517 households in Adur between 2011 and 2031 which represents growth of 276 households per year. We commented that the ONS mid-year population estimates for 2013 and 2014 were suggesting that the population was growing faster than population and household projections were estimating and this needed to be taken into consideration.
- 1.10 In July 2016, the 2014 based CLG projections were published which showed that the number of households in Adur is now expected to increase by 5,809 between 2011 and 2031 at a rate of 290 households per year. Once converted from households to dwellings (to take account of vacancies/second homes etc) this results in a requirement for 300 dwellings pa.
- 1.11 These are then rebased by GL Hearn to take account of the 2015 mid-year population estimates which reduces the figure to 294 dwelling pa. We have checked these figures and the 2015 mid-year estimate is showing slightly lower population growth than the 2014 based projections. We therefore agree that 294 dwellings is an appropriate demographic starting point.

Unattributable Population Change

- 1.12 In GL Hearn's original 2015 OAN assessment they made an adjustment to this figure based on Unattributable Population Change (UPC).
- 1.13 We argued in our review that making this adjustment was not justified. In particular, ONS state that UPC is unlikely to be seen in continuing subnational trends for various reasons including improvements in the methodology used to estimate migration adopted in recent years. We also highlighted that this approach had not been taken in other local authorities within the Housing Market Area (HMA) and that it was not supported by the Local Plans Expert Group (LPEG).

- 1.14 In the September 2016 OAN update, GL Hearn no longer make this adjustment stating that given improvements to the modelling of migration, GL Hearn does not see a strong basis for specific adjustments to the SNPP to take account of UPC. They now state that:

“GL Hearn considers that the 2014-based SNPP provides a robust trend-based assessment of population growth for the purposes of drawing conclusions on housing need. GL Hearn does not consider that there is a strong evidential basis for making adjustments to this, such as for UPC, given the time-period from which projections are derived (2008/9 – 2014) and the improvements made to migration statistics.”¹

- 1.15 We support this revised approach and agree that the 2014 based projections without adjustment for UPC is a robust demographic starting point for the OAN.

Household Formation (Headship) Rates

- 1.16 In our original assessment we argued that the household formation rates for 25-34 year olds should be adjusted as part of the demographic analysis rather than as part of the market signal uplifts as had been done. Household formation rates are the rate at which new households form and are often expressed by the age of the head of the household/household reference person. They are used to translate the population estimates into household estimates and are therefore extremely important in calculating housing need.
- 1.17 The main issue with the 2012 based household projections was that they were largely based on a recessionary period (2008-2012). During this recessionary period household formation rates decreased, particularly amongst younger age groups who struggled to be able to afford forming new households.
- 1.18 GL Hearn’s 2015 OAN assessment found that, like many other areas, the rates for the 25-34 age group had been particularly suppressed during this period when compared with pre-recession (2008 based) rates. Consequently, they applied a 4% increase to allow for correction in this age group as part of their market signals uplift.
- 1.19 The 2016 OAN assessment shows that the 2012 and 2014 household formation rates are broadly similar however have dropped slightly for the 25-34 and 35-44 age groups compared to the 2012 based set. The updated 2016 OAN assessment however no longer applies an uplift to allow for correction of headship rates. It is states that:

“GL Hearn does not consider that there is a justification for including a demographic adjustment to the household formation rates for those aged 25-34” (para 2.45).

¹ Adur OAN Assessment Update 2016 para 2.33

- 1.20 GL Hearn now argue that recently published academic studies have considered trends in household formation and have found that it is not appropriate to revert to the assumptions on household formation from the 2008-based projections. The studies are suggesting that the 2008 based projections were produced at a time when household formation had already changed, starting before the economic downturn of the mid-to-late 2000s, and are in themselves only evidence of the optimism of that period. This is a marked difference in methodology compared to the 2015 Adur OAN assessment and many other GL Hearn OAN Assessments which have included adjusted rates.
- 1.21 We have reviewed these published academic studies and agree that in some circumstances in may not be appropriate to adjust household formation rates. However, it is important to ascertain whether these rates were unusually 'optimistic' in 2008 or whether they are being continually suppressed by worsening affordability and a lack of supply.
- 1.22 As shown on the graph on page 23 of the 2016 OAN assessment (see extract below) household formation rates for 25-34 year olds are lower in the 2014 based projections compared to the 2012 based set suggesting continuing suppression. The graph also shows that by 2008, household formation rates had already dropped significantly from rates back to the early 1990s and do not seem to be particularly 'optimistic' compared to past trends. This leads us to question whether it is appropriate to ignore household formation rates in this age group in Adur. This will be discussed further in relation to the potential uplift in the market signals analysis section below.

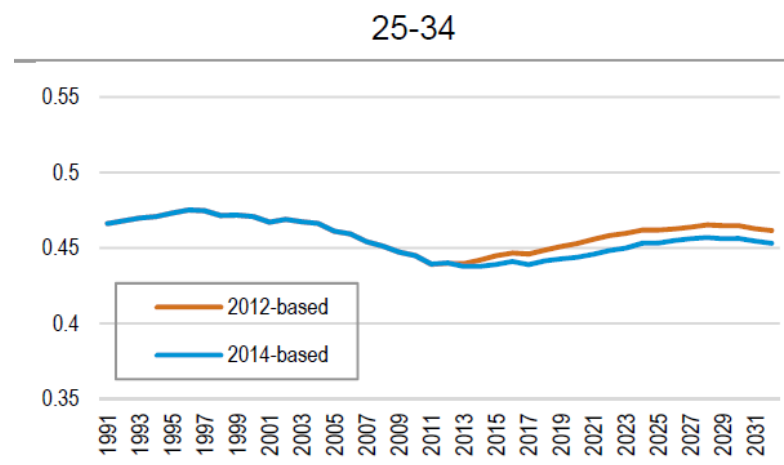


Figure 1 – Extract from Adur 2016 OAN Assessment (page 23) - household formation rates for 25-34 year olds

Market Signals

- 1.23 In our original assessment we reviewed the latest affordability ratios and property sale/rental data and found that the situation had worsened considerably since GL Hearn's 2015 OAN assessment was prepared. As such, we argued that GL Hearn's uplift of 4%, which was linked to household formation rate increases as described above, was not sufficient and was unlikely to have any impact on affordability. We put forward a suggested uplift of around 9%, however this was in addition to an adjustment for 25-34 year olds in the demographic analysis rather than instead of it.
- 1.24 We also argued that some of the market signals identified in the NPPG, such as land values, had not been included in the original analysis. We are reassured to see that these are now included. The analysis is showing that land values in Adur are 21% above the South East average and are just over double the England average, excluding London. GL Hearn state that this points to land supply constraints which are self-evident in the District.
- 1.25 GL Hearn conclude that the updated analysis of market signals suggests a worse position than was the case when the previous OAN Report was prepared and that this provides some basis for making an upwards adjustment to the OAN to support improvements in affordability.
- 1.26 They state that based on the available evidence, they consider that a 10% upward adjustment should be considered to boost the delivery of both market and affordable housing, and improve affordability.
- 1.27 We support this increased adjustment of 10% for market signals however remain concerned that there should also be a further uplift to reflect suppressed household formation rates. In the previous assessment we advised that the adjustment for household formation rates should be included in the demographic assessment and a further 9% uplift based on market signals. We consider that an uplift of around 15% would more appropriately reflect the market conditions in Adur which have clearly been impacted by a lack of supply and have repressed household formation rates for younger people.
- 1.28 An uplift of 15% to the demographically starting point of 294 would result in an OAN of 338 dwellings pa.

Proposed LPEG Methodology

- 1.29 In our original assessment we also discussed the proposed Local Plans Expert Group (LPEG) methodology. The Local Plans Expert group is an independent expert group set up by the Government to examine what measures or reforms might be helpful in ensuring the efficient and effective production of Local Plans.
- 1.30 The proposed LPEG methodology recommends running 2 demographic scenarios based on 5 year and 10 year migration trends and then using whichever is the highest. It does not allow for any adjustments to be made for UPC. It then requires areas with a house price ratio of 8.7 or above and/or a rental affordability ratio of 35% or above to apply a 25% uplift. This would include Adur as it has a house price ratio of 9.64.
- 1.31 The government have still not responded to the LPEG proposals a response is expected in 2017. Based on their proposed method, the OAN for Adur would be at least 368 dwellings pa (294 +25% uplift).

Economic Consideration

- 1.32 The 2015 OAN Assessment considered the forecast of workplace jobs used in the 2014 Employment Land Review² which is based on 2013 Experian Forecasts. These forecasts predicted an annual average growth in employment of 265 jobs per annum.
- 1.33 The report then calculates the level of housing that might be required to support the level of job growth identified in the Experian 2013 forecast. It includes two slightly different scenarios based on the Experian forecasts relating to commuting and 'double jobbing' assumptions. This resulted in the need for between 307 and 362 dwellings pa.
- 1.34 GL Hearn stated that these forecasts should be treated with a degree of caution and argued that 10 and 15 year past trend projections may be a more realistic basis for projecting future economic growth. They also stated that they consider it unlikely that the population (and workforce) will grow as strongly as is projected in the Experian forecasts principally due to the geography of the District and the limited land availability.
- 1.35 Consequently, they used a mid-point between the 10 and 15 year trend based projection of employment to provide a more realistic and likely assessment of future jobs growth in Adur. This mid-point forecast results in a housing need of 281 dwellings per annum if the assumptions on current commuting remaining at current levels are applied and 246 dwellings per annum assuming no growth in net commuting.

² GL Hearn 2014 <http://www.adur-worthing.gov.uk/media/media,127604,en.pdf>

- 1.36 We argued that using this approach constrained the economic forecasts due to the availability of employment land in the District and also noted that the 2013 Experian projections were now out of date.
- 1.37 The 2016 OAN does not appear to have addressed our concerns relating to economic considerations and in the absence of any more up to date economic projections, we believe that the Experian 2013 projections should be used. This results in a dwelling requirement for around 362 per annum if a 'policy off' approach is taken and existing levels of commuting and double jobbing are assumed to remain.
- 1.38 This is very close to the LPEG suggested methodology of 368 dwellings per annum.

Affordable Housing Need

- 1.39 Our review of the original 2015 OAN outlined a number of concerns in relation to the methodology used to assess affordable housing need. The 2016 OAN review does not appear to address any of these concerns and the updated affordable housing need section is very brief.
- 1.40 It reiterates the net need for 233 affordable homes per annum which it states would require 932 dwellings pa to deliver if 30% affordable housing delivery is assumed and 583 dwellings pa to deliver if 40% affordable housing delivery is assumed. GL Hearn assert that this is completely unrealistic. However, given the scale of the affordable housing need, acknowledge there could be some basis for considering an upwards adjustment to the objectively assessed housing need.
- 1.41 We believe that the scale of affordable housing need compared to overall need adds weight to the argument that an uplift of more than 10% is required.

The wider HMA

- 1.42 Our original report provided an overview of the latest housing need/supply balance in the rest of the HMA. We have updated this information where applicable in the table below:

Table 1 – HMA OAN compared to adopted/proposed targets

District	Latest OAN (per annum)	Adopted/ Proposed Target	Difference between OAN and target
Adur	325*	180	-145
Chichester	505	435	-70
Arun	919*	315**	-604
Worthing	636*	200 (Core Strategy 2011)	-436

District	Latest OAN (per annum)	Adopted/ Proposed Target	Difference between OAN and target
Brighton & Hove	1,506	660	-846
Lewes	520	345	-175
Total	4,441	2,135	-2,276

* OAN not yet tested at examination

** Arun do not yet have a proposed target as work on the new Local Plan is ongoing. This figure has been taken from the supply of deliverable and developable sites identified in the Arun HELAA Report published in November 2016³

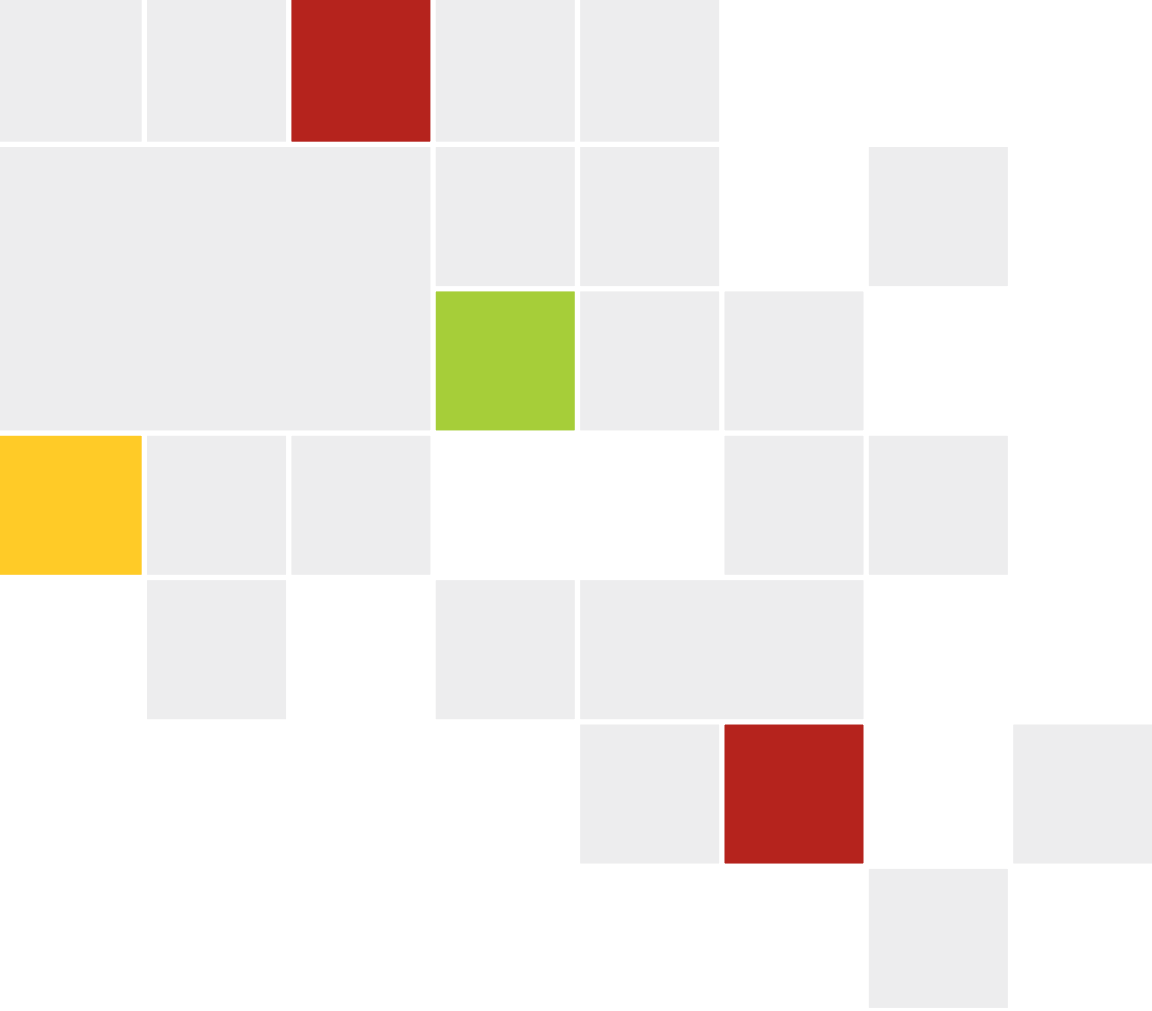
- 1.43 As shown above, there remains a severe shortage of housing in the HMA with a projected deficit of just under 2,300 dwellings per year compared to identified need. The need for South Downs National Park (SDNP) is not included in the table above as it sits across all of the districts and complicates the figures. However, the emerging SDNP evidence base is suggesting need for between 416 and 454 dwellings pa and it seems unlikely that this will be met within the National Park area, thus putting even greater pressure on the remainder of the HMA.
- 1.44 It is recognised that Adur and the wider HMA are highly constrained by South Downs National Park which is the primary reason for the shortage of supply; however the impact of this on Adur should not be ignored in the setting of a housing target and the identification of housing sites.

Conclusion

- 1.45 The updated OAN of 325 dwellings per annum identified in the latest assessment is more robust than the 2015 OAN assessment which concluded on a figure of 291 dwellings per annum.
- 1.46 We support the removal of the downwards UPC adjustment and the increased market signals uplift in the latest assessment. However, we remain concerned that due to the continued suppression of household formation rates for 25-34 year olds, the high number of affordable homes needed and the affordability issues in Adur, that the market uplift should be higher than 10%.

³ Arun HELAA 2016 <http://www.arun.gov.uk/helaa>

- 1.47 We feel strongly that an uplift of 15% to include an adjustment for the household formation rates is appropriate and necessary; which would result in an OAN of 338 dwellings per annum. However, it is noteworthy that based on the proposed LPEG methodology the uplift could be as high as 25% and if this approach were adopted the OAN up 368 dwellings per annum.
- 1.48 It is recognised that this is considerably higher than previous targets and that the resulting population would be above that seen in past trends, however the past population trends will have been influenced by the lack of new housing being built in Adur.
- 1.49 It is also recognised that Adur and the wider HMA is highly constrained by South Downs National Park and the sea and this report has not sought to directly take these factors into consideration. Nonetheless it is clear that Adur must seek every opportunity to meet as much of their own OAN as possible and potentially also accommodate some of the significant level of unmet need from the other districts in the HMA. A failure to do so will lead to worsening affordability and will restrict economic growth in the area.



Boyer

24 Southwark Bridge Road, London, SE1 9HF | 0203 268 2018
devecon@boyerplanning.co.uk | boyerplanning.co.uk

Appendix Two - Environment Agency Email and Minutes of Meeting with Adur, West Sussex County Council and Environment Agency

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Meeting Minutes

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Dinny Shaw

From: Ben Daines <ben.daines@adur-worthing.gov.uk>
Sent: 22 June 2016 14:38
To: Dinny Shaw
Subject: Fwd: New Salts Farm - Kingfisher Meadows Development Proposal

Hi Dinny,

Please see the email below from Marguerite Oxley at the Environment Agency regarding the Flood Risk Assessment for the New Salts Farm development. I thought it would be useful for you to view it prior to our meeting on 27 June 2016.

I understand that these concerns have been raised with Andrew Picton of Tully De'Ath and you may already be aware of them.

Regards,

Ben Daines | Senior Planning Officer | Adur & Worthing Councils
01273 263065 | <http://www.adur-worthing.gov.uk/planning-policy/>

----- Forwarded message -----

From: Oxley, Marguerite <marguerite.oxley@environment-agency.gov.uk>
Date: 17 June 2016 at 12:02
Subject: New Salts Farm - Kingfisher Meadows Development Proposal
To: Ben Daines <ben.daines@adur-worthing.gov.uk>
Cc: "Jackson, Adrian" <adrian.jackson@environment-agency.gov.uk>, "Moffatt, Grant" <grant.moffatt@environment-agency.gov.uk>, "Packwood, Hannah R" <hannah.packwood@environment-agency.gov.uk>, "james.appleton@adur-worthing.gov.uk" <james.appleton@adur-worthing.gov.uk>, "moira.hayes@adur-worthing.gov.uk" <moira.hayes@adur-worthing.gov.uk>, "Griggs, David" <David.Griggs@environment-agency.gov.uk>

Dear Ben,

Thank you for sending us the Flood Risk Assessment produced by Hyde Housing to support the above development proposal.

Colleagues in our Partnership and Strategic Overview Team (Flood and Coastal Risk Management Department) have considered the FRA. The Environment Agency's remit on this site only relates to flood risk from tidal sources. We have however included comments with regards fluvial risk, groundwater and the overall drainage of the proposed Phase 1 and the remaining site area identified for development. We hope these additional comments may be of assistance to the local authority drainage department, and form discussions points for the forthcoming meeting on the 27th June. Our comments are as follows:

1. Due to the significant drainage issues with the site and beyond, the Flood Risk Assessment (FRA) should cover the whole proposed developed phases.
2. It is noted that the FRA has not taken account of the updated fluvial risk changes in the guidance “Flood Risk Assessments: Climate Change Allowances” (published 19/2/2016, last updated 12/4/2016). The revisions could potentially change the Flood Zone (FZ) from a FZ3a to FZ3b, and fluvial modelling will therefore be required.
3. There is a considerable tide lock issue throughout the Lancing Brooks area (both north and south). During periods of prolonged rainfall ditches can take weeks to discharge.
4. Confirmation will be required that the foul sewerage system will be adopted (Section 3.4).
5. It is noted that groundwater has been reported as being artesian (Section 3.5)
6. The FRA notes that since maintenance has been undertaken, localised flooding has improved. However, it needs to be confirmed as to whom will be responsible for ditch maintenance should any development be feasible.
7. Allowing ground floor areas to flood will only be acceptable in extreme conditions in non-habitable rooms as defined by section 0.30 of Approved Document M of the Building Regulation 2000, (Section 6.1)
8. It is suggested that water levels in the ditches are only partially influenced by groundwater. This would conflict with other studies made of the area and needs to be considered further (Section 6.5)
9. Direct discharge from permeable paving, swales and infiltration ditches may not be possible due to tide lock restrictions (Sections 7.8 & 7.9)
10. As stated previously, it should be noted that any amendments to the Flood Zones will only apply to the tidal outlines (Section 11.0 and refer to second paragraph). The flood risk information may affect the outcomes of the Exception and Sequential tests from a fluvial perspective when the revised climate change figures are applied (+ 45% for residential developments.)

11. New drainage ditches will not reduce localised flooding on the West Beach (Hasler) Estate. The West Beach Estate will still remain susceptible owing to the tidal influence raising groundwater on particular high tides.
12. The FRA does not look at the potential effects of flooding upstream or downstream, in particular the proposed New Monks Farm development, or downstream where culvert capacities are inadequate and on line structures hinder the flow. This needs to be considered.
13. The FRA needs to further look at the loss of initial storage, extra flow to be stored during tide lock together with spring flow, and how ponding will be prevented at the airport access road, a known pinch point.
14. Whilst we note that groundwater observations have been undertaken, we recommend that further testing is carried out over a range of spring tides. This will be essential for the area outside of Phase 1. The report findings so far make it quite clear that any infiltration units will need to be shallow.
15. The Drainage Strategy Phase 1 plan (11649 – CIV – 115) shows a drainage ditch connecting to swales/piped ditch. It should be confirmed whether this is a block ended ditch and confirm the direction of flow to ascertain whether this is achievable.
16. Flooding occurs on a frequent basis and is well documented since 1960. Roads and gardens of the West Beach (Hasler) Estate flood, and there is field waterlogging in the New Salts Farm area. The ditch system takes surface water at various points from West Sussex County Council and private roads, springs and catchment run off from the north, including the A27 bypass. When these flows are at their maximum level and tide lock occurs, the system surcharges flooding adjoining fields and gardens.
17. The most common problem in the New Salts Farm and West Beach (Hasler) area is the influence of the sea on groundwater. The existing groundwater table is known to rise and fall in conjunction with the tide. During spring tides (6.7mAOD), water is known to surcharge from certain road gullies and joints in the concrete roads.
18. It is understood that a water main on the phase 1 site has burst on two occasions. This requires further investigation, as to the cause and whether this has been completely rectified.

We have not considered the Sequential and Exception test presented with this document. We would expect that you would update the Sequential and Exception test to justify any allocation of the New Salts Farm site.

We hope you find these comments of use.

Best Wishes

Marguerite

Marguerite Oxley|Technical Specialist|Sustainable Places|Solent and South Downs Area|

Environment Planning and Engagement|Environment Agency|Guildbourne House|Chatsworth Road| Worthing|West Sussex|BN11 1LD

Tel external: 02030257171|Tel internal: 57171|Mobile:- 07733077926|

Email :- marguerite.oxley@environment-agency.gov.uk (or PlanningSSD@environment-agency.gov.uk)

Our Commitment:

Sustainable Places will prioritise and drive forward environmental outcomes from our work with local authorities and partners across the Solent and South Downs Area

We have moved to [GOV.UK](https://www.gov.uk). Our website is now available at: www.gov.uk/environment-agency.

We offer a cost recovery service for bespoke pre-application advice. For more information go to: [gov.uk](https://www.gov.uk) or [email us](#)

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New Salts Farm

MINUTES – Flood, Drainage and Sewage

14.455, Adur & Worthing Council, 27th June 2016 2pm

Attending:	James Appleton	Adur & Worthing Council (A&W)
	Ben Daines	Adur & Worthing Council (A&W)
	Ken Argent	Adur & Worthing Council (A&W)
	Adrian Jackson	Environment Agency (EA)
	Grant Moffatt	Environment Agency (EA)
	David Griggs	Environment Agency (EA)
	Sarah Poulter	The Hyde Group (Hyde)
	Andrew Picton	Tully De'Ath (TD)
	Julian Turner	Tully De'Ath (TD)
	Dinny Shaw	Boyer

Minutes		Action by	Date
1	Local Plan Update		
1.1	JA advised that Adur are reviewing submission date and intend to submit before the end of the year		
2	Overview		
2.1	DS gave a brief overview of the proposals for the site		
3	Flood Risk Assessment – comments from EA		
3.1	We went through the comments from the EA in their email dated 17 th June relating to the FRA for New Salts Farm (numbering is reference to points in EA email)		
3.2	1. EA advised that there are critical uncertainties over drainage of the site and therefore they would want to see a drainage strategy for the whole site. TD advised that a strategy could be prepared but this would be based on one possible layout for the whole site. EA agreed this would be acceptable and would demonstrate one possible way of addressing drainage concerns. EA are reasonably ok with the strategy for the Phase 1 area. TD to prepare strategy for wider site.	TD	

3.3 2. FRA needs to take account of latest guidance on climate change allowances for fluvial flooding (tidal allowances are unchanged). Unclear whether the ditches are classified as drains or watercourses. SWMP describes them as drains; EA confirmed they consider them to be watercourses, although WSCC may have a different view. Further modelling required of the ditches – based on Lancing Surface Water Management Plan as starting point. This should consider tide locking and latest climate change allowances. Bottom and top half of ditches network should be modelled. KA advised that New Monks Farm (NMF) have been asked to do the same for the northern part of the network. It was agreed to try to work with NMF and CH2M Hill to carry out the further modelling requested.

TD to lead on further modelling – TD to speak with CH2M Hill regarding further modelling work.

TD

Hyde to get in touch with NMF to discuss working together on modelling.

Hyde

NMF are not required to consider revised fluvial climate change allowances, as the site already had a draft allocation when the guidance was introduced, but they will be required to consider this at planning application stage.

3.4 3. The event EA refer to was in 2012. EA also have anecdotal evidence of western part of the site flooding in 1960 and 1974.

EA to provide details of 2012 event and whether this was in excess of the 1 in 100 year event, also how long pumping was undertaken for.

EA

TD to approach WSCC for details they have of 2012 event

TD

3.5 4. TD confirmed that Southern Water have been approached and we will share information once received which should be w/c 27th June

TD

3.6 5. Updated groundwater modelling will pick up point re some groundwater being artesian and will cover spring tides. TD to issue this information to all.

TD

TD advised that artesian water can be designed around and that there are foundation solutions.

TD to provide details of proposed foundations.

TD

- KA raised concerns about use of geogrid for the roads and degrading of subsurface material if it is frequently below groundwater level – he will provide further feedback on geogrid once heard from transport team. KA
- 3.7 6. It was agreed that there is a potential solution to ongoing maintenance of ditches, either by management company or LPA and details can be agreed at the appropriate time. LPA need assurance that the Hasler estate scenario won't be repeated.
- 3.8 7. EA agreed that as long as all habitable rooms are at first floor allowing ground floor to flood is an acceptable approach. Additional protection will be provided by raising the ground floor by 300 ml.
- It was discussed that a mechanism to control future extensions (and type of foundation)/ introduction of hardstanding etc to the proposed homes would need to be introduced either by removing permitted development rights and/or including restrictive covenants within Transfers or leases and controlled by the management company)
- 3.9 8. EA had not seen the Lancing SWMP study – it was agreed that this was the most recent study and information regarding water levels in ditches being only partially affected by groundwater levels is correct.
- 3.10 9. Attenuation proposed is a combination of measures as no one solution will fix the issue. Some phases may be more reliant on the ditch network. Further work on drainage needs to take tide lock into account. 7-10 hours is average time for flow to clear. TD to consider and provide further details. TD
- 3.11 10. The S&E test prepared for New Salts Farm will need to be updated to reflect further information being prepared following this meeting and reissued. EA confirmed flood maps won't change. EA concerned that climate change impacts will be greater on this site than on other allocated sites. LPA would only need to do new SFRA to consider new fluvial climate change guidance if putting in a new allocation. Tidal wall will only change tidal risk zones, not fluvial.
- 3.12 11. It was agreed that we can improve West Beach Estate drainage to some extent; we can produce new outlet for high tide events, but will not fix all the problems.

- 3.13 12. Our FRA demonstrates the scheme is restricted to greenfield run off. A&W advised that New Monks Farm would also be restricted in this way.
- 3.14 13. Further detail as per 9. above to take tide lock into account and set out how long water likely to be on site before discharge. TD
- 3.15 14. Further testing has been carried out over last 6 months which will be provided to all. TD
- More boreholes will be installed for further monitoring across the wider site – KA advised to speak to WSCC about locations they want to see monitored. Frank Grantham (farmer) could confirm which areas tend to be wettest. TD
- 3.16 15. TD confirmed that ditch referred to was block ended and would be connected by new ditches. Detail would be shown in wider site plan drainage strategy to be provided. TD
- 3.17 16, 17, 18. It was agreed that these points were all statements that did not require further action.
- 4 AOB**
- 4.1 TD to advise how the scheme would be designed to ensure flooding does not occur to homes through service pipes. TD
- 4.2 KA requested that we look into relocating the ditch adjacent to the railway line into NSF land ownership, or running an additional parallel channel, so as to have control over maintenance. Hyde to discuss with Network Rail. Hyde
- 4.3 Hyde to get in touch with NMF to discuss sharing data. Hyde
- 4.4 It was agreed that EA would provide a list of the points they consider need addressing in order to satisfy them that the site can be allocated in the Local Plan. (see covering email) EA
- 4.5 KA suggested that one action which might help flooding would be to lower the bed beneath bridge to help flows. TD / Hyde to consider this option. Hyde / TD

END