

ADUR DISTRICT COUNCIL

**HOUSING DELIVERY TEST
ACTION PLAN**

2022

July 2022



**ADUR DISTRICT
COUNCIL**

Adur Housing Delivery Test Action Plan 2022

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1. Introduction

Context

- 1.1 The Adur Local Plan was adopted in December 2017¹. It sets the framework for development across the District (outside of the South Downs National Park) including the strategy for the delivery of housing. In identifying a housing need of 325 dwellings per annum (through the Objectively Assessed Need process), the Inspector concluded that the Council had adequately justified this figure and its “approach is sufficiently aspirational whilst remaining realistic” taking into account the constrained nature of the area.
- 1.2 In considering whether this level of growth could be satisfactorily accommodated in the Plan area, a comprehensive evidence base supported the Local Plan. [A Housing Implementation Strategy](#) (2016) set out the Council’s approach to managing the delivery of housing over the Plan period and assessed the risks to that delivery and how it can be mitigated and managed. The Adur Strategic Housing Land Availability Assessment (SHLAA) assessed a large number of potential sites, including small sites (of less than six dwellings), areas of open space, employment land and greenfield/brownfield sites. It was accepted that the evidence demonstrated that this level of growth **could not** be delivered in a sustainable way because of the constraints that exist and that the Council had gone as far as possible to identify potential development sites.
- 1.3 Given the significant constraints in Adur, particularly in terms of flood risk, the need to retain green gaps between settlements and the limited options for growth due to tightly drawn boundary and the South Downs National Park to the north, the Local Plan proposed a sustainable development strategy to deliver 3718 new homes (177dpa) over the period 2011-2032. This strategy relies on the delivery of two strategic greenfield sites, New Monks Farm and West Sompting (which together will deliver a minimum of 1080 new homes) and a broad location for development identified at Shoreham Harbour which will deliver a minimum of 1100 new homes (for which the detailed development proposals are addressed in a Joint Area Action Plan which was adopted by the relevant Councils in October 2019). As such, the housing trajectory accompanying the Local Plan indicated a slow increase in growth followed by a significant peak as these larger sites came on stream. The delivery of small and unidentified sites will also continue to make a significant contribution to the housing supply. The Inspector endorsed the annual delivery target in the Plan of 177dpa.
- 1.4 The strategic sites and the broad location at Shoreham Harbour by their very nature were understood to have a long lead in time before delivery would commence. This is recognised in the housing trajectory (which can be found in the Adur Annual Monitoring Report) which predicts the delivery of these sites from 2022/23. Until this point, housing delivery has, as anticipated, been largely reliant on smaller SHLAA/unidentified sites; (other than a couple of larger sites which are indicated). This is reflected in the Housing Delivery Test results below.

¹ For clarity, this covers the land within Adur District but outside of the South Downs National Park.

Reasons for this Action Plan

- 1.5 The revised National Planning Policy Framework (NPPF) of 2018 introduced the Housing Delivery Test (HDT) as a mechanism to monitor housing delivery locally. The HDT measures additional net dwellings provided in a local authority area against the homes required (plan delivery target). The consequences of failing the test are set out in the NPPF and these will apply until subsequent HDT results demonstrate that delivery in future years has improved:
- A local planning authority must produce an Action Plan within six months if the Housing Delivery Test result is **less than 95%**.
 - A local planning authority with a Housing Delivery Test result **of less than 85% must provide a 20% buffer** to the five year housing land supply.
 - The presumption in favour of sustainable development applies if the Housing Delivery Test result is less than:
 - i) 25% in November 2018
 - ii) 45% in November 2019
 - iii) 75% from November 2020 onwards

How is the Housing Delivery Test Measured?

- 1.6 The methodology for calculating the HDT measurement is set out in the Housing Delivery Test Measurement Rulebook. It is based on the Department for Levelling Up, Housing & Communities (DLUHC) statistics for the total net housing completions (which includes student and other communal accommodation) in a local planning authority area over a three year rolling period using a ratio to adjust for occupancy. The result of the HDT for each local planning authority will be published annually by the DLUHC.

How did Adur perform against the Housing Delivery Test?

- 1.7 For Adur, housing delivery will be measured against the adopted Adur Local Plan 2017 target of 177 homes per annum for the period up to 2018/19; for 2019/20 a figure of 162 was used - this is the annual requirement figure adjusted by the MHCLG to reflect circumstances resulting from the Covid-19 pandemic; for 2020/21 a figure of 118 is used, again adjusted as a result of the pandemic.

Adur Housing Delivery Test results – 2020/21

Year	Delivery Figure (net)	Annual Housing Target*
2018/19	122	177
2019/20	13	162
2020/21	217	118
Total over 3 years	352	457

*Please note that for the 2021 measurement, there is a reduction in period for measuring total homes required – usually this would be measured over a 3-year period, but an 8-month period has been used for the 2020/21 monitoring year. This is to account for the considerable variations in levels of housing delivery as local planning authorities and construction industry faced disruption on a national, regional, and local level due to the pandemic. Additionally, an 11 month period has been used for the 2019/20 monitoring year. This was to account for disruption to housing delivery and monitoring caused by the first national lockdown in March 2020. (DLUHC Housing Delivery Test: 2021 Measurement Technical Note; published by DLUHC 14 January 2022).

- 1.8 The Housing Delivery Test measurement for Adur is $352/457=77\%$ and therefore an Action Plan must be produced; and in calculating the housing land supply, a 20% buffer must be added. The presumption in favour of sustainable development does not apply as Housing Delivery Test exceeds the 75% threshold.

Purpose and Objectives

- 1.9 This Action Plan is the Council's response to the challenge set out in the NPPF to significantly boost the supply of homes. It sets out why this authority has not been able to deliver against its target in previous years, although this is improving and identifies a number of actions to maintain and increase housing delivery. However, it should be recognised that housing delivery is a complex matter which includes the involvement of a number of different organisations in the delivery of new homes. Consequently, if this Action Plan is to succeed, then the cooperation of all partners, such as landowners and developers, will be essential.

- 1.10 This Action Plan covers the following issues:

- Relationships with other plans and strategies
- The historic performance on housing delivery

- The Council's actions to boost housing delivery
- Analyses evidence on sites with planning permission (and sites allocated for housing development) to understand what barriers are preventing homes being built on these sites
- Sets out what actions the Council can take to increase the rate and number of homes built
- Monitoring.

Relationship with other plans and strategies for housing delivery

1.11 This Action Plan together with the following key Council plans, policies and strategies provides a mechanism for delivery of local housing targets:

[Platforms for our Places – Going Further 2020-2022](#) (Corporate Strategy)

1.12 This is a plan that sets out Adur & Worthing Councils' ambition for our places' and our communities' prosperity and wellbeing. This was agreed in December 2019; sets out a direction of travel for the Council over the following three year period, and seeks to build on the success of the progress made in recent years. Platform 2 (Thriving People and Communities) encourages innovative actions around housing needs. Relevant projects referred to in the strategy include working with a preferred developer to progress redevelopment of the Adur Civic Centre site, delivering 171 social and affordable homes, and business space, on this vacant site. The document also refers to other Council projects in Adur, including proposals to redevelop Council sites for affordable housing.

['And Then...Bouncing Back in post-pandemic Adur and Worthing'](#) (2020)

1.13 Adur & Worthing Councils published this document (agreed at Joint Strategic Committee on 7th July 2020) which sets out a series of place based activities and interventions AWC will take to enable its communities to thrive, prosper and be healthy and resilient following the pandemic of 2020. This builds on the AWC strategy 'Platforms for our Places' and includes the following:

1.14 *Major new development across our places will deliver thousands of new homes and jobs. We will take every opportunity to accelerate the programme for delivery, including building out new projects ourselves and in partnership with others. The emphasis will be on sustainable growth; high levels of connectivity and skills and learning as an integral part of any major scheme. We will actively support those whose projects are already underway and use our regulatory powers wisely to create the right conditions for others to come forward. Where projects are stuck or can be catalysed we will consider what if any interventions we as Councils can make to unblock and speed delivery (See Platforms for Our Places 1.8)*

[Housing Strategy 2020-2023: Enabling Communities to Thrive in their own Homes](#)

1.15 Priority 3 of this strategy refers to levels of improving affordable housing supply, and states that the Councils are creating a Development Strategy detailing how it intends to increase the number of affordable homes across Adur and Worthing through self-delivery and working closely with developers. This will address five key objectives, which are to:

- Deliver 1,000 affordable homes by 2025, of which 250 homes will be delivered directly by Adur & Worthing Councils

- Create sustainable homes for people to live and thrive in
- Utilise the Council's land and housing stock for self-delivery
- Purchase sites for development where appropriate
- Work with strategic partners to unlock and maximise affordable housing delivery across the Councils.

1.16 The strategy provides an overview of how the Councils will look to meet demand through self-delivery and partnership to progress the delivery of affordable housing. The Council will review ways in which different tenures could be offered to help complement affordable homes delivery and meet the needs of people throughout the housing market. These tenures could include discounted market sale, intermediate rent or shared ownership. As part of this review the Council will consider the need to set up a housing delivery company and/or joint ventures with development partners.

1.17 The Strategy also makes clear that the Councils will explore new and innovative partnerships and vehicles to create opportunity to increase the supply of affordable homes.

[Economic Strategy 2018-2023](#)

1.18 This sets out ambitious plans for how the place will achieve “good growth” It seeks to ensure that this growth balances economic success with improvements to the quality of life for residents, including good quality housing.

[Shoreham Harbour Joint Area Action Plan \(JAAP\) \(October 2019\)](#)

1.19 Produced by the Shoreham Harbour Regeneration Partnership comprising the local authorities of Adur District Council, Brighton & Hove City Council and West Sussex County Council and working with Shoreham Port Authority. The JAAP sets out the overall spatial strategy for the regeneration of Shoreham Harbour and proposals for the defined character areas within it, which will serve as the location for a minimum of 1100 dwellings, as identified within the Adur Local Plan 2017. The Plan was adopted by the relevant Councils in October 2019.

Coast to Capital Local Economic Partnership

1.20 This is a local business led partnership between local authorities and businesses and plays a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. It has a critical role in the delivery of local infrastructure to support growth in the local economy and helps unlock development. In turn this helps to support the housing delivery priorities of the District.

Approach and Methodology

1.21 The Council already has in place a long standing monitoring arrangement with West Sussex County Council and also maintains its own comprehensive monitoring system. The Annual Monitoring Report provides updates regarding the housing land supply position. This monitoring has identified that there are significant challenges to the delivery of housing typical of an authority with limited land availability and recognised constraints to development.

1.22 A number of sources of information/evidence have been, and continue to be, used to identify and assess any opportunities for residential development and to understand any barriers to delivery that need to be addressed. These include:

- Strategic Housing Land Availability Assessment
- Brownfield Register
- Self-Build and Custom Housebuilding Register
- West Sussex County Council Data
- Empty Homes Strategy
- Affordable Homes Delivery Group
- Housing Implementation Strategy.

2. Housing Delivery Analysis

Past Performance on housing delivery

- 2.1 Prior to the adoption of the Adur Local Plan in 2017, housing delivery was monitored against the South East Plan (and the West Sussex Structure Plan before it). Historically the housing targets for Adur did not have a strong relationship with the need and demand for new dwellings in the District due to the tight geographical constraints and were strongly influenced by the capacity to accommodate development. A target of 105 dwellings per annum was set in the South East Plan (2006-2013) recognising the development constraints and strong environmental protection policies for the District included in previous regional and structure plans. Adur delivered sufficient homes to meet this target.
- 2.2 The adopted Adur Local Plan 2017 has a base date of April 2011 for monitoring housing delivery.
- 2.3 Since the start of the new plan period in 2011 and 1 April 2021, 1,069 net new homes have been completed. For the last 5 year period (2016/17 – 2020/21) the annual average for net dwelling completions in Adur is 102 per annum.

Dwelling completions 2011/2012 - 2020/21

Year	Net
2011/2012	193
2012/2013	146
2013/2014	93
2014/2015	96
2015/2016	31
2016/2017	64
2017/2018	114
2018/2019	111
2019/20	13

2020/21*	208
Total	1,069

*Please note these figures differ from the Government's Housing Delivery Test figure of 217 homes delivered; this is because the HDT includes the entire District of Adur, including that part which lies within the South Downs National Park Authority, whereas the WSCC figures exclude that area and relates only to the Adur Local Plan area.

2.4 The number of homes that have actually been built is 1,069 or 60% of the Councils annualised housing target as set out in the Adur Local Plan. This can mainly be attributed to a lack of suitable sites coming forward for development and some delays on strategic sites, which are referred to below (See Housing Delivery Analysis section). The challenge has been to identify and bring forward additional sites to deliver the new homes required.

Housing approvals and completions against housing targets 2011-2021

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Housing Supply Target	177	177	177	177	177	177	177	177	177	177
New Residential Approvals	60	72	187	139	147	86	44	689	656 gross	384 gross
Net Residential completions	193	146	93	96	31	64	114	122	13	217*

**This figure has been sourced from the Housing Delivery Test 2021 Measurement and been calculated in line with the Housing Delivery Test: 2021 measurement technical note)*

- 2.5 There has always been a considerable fluctuation in the delivery rates per year, with the highest number recorded in 2021/22 (217 net dwellings) and the lowest in 2019/20 (13 net dwellings). This is demonstrated in the table above which details delivery since the base date of the Local Plan. Whilst these fluctuations can, in part, be attributed to economic conditions, the availability, location and size of sites coming forward plays a significant role. In previous years, much of Adur's new development has been on smaller infill brownfield sites. With only a limited number of large brownfield sites available for development, (plus allocations from the Adur Local Plan 2017) the delivery of these sites makes a significant difference to the annual number of completions.
- 2.6 However a significant increase in the number of dwellings granted consent can be seen in 2018/19, 2019/20 and whilst a decrease is noted for 2020/21 this is still high compared to residential consents between 2011 and 2018. This is largely due to larger sites coming forward; Riverside and Free Wharf in 2018/19, (the latter forming part of the Shoreham Harbour Broad Location identified in the Adur Local Plan 2017 and allocated in the Joint Area Action Plan 2019), New Monks Farm 2019/20 (allocated in the Adur Local Plan 2017), Adur Civic Centre 2021/22 and Kingston Wharf 2020/21 which falls within Shoreham Harbour Regeneration Area. This indicates that the strategy within the Local Plan (and JAAP) is beginning to deliver; consents will increase further in subsequent years as more key sites come forward. As a result, the delivery rate has begun to increase with 217 net dwellings completed in 2020/21, a significant and positive improvement on the previous figure of 13 net dwellings in 2019/20. This is a strong indicator that the housing delivery rate should continue to increase in future years to reflect the increase in approvals as predicted in the Adur Local Plan.

Current housing supply

- 2.7 As referred to above, the development strategy in the adopted Adur Local Plan (December 2017) seeks to increase the delivery of new housing across the Local Plan area. It has allocated land to accommodate a minimum of 3,718 new homes (177 per annum), including two large strategic greenfield sites and a broad location for development on a series of brownfield sites at Shoreham Harbour.
- 2.8 As part of the evidence base to support the Adur Local Plan, and to ensure "no stone was left unturned", a comprehensive review of the Council's Strategic Housing Land Availability Assessment was undertaken, which reassessed all potential sites, those sites which had potential for development but were not deliverable within five years, rejected sites, employment land, greenfield sites and land owned by public bodies (including the Council). The aim was to identify further sites (both greenfield and brownfield) with potential for development and to identify any barriers to sites coming forward. In January 2020 a consultation on the methodology was undertaken to address the updated NPPF and revised SHLAA methodology. A note setting out responses received, and the minor changes made to the methodology can be found [here](#). The SHLAA is updated annually; the latest 'call for sites' was undertaken between December 2021 and January 2022.
- 2.9 The adopted Local Plan housing strategy relies on a small number of strategic sites to deliver new homes and, as these have longer lead-in times, were anticipated to start delivering in the middle part of the Plan period. It was clear that, for the early part of the Plan period, annual targets would not be met. This was considered at the

Examination of the Adur Local Plan, and accepted by the Inspector. Although therefore Adur can meet its housing targets over the Plan period, as predicted the number of homes actually built over the last ten years has fallen short of the adopted annual housing target. However, as set in the table above, the number of dwellings granted permission is significantly rising, work is progressing on strategic allocations and therefore the indications are that the predicted increase set out in the mid-plan period trajectory is coming to fruition.

2.10 Housing supply is made up of the following sources:

Dwelling completions - using local and West Sussex County Council (WSSCC) data to determine the level of completions each year.

Commitments - Those sites identified as commitments at 1st April of the monitoring year in the Housing Land Supply Study produced annually by WSSCC are those sites that can accommodate five or more units, which have planning permission but have not commenced or are under construction.

Small sites of less than five dwellings (previous threshold was 6 across the County) - these sites continue to come forward. It is not practical to identify and assess all of these sites in terms of their deliverability. Therefore, in forecasting house building on these small sites, it is assumed that all dwellings under construction and 45% of those with planning permission but not yet started will be built. This is based on past evidence of completion rates and this approach was accepted by the Inspector at Examination.

Strategic Housing Land Availability Assessment (SHLAA) sites - The Council's SHLAA has provided the mechanism through which the quantity and suitability of land potentially available for housing development has been determined. Informed by a number of 'calls for sites' the SHLAA is monitored and updated regularly to give the most up to date picture of housing delivery for Adur. As part of the assessment a small number of sites have been identified as having potential for residential use but are not currently available for development. These sites are monitored on a regular basis and officers continue to work with landowners and other stakeholders to bring these sites forward. The threshold has been amended to include sites that are capable of accommodating five or more dwellings in order to ensure consistency with the threshold set by WSSCC (commitments and small sites of less than five dwellings).

Strategic Allocations – In addition to the Shoreham Harbour Regeneration Area (see below) two strategic greenfield sites have been identified in the Local Plan which, together, will deliver a minimum of 1080 new homes.

Shoreham Harbour Regeneration Area - a Joint Area Action Plan was adopted in October 2019 by the relevant Councils. It will deliver a minimum of 1100 new homes in that part of the Harbour falling within Adur District.

Windfall Allowance - A windfall allowance takes account of housing development on sites which it is not possible to identify in advance (e.g. conversions, changes of use etc.). Historic small sites housing delivery data over a ten year period has been used to calculate a windfall allowance of 22 homes per year. To avoid double counting with the small sites commitments, the windfall allowance is not applied to the first three years of the projections.

2.11 This Action Plan has been prepared to consider the delivery rate and how the Council is responding to the challenge of building more homes at a faster rate. It sets out the

challenges being faced and the actions the Council proposes to take to address housing delivery.

Housing delivery analysis

- 2.12 The development strategy for Adur is largely dependent on the delivery of a small number of large sites. The two strategic allocations (New Monks Farm and West Sompting) were identified as having potential to deliver a minimum of 1080 new homes during the early stages of the Local Plan process and officers have continuously worked with the developers, infrastructure providers and other interested parties to develop masterplans for each site. Each site has a specific policy in the Local Plan to guide development.
- 2.13 When the Local Plan was examined in early 2017, masterplanning for both strategic sites was well underway and indications from the developers was that outline planning applications would be submitted to coincide with the examination and to help demonstrate the viability and deliverability of the sites. The projected delivery of both sites was reflected in the trajectory at that time; however applications were delayed (see below). Planning permission was granted for the strategic site at New Monks Farm, Lancing in February 2020 and work has commenced; planning permission was granted for the strategic site at West Sompting in September 2021. (See below for more details).
- 2.14 These two sites provide a significant proportion of planned new homes in Adur and their delivery is critical to achieving the overall strategy of the Plan.

Strategic allocation: Land at West Sompting - The strategic allocation comprised a minimum of 480 dwellings together with mitigation for off-site traffic impacts. There was initially some delay in the applicants undertaking public consultation and stakeholder engagement, preparing the necessary supporting statements and completing pre-application consultation with the Council; and later in making amendments. A hybrid planning application was submitted and validated in February 2019; an amended proposal was made in summer 2021 to reduce the number of dwellings to 469 which was granted permission in September 2021 subject to S.106 sign off. The Housing Trajectory as at 1st April 2021 anticipates that housing delivery will commence in 2022/23 with development to be completed in 2030/31.

Strategic allocation: New Monks Farm - The strategic allocation within the Adur Local Plan 2017 comprised a mixed use development of 600 homes, a minimum of 10,000 sqm employment generating floorspace, land to accommodate a 2 - form entry primary school, infrastructure improvements and the relocation of a Gypsy and Traveller site.

A planning application for this site was submitted in June 2016 (validated in July 2017) proposing the development of a 33,000 sqm Ikea store together with 600 new homes, a country park, a new Gypsy and Traveller site, land for a new school and a community facility. This was the largest and most controversial development proposal to be considered by Adur District Council and the planning process took 15 months to secure a Committee resolution. In view of the level of retail floorspace proposed the application was referred to the Secretary of State. A subsequent holding direction was issued and after 7 months, the Council was notified on 22nd May 2019 that the Secretary of State was not going to "call-in" the application and

the decision notice could be issued. Whilst waiting for the call in decision, work progressed on the detailed s106 agreement. Planning permission (AWDM/0961/17) was granted on 4th February 2020 (which included full permission for 249 dwellings, outline permission for 351). As at June 2022, a number of homes have been completed; the new Gypsy and Traveller Site has been completed and all pitches occupied. Although in July 2021 IKEA announced that it would not be delivering its retail store, all infrastructure required on-site will still be delivered; and works on the new roundabout junction with the A27 are due to start shortly. The removal of the retail store will allow the authority to seek commercial floor space (consistent with the Adur Local Plan policy requirement) but there may be an opportunity for further residential development.

Strategic Allocation: Shoreham Harbour Regeneration Area

- 2.15 To ensure the regeneration of Shoreham Harbour the Council has worked in partnership with West Sussex County Council, Brighton & Hove City Council and Shoreham Port Authority using funding secured from previous Government initiatives (Growth Funding and Eco Town Funding). The Partnership developed a Joint Area Action Plan (JAAP) which was adopted in October 2019. A delivery strategy has been prepared and the Partnership has an active Delivery Sub Group taking a proactive approach towards bringing the various brownfield sites forward for development.
- 2.16 A number of sites within this broad location for development are now starting to come forward. One site has planning permission to develop 540 flats and demolition, remediation works and flood risk measures have been completed/are underway (Free Wharf, AWDM/1497/17). This site has secured Housing Infrastructure Funding of approximately £10 million to deliver the new flood defence works and public realm. The new flood wall has been constructed and revised plans have been recently approved for phase 1 incorporating the affordable housing units.
- 2.17 A planning application was granted consent (subject to legal agreement) in July 2020 for 255 dwellings and commercial floorspace at Kingston Wharf (AWDM/0204/20), and the legal agreement signed in January 2021. The Hyde Group has entered into a strategic partnership with Homes England and this site has been earmarked to deliver 100% affordable homes. (This post-dates the monitoring period and therefore is not included in the tables above – however it is highlighted here to demonstrate that commitments continue to increase). Preparations are advanced in relation to commencement of development on this site.
- 2.18 Other developments within the Shoreham Harbour broad allocation which have been developed, include the following:
- 63/67 Brighton Road (Humphrey's Gap) (AWDM/1625/16). This site has been developed for 14 units.

Other sites in the Shoreham Harbour Regeneration Area are indicating considerable progress, with the following applications having been submitted in August 2021 and going to planning committee in autumn 2022:

- AWDM/1473/21: 183 dwellings at the Frosts site, Brighton Road, Shoreham Harbour (plus commercial units).

- AWDM/1481/21: Howard Kent, Brighton Road, Shoreham Harbour: 45 units, and a commercial unit.

2.19 It should be noted that several sites within the Shoreham Harbour area are likely to deliver a greater number of dwellings than originally anticipated; as such, the minimum figure of 1100 dwellings indicated in the Adur Local Plan figure is likely to be exceeded. This will further boost housing supply. The Council is undertaking a review to consider any implications arising from this (for example, with regards to infrastructure requirements).

Other Site Updates

2.20 Outside of the strategic allocations, development is progressing well. Updates on a few key sites are given here to indicate progress and anticipated increased rates of permissions and completions:

- Cecil Norris House (AWDM/1742/18): A development of 15 new Council homes in the centre of Shoreham which were completed in 2021.
- Land at 7-27 Albion Street, Southwick (AWDM/0954/18): A development of 55 (gross) new Council homes, granted permission in 4th May 2020. Development has commenced.
- Adur Civic Centre: an application has been granted permission (subject to S.106 sign off) in March 2022) for the redevelopment of the former Council Civic Centre for 171 units and business floorspace. (AWDM/1450/21). This is another site due to deliver 100% affordable housing with Homes England affordable housing grant.
- The Pilot Pub, Station Road (AWDM/2139/20) - Demolition of existing building and construction of a new six storey building containing 34 one & two bedroom flats; 70sqm ground floor commercial space (Class E). Granted permission in April 2021 but awaiting S.106 sign off.

Potential barriers to delivery

2.21 The physical and environmental constraints of the area strongly influence its capacity to accommodate new dwellings within the Local Plan area, with the sea to the south, the South Downs National Park to the north and Local Green Gaps forming an important component of the landscape setting of towns/villages in Adur, which prevent coalescence of Adur's settlements. A key challenge is to balance the need for development against the need to minimise the impact on the countryside and landscape character. There are also flooding and key infrastructure constraints which impact on the availability of land for development.

2.22 Additionally, many parts of the Local Plan area are already intensely developed or the local characteristics are such that they make it very difficult to facilitate further significant development; for example there is a predominance of suburban housing with relatively few areas where larger scale growth and change can be easily accommodated.

2.23 As mentioned previously, there is also a significant reliance on a relatively small number of larger sites in the area. An associated problem is that the housing market

in the area is dominated by a relatively small number of key landowners and major developers, reducing possibilities for the smaller developers or other arrangements. Additionally some sites are subject to complex planning histories or other planning complexities such as multiple ownership. As a consequence, many opportunities for development tend to come forward at a slow pace.

- 2.24 The provision of appropriate infrastructure is important to support new development, particularly on the strategic sites and was and continues to remain a key aspect of Local Plan preparation and progression. The Council will update its Infrastructure Delivery Plan working with key providers as required, as the review of the Adur Local Plan progresses.
- 2.25 There is also a long standing under provision of affordable and social housing. The Council is addressing this in part by promoting use of its own sites for affordable housing development. These include Cecil Norris House (above), Land at Albion Street (above) and a review of small garage sites which has resulted in the progression of several small affordable development (refer to paragraph 3.25).

Development costs and viability

- 2.26 The latest MHCLG report Land Value Estimates for Policy Appraisal 2019 (published 2020) gave a residential land value figure for Adur of £4,100,000.
- 2.27 The Adur Whole Plan and Community Infrastructure Levy Viability Assessment 2017, provided an appraisal of the viability of the Adur Local Plan in terms of the impact of its policies on the viability of development expected to be delivered during the plan period. It concluded that the key strategic sites (both greenfield and brownfield) which are key to the delivery of the housing strategy are viable, provided that zero Community Infrastructure Levy is applied, should this be introduced by the Council (due to high infrastructure costs).
- 2.28 An updated Whole Plan Viability Assessment will be prepared as part of the update of the Adur Local Plan. The Government is also proposing changes to the system of developer contributions, and the Council will respond to this accordingly.

3. Key Actions & Responses

- 3.1 The Council has already undertaken a significant amount of work to identify the barriers to bringing forward some of the key sites in the area as discussed above. It will continue to be proactive in searching for additional opportunities to bring forward both existing and new sites. The following are those identified areas where it is considered that regular reviews are undertaken to ensure that potential opportunities are identified, robustly assessed and delivered expediently.

Ensuring housing delivery remains a Council priority

- 3.2 Housing delivery is already a high-level corporate and political priority for Adur, as detailed in the Council's Corporate Plan - Platforms For Our Places. Strong corporate leadership will be an ongoing requirement to ensure housing delivery remains a focus

across the Council. This is also reflected in other Council strategies and policy documents - see section 1 above.

- 3.3 The Council has an internal Affordable Housing Delivery group with representatives from Housing, Planning, Finance, Legal, and Major Projects Teams to ensure a co-ordinated approach. The primary focus of the Affordable Homes Delivery Group is to identify opportunities for the delivery of affordable homes through more efficient use of Council owned land, together with the acquisition of land and premises for redevelopment.

Planning policy

- 3.4 There are a number of policy approaches that can help with the delivery of more new homes whilst balancing the wider sustainable, community and economic needs of Adur. In order to deliver sites and respond to changes in the economy the Council takes a flexible approach to the application of its adopted policies. This includes residential tenure mix, loss of employment and other land use, where appropriate. At present the development plan for Adur consists of:
- The Adur Local Plan 2017
 - The Shoreham Harbour Joint Area Action Plan 2019
 - The West Sussex Joint Minerals Plan 2018, partially revised 2021
 - The West Sussex Waste Local Plan 2014.
- 3.5 The policies in the adopted Local Plan are kept under review to monitor their effectiveness. This is reported through the Annual Monitoring Report.
- 3.6 The adopted Adur Local Plan requires 30% affordable for all developments over 11 dwellings and emphasises the need for the majority (75%) of the affordable housing provided to be delivered as rented accommodation reflecting local need. Following a decision by the Executive Member for Regeneration, from 8th April 2020 Adur District Council will use the NPPF threshold of 10 dwellings for seeking affordable housing contributions, rather than the 11 dwellings in the adopted Adur Local Plan 2017. This is set out in an Interim Position Statement published in April 2020, which may be found [here](#).
- 3.7 An update of the Adur Local Plan 2017 is being progressed. To inform this review, the evidence base is currently being updated, in many cases jointly with Worthing Borough Council, including the Strategic Market Housing Assessment 2020, the Strategic Flood Risk Assessment 2020 and the Open Space Study, Playing Pitch Strategy and Indoor Built facilities/ Needs Assessment report 2019.
- 3.8 The updated Adur and Worthing Strategic Housing Market Assessment may be found [here](#). It addresses housing needs over the period 2019-2036 and 2039.
- 3.9 The Council has published an Interim Position Statement regarding First Homes (agreed 3rd May 2022) which can be viewed [here](#).

More effective use of land

- 3.10 A key policy in the Adur Local Plan 2017 encourages the most efficient use of land which will usually mean, where appropriate, developing at densities above those of the surrounding areas. The optimum density of a site should be achieved through a design led approach to determine the capacity of a site.
- 3.11 The expectation is that residential development of a family housing scheme should achieve minimum densities of 35dph whilst flats, mixed residential developments in or close to town centres or near public transport hubs should be achieving densities in excess of this. Where developments do not demonstrably optimise the housing density of a site then permission will be refused. The Council has adopted a Supplementary Planning Document "Space Around New Dwellings and Flats" which sets out the minimum external space standards for new development.
- 3.12 The regeneration of Shoreham Harbour provides a unique opportunity within the District to provide high density housing led mixed use development. The Joint Area Action Plan therefore proposes a minimum density of 100 dpa within this defined area, which is considered appropriate for this waterside development. In reality, some applications coming forward within this area are achieving higher densities than this. As such, the approach to densities will be reviewed through the update of the Adur Local Plan.

Specific Site Policies

- 3.13 The key strategic allocations in the Local Plan have dedicated policies which set out the requirements for delivery. This provides developers and landowners with clear guidelines of the mix of uses, level of development, infrastructure etc. with the aim of speeding up the decision making process.

Supplementary Planning Documents

- 3.14 There are a number of Supplementary Planning Documents relevant to the delivery of housing:

Planning Guidance for Infrastructure Provision 2013 - this document gives clarity as to how infrastructure is to be provided as part of development proposals in line with the Local Plan and NPPF. This is an interim document pending the production of further work; develop contributions will also be reviewed in due course to reflect the emerging Adur Local Plan update.

Development Management Standard No 1: Space Around New Dwellings and Flats SPD (Updated January 2018) - sets out external space standards required around all new build homes.

Demonstrating Genuine Redundancy of Employment Sites 2019 - Supports the employment policy in the Local Plan which seeks to ensure that employment sites are developed for alternative uses (including residential) only when they are demonstrated to be no longer required for employment use.

Shoreham Harbour Flood Risk Management Guide (2015) - developed to ensure a consistent approach to flood defence infrastructure delivery in the Shoreham Harbour Regeneration Area. It aids developers of sites allocated in the Shoreham

Harbour JAAP to identify the flood defence and mitigation measures required to demonstrate that a development will be safe for its lifetime and that flood risk has been reduced.

Development briefs

3.15 Development briefs are prepared, where appropriate, to guide the future redevelopment of specific sites. By providing more detailed site analysis and development principles they provide landowners and developers with a clear indication as to what which proposals are likely to be granted planning permission which, in turn, reduces uncertainty.

3.16 The purpose of development briefs is to:

- Improve the quality and consistency of advice provided to developers;
- Improve the efficiency of the planning and development process; and
- To improve the quality of the built environment.

3.17 The Council will continue to review its guidance in response to changes in policy to ensure there is adequate information for a developer to know what is expected from new development, including at the stage of the initial investment/land purchase, and to ensure the relationship between local and national policy guidance is clear.

Improving our planning application processes

3.18 Whilst the Council has not identified the Development Management planning process as a barrier to delivery it does recognise the importance of monitoring its performance and addressing any issues that may arise swiftly.

3.19 It can be seen from the data below on determining planning applications that the Councils performance and the speed of decision making is good and delays in the system are minimal. It can therefore be concluded that the authority has an efficient decision making process in place.

Percentage of applications determined within the prescribed timetable

Year	Total Applications	Majors %	Minors %	Others* %
2014/2015	541	100%	67%	86%
2015/2016	541	100%	75%	84%
2016/2017	436	100%	82%	90%
2017/2018	414	100%	85%	90%
2018/2019	444	80%	96%	93%
2019/2020	419	86%	92%	98%
2021/21	437	100%	100%	98%

**(Please note this figure excludes prior approvals, Certificates of Lawfulness, etc).*

Principal Planning Officer (Major Applications)

- 3.20 There are a number of major development sites identified to come forward over the Plan period. In order to ensure that are dealt with in the most efficient manner the Council has a dedicated Principal Planning Officer (Major Applications) with responsibility to provide detailed pre-application advice, enter into early stage negotiations in respect of s106 Agreements and liaise with other Council departments and other stakeholders. The aim is to ensure that the application process through to decision making is as smooth as possible by providing continuing and greater certainty for all parties involved.

Pre-Application Advice Service

- 3.21 To save unnecessary delays in the planning application process the Council has successfully introduced a Pre-Application Advice Service. Since 2021 this has been refocussed to address major development proposals only, given the rise in applications experienced by the Council.

Planning Performance Agreements

- 3.22 In the last few years the Council has entered into planning performance agreements with a number of applicants to provide a tailored project management framework for handling a development proposal from pre-application stage through to decision and any compliance with conditions. These have been used successfully on some of the major development schemes and will continue to be used where appropriate.

Major Projects & Investments Team

- 3.23 An experienced cross-discipline Major Projects & Investments team has been set up to allow the Council to be more proactive in identifying issues and barriers to housing delivery on major sites. Part of their remit is to develop close working relationships with land owners/developers of the key sites across the District together with infrastructure providers and other departments in the Council in order to unlock barriers to delivery. This includes a full review of the Councils' own estate and a more proactive land assembly and 'commercial' approach to site delivery if required. The team has been successful in leveraging public funding where available and developing business cases to help unlock sites.
- 3.24 The Council has also appointed a Development Manager to oversee both the delivery of council owned sites and to identify any opportunities to acquire land in the private sector which could be developed for new affordable homes.

Other initiatives to support housing delivery

Council Owned Land

- 3.25 The Council as a landholder has identified a number of its own sites that may be surplus to requirements. This allows the Council to prioritise and use resources to unblock any barriers to delivery as well as providing more delivery certainty. As well as progressing Albion Street and Cecil Norris House through this process (see above)

the Council has undertaken a review of its small garage sites and has carried out community consultation with regards to redeveloping some of these sites for residential use. These include Garages at Gardner Road, Southwick and Garages at Wilmot Road, Shoreham both of which have received planning permission for two dwellings and five dwellings respectively.

Land in Private Ownership

- 3.26 A number of the major/strategic sites, which are critical to the delivery of the housing strategy, are controlled by the volume/national housebuilders who are also developing large sites in neighbouring local authorities. This could be a significant factor in delivery as volume housebuilders are known to limit the release/commencement of development sites in order to maintain strong demand within the housing market area. The Council continues to work closely with these key developers/landowners and others to ensure the housing trajectory reflects the most realistic delivery timescales.

Working Groups

- 3.27 As well as the Affordable Homes Delivery Group referred to above, Planning Officers meet regularly with other districts and boroughs in West Sussex as part of Duty to Co-operate and to consider a range of cross boundary issues, including addressing the delivery of housing. This has allowed for best practice to be disseminated that when implemented could help to 'unblock' delivery constraints.
- 3.28 The Council is a member of the West Sussex and Greater Brighton Strategic Planning Board which seeks to jointly address these 'Duty to Co-operate' strategic planning and development issues. The constituent authorities have prepared a Local Strategic Statement (LSS) and update (LSS2) which set out long term strategic objectives and spatial priorities for delivering these in the short to medium term. The Board is currently in the early stages of preparing the third revision to the LSS (LSS3) which will explore options for meeting the area's unmet needs for housing, employment and infrastructure. LSS3 will develop a longer-term strategy for the sub-region over the period 2030-2050. This will be a non-statutory strategic planning framework to help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans.
- 3.29 Housing delivery is a key consideration and the District Council has made it known to other local authorities within the Partnership that, despite taking a very positive approach to development, Adur will not be able to meet its full housing needs. As a consequence, requests were, and will continue to be made to neighbouring authorities as part of the 'Duty to Co-operate' to ask whether they have any potential to help meet some of Adur's housing shortfall.

Agents Forum

- 3.30 The Councils' Place and Investment Team has set up an Agents Forum comprising key residential and commercial agents. The purpose is to create an open forum for dialogue about trends and issues impacting on development arising across the District.

Corporate Marketing

- 3.31 The Council has sought to raise the profile of the authority and the key development opportunities it offers. Initiatives include a dedicated website.

Relationship with developers, landowners and agents

- 3.32 The Council recognises the fundamental importance of building relationships with the developers, landowners and agents within the District.
- 3.33 Contact with these partners is an essential part of assessing whether sites are available for development as part of the Strategic Housing Land Availability Assessment. This is carried out on a regular basis to ensure that only those sites that are genuinely available can be considered as part of the potential housing land supply. As part of this, a 'Call for Sites' exercise is undertaken regularly.

4. Monitoring

Monitoring

- 4.1 Housing delivery is monitored jointly by West Sussex County Council and Adur District Council and is reported through the Annual Monitoring Report published each December (to cover the preceding financial year). This includes an update on sites identified in the Strategic Housing Land Availability Assessment and Self Build and Custom Housebuilding Register. In addition the Council maintains and updates the Brownfield Register.
- 4.2 The results of the Housing Delivery Test will be reported through the Adur Local Development Framework Members Working Group and, where necessary, the Action Plan will be reviewed and published in line with the requirements of the National Planning Policy Framework. Any changes in legislation, government policy or practice guidance will also be reflected in any update.

5. Conclusion

- 5.1 This is the fourth Action Plan produced by the Council. Although housing delivery declined in 2019/20, there has been a marked significant increase in delivery during 2021/22 which reflects the significant number of dwellings being granted permission in 2018/19 and 2019/20 coming to fruition. These characteristics are very much a reflection of the limited supply of available land in Adur, and the fact that supply relies on several larger sites coming forward.
- 5.2 This Housing Delivery Action Plan demonstrates the proactive approach being taken by the Council and its partners to increase the level of housing delivery in the Local Plan area. Significant steps have been taken within the Planning Service and beyond to help bring forward identified development sites and identify new ones. Some of the key steps identified in this Action Plan include:
- The review of the Local Plan;
 - A focussed approach to bring forward existing development through land assembly, improved marketing and partnership working (often led by the Council);
 - A full and positive review of all potential development opportunities (including greenfield sites) with a robust and comprehensive Strategic Housing Land Availability Assessment, which includes a regular 'call for sites';
 - Improved Development Management processes;

- A dedicated Principal Planning Officer (Major Applications) and a Major Projects & Investments Team;
- Alignment of plans and strategies (internal and external) to deliver housing objectives;
- A clear Corporate commitment to deliver development on its own sites and to work with partners and other landowners to facilitate delivery on theirs;
- Continued co-operation with neighbouring local authorities.

5.3 It is clear that, as predicted through the Adur Local Plan 2017, the projected increase in dwellings being granted planning consent is being seen in reality as sites come forward. Furthermore, the Council has put in place actions and interventions that will help to increase housing delivery in the District. However, looking longer term past this current plan period, the Council has no way of addressing the main constraint which is a tightly drawn District boundary, environmental constraints and very limited land availability. However the Adur Local Plan review will take a positive approach to maximising the opportunities available to facilitate housing delivery and continue to work with neighbouring authorities through the West Sussex and Greater Brighton Strategic Planning Board to jointly address strategic planning and development issues.

**Adur District Council
Planning Policy
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA**



**ADUR DISTRICT
COUNCIL**