

ADUR DISTRICT COUNCIL

HOUSING DELIVERY TEST

ACTION PLAN -

2023 Test Result

Published June 2025



**ADUR DISTRICT
COUNCIL**

[THIS PAGE HAS BEEN LEFT INTENTIONALLY BLANK]

1. Introduction

Context

1.1 This Housing Delivery Test Action Plan is based on the 2023 Test Result which was published in December 2024. This action plan covers three monitoring periods 2020/21, 2021/22 and 2022/2023.

1.2 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.

1.3 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.

1.4 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 3,718 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 (see paragraphs 2.14 - 2.19) which would deliver a

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

minimum of 1,100 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.

1.5 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 predicted the delivery of these sites from 2022/23. Until this point, housing delivery was, 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.

1.6 The adopted Local Plan contains a commitment to review within 5 years, and the Government now requires local authorities to have up-to-date plans in place in due course. As such, an update of the Local Plan is being undertaken to ensure it remains relevant and addresses Adur's needs for development and infrastructure. The Council is intending to progress the new local plan under the emerging plan-making system based on the Levelling Up and Regeneration Act 2023. However work on the emerging Adur Local Plan evidence base is progressing and a public consultation on 'Issues' has recently been carried out (26th November 2024 - 5th January 2025). The timetable for the Local Plan update may be found in the latest [Local Development Scheme 2025 - 2028](#) (March 2025).

Reasons for this Action Plan

1.7 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 latest revised NPPF (December 2024) sets out the following policy consequences that will apply where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years:

a) where delivery **falls below 95%** of the requirement over the previous three years, the authority **should prepare an action plan** to assess the causes of underdelivery and identify actions to increase delivery in future years;

b) where delivery **falls below 85%** of the requirement over the previous three years, the authority should **include a buffer of 20%** to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an **action plan**;

c) where delivery **falls below 75%** of the requirement over the previous three years, **the presumption in favour of sustainable development applies**, as set out in footnote 8 of this Framework, in addition to the requirements for an **action plan** and **20% buffer**.

1.8 This update is the sixth Action Plan and its focus has been to consider whether there are any additional measures that can be included to help improve the delivery of new dwellings. 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.

How is the Housing Delivery Test Measured?

1.9 The methodology for calculating the HDT measurement is set out in the Housing Delivery Test Measurement Rulebook (latest version published 12th December 2024). It is based on the Ministry of Housing, Communities & Local Government (MHCLG) 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 is usually published on an annual basis by MHCLG.

1.10 For the test, the government compares the number of additional homes that were delivered in an LPA over the past three years with the number of homes required in that LPA. For LPAs with an up-to-date local plan (a plan that was adopted or reviewed in the past five years), the number of homes needed is the figure set out in the local plan. For other LPAs, it is the figure produced by the standard method. For Adur, the sixth HDT (2023 measurement published in December 2024) covers the three monitoring periods 2020/21, 2021/22 and 2022/23. For Adur, housing delivery will be measured against the adopted Adur Local Plan 2017 target of 177 homes per annum whilst the plan is within 5 years of adoption. However, for test year 1 (2020/21), a figure of 118 was used - this was the annual requirement figure adjusted by the Government to reflect circumstances resulting from the Covid-19 pandemic. For test year 2 (2021/22), it has been reverted back to Adur Local Plan Plan target of 177 homes and therefore no adjustment was made. For test year 3 (2022/23), given that the Adur Local Plan turned 5+ years part way through the

2022/23 measurement (which runs from 1 April 2022 to 31 March 2023) a split calculation has been used (based on the Plan figure of 177 and the standard methodology figure). The housing requirement is apportioned between the plan requirement and local housing need based on the number of days in the year giving a figure of 198.

How did Adur perform against the Housing Delivery Test?

Adur Housing Delivery Test results – 2022/23

Year	Delivery Figure	Annual Housing Target*
2020/21	213	118
2021/22	97	177
2022/23	89**	198
Total over 3 years	399	493
The Housing Delivery Test measurement for Adur is 399 / 493 = 81%		

* For the 2023 measurement, there is a reduction in the 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; requirement is assessed from 1 August 2020, meaning that 243 days are assessed. This is to account for the considerable variations in levels of housing delivery as local planning authorities and the construction industry faced disruption on a national, regional, and local level due to the pandemic. No adjustment was made in the 2021/22 and 2022/23 monitoring years.

**For 2022/23 the delivery figure of 89 units is lower than the net completions figure (106) as shown in the table below (titled Net Dwelling Completions 2011/2012-2022/23). This is due to a loss of 30 communal accommodation units. When calculating the HDT figures MHCLG applies a ratio of 1.8 to the communal losses / gains and this represents the number of actual dwellings within the housing stock that are freed up / lost due to communal accommodation development. As a consequence there is an extra 16.67 'losses' to be taken into consideration off the net completion figure when it comes to calculating the HDT thus resulting in the reported figure of 89.

1.11 The Housing Delivery Test 2023 (covering the period 2020/21-2022/23), published December 2024, indicates that Adur delivered 81% of its requirement. As a consequence, the presumption in favour of sustainable development **no longer**

applies; an Action Plan will be prepared, and in calculating the five-year housing land supply, a 20% buffer must be added. This is an improvement on the previous HDT result (72%) based on the 2022 Test.

Purpose and Objectives

1.12 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. 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.

1.13 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

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

'Our Plan' (Corporate Strategy)

1.15 ['Our Plan'](#) was published in November 2022 and provides a framework for Adur & Worthing Councils for the coming three years. (This supersedes Platforms for our Places - Going Further: 2020-2022 as referred to in the previous iterations of the Housing Delivery Test Action Plans). Our Plan has been designed to be 'organic' and thus evolve as we go along. It is based on the following three principles:

1. Resilient
2. Adaptable
3. Participative

1.16 These principles are supported by five missions which are complex issues which must be addressed for Adur (and Worthing) to thrive long term. This includes supporting people to live healthy and safe lives, creating towns and places where people are able to afford to live well, and encouraging people to make changes that will help us all to address climate change. Of relevance to this action plan, the mission ‘thriving people’ sets out the following:

Residents can lead positive, healthy and independent lives. Access to the right support is there when they need it. They are included and valued in their local community. They can take part in decisions about their area and the services they receive.

1.17 The Plan recognises that in order to achieve this mission, everyone must have a safe, secure and sustainable home.

Housing Strategy 2025 - 2030 (May 2025)

1.18 Since the last Housing Strategy was published in 2020, there have been significant changes in national housing policy. The implementation of the Homelessness Reduction Act (2017) has significantly changed the Councils’ legal duties towards households facing homelessness. The continued rise in rough sleeping and homelessness, and concerns over the quality of rented homes, have led to further improvements in housing rights and standards. This has led to the introduction of new regulations including the Social Housing Regulation Act, which aims to improve the standards, safety, resident voice and landlord accountability.

1.19 The Housing Strategy also forms the foundation of further strategies and policies including the next Homelessness and Rough Sleeping Strategy 2025/26 and will provide a framework for more detailed housing plans, including the (Adur Homes) Improvement Plan agreed with the Housing Regulator and the Adur and Worthing Housing Allocations Policy. It connects to other major strategies and plans including our Local Plans and the priorities of the Adur and Worthing administrations described above.

1.20 This overarching document details the Council's housing vision and priorities for Adur & Worthing. The six strategic priorities we have identified will help us in our work to help our residents have a home in which they feel comfortable and safe and that positively contributes to their health and wellbeing:

Priority 1: Improving the quality of our homes and neighbourhoods

Priority 2: Increasing the amount of genuinely affordable housing

Priority 3: Improving the sustainability and climate resilience of our homes

Priority 4: Preventing homelessness and rough sleeping

Priority 5: Improving health, wellbeing and community support

Priority 6: Empowering residents to drive change

Shoreham Harbour Joint Area Action Plan (JAAP) (October 2019)

1.21 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 1,100 dwellings within Adur as identified within the Adur Local Plan 2017. The Plan was adopted by the relevant Councils in October 2019.

Adur and Worthing Growth Deal

1.22 The Adur and Worthing Growth Deal was signed in March 2017 as an ambitious 5-year partnership programme of regeneration which focussed on 7 key priorities across the area, including:

- Lancing and Shoreham, development at New Monks Farm and Shoreham Airport
- Shoreham Harbour regeneration
- Pond Road, Shoreham

The Growth Deal between West Sussex County Council (WSCC) and Adur District Council is currently undergoing a refresh in order to continue attracting investment and combining resources to deliver local economic growth.

Approach and Methodology

1.23 The Council already has in place a long standing housing monitoring arrangement with West Sussex County Council (WSCC) and also maintains its own comprehensive monitoring system that complements the monitoring work undertaken by WSCC. The Annual Monitoring Report (published each December to cover the preceding financial year) provides updates regarding the housing trajectory. This includes an update on sites identified in the Strategic Housing Land Availability Assessment. The Council also publishes a separate Housing Land Supply Position on an annual basis. In addition the Council maintains and updates the Brownfield Register. 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.

1.24 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
- 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 1996 Adur Local Plan, and derived from the South East Plan (2006-2013) and associated work. This target recognised 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 2023, 1,283 net new homes have been completed.

Net Dwelling Completions 2011/2012-2022/23

Year	Net
2011/12*	193
2012/13	146
2013/14	93
2014/15	96

2015/16	31
2016/17	64
2017/18	114
2018/19	122
2019/20	13
2020/21**	208
2021/22	97
2022/23	106
2023/24***	120
Total	1,283

* Although small in number, it should be noted that the figures for 2011/12 includes new homes delivered within that part of Adur which falls within the South Downs National Park Authority (SDNPA) area. Since that date, the SDNPA has produced its own AMR.

** 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.

*** This HDT Action plan focuses on the period up to 2022/23 but for information purposes, net dwelling completions for 2023/24 is provided. Please note that this figure (120) is not accounted for in the total figure.

The number of homes that have actually been built is 1,283 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 2011-2023

Year	Local Plan Target	Net Residential Approvals	Net Residential Completions
2011/12	177	60	193
2012/13	177	72	146
2013/14	177	187	93
2014/15	177	137	96
2015/16	177	147	31
2016/17	177	86	64
2017/18	177	44	114
2018/19	177	689	111
2019/20	177	656 (Gross)	13
2020/21	177	384 (Gross)	208
2021/22	177	408 (Gross)	97
2022/23	177	116 (net)	106

2.4 There has always been a considerable fluctuation in the completion 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.

2.5 However a significant increase in the number of dwellings granted consent can be seen in 2018/19 and 2019/20 mainly due to larger sites coming forward; such as 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) and New Monks Farm coming forward in 2019/20 (allocated in the Adur Local Plan 2017).

2.6 Whilst a decrease is noted for 2020/21 this is still high compared to residential consents between 2011 and 2018. In 2021/22, the number of dwellings permitted increased again largely due to Kingston Wharf (255 units), The Mannings (74 units) and Marquis of Granby (9 units) receiving consent. With regards to 2022/23, the net number of dwellings decreased due to no sites at Shoreham Western Harbour Arm being permitted during this monitoring period (for information Frosts (176 units) and Howard Kent (45 units) were permitted in 23/24 monitoring period). The majority of sites being permitted during this period were small sites. However, a Reserved Matters application for New Monks Farm which sought an increase of 34 dwellings from the outline approval (351 dwellings) was approved in February 2023. This resulted in a revised figure of 385 dwellings to be delivered at New Monks Farm. The additional 34 units have been counted within the 22/23 monitoring period. However, despite this, when measured against the standard methodology, there is an under-supply of completions.

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 11 (177 per annum), including two large strategic greenfield sites and a broad location for development on a series of brownfield sites (Western Harbour Arm) 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 SHLAA methodology was undertaken to address the then updated NPPF. A note setting out responses received, and the minor changes made to the methodology can be found [here](#). The SHLAA is updated annually; a ‘call for sites’ was undertaken between October - January 2023 and an additional call for sites was carried out between October 2024 - January 2025 (which falls outside of the monitoring period of this Action Plan).

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. As set in the table above, 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 (WSCC) 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 WSCC 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 supply 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 was amended in 2020 (as part of the SHLAA methodology review) to include sites that are capable of accommodating five or more dwellings in order to ensure consistency with the threshold set by WSCC (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 (West Sompting and New Monks Farm)

were identified in the Adur Local Plan which, together, will deliver a minimum of 1080 new homes.

Shoreham Harbour Regeneration Area - a Joint Area Action Plan (JAAP) was adopted in October 2019 by the relevant Councils. The JAAP seeks to deliver a minimum of 1,100 new homes in that part of the regeneration area falling within Adur District. Development is already coming forward at significant levels and thus the minimum requirement will be exceeded.

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 18 (2022/23) homes per year. For information, the windfall allowance for 2023/24 is 19 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.

Housing delivery analysis

2.11 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.

2.12 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 commentary below). Planning permission was granted for the strategic site at New Monks Farm, Lancing in February 2020 and development is well underway with 254 units being completed as at 1st April 2024; planning permission was granted for the strategic site at West Sompting in September 2021. (See below for more details).

2.13 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 S.106 was signed on 7th August 2023. Phase 1 for 96 units has been approved in full. Development commenced during the 2024/25 monitoring period.

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 in history 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).

A Reserved Matters application for the additional dwellings was submitted in 2022. This proposed an increase of 34 dwellings from the outline approval. The plans submitted related to the erection of 385 dwellings and Community Hub (Flexible Class E/F1/F2 use). This application went to Adur Planning Committee on 30th November 2022 with the decision to grant the application subject to the completion of a planning obligation. The Deed of Variation to the original s106 agreement Adur Annual Monitoring Report 2022-23 12 (under AWDM/0961/17) was signed on 13th February 2023 and supersedes some of the previous obligations. It was agreed that, across the phases, a total of 180 affordable homes will be delivered, consistent with the policy requirement. Since the Reserved Matters application was granted consent in February 2023, the total number of affordable homes to be delivered has increased to 190.

Between 2020 - 2024, WSCC monitoring indicates that 254 dwellings have been completed. A total of 23 Affordable Houses were completed in 2021/2022, 12

affordable units completed in 2022/2023 and a further 40 affordable units completed in the 2023/24 monitoring period thus giving an overall total of 75 affordable dwellings being completed to date. 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; with a new roundabout junction being implemented in 2024. The non-implementation 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

2.14 As referred to in section 1, The Adur Local Plan (adopted 2017) allocated the Shoreham Harbour Regeneration Area as a broad location for development; subsequently the Shoreham Harbour Joint Area Action Plan (adopted 2019) set more detailed policy requirements for the regeneration area. 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.

Western Harbour Arm

2.15 Sites within the Western Harbour Arm are coming forward for development, earlier in the plan period, and at greater densities than previously anticipated. As a result the overall number of dwellings delivered across the JAAP area is exceeding the minimum figure (1,100) allocated in the Adur Local Plan and Shoreham Harbour Joint Area Action Plan. These are positive indications in terms of demonstrating the demand for the sites; willingness of developers to invest in Adur, and bringing new homes of various tenures forward; however there are some community concerns regarding the provision of infrastructure given the higher levels of housing and the design and 'placemaking' aspects of the new development. Further details on this can be found later on in this section.

2.16 The majority of dwellings being delivered at the WHA are affordable tenures (59% of the housing permitted in the WHA is affordable, roughly twice the requirements of the relevant policy) and a significant proportion of which will be occupied by people currently on the council's waiting list for a home.

2.17 A [‘Permissions to Date’](#) document (July 2024) has been published on the Council website to give an overview of those developments granted permission in the WHA, and includes information such as densities, mix of dwellings, proportion of

affordable homes, and summaries of on-site and off-site infrastructure. The table below outlines the approved number of dwellings and density at the WHA as at July 2024.

Site	Dwellings	Density (dwellings per hectare)
Free Wharf AWDM/1497/17	587	199 dph
Kingston Wharf AWDM/0204/20	255	250 dph excluding commercial land
Mariners Point AWDM/0501/12 (completed and occupied)	132	189 dph
67 Brighton Road (Humphrey's Gap) AWDM/1625/16 (completed)	14	432 dph
Frosts AWDM/2039/22	167	259 dph
Howard Kent AWDM/1962/22	45	96 dph
New Wharf*	62	170
Total	1,271	

* A planning application (AWDM/0886/23) for 62 residential units at New Wharf (Paladone) was submitted in July 2023 and received approval at Adur Planning Committee on 4th December 2023 subject to S.106.

2.18 For a short term, the Council appointed a dedicated Shoreham Harbour Delivery Manager on a consultancy basis to undertake a review and analysis of development coming forward at the Shoreham Harbour Western Harbour Arm. A Placemaking and Design-based study of those sites on the Western Harbour Arm which have yet to come forward for development is also being progressed (work on this study commenced in 2024).

2.19 In addition, as part of this review, a number of topic papers were produced to look at specific matters, relevant planning policies, and how they have been addressed in developments coming forward within the Western Harbour Arm. Topic papers on air quality (July 2023) , open space (July 2023), retail and employment (July 2023), and flood risk and water quality (July 2023) can be found on the Council's [website](#).

Other Site Updates

2.20 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 was completed in 2021.
- Land at 7-27 Albion Street, Southwick (AWDM/0954/18): A development of 55 (gross) new Council homes, granted permission on 4th May 2020. Development was completed In March 2025 and a phased occupation is underway.
- Adur Civic Centre (AWDM/1450/21): an application was granted permission in March 2022 with the S.106 being signed on 21st April 2023 for the redevelopment of the former Council Civic Centre for 171 units and business floorspace. This is another site due to deliver 100% affordable housing with Homes England affordable housing grant. Development commenced in January 2024 and practical completion is estimated by July 2026.
- The Mannings, Surry Street, Shoreham (AWDM/1281/19): 74 units. Granted permission on 15th October 2021. Practical completion is estimated by August 2025.
- Marquis of Granby, West Street, Sompting (AWDM/1478/21): 9 units. Granted permission on 22nd March 2022. Development has completed.
- Land North Of 1 To 28 The Haven, Brighton Road, Lancing (AWDM/0384/22): an application was granted permission on 20th May 2022 for 7 dwellings. Development has yet to commence.
- Ashcroft, 100 Kingston Lane, Shoreham (AWDM/1230/22): an application was granted planning permission on 1st February 2023 for sheltered housing accommodation (52 units). Development has commenced.
- South Street Car Park, Lancing (AWDM/0118/23): a Council owned site with a development of 7 temporary and emergency accommodation being completed in February 2025.

- 76-78A Brighton Road Lancing (AWDM/1247/23): an application was granted planning permission on 12th February 2024 for 8 dwellings. Development has yet to commence.
- Garage Block 88 To 97 Daniel Close, Lancing (AWDM/0827/22): as part of a review of its land holdings, Adur Council has investigated the potential of this site for redevelopment through a feasibility study and detailed technical work. A planning application for 9 dwellings was approved in December 2022. Development commenced in June 2024.
- Garage Compound Gravelly Crescent, Lancing (AWDM/2068/21): the site is in the ownership of Adur District Council and has been considered as part of a feasibility study, to address the potential of under-used garage compound sites to provide affordable housing. A planning application for 7 dwellings was approved in December 2022. Development commenced in May 2024.
- Garage Compound Rear Of Kingston Broadway, Hawkins Road, Shoreham-by-sea (AWDM/0607/22) : a planning application for 5 two bed live / work units was approved in November 2022. Development has not yet commenced. A new planning application (AWDM/0030/25) was submitted in January 2025 for 5 residential units.
- Development Site At 12 To 18 Old Shoreham Road, Shoreham-by-sea (AWDM/2294/21): a planning application for 7 units was approved in February 2023. Development has yet to commence.

Whilst the following site was granted planning permission after the reporting period 2022/23 which this iteration of the HDT Action Plan focuses on, they have been included to indicate that new developments (non-allocations) are continuing to come forward.

- Land East Of 3 Salt Marsh Road, Shoreham-by-sea (AWDM/1314/22): a planning application was submitted in August 2022 for 34 residential units. It received consent on 12th June 2023. Development has yet to commence.

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 intensively 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 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 3.23).

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 per hectare.

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. As such the use of CIL in Adur District is not currently being reviewed at this point in time but is likely to be considered alongside the emerging Adur Local Plan.

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, especially the provision of affordable housing, is already a high-level corporate and political priority for Adur, as detailed in the Council's Corporate Plan - Our Plan. 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 coordinated 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 which can be accessed here: <https://www.adur-worthing.gov.uk/adur-ldf/annual-monitoring-report/>

3.6 The adopted Adur Local Plan required 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 has used 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](#). The Council has also published an Interim Position Statement regarding First Homes (agreed 3rd May 2022) which can be viewed [here](#).

3.7 An update of the Adur Local Plan 2017 is being progressed and will be prepared under the emerging planning system based on the Levelling Up and Regeneration Act 2023. 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 and Strategic Flood Risk Assessment 2020.

3.8 The Adur and Worthing Strategic Housing Market Assessment (2020) may be found [here](#). It addresses housing needs over the period 2019-2036 and 2039. This study is being updated and it is expected that a report will be published in 2025.

More effective use of land

3.9 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.

3.10 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.

3.11 The regeneration of Shoreham Harbour provides a unique opportunity within the Local Plan area 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 (see paragraphs 2.14 - 2.19). As such, the approach to densities will be reviewed through the update of the Adur Local Plan.

Specific Site Policies

3.12 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

3.13 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.

Development briefs

3.14 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 which proposals are likely to be granted planning permission which, in turn, reduces uncertainty.

3.15 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.

3.16 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

3.17 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.

3.18 It can be seen from the data below on determining planning applications that the Council's 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* %
2014/15	541	100%	67%	86%
2015/16	541	100%	75%	84%
2016/17	436	100%	82%	90%
2017/18	414	100%	85%	90%
2018/19	444	80%	96%	93%
2019/20	419	86%	92%	98%
2020/21	437	100%	100%	98%
2021/22	569	75%	95%	96%
2022/23	413	93%	95%	96%
2023/24**	398	93%	96%	95%

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

** This HDT Action Plan focuses on the period up to 2022/23 but for information purposes, data for the period 2023/24 has been provided.

Principal Planning Officer (Major Applications)

3.19 There are a number of major development sites identified to come forward over the Plan period. In order to ensure that they 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

3.20 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

3.21 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

3.22 An experienced cross-discipline Major Projects & Investments team was 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 was 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 included 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. This includes developing some of the first council housing in Adur for more than 30 years. Further innovative ideas are also delivering results, with the Councils' Opening Doors project having saved

more than £200k in Temporary Accommodation costs through working directly with landlords. However, due to a Council wide service redesign, the Major Projects & Investment Team has been dissolved and absorbed into the newly created Regenerative Development team. This team will facilitate and enable the delivery of regenerative and regeneration schemes, working with delivery partners and leveraging inward investment. This will include residential development.

Other initiatives to support housing delivery

Council Owned Land

3.23 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, South Street Car Park, Ashcroft House and Cecil Norris House through this process (see above) the Council has undertaken a review of its small garage sites (such as Daniel Close & Gravelly Crescent) and has carried out community consultation with regards to redeveloping some of these sites for residential use. The Council has a dedicated webpage which provides details about Adur Homes' new sites programme. A number of these sites have recently been completed and are now occupied by local people on the Council's housing register. <https://www.adur-worthing.gov.uk/adur-homes/new-sites/>

3.24 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

3.25 As well as the Affordable Homes Delivery Group referred to above, planning officers meet with other districts and boroughs in West Sussex as part of the Duty to Co-operate and to consider a range of cross boundary issues, including addressing the delivery of housing.

3.26 The Council has been part of the West Sussex and Greater Brighton Strategic Planning Board which sought to jointly address these 'Duty to Co-operate' strategic planning and development issues. The constituent authorities 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. However, the work on LSS3 (which would have explored options for meeting the area's unmet needs for housing, employment and infrastructure) was paused when the implications of water neutrality on the partnership were fully realised, in particular the non-delivery of housing sites across 3 local planning authorities within the partnership area. Proposals for revisions to the planning system and consultation on a draft NPPF suggesting that the duty to cooperate would be replaced also impacted on the political momentum of the partnership. However, duty to cooperate discussions continue between authorities in the course of plan preparation and between authorities within the defined housing market areas within the wider partnership.

3.27 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 is unlikely to be able to meet its full housing needs due to limited capacity and constraints. As a consequence, requests were, and will continue to be made to neighbouring authorities as part of the 'Duty to Co-operate' to consider whether they have any potential to help meet some of Adur's housing shortfall. Beyond this monitoring year, the Government has commenced Devolution and Local Government reorganisation in East and West Sussex. Sub-regional issues will continue to be addressed with other Local Authorities as these proposals are developed and implemented.

Agents Forum

3.28 The Councils' Place and Economy Team, together with the Adur & Worthing Chamber of Commerce have set up a Worthing Development Forum comprising key residential and commercial agents and developers. The purpose is to create an open forum for dialogue about trends and issues impacting on development arising across the Adur and Worthing area.

3.29 The Council recognises the fundamental importance of building relationships with the developers, landowners and agents within the District.

3.30 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

4.1 The results of the Housing Delivery Test will be reported through the Adur Local Plan 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.

4.2 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](#).

5. Conclusion

5.1 This is the sixth Action Plan produced by the Council. Although housing delivery declined in 2019/20, there has been an 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. However, the Council has a HDT result of 81% (based on completions) and thus still has to prepare an Action Plan. This is an improvement on the previous HDT result (72%) as at December 2023. 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. However despite this, given that the adopted Adur Local Plan is more than 5 years old, delivery is now being measured against the standard methodology and in this context, delivery is under-supplying.

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:

- Commencement of review of the Adur 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;

- 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;
- Continued co-operation with neighbouring local authorities.

5.3 It has been reported in previous action plans, as predicted through the Adur Local Plan 2017, the projected increase in dwellings being granted planning consent was being seen in reality as sites came forward. Furthermore, the Council has put in place actions and interventions that will help to increase housing delivery in the Local Plan area. However, as reported in this current action plan, with regards to the monitoring period 2022/23, the net number of dwellings have decreased compared to previous monitoring periods. The majority of sites being permitted during this period were small sites. This is to be expected as the majority of the sites that fall within Shoreham Harbour Western Harbour Arm were granted permission earlier in the plan period and are now being delivered along with the two strategic allocations in the Adur Local Plan (New Monks Farm and West Sompting). Looking longer term past this current plan period, the Council has no way of addressing the main constraint which is a tightly drawn boundary, environmental constraints and very limited land availability. However the emerging Adur Local Plan will take a positive approach to maximising the opportunities available to facilitate housing delivery and continue to work with neighbouring authorities to jointly address strategic planning and development issues.

[THIS PAGE HAS BEEN LEFT INTENTIONALLY BLANK]

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



**ADUR DISTRICT
COUNCIL**