



Adur District Council

Adur Local Plan

Housing Implementation Strategy

March 2016



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1. Introduction

- 1.1.1 This Housing Implementation Strategy has been prepared to support the Adur Local Plan 2011-2031 in accordance with the requirement of the National Planning Policy Framework (NPPF). Paragraph 47 states that local planning authorities should:

“for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain a delivery of a five year supply of housing land to meet their housing target”.

- 1.1.2 This Strategy sets out the Council’s proposed approach to managing the delivery of housing over the Local Plan period 2011 to 2031 in order to support the housing delivery target set out in the Amendments to Proposed Submission Adur Local Plan (2016) for a minimum of 3609 dwellings.
- 1.1.3 The document includes the housing trajectory for both market and affordable housing, identifies the sources of housing supply for the Plan period and the five year housing land supply position as at 1 April 2015.
- 1.1.4 It also assesses the risk to housing delivery and how any risk can be managed and mitigated as well as setting out the framework for monitoring and reviewing delivery of housing.

1.2 Current Housing Position in Adur

- 1.2.1 The Council has been using saved Local Plan 1996 housing policies since 2007 and housing delivery has been monitored against the South East Plan requirement until its revocation in 2013. The South East Plan set a target of 105 net dwellings to be delivered per annum (dpa) and housing completions in Adur have averaged 135 dpa, comfortably exceeding this target.
- 1.2.2 In the last two recorded monitoring years (2013/14 and 2014/15) housing completions in Adur have been low, with 93 and 96 dwellings completed respectively. This was anticipated in the housing trajectory and it is expected that delivery will again be low in the next monitoring year. This is due to market conditions with a low number of identified sites coming forward together with a delay in the delivery of a key site with planning permission.
- 1.2.3 The NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirement. In accordance with Government advice, the most up to date housing land supply position at 1st April 2015 was measured against the objectively assessed need (OAN) figure of 291 dwellings per annum in the most recent Objectively Assessed Need for Housing: Adur

District 2015 study. This is seen as an interim position until the Local Plan target for housing delivery is adopted.

- 1.2.4 The most recent housing supply position is set out in the Adur District Five Year Housing Land Supply Assessment 2015-2020, published in December 2015. It can be seen that, currently, the Council is unable to demonstrate a five year supply of deliverable land when measured against the OAN.
- 1.2.5 This Housing Implementation Strategy demonstrates that a five year supply of deliverable land will be achieved once the housing target in the Local Plan is adopted.

1.3 Local Plan Strategy for housing delivery 2011-2031

- 1.3.1 The base date for the emerging Local Plan housing delivery target is 1st April 2011. The proposed breakdown of housing provision from the different sources of housing supply is discussed below and set out in Table1. A housing trajectory, setting out the projected annual housing delivery over the Local Plan period 2011-2031 is included in this Housing Implementation Strategy.

The Local Plan aims to deliver a minimum of 3609 dwellings over the Plan period 2011-2031, equating to an average of 180 dwellings per year. Whilst this planned housing target does not meet the objectively assessed need requirement of 5820 homes, it is considered to be a realistic and deliverable figure given the genuine constraints of the area

The following emerging policies in the Amendments to Submission Local Plan (2016) document relate specifically to housing delivery:

- Policy 3 – sets out the overall target for delivery of a minimum of 3609 homes over the period 2011-2031. It identifies the different sources of housing provision, including the strategic development sites and the broad location for development at Shoreham Harbour.
- Policies 5 and 6 – allocate strategic sites for development at New Monks Farm, Lancing (for mixed use development to include 600 homes) and West Sompting (for 480 homes) which together will deliver 1080 homes.
- Policy 8 – identifies the Shoreham Harbour Regeneration Area as a broad location for change and includes the delivery of a minimum of 1100 homes.

2. Sources of Housing Supply

- 2.1.1 This Local Plan target has been informed by a number of studies, evidence documents and monitoring reports.

2.2 Strategic Housing Land Availability Assessment

- 2.2.1 The first Adur Strategic Housing Land Availability Assessment (SHLAA) was completed in 2009 and updated in 2012. A full review of the SHLAA was undertaken in 2013/14 (published October 2014). The SHLAA will be updated on an annual basis and reported through the Councils Annual Monitoring Report. The most recent SHLAA Update covers the monitoring period 2014/2015 and indicates that 291 dwellings can be delivered on eight sites over the Local Plan period (see Appendix 1 for list of sites). The full SHLAA 2014 document, which includes the methodology can be viewed www.adur-worthing.gov.uk/adur-local-plan-2014. The SHLAA Update 2014/2015 can be viewed at <http://www.adur-worthing.gov.uk/media/media,137713,en.pdf>
- 2.2.2 The SHLAA provides an assessment of risk associated with each site in terms of potential delivery constraints. All sites have been evaluated in terms of suitability, availability and achievability in accordance with the SHLAA practice guidance. Sites that do not have reasonable development potential have been excluded from the housing land supply. For those sites which are assessed as having reasonable development potential, any identified risk, in terms of policy constraints, infrastructure requirements, ownership constraints etc. are reflected in potential delivery rates.
- 2.2.3 Other sources of housing land have been carefully considered in order to determine realistic levels of potential supply:

2.3 Housing completions

- 2.3.1 Monitoring indicates that, for the four year period since the base date of the Local Plan, 528 net dwellings have been completed (1 April 2011 to 31 March 2015) equating to approximately 132 dwellings per year.

2.4 Commitments

- 2.4.1 These are large sites of 6 or more dwellings and small sites of 5 or fewer dwellings that have extant planning permission and which are either under construction or have not yet started. For small sites a discount of 55% has been applied (in accordance with the West Sussex County Council standard based on historic completion data). The large identified sites are listed in Appendix 2.

2.5 Small sites windfall allowance

2.5.1 Windfall sites are defined by the NPPF as:

'Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available'. It allows local planning authorities to 'make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens' (para 48).

2.5.2 Historically, given the built up nature of Adur, a significant proportion of housing development has come forward on small sites which generally comprise of infill sites, conversions and changes of use. These sites fall below the size threshold for sites to be included in the SHLAA.

2.5.3 Appendix 3 sets out in more detail how the projected windfall allowance has been calculated based on historic trends for small site completions from 2004-2013. It shows an average of 32 dwellings being completed on small sites per annum. Whilst the figure fluctuates from year to year, there is no clear trend suggesting an overall decline in completions and it is considered that there is compelling evidence to extrapolate these forward based on past evidence of delivery.

2.6 Broad Location: Shoreham Harbour Regeneration Area

2.6.1 This area comprises a number of sites which, together, will potentially accommodate a minimum of 1100 new dwellings up to 2031.¹ It is identified as a broad location for development in this Plan and the detailed development proposals and a planning framework to guide investment and delivery proposals will be addressed in a Joint Area Action Plan (JAAP) currently being prepared by the Shoreham Regeneration Partnership (Adur and Worthing Councils, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority).

2.7 Strategic development sites

2.7.1 Two large greenfield sites are allocated for housing or mixed use development (including housing) in the emerging Adur Local Plan at New Monks Farm in Lancing and at West Sompting. Together these two sites provide a significant

¹ Shoreham Harbour will deliver a minimum of 1100 dwellings over the whole Plan period 2011-2031. 132 dwellings have planning permission and to avoid double counting with commitments, the remaining 968 dwellings are shown in Table 1.

proportion of planned new homes and their delivery is critical to achieving the overall strategy of the Plan:

- New Monks Farm, Lancing – a mixed use development to include the delivery of 600 homes.
- Land at West Sompting – 480 homes

2.7.2 There is a risk that delivery of one or more of these sites is delayed, impacting on the Council's ability to demonstrate a five year housing land supply. As part of the Local Plan preparation, a detailed analysis of the suitability and deliverability of these sites has been undertaken as part of the Sustainability Appraisal process. A number of evidence studies have informed and addressed key issues such as transport and infrastructure provision, landscape, biodiversity and flood risk. There have been regular and ongoing discussions with the site promoters and their agents, the relevant statutory agencies and service providers.

2.7.3 Masterplanning is well underway for both strategic sites and it is anticipated that outline planning applications will be submitted to the local planning authority in 2016 for both sites. This is likely to coincide with the formal Submission of the Adur Local Plan to the Secretary of State in July 2016 and demonstrates that the strategic allocations are viable and deliverable

2.7.4 Policy 5 and 6 set out the specific requirements for each site, including appropriate mitigation measures to ensure delivery.

2.7.5 How this housing is to be delivered is set out in the following table:

Table 1: Housing Supply Position at 1 April 2015

Total Housing Provision 2011-2031	3609	
Net housing completion 2011-2015	528	
Remaining Local Plan housing requirement 2015-2031	3081	
<i>Existing sources of housing supply:</i>		
Existing commitments (large and small sites)	326	
Sites identified in the SHLAA Update 2015	291	
Small sites windfall allowance	416	
Total yield from existing sources	1033	
<i>Sites identified in the Local Plan:</i>		
New Monks Farm, Lancing	600	
Land at West Sompting	480	
Shoreham Harbour Broad Location	968	
Total yield from identified sites in the Local Plan	2048	
Total Housing Supply 2015-2031	3609	

3. Housing Trajectory for the Plan period 2011-2031

- 3.1.1 The National Planning Policy Framework requires local authorities to prepare a housing trajectory to illustrate the expected rate of delivery for the Plan period.
- 3.1.2 This Housing Implementation Strategy accompanies the Amendments to the Submission Adur Local Plan (2016) document and includes the housing trajectory for the Local Plan period 2011-2031. This trajectory has a base date of 1st April 2015. The housing trajectory will be monitored and updated on an annual basis through the Council's Annual Monitoring Report (AMR). The annual update of the Adur Strategic Housing Land Availability Assessment (SHLAA) will also be reported through the AMR.
- 3.1.3 The trajectory included in this Housing Implementation Strategy is based on the housing monitoring position at 1st April 2015 and the SHLAA Update 2015, published in December 2015 and sets out the expected rate of delivery over the Plan period. It indicates the amount of housing already delivered since 2011 and the anticipated delivery of both market and affordable housing from the current year to the end of the Plan period. It is based on actual completions for the first four years of the Plan period, current commitments on both large and small sites, potential strategic allocations, the Shoreham Harbour Regeneration Area broad location and an allowance for small windfall sites. It also takes into account the backlog in past completions since 2011.
- 3.1.4 The housing target for Adur is for a minimum of 3609 dwellings to be delivered between 2011 and 2031 as set out in Policy 3 of the Amendments to the Submission Adur Local Plan (2016) and which results in an annual average of 180 net dwellings per annum.
- 3.1.5 The trajectory indicates that the Council can meet the overall housing target with a continuous supply of land coming forward for development. There is an anticipated drop in delivery for the current year, with delivery rates projected to be highest over the 10 year period 2016 to 2026. This is when the strategic greenfield allocations and sites within the Shoreham Harbour Regeneration Area broad location are expected to come forward. Delivery rates will reduce considerably during the latter part of the Plan period. This is in part due to the reduced certainty of identifying sites that far into the future and there may be an issue in maintaining a continuous supply of available land for housing towards the latter part of the Plan period. Annual monitoring will highlight any such issue and appropriate intervention measures may be required as set out in the Overall Risk to Housing Delivery and Contingencies sections below.

Table 2: Adur Housing Trajectory 2015

Housing Trajectory for Adur District Council 2015

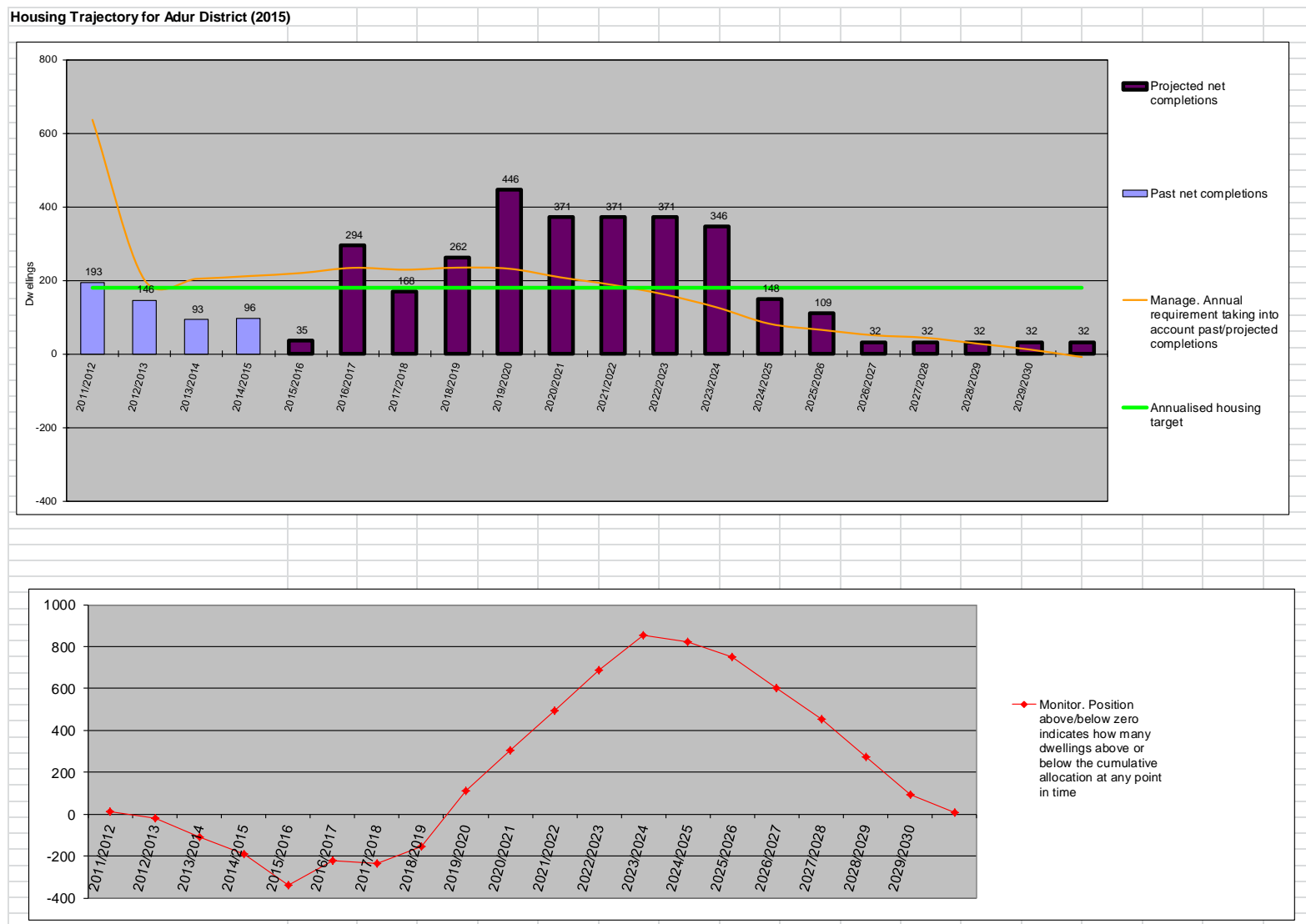
				Projected Completions																	Total
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	
Gross Completions (large and small sites)	204	153	103	105	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	565
Commitments (large and small sites with planning permission)(net)					35	212	76	3	0	0	0	0	0	0	0	0	0	0	0	0	326
Allowance for small windfall sites					0	0	0	32	32	32	32	32	32	32	32	32	32	32	32	32	416
SHLAA sites 2015 (net)					0	82	67	67	75	0	0	0	0	0	0	0	0	0	0	0	291
Broad Location (Shoreham Harbour)					0	0	0	0	179	179	179	179	179	36	37	0	0	0	0	0	968
Strategic Allocation (New Monks Farm)					0	0	0	80	80	80	80	80	80	80	40	0	0	0	0	0	600
Strategic Allocation (West Sompting)					0	0	25	80	80	80	80	80	55								480
Total Past Completions	204	153	103	105																	
Total Projected Completions/Commitments	204	153	103	105	35	294	168	262	446	371	371	371	346	148	109	32	32	32	32	32	3648
Losses	11	7	10	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0			37
Past net completions	193	146	93	96																	528
Projected net completions					35	294	168	262	446	371	371	371	346	148	109	32	32	32	32	32	3083
Cumulative net completions	193	339	432	528	563	857	1025	1287	1733	2104	2475	2846	3192	3340	3449	3481	3513	3545	3577	3609	3609
Annualised housing target	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	3600
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	13	-21	-108	-192	-337	-223	-235	-153	113	304	495	686	852	820	749	601	453	273	93	9	
Manage. Annual requirement taking into account past/projected completions	636	200	204	211	219	234	229	234	231	207	187	161	126	82	65	50	44	28	12	-9	

Notes

Completions include sites with planning permission but which have not commenced and sites on which development has commenced. Large sites comprise 6 or more units, small sites compromise 5 or less units. Estimated losses include actual and projected losses that may occur due to demolition, conversion and change of use. Deducting estimated housing losses from gross completion figures gives net completions. Source: 2015 Residential Land Availability Survey, WSCC. To view source data search WSCC planning data for Housing and Residential Land in West Sussex.

Oct-15

Figure 1: Adur Housing Trajectory 2015



4. Housing Delivery – Five Year Housing Land Supply

- 4.1.1 The NPPF requires that the Local Plan should identify a continuing five year supply of deliverable housing sites against their housing requirement with a buffer of 5% to ensure choice and competition or a 20% buffer where there is a record of persistent under delivery.
- 4.1.2 Since the revocation of the South East Plan and in the absence of an adopted local plan, Adur has measured its housing delivery against its Objectively Assessed Housing Need figure. The current published Five Year Housing Land Supply position was prepared against the Objectively Assessed Housing Needs Assessment 2015 figure of 291dpa. As this figure has not been met for the past four years, (since the base date of the Local Plan), this was considered to be “under delivery” and a 20% buffer was applied.
- 4.1.3 However, in determining whether a 5% or 20% buffer is appropriate, National Planning Guidance advice is that any assessment of local delivery is likely to be more robust if a longer term view is taken.
- 4.1.4 Historically there has never been a strong relationship between housing targets set for Adur in Structure and Regional Plans and the need and demand for new dwellings in the District. Previous targets have been strongly influenced by the capacity of the District to accommodate new dwellings in terms of its physical and environmental characteristics – the sea to the south, the South Downs National Park to the north, flooding and key infrastructure constraints, including transport.
- 4.1.5 Table 3 indicates that annual average dwelling completions since monitoring of the South East Plan began in 2006 is 135 net dwellings. This exceeds the now revoked annualised South East Plan target of 105 dpa (excluding development at Shoreham Harbour which was ring-fenced). Taking a longer term view, annual average completions also compares favourably with the last West Sussex Structure Plan 2001-2016 delivery target of 99 net dwellings per annum (dpa) with an annual average of 102dpa delivered.
- 4.1.6 It can be seen in Table 3 that completion rates in Adur have varied considerably over time, with the lowest recorded delivery of just 47 dwellings occurring in 2001/2002 and the highest recorded delivery of 216 dwellings in 2006/2007. Whilst these fluctuations can in part be attributed to economic conditions, the location and size of sites coming forward also play a role. In previous years much of Adur new development has been on smaller brownfield sites. With only a limited number of large brownfield sites

available for development, delivery on just one of these sites makes a significant difference to the housing delivery rate.

- 4.1.7 Over the whole period for which monitoring figures are available (1996 – 2015) the annual average delivery rate has been 112dpa (net). Adur has therefore consistently delivered sufficient new homes to meet previous housing targets and in calculating the five year housing land supply a buffer of 5% is considered appropriate as there is not considered to be a history of persistent under delivery.

Table 3: Dwelling Completions 1996 - 2015

	Year	Total Dwelling Completions			Time Periods		Annual Average	
		Gross	Net	Losses	Gross	Net	Gross	Net
West Sussex Structure Plan 1993-2006	1996/1997	71	66	5	524	490		
	1997/1998	95	89	6				
	1998/1999	161	153	8			105	98
	1999/2000	136	128	8				
	2000/2001	61	54	7				
West Sussex Structure Plan 2001-2016 Annual delivery rate 99dpa (net)	2001/2002	48	47	1	559	508		
	2002/2003	99	82	17				
	2003/2004	63	59	4			112	102
	2004/2005	131	120	11				
	2005/2006	218	200	18				
South East Plan 2006-2026 Annual delivery rate 105 dpa(net)	2006/2007	230	216	14	1065	948		
	2007/2008	159	146	13				
	2008/2009	134	123	11				
	2009/2010	92	61	31			152	135
	2010/2011	88	63	25				
	2011/2012	204	193	11				
	2012/2013	158	146	12				
Adur OAN 291dpa	2013/2014	103	93	10	208	189	104	95
	2014/2015	105	96	9				
	Total	2356	2135	221	2356	2135		
	Annual Average	124	112.4	11.6				

- 4.1.8 There has however, clearly been a shortfall against the Local Plan annualised delivery target of 180dpa over the past 4 years since the start of the Plan period. When calculating the five year housing land supply, the NPPF indicates that local planning authorities should aim to deal with any

undersupply within the first five years of the plan period where possible. Since 2011, when measured against the Local Plan target, there has been an undersupply of 192 homes and the five year housing land supply calculation in Table 4 has been adjusted to reflect this.

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

4.1.10 This Housing Implementation Strategy identifies a supply of sites which are considered deliverable and developable within the five year timeframe 2015-2020. The trajectory demonstrates that the housing supply is sufficient to meet (and exceed) targets for the five year period with a 5% buffer.

Table 4: Five year housing land supply 2015-2020

		Dwellings (net)	Annual Average
a	Local Plan Housing Target 2011-2031	3609	180
b	Completed 2011-2015 (net)	528	
c	Number of years left in plan period = 16		
d	Remaining requirement 2015-2031 (a-b)	3081	193
e	Five year target with no adjustment (180x5)	900	
f	Shortfall of housing provision from 2011 (180x4 years = 1164) minus completions (f – b)	192	
g	Five year target including shortfall (e+f)	1092	
h	5% Buffer (1092/100x5)	57	
i	Requirement for five years 2015-2020 with 5% buffer (g+h)	1149	230
	Supply:		
j	Commitments (large and small sites) at 1 April 2015	326	
k	SHLAA sites 2015	291	
l	Windfall allowance (32x2 years)	64	
m	Local Plan Strategic Allocations	345	
n	Shoreham Harbour Broad Location	179	
o	Total Commitments	1205	
p	Surplus (o-i) (1205-1149)	56	

This table demonstrates a 5.2 year supply of deliverable sites (o/230) from the current monitoring year 2015.

5. Affordable Housing Trajectory

- 5.1.1 The saved 1996 Local Plan Policy AH3 seeks 30% affordable housing on sites of 15 dwellings or more. Table 5 below sets out how much affordable housing has been delivered per annum since 2011 (the base date of the new Adur Local Plan). It indicates that 28% of the total housing supply over the last 4 years has been affordable housing with an annual average of 40 affordable homes.

Table 2: Affordable Housing Completions

Year	Total Dwellings (gross)	Affordable Housing	% Affordable Housing
2011/2012	204	91	44.6
2012/2013	151	32	21.2
2013/2014	103	12	12.0
2014/2015	105	23	21.9
Total	563	158	28.1

- 5.1.2 The Objectively Assessed Need for Housing: Adur report 2015 (OAN) sets out the level of affordable housing need in Adur and identifies a need for 141(net) homes per annum over the Plan period. Policy 22 of the Amendments to Proposed Submission Adur Local Plan (2016) sets out the thresholds that all residential development will be required to provide affordable housing either on site or through commuted payments for off- site provision.
- 5.1.3 The main sources of supply of affordable housing will be through:
- Provision on-site by developers in partnership with Registered Providers
 - Registered Providers delivering on sites within their own control
 - Adur District Council as part of potential self- build schemes
- 5.1.4 The Council is seeking to maximise the amount of affordable housing delivered by expecting either a financial contribution or on site provision for all sites coming forward for residential development. Given the uncertainty over future funding mechanisms and viability issues that may be relevant for individual sites it is difficult to assess the delivery of affordable housing. The Governments proposed change to the definition of affordable housing to include starter homes may also impact on delivery.
- 5.1.5 The following trajectory sets out the likely delivery of affordable housing on sites with planning permission and where affordable housing provision has been negotiated. It also sets out the likely affordable housing provision to be delivered by the strategic allocations and broad location if the maximum levels of affordable housing are achieved according to policy requirements over the Plan period:

Table 3: Affordable Housing Trajectory 2015

	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031
Strategic Allocations	0	0	20	40	40	40	41	41	41	41	20	0	0	0	0	0
Broad Location	0	0	0	0	41	41	41	41	41	41	41	0	0	0	0	0
79/81 Brighton Road, Shoreham-by-Sea	0	0	36	0	0	0	0	0	0	0	0	0	0	0	0	0
Southlands Hospital	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0
Riverside Business Centre, Old Shoreham Road, Shoreham-by-Sea		10	10	10	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	10	76	60	81	81	82	82	82	82	61	0	0	0	0	0

6. Overall Risks to Housing Delivery

- 6.1.1 Throughout the production of this Local Plan there has been ongoing engagement with key stakeholders and local communities. The process of this engagement is set out in the Adur and Worthing Statement of Community Involvement.
- 6.1.2 A consultation database specifically for the Local Plan has been maintained and used to engage with all parties with an interest throughout the whole Local Plan production process. A Statement of Consultation (2016) accompanies the Amendments to the Proposed Submission Adur Local Plan (2016) document and sets out details of the engagement undertaken and how it has been used to inform the Local Plan policies.
- 6.1.3 Overall, risks to delivery are considered low. A raft of background evidence, together with continuous engagement, the encouragement for pre-application discussions with developers and landowners gives the Council confidence that the Local Plan strategy is able to deliver sufficient housing to meet the target of a minimum of 3609 dwellings in the Amendments to Proposed Submission Adur Local Plan (2016) and ensure a continuous supply of housing throughout the Plan period.
- 6.1.4 However, it is necessary to identify potential risks to delivery, firstly to increase the robustness of this Housing Implementation Strategy and also to ensure that, where possible, potential mitigation measures are identified to address these risks.
- 6.1.5 The main identified risk to overall housing delivery is the health of the economy, which will be a major factor in the supply of housing throughout the Local Plan period. Whilst the housing market is showing signs of recovery, this has not yet been reflected in the number of housing completions with just 93 and 96 net dwellings being completed in 2013/2014 and 2014/2015 respectively. This may, in part, be due to slower build rates, lack of available building materials and smaller sites being put on hold during the recession. Also, there is typically a lag time of around 18 months for small sites to be reflected in completions. The ability of developers to access finance and the availability of mortgage products to prospective purchasers have also had an impact. If there is another downturn, this will have a detrimental effect on housing delivery rates, over which the Local Authority will have little control.
- 6.1.6 There is a risk therefore that the Local Plan housing target will not be delivered. The Council is confident that the comprehensive evidence base indicates that sufficient housing will be delivered from the sources identified. The Council has sought to minimise the risk of unforeseen development constraints by undertaking detailed assessments of potential constraints during the Plan preparation process. This has included commissioning a number of background evidence studies and continuous liaison with key

statutory agencies and site promoters throughout the local plan process. The risk of additional infrastructure requirements, particularly in respect of the strategic allocations, has been minimised through working closely with key infrastructure and service providers throughout Plan preparation process. Overall the risk of non-delivery of sites is low although unforeseen barriers to development may occur. The Council will work with developers to help overcome this.

- 6.1.7 The level of development proposed to be delivered in this Plan (180 dpa) is considerably higher than has historically been delivered in Adur. The historic build rate over the last 19 years is on average 112 net dwellings per year. The delivery rate of 180dpa has only been achieved twice in the last nineteen years. There is a risk that the high number of completions predicted in the ten years between 2016 and 2026 will not be achieved. The concern is that the market will not be able to absorb these levels of completions, particularly when other large schemes in adjoining authorities are planned to deliver to similar timescales. Also, it is possible that the building industry will not have the capacity to facilitate the delivery of sites.
- 6.1.8 Viability of individual sites is a key risk. Working with the relevant infrastructure/service providers and site promoters, an Infrastructure Delivery Plan has been prepared alongside this Local Plan. This sets out what infrastructure is required to support specific developments and the costs and sources of funding proposed to deliver this infrastructure.
- 6.1.9 There is a risk that the policies in this Plan will have an adverse impact on the viability of development, thus inhibiting completion rates. A Whole Plan and Community Infrastructure Levy Viability Assessment has been undertaken. It indicates that the policies of the Plan, taken together, do not adversely impact the viability of development.

7. Contingencies

- 7.1.1 The Local Plan includes a Monitoring and Delivery Framework which will assess the overall impact of the strategy and whether or not the vision and strategic objectives are being delivered. Housing delivery will continue to be measured as part of this.
- 7.1.2 The Council has been unable to identify contingency sites due to the shortfall in meeting its objectively assessed need for housing, but, in addition to the housing identified, there is likely to be scope for additional housing, as yet unidentified, from other sources over the Plan period:
- Additional housing opportunities from future “windfall “ large sites of 6+ homes which are not currently identified in the SHLAA
 - Sites identified in the SHLAA that are suitable for development but are not currently available (see Appendix 4)
 - Additional housing from current planning applications which were either granted consent after 1 April 2014 or are yet to be determined (see Appendix 5).
- 7.1.3 The Local Plan does not rely on contributions from these additional sources to help meet the housing target as there is uncertainty about how much and when any new homes may be delivered. It does however provide a degree of flexibility in the event of any shortfall arising in identified sites over the Plan period.
- 7.1.4 The Council has identified potential measures to encourage the delivery of sites:
- Consideration will be given to the redevelopment for housing of any Council owned land identified through a review of assets.
 - Developers/landowners will be contacted to identify and understand reasons for delay or non-delivery of sites and find ways to help
 - Developers/landowners will be encouraged to hold pre-application discussions
 - A flexible policy approach will be taken where it can be demonstrated that viability is an issue
 - Alternative/additional funding streams to help with bids as appropriate
 - The Council’s project managers will help co-ordinate inputs from relevant stakeholders etc. on major sites

8. Monitoring and Review of Performance

- 8.1.1 The Council comprehensively monitors housing delivery. The monitoring of planning permissions on all sites involving residential dwellings is undertaken by West Sussex County Council on behalf of the West Sussex Authorities on an annual basis. This has been undertaken since the late 1990s and thus good historical evidence of delivery exists. All sites of 6 or more dwellings are visited and together with information from a variety of other sources, the progress of each site is tracked. This information is checked by the local authority and additional information on site specific delivery rates and phasing is provided. Any lapsed permissions are removed from the database. Together this provides comprehensive information on housing commitments, completions and other identified sites.
- 8.1.2 This information is included in the Councils Annual Monitoring Report (AMR) which will be the main document for monitoring housing delivery. The AMR also shows the 5 year housing land supply position against the housing target set in the Local Plan. The housing trajectory will be updated annually and provides for projected housing supply over the plan period to 2031.
- 8.1.3 The SHLAA will be monitored on an annual basis to ensure that the most up to date site information is incorporated and reflected in an updated housing trajectory. This will be reported through the AMR.
- 8.1.4 If monitoring of the five year housing land supply indicates that targets are not being met in the short term or that strategic sites are not being delivered in the longer term, the Council will seek to address the issues within the framework of this Plan. The Council will continue to work with landowners, developers, and other relevant bodies to identify and resolve obstacles to delivery.
- 8.1.5 If however, the issues surrounding delivery are unable to be resolved then the Council may need to review the Local Plan. This may be the case if:
- New evidence indicates that an unforeseen issue prevents development of a strategic allocation/broad location
 - New evidence results in a significant reduction in the amount of housing able to be delivered on a strategic allocation/broad location and the shortfall is unable to be addressed elsewhere in the Plan
- 8.1.6 Under delivery in any one particular year may not require immediate intervention but prolonged under delivery may have implications for the 5 year supply.
- 8.1.7 Where necessary the Council may produce development briefs/planning briefs/planning statements to increase certainty of sites progressing through planning process.

- 8.1.8 The Annual Monitoring Report will be published in December each year and made available on the Council's website.

9. Conclusion

- 9.1.1 A significant increase in the housing delivery rate has been planned for in this Local Plan. Adur District Council is confident that the housing delivery target set out in Policy 3 of the Amendments to the Submission Adur Local Plan (2016) can be delivered. This Housing Implementation Strategy demonstrates that the local planning authority does have a five year housing land supply and that there is a sufficient supply of land for the delivery of the housing target as shown in the housing trajectory.
- 9.1.2 The two strategic sites and the broad location at Shoreham Harbour are essential to the delivery of the overall strategy. However, the delivery of small and unidentified sites will continue to make a significant contribution to the housing supply.
- 9.1.3 Extensive and continuous stakeholder engagement has taken place throughout the process of developing policies in this Local Plan. The risks to the delivery of the components of the housing delivery strategy, together with the mitigation required have been identified and the overall risk to the housing delivery strategy is low.

An updated housing trajectory for the Local Plan period as at 1st April 2016, based on the most up to date monitoring data and the SHLAA Update 2016 will be prepared for the Local Plan Examination.

10. Appendix 1 – SHLAA Update - as at 1st April 2015

SHLAA / Monitoring Reference	Site	Site Capacity (Net)	Time Frame (Years)			Achievability	Updated position since 1 st April 2015.
			0-5	6 -10	11-15		
ADC/049/13	Riverbank Business Centre & 12/18 Old Shoreham Road, Shoreham-by-Sea	120	120	0	0	Awaiting the signing of S106 Agreement.	Outline planning permission was granted in June 2015. Development is due to commence in 2016.
ADC/052/13	Civic Centre Staff Car Park, Ham Road, Shoreham-by-Sea	10	10	0	0	Marketing exercise has been completed and a number of bids received. Planning application anticipated late 2015.	Sale not completed during this monitoring period and planning application now expected in 2016. The council now intends to develop the site.
ADC/059/13	Adur Civic Centre, Ham Road, Shoreham-by-Sea	75	0	75	0	Marketing exercise has been completed and a number of bids received. Planning application anticipated late 2015.	Sale not completed during this monitoring period and planning application expected in 2016. The Council now intends to develop the site.
ADC/083/13	Lancing Manor Filling Station, Old Shoreham Road, Lancing	8	8	0	0	Planning application decision pending (AWDM/1128/14).	Planning permission refused in November 2015. Appeal lodged January 2016.
ADC/086/13	Community Buildings, Pond Road, Shoreham-by-Sea	27	27	0	0	Site in multiple public ownership. Planning application anticipated in 2016 with delivery in 2017.	No change
ADC/090/13	Northbourne Medical Centre, Eastern Avenue,	10	10	0	0	Site is now vacant. Pre-application enquiry from	It is understood that the site is no longer being marketed

	Shoreham-by-Sea					agent.	and its current use is to be retained.
ADC/119/13	Land at Eastbrook Primary School, Manor Hall Road, Southwick	24	24	0	0	In public ownership, the site is surplus to requirements and is now vacant. A planning application is anticipated in 2016.	No change
ADC/124/13	Land west of Highview, Sompting	17	17	0	0	Pre application discussions held with developer – anticipate planning application 2016.	No change
	Total (net)	291	216	75	0		

11. Appendix 2 – Large Sites with Extant Planning Permission as at 1st April 2015

Application Number	Site	Site Capacity (Net)	Time Frame (Years)			Achievability	Updated position from 1 st April 2015
			0-5	6 -10	11-15		
ADC/0334/06	22-26 West Lane, Lancing	10 (7 complete)	3	0	0	Remaining houses not yet demolished	No change
AWDM/0501/12	79/81 Brighton Road, Shoreham-by-Sea	132	132	0	0	Demolition complete	Under construction
AWDM/0871/11	Norfolk House, High Street, Shoreham-by-Sea	9	9	0	0	Under construction	No change
AWDM/0287/09	Southlands Hospital Site, Upper Shoreham Road, Shoreham-by-Sea	106	106	0	0	Reserved Matters now approved	Demolition commenced February 2016.
AWDM/0737/14	Town Hall Chambers, 45-49 High Street, Shoreham-by-Sea	6	6	0	0	To be delivered within the first five years.	No change
AWDM/1404/12	Land at 60/66 Busticle Lane, Sompting	6 (3 complete)	3	0	0	Under construction	No change
	Total (net)	259	0	0	0		

12. Appendix 3 – Calculating a Small Sites Windfall Allowance

12.1 Introduction

12.1.1 The National Planning Policy Framework (NPPF) 2012 defines windfall sites as:

“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.”

12.1.2 It allows local planning authorities to “make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens” (para 48).

12.1.3 The Planning Practice Guidance (PPG) 2014, states that “local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance based on a geographical area” (para 24).

12.1.4 A windfall allowance takes account of housing development on sites which it is not possible to identify in advance. To meet the NPPF criteria, a windfall allowance must avoid double counting those sites already identified for housing development and must be supported by evidence.

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

12.2 Housing Land Supply

12.2.1 The Local Plan covers the 20 year period 2011 to 2031 and will deliver a minimum of 3600 new homes at an annual average of 180 dwellings.

12.2.2 The housing land supply is comprised of the following sources:

- Housing completions since the 2011 base date of the Local Plan
- Dwellings with planning permission but which have not yet commenced or are under construction
- Sites identified in the Strategic Housing Land Availability Assessment Update 2015 (sites of 6+ dwellings)

- An allowance for windfall sites (from 2018-2031)
- Strategic allocations to be taken forward in the Local Plan
- Shoreham Harbour Regeneration Area Broad Location

12.3 Calculating a Windfall Allowance

12.3.1 The windfall allowance has been calculated using historic data over a nine year period 2004 to 2013 which takes account of a range of market conditions from a buoyant market in 2004 to 2007 to a downturn between 2007 and 2011. The effects of the downturn were not seen in terms of housing delivery until 2010/2011. It is not considered necessary to make any adjustments to allow for different market conditions.

Analysis of past trends

12.3.2 Table 9 indicates that over the past 9 years the annual housing completion rate has fluctuated from a high of 200 completions in 2005/06 to a low of 61 completions in 2009/10 which broadly follows the market trends. There has been an average of 141 dwellings completed per annum over this time period.

12.3.3 Housing completions are categorised according to the number of dwellings delivered. Large sites 6+ units make up the Housing Land Supply and small sites of 5 dwellings or less are windfall sites. Between 2005/06 and 2013/14 there were 286 windfall completions, which account for 22% of all completions.

Table 7: Historic Housing Delivery Rates 2004-2013

Year (April-March)	Number of Completed Dwellings			Percentage Windfall
	Large Sites (6+) net	Windfall (net)	Total (net)	
2004/05	94	26	120	22%
2005/06	171	29	200	15%
2006/07	174	42	216	19%
2007/08	118	28	146	19%
2008/09	88	35	123	28%
2009/10	47	14	61	23%
2010/11	39	24	63	38%
2011/12	149	44	193	23%
2012/13	107	44	151	29%
	987	286	1273	22%
Total	987	286	1273	
Average	110	32	141	

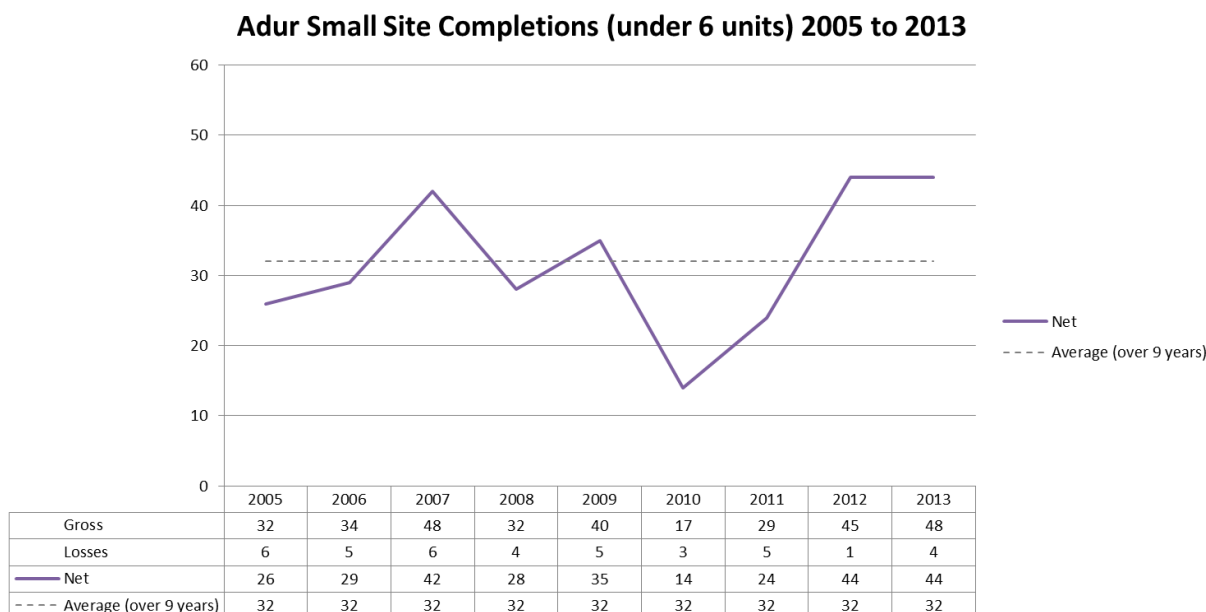
Avoidance of Double Counting

- 12.3.4 A significant proportion of housing development has historically been delivered on small sites which comprise of infill sites, changes of use and conversions. These sites have not been included in the SHLAA as they fall below the threshold of 6 dwellings. However, it is important to ensure that there is no double counting between historic Housing Land Supply sites and current SHLAA sites.
- 12.3.5 The Adur SHLAA Update 2015 identifies all sites which have a potential development capacity of 6+ dwellings (new build, redevelopment, conversion or change of use). It provides a comprehensive assessment of housing potential on these sites and has been prepared to help inform housing delivery in this Local Plan.
- 12.3.6 Historic monitoring data from West Sussex County Council identifies all HLS sites of 6+ dwellings. These sites have been excluded from the analysis.
- 12.3.7 The NPPF does not allow for development on garden land to be included in the windfall allowance. Historic monitoring data from WSCC identifies all development sites on garden land. These have therefore been excluded from the analysis.
- 12.3.8 Table 8 indicates the historic delivery rate for each category of development type which has been used to calculate the windfall allowance.

Table 8: Number of windfall dwellings excluding sites of 6+ dwellings and garden land

Year (April-March)	New Build	% Total Windfall	Conversion/ Change of Use	% Total Windfall	Total Windfall
2004/05	9	35%	17	65%	26
2005/06	8	28%	21	72%	29
2006/07	19	45%	23	55%	42
2007/08	11	39%	17	61%	28
2008/09	14	40%	21	60%	35
2009/10	4	29%	10	71%	14
2010/11	9	38%	15	62%	24
2011/12	14	32%	30	68%	44
2012/13	27	61%	17	39%	44
Total	115	40%	171	60%	286

Figure 2: Adur Small Site Completions (under 6 units) 2005 to 2013



12.3.9 The average annual windfall from these sources is 32 dwellings per annum between 2004 and 2013, with the highest proportions being from conversions/changes of use.

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

12.4 Estimating a windfall allowance

Large sites

12.4.1 The majority of large redevelopment sites have been identified in the SHLAA. Whilst further large sites may come forward during the Local Plan period beyond those currently identified in the SHLAA, an additional windfall allowance for large sites is not considered justified (to avoid double counting). It is not proposed to include a windfall allowance for large sites during the Plan period.

Small sites

12.4.2 Due to the built up nature of Adur, small infill sites, changes of use and conversions of buildings have consistently come forward across the whole of the urban area. It is anticipated that the historic windfall delivery rate for sites of under six dwellings will continue.

- 12.4.3 It is anticipated that the windfall delivery rate for change of use/conversion could increase due to flexible policies in the NPPF regarding the reuse of redundant buildings and changes to permitted development rights. Apart from 2012/2013, the number of changes of use/conversions has been fairly consistent and make up 60% of windfall sites. Whilst this may well increase the number of small windfall sites coming forward in future years, it is not considered necessary or appropriate to make any adjustment to the rate of windfall delivery at this stage although this will be monitored through the Annual Monitoring Report.

Discounting Planning Permissions in the early part of the Plan period

- 12.4.4 New planning permissions for dwellings on small windfall sites will continue to come forward each year and evidence indicates that these are likely to be completed within 3 years. West Sussex County Council undertakes annual monitoring on behalf of the West Sussex Local Planning Authorities and has historically applied a 55% discount rate for delivery of these sites. This discount rate has been based on many years of monitoring the delivery of small sites across West Sussex. To avoid any double counting of small sites which currently have planning permission and are counted as commitments, an allowance for windfall sites has not been made for the three years of the Plan period (2015/16 to 2017/18) but has been applied from 2018 to 2031.

12.5 Conclusion

- 12.5.1 The level of housing projected to come forward on small windfall sites is based on historic trends over the past 9 years (2004/05 to 2012/13). The average completion of dwellings on small sites over this period was 32 dwellings (net) per annum. The evidence presented above indicates that there is no real trend to windfall provision and the Council can justify projecting forward on basis of these past figures.

13. Appendix 4: List of rejected SHLAA sites to be monitored for their development potential

SHLAA ID	Site Address	SHLAA Update 2015 Status Conclusion	Updated Position from 1 st April 2015
ADC/018/13	Coastline Caravans, 88 Old Shoreham Road Lancing	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that there was no reasonable prospect that housing will be delivered on the site as the site is not currently available. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study.</p> <p>Although the site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term (particularly if the strategic allocation to the south and east is delivered - ADC/122/13) and, as such, it should be monitored on a regular basis.</p>	No change
ADC/023/13	South Street Car Park, South Street Lancing	<p>This Council owned site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the site is more suitable to be retained as a public car park. The Council decided in June 2007 that this site should remain as a public car park. Following a reassessment in 2013 it is concluded that, pending a review of Council land holdings, the same reasons for rejection still apply and therefore this site is not taken forward in this study. This site is now being considered as having potential for a Council new build scheme.</p> <p>Although this site is not taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.</p>	No change
ADC/025/13	Police Station, 107-111 North Road Lancing	<p>This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is rejected from the scope of this study as it is not considered that there is a reasonable prospect that housing will be delivered on the site as it is not currently available. It is identified in the Sussex Police Estates and Facilities Department Estates Strategy 2013-2018 as a site where the building is not in the right location/under-utilised or in a poor state of repair and where the service could be re-provided in a better location within the area. Whilst the building is not used to its full potential, alternative provision for this service has not yet been provided.</p>	No change

		Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term and should be monitored on a regular basis.	
ADC/036/13	Garage Compound, Gravelly Crescent Lancing	This Council owned site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the site is located within a residential area, the cumulative impact of reducing existing car parking space whilst increasing housing with its potential demand for more parking space would result in increased on street parking within an area with little or no capacity for more parking. Development would have an unacceptable impact on residential amenity and the ability of emergency services to access these residential streets. Part of this site is now being considered as having potential for a Council new build scheme. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.	No change
ADC/053/13	Car Park, Tarmount Lane Shoreham	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the site is required for public car parking in Shoreham town centre and is not considered suitable for housing development. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term (as part of a larger mixed use redevelopment scheme to include Shoreham Police Station (ADC/120/13)) and, as such, it should be monitored on a regular basis.	No change
ADC/075/13	NTL, Gardner Road Southwick	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that there was not a reasonable prospect that housing would be delivered on this site as it is not currently available. Following a reassessment in 2013 it is concluded that the same reasons for rejection still apply and therefore this site is not taken forward in this study. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term as, as such, it should be monitored on a regular basis. A planning application was submitted for Change of Use to D1 (non-residential institution) and D2 (Assembly and Leisure). The application was withdrawn in February 2015.	The most recent planning application for this site was submitted in December 2015 (AWDM/1673/15) for a part change of use mixed Use Classes B1 (business) and B8 (storage or distribution) to mixed Use Classes B1, B2 and B8 in addition to part internal change of use to MOT testing of applicants own motorcycles. Planning consent was granted 20 th January 2016. The site is no longer available for residential development and its SHLAA status will change from 'Reject – Monitor' to 'Reject' in the SHLAA Update 2016.
ADC/076/13	Land at 7-27	The site was considered in 2009 and 2012 as part of the SHLAA review. At	

	Albion Street Southwick	that time it was rejected as it is considered that there is not a reasonable prospect of housing being delivered on this site as it is not currently available. Following a reassessment in 2013 it is concluded that, pending a review of Council land holdings, the same reasons for rejection still apply and therefore this site is not taken forward in this study. Part of this site is now being considered as having potential for a Council new build scheme. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer potential in the longer term and should be monitored on a regular basis.	No change
ADC/082/13	Laundry, Alma Street Lancing	This site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013 it is concluded that the availability of this site is unknown. There was no response at the "Call for Sites" stage of both the 2012 SHLAA update and this SHLAA and it is concluded that the site is no longer available and should not be taken forward in this study and that there is not a reasonable prospect that housing will be delivered on this site. The Council is aware that there has been developer interest in this site and although this site is not being taken forward for residential development at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.	No change
ADC/084/13	Yard rear of St Peters Place, Western Road Sompting	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that the site is not currently available. The planning application for residential development in 2008 was withdrawn and the site is not being actively promoted for development. There was no response at the "Call for Sites" stage of both the 2012 SHLAA update and this SHLAA. For this reason the site should not be taken forward in this study. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.	No change
ADC/088/13	Cecil Norris House, Ravens Road Shoreham	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that the site is still in residential use and, pending a review of Council land holdings, this site is not currently available and the site should not be taken forward in this study. This site is now being considered as having potential for a Council new build scheme.	A proposal to redevelop this sheltered housing scheme with a scheme specifically designed for older people was approved at Adur Joint Strategic Committee (6 th October 2015) and Adur Full Council (20 th October 2015). Capital bids for design, site preparation and clearance etc. are likely to be made in the 2016/2017 and 2017/2018 capital programmes. Feasibility work to be completed by January 2016.

		Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.	There is now a clear commitment by the Council to redevelop this site and its SHLAA status will change from 'Reject – Monitor' to 'Potential' in the SHLAA Update 2016.
ADC/089/13	3 to 15 New Road Shoreham	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that, as the planning consent for residential development has lapsed and the applicant is no longer pursuing its redevelopment, the site is not currently available and the site should not be taken forward in this study. Although this site is not being taken forward in the SHLAA at this time it is considered that, as market conditions continue to improve, it may offer development potential in the longer term and it should be monitored on a regular basis.	No change
ADC/091/13	412/414 Brighton Road Shoreham	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. A planning application for residential development was withdrawn and the site is no longer being promoted for development. Following a reassessment in 2013, it is concluded that the site should not be taken forward in this study as it is not currently available. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.	No change
ADC/093/13	Car Park, Beach Green Shoreham	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable subject to the flooding constraints being satisfactorily addressed. Following a reassessment in 2013, it is concluded that, as the flood issues have yet to be addressed, the site should not be taken forward in this study. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.	No change
ADC/095/13	124 Upper Shoreham Road Shoreham	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. However, following a reassessment in 2013, it is concluded that there is not a reasonable prospect that housing will be delivered on the site as the site is not currently available. There was no response at the "Call for Sites" stage of both the 2012 Update and this SHLAA and it is concluded that the site is no longer available and should not be taken forward in this study. Although the site is not being taken forward in the SHLAA at this time it is	No change

		considered that, as market conditions continue to improve, it may offer development potential in the longer term and should be monitored on a regular basis.	
ADC/099/13	r/o 53/59 Southview Road Southwick	<p>The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was considered to be suitable, achievable and deliverable. Whilst the agent has confirmed that the site is likely to be delivered 2016-2018, a planning application has yet to be received. Following a reassessment in 2013, this greenfield site comprises the rear garden of a dwelling and the principle of redevelopment has not been established. In addition, it has not been demonstrated that access to the site can be satisfactorily achieved. Therefore it is concluded that this site should not be taken forward in this study.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.</p>	No change
ADC/106/13	Land north east of Hasler Estate Lancing	<p>This greenfield site was identified through the Local Plan process as a potential strategic allocation for housing development. However, development of the site is currently not achievable. Various constraints, including flood risk and landscape impact have not been addressed to the satisfaction of the local planning authority. The site has not therefore been included as a strategic allocation in the Proposed Submission Adur Local Plan 2014.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>	No change
ADC/117/13	Lancing Delivery Office, 40 North Road Lancing	<p>This site, that was not previously considered as part of the 2009 SHLAA review, is rejected from the scope of this study. The landowner has indicated that prior to any redevelopment, the current use as a delivery office for the Post Office would need to be relocated within the vicinity and a suitable site has not been identified. The site is therefore not currently available.</p> <p>Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and it should be monitored on a regular basis.</p>	No change
ADC/120/13	Shoreham Police Station, Ham Road Shoreham	<p>This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is rejected from the scope of this study as it is not considered that there is a reasonable prospect that housing will be delivered on the site as it is not currently available. It has been Identified in the</p>	No change

		<p>Sussex Police Estates and Facilities Department Estates Strategy 2013-2018 as a site where the building is not in the right location/under-utilised or in a poor state of repair and where the service could be re-provided in a better location within the area. Pending re-provision of this service, the site is not currently available.</p> <p>Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term and should be monitored on a regular basis.</p>	
ADC/123/13	Land north of 20/40 Firle Road Lancing	<p>This site was previously within the Area of Outstanding Natural Beauty where development was resisted, but was then excluded from the National Park. The Proposed Submission Adur Local Plan 2014 proposes that the site be included within the built up area boundary. The site has previously been promoted for development by the previous owner. More recently, a pre application enquiry has been made for residential development on this site comprising 5 dwellings.</p> <p>The site is too small for 6 dwellings which is the threshold for this study. Any dwellings that may be delivered on this site will be picked up through other monitoring.</p>	No change
ADC/128/13	Land between Adur Rec and New Salts Farm Road Lancing	<p>This greenfield site was identified through the Local Plan process as a potential strategic allocation for housing development. However, the development of the site is currently not achievable. Various constraints, including flood risk, transport and landscape impact have not been addressed to the satisfaction of the local planning authority. The site has not therefore been included as a strategic allocation in the Proposed Submission Adur Local Plan 2014.</p> <p>Although the site is not being taken forward in the SHLAA at this time as it is considered that it may offer development potential in the longer term and, as such, it should be monitored on a regular basis.</p>	No change
ADC/129/13	Land north west of the Hasler Estate Lancing	<p>This greenfield site was identified through the Local Plan process as a potential strategic allocation for housing development. However, the development of the site is currently not achievable. Various constraints, including flood risk, transport and landscape impact have not been addressed to the satisfaction of the local planning authority. The site has not therefore been included as a strategic allocation in the Proposed Submission Adur Local Plan 2014.</p> <p>Although the site is not being taken forward in the SHLAA at this time as it is considered that it may offer development potential in the longer term and, as such, it should be monitored on a regular basis.</p>	No change

ADC/133/13	St Marys Church Hall, 24/25 East Street Shoreham	This site, that was not previously considered as part of the 2009 and 2012 SHLAA review is rejected from the scope of this study as it is not considered that there is a reasonable prospect that housing will be delivered on the site as it is not currently available. Although this site is not being taken forward in the SHLAA at this time, it is considered that it may offer potential in the longer term and should be monitored on a regular basis.	No change
ADC/138/13	Land north 123/207 Manor Hall Road Southwick	The site was considered in 2009 and 2012 as part of the SHLAA review. At that time it was rejected as it was concluded that the east of the site contains well used allotments which have not been declared surplus to requirements. Whilst the land to the west is vacant, the lack of access, the proximity to the sub-station and the location of underground cables makes the site physically constrained. It is considered more appropriate as a possible extension to the current allotments or a community use rather than for housing development. Following a reassessment in 2013 it is concluded that there may be some potential for development in the longer term if alternative access arrangements can be achieved. A development brief is currently being prepared for both this site and ADC/132/13) to help guide development. The site will be monitored on a regular basis.	The Eastbrook Allotments Development Brief (October 2015) was approved on 26 th November 2015. It will be used as guidance for developers when submitting applications for development. The Brief identifies the various constraints, including the difficulty in achieving a satisfactory access, and the proximity of the site to the EDF substation and associated underground cables. It states that in the medium term it is considered that housing is not appropriate but the site will continue to be monitored to see if the situation changes.
SH/001/13	5 Brighton Road Shoreham	This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change. The precise form and amount of development has yet to be determined but any residential development delivered on this site in the future will contribute to the housing delivery target in the Local Plan. Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.	Early pre-application discussions have taken place.
SH/002/13	Technology House, West Street Southwick	This site lies within the Shoreham Harbour Regeneration Area identified as a broad location for change. The precise form and amount of development has yet to be determined but any residential development delivered on this site in the future will contribute to the housing delivery target in the Local Plan. The site is currently in employment use and is not available for development Although this site is not being taken forward in the SHLAA at this time it is considered that it may offer development potential in the longer term and should be monitored on a regular basis.	No change

14. Appendix 5: Position since 1 April 2015

14.1.1 Since 1 April 2014, the following large sites have either been granted planning permission for residential development or are yet to be determined:

Table 9: Planning application granted consent since 1 April 2015

Site Address	SHLAA ID Number	Number of dwellings (net)
17 Ham Road, Shoreham-by-Sea	ADC/	6
Riverbank Business Centre, Old Shoreham Road, Shoreham-by-Sea	ADC/049/13	120
Garage Block, Britannia House, High Street, Shoreham-by-Sea	ADC/001/15	7

Table 10: Planning applications not yet determined at 1 April 2015

Site Address	SHLAA ID Number	Number of dwellings (net)
Lancing Manor Filling Station, Old Shoreham Road, Lancing Refused – Appeal Lodged January 2016 to be determined.	ADC/083/13	6

Shoreham Harbour Regeneration Area: Broad Location

14.1.2 Within the Shoreham Harbour Regeneration Area broad location, a minimum of 1100 new homes are planned for delivery on the south side of Brighton Road (A259) in the Western Harbour Arm during the Plan period up to 2031.

14.1.3 Pre-application discussions have recently been held with a developer interested in a site within the Regeneration Area. Pre-application consultation is anticipated in spring 2016 with a planning application submitted in summer 2016. This large site, if approved, will increase delivery in the first five years of the Plan period. Further details will be included in the SHLAA 2016 Update.