Housing and Economic Land Availability Assessment (HELAA)

Arun District Council

August 2017
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### Glossary

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<th>Description</th>
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<tr>
<td>ADC</td>
<td>Arun District Council</td>
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<tr>
<td>ALP</td>
<td>Arun Local Plan (2011-2031) Publication Version (October 2014)</td>
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<td>BUAB</td>
<td>Built Up Area Boundary</td>
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<td>CILA</td>
<td>Commercial and Industrial Land Assessment</td>
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<td>EELA</td>
<td>Employment and Economic Land Assessment</td>
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<td>EiP</td>
<td>Examination in Public</td>
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<td>HELAA</td>
<td>Housing &amp; Economic Land Availability Assessment</td>
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<td>HIS</td>
<td>Housing Implementation Strategy</td>
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<td>HLS</td>
<td>Five year housing land supply report</td>
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<td>LPA</td>
<td>Local Planning Authority</td>
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<td>LPAA</td>
<td>Local Planning Authority Area</td>
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<td>NDP</td>
<td>Neighbourhood Development Plan</td>
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<td>NLPG</td>
<td>National Land and Property Gazetteer</td>
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<td>NPPF</td>
<td>National Planning Policy Framework</td>
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<td>OAN</td>
<td>Objectively Assessed Needs (the housing requirement)</td>
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<td>PPG</td>
<td>Planning Practice Guidance</td>
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<td>SAC</td>
<td>Special Area of Conservation</td>
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<td>SFRA</td>
<td>Strategic Flood Risk Assessment</td>
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<td>SHLAA</td>
<td>Strategic Housing Land Availability Assessment</td>
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<td>SPA</td>
<td>Special Protection Area</td>
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<td>SSSI</td>
<td>Site of Special Scientific Interest</td>
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<tr>
<td>TPO</td>
<td>Tree Preservation Order</td>
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<td>WSCC</td>
<td>West Sussex County Council</td>
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Executive Summary

The Housing and Economic Land Availability Assessment (HELAA) is a key component of the evidence base to inform the preparation for the Arun Local Plan (ALP).

It forms a strategic assessment of land available for development, which is required by the National Planning Policy Framework 2012 (paragraph 159) with further guidance set out in the Planning Practice Guidance (PPG).

This version of the HELAA replaces one prepared by officers in December 2016.

The HELAA presents a strategic picture of the availability and suitability of land within the Arun Local Planning Authority Area (LPAA) for development. Further, it attempts to establish realistic assumptions about the number of homes and amount of economic development that this land could yield and the timeframe within which this might come forward.

This HELAA report follows the published methodology set out in May 2016 which was prepared in accordance with the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). This was made available to view during a period of public consultation organised earlier in the year when the Council also undertook a ‘Call for Sites’ exercise.

However, it should be noted that, the PPG is very clear that ‘the Assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for housing development’ (para 8, PPG).

Therefore, this document must be considered as part of the wider evidence base for the emerging Arun Local Plan but cannot be construed as committing the Council to allocate any particular parcel of land for a particular use, nor approve any application for development.
The HELAA is divided up into three sections: Introduction, Methodology and Detailed Site Assessments. Site proforma are contained within the appendices to this report.
Introduction

The National Planning Policy Framework (NPPF) requires Local Authorities to maintain an adequate supply of housing sites in their area. As part of this process, Local Planning Authorities must consider where housing development would be best located and assess all potential opportunities for development locations.

The Housing and Economic Land Availability Assessment (HELAA), is a technical study that determines the suitability, availability and achievability of land for development. It is an important evidence source to inform plan-making, but does not, in itself, represent policy nor does it determine whether a site should be allocated for future development. Land allocations can only be made through the Arun Local Plan.

This process was previously known as a Strategic Housing Land Availability Assessment (SHLAA), but has been renamed as the HELAA in order to reflect its ability to assess land for uses other than housing. All sites that were considered as part of the previous SHLAA process were retained and carried forward into the HELAA to be considered in an up to date context.

This Housing and Economic Land Availability Assessment (HELAA) is the third housing land assessment document to be published. It is a rolling update to the initial SHLAA undertaken in 2009 and covers the areas of the district within the Local Planning Authority Area (LPAA).

This document provides a brief introduction to the HELAA and policy background, as well as the findings of this HELAA update itself. The original methodology can be viewed on the Council’s website (www.arun.gov.uk).

The methodology for the assessment has been prepared in accordance with the latest policy perspective in mind.
Whilst the HELAA is a key document, it is only one part of the extensive evidence base used to inform the preparation of the Local Plan. It is also important to understand that the HELAA:

- Does not allocate land for development and is not a statement of Council policy. It also does not outweigh or alter any existing policies or designations.
- Highlights the potential of land across the LPAA for development;
- Is not, and is not intended to be, a proxy for site allocations in the Local Plan and
- The assessment uses an agreed, objective and consistent methodology which seeks to capture information on constraints as they exist at a particular point in time.

The HELAA can be viewed at the Council’s Offices and on the Council’s website. The online version takes advantage of interactive mapping to ensure that it is user friendly.

**What is the HELAA?**

An assessment of housing land availability is required by the National Planning Policy Framework (NPPF) in order to “establish realistic assumptions about the viability of land to meet the identified need for housing over the plan period” (para 159, NPPF). An assessment of land for economic suitability and development is also required by paragraph 161 of the NPPF.

As part of this, Local Planning Authorities must assess all potential opportunities for development locations to consider where residential development would be best located.

The aim of the HELAA is to assist the Council in the identification of suitable sites for development to enable it to maintain an adequate supply of land to meet the identified development needs (OAN).
Therefore, the purpose of a HELAA is to:

- Identify sites with potential for housing or economic development;
- Assess their housing or economic potential;
- Assess their suitability for housing or economic use and likelihood of delivery.

This HELAA has a primary focus on housing potential, and consequently, economic sites have been considered where they have been submitted for housing development, included in the previous Employment and Economic Land Assessment, the previous SHLAA or, have been previously assessed for economic use. This HELAA does not assess all identified economic sites in the district. The next update may include wider consideration of this.

Sites assessed are identified as either:

- Deliverable (Suitable, Available and Achievable); or
- Developable (Suitable but either the availability is specified for a future date or is currently unknown, or the achievability of the site is unknown/marginal).
- Not developable – if a site is currently not considered suitable and/or it is not known when a site could be made available, it is neither suitable nor viable.

This HELAA report assesses development potential of those sites that have been submitted to the Council previously and through the ‘Call for Sites’ process. The report presents the following key outputs:

- Details of all sites submitted as part of the HELAA process, including their locations on a map;
- An assessment of the suitability of each site for development;
- A notional development capacity that could be delivered on each site assessed to be suitable;
- A calculation of the potential windfall delivery of housing for the District (i.e. housing to be delivered in the Local Plan period on unidentified sites or on sites that fall below the minimum threshold to be included in the HELAA); and
• An indicative trajectory of anticipated development and consideration of associated risks (to be included within the Housing Implementation Strategy).

The Assessment is updated on a regular basis in order to reflect any changes of circumstance with individual sites (i.e. previously identified constraints to the delivery of a site have been removed). The housing trajectory will also be updated to reflect any changes. Updates to the assessment will:

• Review the sources of sites to determine if any new sites are to be included;
• Gather up-to-date information through a desktop survey
• Survey new and amended sites
• Re-assess the deliverability and developability of sites (this may mean that the status of a site may change as part of a review.

Background Information

The following section outlines the recent changes in the planning system and summarises the key pieces of local evidence that have informed the HELAA site appraisals in this update. The latter half of this section provides the Council’s latest identified housing need.

Policy Context

National Planning Policy

The National Planning Policy Framework (NPPF) outlines Central Government’s policies for plan making and decision-making with the overarching aim of shifting power to local planning authorities and local communities.

The NPPF outlines the common theme, or “golden thread”, of a presumption in favour of sustainable development for plan-making and decision making. Local Plans should “positively seek opportunities to meet development needs” and “meet
Objectively Assessed Needs, with sufficient flexibility to adapt to rapid change”. For decision-taking local planning authorities should approve development proposals that conform to the development plan without delay and grant planning permission where the development plan is absent or out-of-date.

The NPPF states that the HELAA remains a key piece of evidence required for the preparation of the planning policy documents, such as the Arun Local Plan 2011-2031

Paragraph 159 of the National Planning Policy Framework (NPPF) (2012) requires that once a Local Planning Authority has a full understanding of housing needs in their area they should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the suitability, availability and achievability (the likely economic viability) of land to meet the identified need for housing.

Paragraph 161 of the NPPF requires Local Planning Authorities to assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet identified needs.

In March 2014 the Government published the Planning Practice Guidance (PPG). This document replaced a number of Circulars and Planning Practice Guidance, including the 2007 Strategic Housing Land Availability Assessment Practice Guidance. The Housing and Economic Land Availability Assessment¹ section of the PPG now provides guidance on undertaking land assessments.

The PPG recommends that housing and economic evidence should be undertaken as part of the same exercise. Therefore, in 2014 ADC officers merged the database of sites from the SHLAA (updated in 2012) and the Employment and Economic Land Assessment (2010) to create the Arun Housing and Employment Land Availability Assessment (HELAA).

The most up to date guidance on the preparation of a HELAA is contained within the PPG. Whilst the PPG sets out a similar methodology to that previously outlined in the 2007 SHLAA guidance, the NPPG now suggests a site size of 5 or more units. To date, the Council’s SHLAAAs have applied a threshold of 6 or more units. This update continues to use this threshold, as it is consistent with the Council’s established monitoring framework and any data supplied by the County Council.

In line with the PPG, this update incorporates an increased emphasis on economic land by drawing out, from the assessment of suitability of sites for housing, whether mixed use opportunities might exist.

**Local Planning Policy**

Arun District Council’s local planning policies currently consist of ‘saved’ policies from the Arun Local Plan 2003. These policies are used in conjunction with the NPPF.

**Emerging Local Plan**

Arun District Council is currently preparing a new Local Plan to replace one adopted in 2003. This plan will steer development in the district over a 20 year period and is a key driver for growth and regeneration. The Arun Local Plan (2011-2031) (ALP) was submitted to the Planning Inspectorate in January 2015.

Following comments received from the Inspector, the examination process has been suspended for a 12-18 month period. The suspension process has provided the Council with the opportunity to prepare a new SA in which all of the reasonable alternatives for meeting the requirements of a higher OAN will need to be first identified, and then subject to clear comparative assessment.

Arun District Council has commissioned a number of studies which have informed the revised SA as well as any modifications to the ALP.
In addition, where Neighbourhood Plans bring forward site allocations, they will take precedence once they are ‘made’, so long as they are in conformity with the ALP.

Further information on the Arun Local Plan, including the latest timetable, can be found on the District Council’s website²

**Evidence Base**

The HELAA is used as part of the evidence base for planning policy documents and policy formulation, including the Arun Local Plan. There are a number of evidence base documents that also help to inform policy formulation, particularly those that consider strategies for the planning of new housing. Such documents include a Transport Study, Landscape Study, Sustainability Appraisal and an Infrastructure Delivery Plan. As a consequence, the findings of the HELAA need to be tempered against the findings of other evidence base documents when considering future housing potential. For example, the HELAA only assesses individual sites, whereas transport and infrastructure studies may consider the cumulative impact of potential developments. Therefore, whilst one particular settlement may seem to have significant potential for housing growth, based solely on HELAA findings, other evidence may paint a different picture of how much of that potential is suitable and deliverable.

In addition, it should be noted that evidence based documents prepared and held by the Council have been utilised in helping come to conclusions on HELAA sites.

**Previous Site Assessment Work**

The Council had previously produced a Strategic Housing Land Availability Assessment (SHLAA), with the most recent update being published in 2012.

The 2012 update was prepared to reflect national policy changes introduced by the National Planning Policy Framework (NPPF) (2012) and the methodology was based on the following:

- Communities Practice Guidance “Strategic Housing Availability Assessments” published in 2007 and
- “SHLAA and development plan preparation” prepared by Planning Officers Society in January 2008

It should be noted that the 2012 SHLAA focused on existing sites and did not include a full call for sites exercise.

The 2012 SHLAA update forms part of the primary evidence in the preparation of the Arun Local Plan (2011-2031) (ALP). In particular, the report informed the preparation of the Arun Local Plan Housing Implementation Strategy 2015 and the Arun 5 year housing land supply 2014-2019 report, submitted alongside the ALP. Furthermore, the SHLAA was a key document used to prioritise the identification of potential strategic allocations assessed as part of the preparation of the ALP.

With regard to assessing land for economic and employment purposes the Council, in 2010, commissioned consultants to undertake an Economic and Employment Land Assessment (EELA). The aims of this study were to assess future demand and supply for employment land and assess the suitability of sites, whether existing, permitted or proposed, for employment uses.

The EELA reviewed existing employment sites, the information which is now included in this study.

In 2014, following the publication of the Planning Practice Guidance, officers merged the database of sites from the SHLAA 2012 Update and the 2010 Employment and Economic Land Assessment to create the Arun Housing and Employment Land Availability Assessment (HELAA).
The HELAA was made available on the Arun District Council (ADC) website in December 2014 alongside a Call for Sites form as part of an open and ongoing exercise to ensure that submission sites could be added to the HELAA on a rolling basis. This approach was taken because the HELAA must be a ‘live’ document, allowing the opportunity for new sites to be submitted and assessed on an annual basis.

A full review of the HELAA was undertaken and published in December 2016. This review was triggered by a significant change to the housing requirement figure (Objectively Assessed Need), which is being assessed through the Local Plan process. A further, annual review has now taken place in August 2017.
HELAA Update

The HELAA should be reviewed and updated on an annual basis in order to ensure that the information contained within it is as accurate as it can be. As a consequence, the Council has undertaken a review of the HELAA in 2017.

The update to the existing HELAA has enabled the Council to identify and assess new sites and broad locations (as well as review/update data regarding existing HELAA sites) to identify which are ‘deliverable’, ‘developable’ or ‘not currently developable’ for housing and employment development.

The preparation of an updated trajectory for the delivery of sites is also crucial to ensure that the Council can test the delivery of a five-year supply of deliverable sites against the Council’s latest OAN figure.

The 2017 HELAA, therefore, replaces all previously published land availability assessments.

Consultation and Call for Sites Exercise

As part of the update to the HELAA, an informal consultation was undertaken from the 12 April – 12 May 2017 to check the baseline data held on the HELAA database, as it stood as of April 2017. This allowed Town and Parish Councils, local residents and amenity groups the opportunity to have an input and provide the Council with any information that they were aware of.

It also included a Call for Sites exercise in which landowners and developers were able to promote any new sites within the district for inclusion.

The exercise included a form which was provided in both paper and electronic format. In an attempt to contact all of the landowners in the HELAA, letters were sent out requesting that the existing information held about the sites should be reviewed.
The intention for carrying out such a consultation was to ensure that the HELAA baseline is accurate and as up to date as possible.

The level of information made publically available was extensive, and displayed in full. This was provided by way of an interactive map and a complete version of the 2016 appraisal.

A good level of responses was received as a result of the consultation and call for sites exercise. The results have been useful and fed into the final version of this report. Responses were received from a variety of sources including Town and Parish Councils, key stakeholders, local groups and residents, along with landowners, agents and developers. As a result of the exercise, an additional 13 sites were added to the appraisal.
Identified Housing Need for Arun District

The Council is required to consider the Objectively Assessed Need (OAN) for housing in its area, and make appropriate provision for that figure in its Local Plan. In order to determine the OAN, the Council appointed consultants to undertake the relevant assessments. This is updated on a regular basis in line with the latest housing and population projections.

The Arun Local Plan (2011-2031) Publication Version (October, 2014), was submitted to the Secretary of State for independent Examination in Public (EiP) in January 2015. This set out a requirement for 580 dwellings per annum (dpa). The 2012 SHLAA update report supported the preparation of the ALP and identification of potential strategic sites as well as the preparation of the Council’s Housing Implementation Strategy and Five Year Housing Land Supply 2014-2019 report.

EiP hearings followed submission in June 2015. At this time, the Inspector was made aware of further evidence emerging which increased the housing requirement figure (OAN) to 758 dpa. The Inspector held a Procedural Meeting in order to determine how the ALP EiP should proceed. It was concluded that the OAN evidence should first be consulted on, with a hearing to follow in early 2016.

The OAN hearing took place on January 14th at Arun District Council, led by Inspectors Mr Roy Foster and Mr Jonathan Bore (who has now replaced Mr Foster as the ALP Inspector due to Mr Foster’s retirement). On the 2nd February, the Inspectors’ letter was received which formally suspended the ALP EiP for a period of fifteen months. Furthermore, the letter concluded that the OAN figure for Arun District Council should be 845 dwellings per annum.

Further work has been undertaken by the consultants to consider the implications for the Objectively Assessed Need (OAN) arising from the 2014-based Sub-National Population Projections, issued by the Office of National Statistics (ONS) in May 2016, and associated Household Projections. The report identifies an OAN for 919 dwellings per annum.
Emerging Planning Changes

The Housing and Planning Bill was introduced to Parliament on 13th October 2015. It received Royal Assent in May 2016 with any necessary secondary legislation being brought into force soon afterwards.

Meanwhile, the government also consulted on a range of proposed technical planning changes as part of the implementation of the Housing and Planning Bill. The Technical Consultation on Implementation of Planning Changes was published for consultation in February 2016 and set out technical details for the implementation of changes including the production of a brownfield register. The consultation identified that the register would become a vehicle for granting permission in principle for new homes on suitable brownfield sites.

The proposed changes identify that the starting point for identifying suitable sites for the brownfield register should be the HELAA. The consultation was clear that Local Planning Authorities must ensure that these assessments are up to date, and if not, to undertake prompt reviews.
Important information and Caveats related to the HELAA

The HELAA is an important evidence source to inform Plan making, but does not in itself determine whether a site should be allocated for housing or economic development or whether planning permission should be granted. The allocation of a site for development can only be made in the Local Plan or through a Neighbourhood Plan. The Plan making process (including Sustainability Appraisal) will determine which suitable sites should come forward for development and for what level of development.

Although sites can only be allocated in the Local Plan or a Neighbourhood Plan, planning applications must still be determined during the preparation of a Plan and via the Development Management process. This can relate not only to sites that the Council is considering allocating, or has allocated, but to sites that are contrary to an emerging or adopted Plan.

The inclusion of a site within the HELAA does not preclude it being developed for other uses.

The HELAA is not the Council’s last word in respect of site analysis for Development Management or site allocation purposes. Due to the scope of the HELAA, the Council has not assessed every site to the extent that would be required to support a planning application or make an allocation. The resource implications are too great. It can provide a view on suitability and capacity based the strategic level of analysis undertaken, which is proportional to the primary task of the HELAA, which is to assist in local plan-making and to evidence, broadly speaking, what the district might be able to achieve in respect of growth and the options for where growth can go.

The assessment and conclusions of sites may be subject to change over time, for example site boundaries, constraints may be overcome/mitigated or additional constraints identified, likely timescales may change, along with site capacities.
Monitoring and Updating the HELAA

The HELAA is a live document and it is important that it is monitored and kept up to date so that it is a useful resource for the Council. As a result, it shall be incorporated into the ALP monitoring framework and monitored annually in accordance with the PPG.

The main information that shall be monitored is as follows:

- Progress with delivery of development on allocated and sites with planning permission
- Planning applications that have been submitted or approved on sites and broad locations identified by the assessment
- Progress that has been made in removing constraints on development
- Unforeseen constraints that have emerged which means a site is no longer deliverable or developable, and how these can be addressed
- Whether the windfall allowance is coming forward as expected, or may need to be adjusted.

Sites submitted to the Council following the cut-off date for this assessment, will be considered as part of the next review.

If any member of the public, developer, landowner/agent or Parish Council or other organisation has any further information they would like to submit in relation to a site already within the assessment (including factual errors), this material should be passed to the Council via the update form which can be found on the website (http://www.arun.gov.uk/helaa).

Information related to potential new sites for inclusion in the HELAA, should be sent to the Planning Policy and Conservation Team, via the ‘Call for Sites’ form on the Council’s website. These sites will be considered as part of the next review.
Following the publication of this report, the next review of the HELAA is scheduled for publication in autumn 2017. The cut-off date for the submission of new site information will be made available on the Council’s website.
Structure

Due to the nature of the topic covered, the HELAA is divided up into a number of sections/parts:

Part one: Introduction

Part two: Methodology – this identifies the methodology prepared in the topic paper dated May 2016

Part three: Site assessment information including windfall assessment.

Appendices: Detailed site assessments – this part contains information related to each of the sites assessed. The site assessments are reported by their status: deliverable, developable and not developable.

The report presents the following key outputs:

- Details of all sites submitted as part of the HELAA process, including their locations on maps;
- An assessment of the suitability of each site for development;
- A notional development capacity that could be delivered on each site assessed to be suitable;
- A calculation of the potential windfall delivery of housing for the District (i.e. housing to be delivered in the plan period on unidentified sites or on sites that fall below the minimum threshold to be included in the HELAA); and
Methodology

Establishing a Methodology

The first element of the process required that an agreed methodology for undertaking the HELAA was prepared. An initial draft methodology was produced as part of an interim HELAA topic paper. This took account of national policy and advice contained in the NPPF and PPG. The draft methodology was placed on the Council’s website during the HELAA consultation and call for sites exercise.

The Process

The adopted methodology sets out a 5 stage approach, based on the approach identified in the PPG, for undertaking the HELAA, as set out below:

1. Site identification;
2. Site assessment;
3. Windfall assessment;
4. Assessment review; and
5. Final evidence base.

The above approach has been followed and the various stages have been addressed in the subsequent sections of this report.

The entire process is summarised in the flow chart on the following page.
It should be noted that the HELAA has been prepared using the sites within 2012 SHLAA and 2010 EELA as baseline evidence and considers further sites that were submitted through the Call for Sites process which ran between 2nd May and 6th June 2016.

The following paragraphs provide a summary of the methodology followed by the authority when preparing the HELAA update. The complete methodology can be found on the Council’s website (www.arun.gov.uk/helaa)
Stage 1: Identification of sites and broad locations

Geographical Scope

Arun District Council is preparing further evidence based work to support the Local Plan within a restricted timetable associated with the Local Plan Examination in Public Suspension Timetable. Due to the fact that this timetable does not fit with surrounding authorities, the decision has therefore been taken to proceed with the HELAA at a district level.

The assessment area will cover that of Arun District Council Local Planning Authority Area, which does not include the South Downs National Park.

Site Size/Threshold

The guidance states that all sites capable of delivering five or more dwellings should be considered as part of the assessment, but that plan makers may wish to consider alternative site size thresholds.

Any site considered to have an estimated yield falling below the threshold of 6 dwellings and 0.25ha (or 500m$^2$ of floor space) for economic development, has been excluded from the assessment.

This threshold is in alignment with the annual Housing Land Supply Assessment undertaken by West Sussex County Council (WSCC), which is a key source of site monitoring information for the Council.

Timescales

The HELAA is based on the period covered by Arun Local Plan which runs from 2011 to 2031. Therefore the HELAA will include sites that have planning permission and are being constructed but still have phases for construction planned over the next few years. The HELAA will also include sites which may not be suitable,
available or achievable at this time, but may be developable towards the end of the plan period. This will be reflected in the yield section of the HELAA.

**Land designations**

Within the Arun LPA area there are some clear intrinsic designations where development (housing or employment) would be unsuitable, so these areas have been excluded from the assessment.

Sites falling within or covered by the following nature conservation designations have been excluded from the HELAA:

- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)
- Ramsar sites
- Sites of Special Scientific Interest (SSSI)
- Regionally important geological and geomorphological sites

**Other designations**

Other designations considered important for exclusion from the HELAA are:

- Flood zone 3b
- Open space
- Ancient woodland
- Sites of Nature Conservation Interest (SNCI),
- Nature reserves,
- Historic parks and gardens, Scheduled Ancient Monuments (SAMs)
- Local Green Space

Although development in these locations is not preferable, it may, in some instances be possible to appropriately mitigate adverse impacts through development design.
Therefore sites containing small areas of these designations may be permitted within the assessment. Nevertheless, these designations will be noted as a potential constraint. Sites wholly within these constraints will have been excluded from the HELAA as they would not be suitable for development. In addition, site proposed for inclusion by consultees, have been included, even if covered by an excluded designation. This is to ensure transparency of the process.

**Existing Sites and Broad Locations**

The HELAA is currently being updated from a baseline database of sites that were originally promoted to the Council or identified by officers from the 2009 SHLAA and 2012 SHLAA Update. Each of the sites from the 2012 SHLAA update will be fully reviewed, based on up to date information. It should be noted, that any sites under the threshold of 6+ dwellings have been removed at this stage.

**Identifying New Sites and Broad Locations**

A consultation, running between 3\textsuperscript{rd} May – 3\textsuperscript{rd} June 2016 was held in order to ask consultees to provide updates on each of the sites and to identify whether there are any sites which should be added to the HELAA (through a Call for Sites exercise).

In addition to the HELAA consultation and Call for Sites exercise, the Council also undertook an exercise to identify new sites through a desktop review of data covering the Local Planning Authority area. Data sources included the following:

- ‘Made’ Neighbourhood Development Plans
- Planning application records including unimplemented, withdrawn and refused
- National register of public sector land
- Empty property register
- English House Condition Survey
- Valuation Office database
- National Land Use Database
- OS maps and Aerial photography
• Business enquiries for land, active engagement with sector.
• Active engagement with local landowners

Neighbourhood Development Plans

There are currently fourteen ‘made’ Neighbourhood Development Plans across the district. Each housing allocation within the plans have been included in the most up to date version of the HELAA, published as part of the updated consultation.

Due to the fact the sites have been allocated, there is a strong level of certainty that the site will be delivered.

As part of the desktop exercise, sites which were considered as part of the Neighbourhood Development Plan processes but rejected at Examination stage, or even prior to that stage, will be included in the HELAA and reassessed.

Greenfield/Previously Developed Land

The identification of sites for inclusion within the HELAA will include both greenfield and brownfield land which could be improved, intensified or changed. Where a site has particular development constraints, these will be clearly documented together with a description of how this could be overcome, if appropriate.

Whilst policies within the emerging ALP seek to make optimal use of land within the built up area boundaries of existing settlements, it is not possible to accommodate all future development within these boundaries. There will be greenfield sites which lie on the urban fringe of the main towns and villages which will need to be considered for future planning purposes. In these cases, consideration will be given in particular to landscape, biodiversity enhancement, woodland management, recreation provision and access routes.
**Employment Land**

As mentioned above, in 2014, the SHLAA 2012 update was merged with the 2010 Employment and Economic Land Assessment to include all sites that had been identified as suitable for economic development. The study carried out a qualitative assessment of existing and potential future employment sites of 0.25+ ha in Arun District (including sites with potential for mixed uses and/or live/work units).

This baseline of employment sites from 2010 has been checked and updated to identify whether they are still active and whether the potential sites have been developed for employment use.

An important data source to be used to check/update the baseline data, and to add new employment sites is the Commercial and Industrial Land Assessment (CILA) data provided by WSCC on an annual basis. The CILA provides data on all employment sites of 50sqm+ which are committed, available or in course of erection. The sites identified on the database will be checked against the baseline data and any new sites within the HELAA threshold of 0.25+ha will be added.

**Additional Data**

Since April 2015, the Council has collected data on care homes under use class C2 which will provide useful data to input into the HELAA as part of the identification of committed/deliverable sites.

**Submitted Sites**

Submitted sites include those submitted to the Council by an external body such as a landowner, agent or Town/Parish Council. Information was collected via a Call for Sites form, available to download from the Council's website, and also emphasised through the HELAA update consultation which ran between 3rd May – 3rd June 2016.

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3 The data provided for the CILA includes sites .50sqm floor area of new or change of use to any of the following: A1, A2, B1, B2, B8, D2, C1 hotel if more than 25 rooms.
Table 1 summarises the type of information collected for each site.

<table>
<thead>
<tr>
<th>Site Characteristics</th>
<th>Site Size</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Site Boundaries and location</td>
</tr>
<tr>
<td></td>
<td>Current land use(s)</td>
</tr>
<tr>
<td></td>
<td>Surrounding land use(s)</td>
</tr>
<tr>
<td></td>
<td>Character of surrounding area (i.e. rural, urban etc)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Constraints and ways to alleviate them</th>
<th>Physical constraints, e.g. access, contamination, topography, flood risk, natural features of significance.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Environmental constraints</td>
</tr>
<tr>
<td></td>
<td>Planning Policy Constraints, e.g. designations, landscape issues</td>
</tr>
<tr>
<td></td>
<td>Infrastructure constraints, e.g. impact on highways, access to the site, proximity to public transport</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Development Progress</th>
<th>Ground works complete/ homes started / site built out</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total number of units proposed/permitted</td>
</tr>
<tr>
<td></td>
<td>Units built</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Suitability and Deliverability</th>
<th>Assessment of whether the site is suitable for housing, including where applicable as part of a mixed use development.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>An assessment of and land preparation costs</td>
</tr>
<tr>
<td></td>
<td>An assessment of viability and deliverability</td>
</tr>
<tr>
<td></td>
<td>A summary of land ownership/ control of site</td>
</tr>
<tr>
<td></td>
<td>Likely timescale for commencement of development</td>
</tr>
<tr>
<td></td>
<td>Identification of barriers to development and how they can be overcome</td>
</tr>
</tbody>
</table>
**Broad locations**

Broad locations are wider areas, identified to have characteristics for accommodating housing developments, but where not all potential sites may have been identified.

The advantage of identifying broad locations is that it gives communities an idea of where future development may be directed and it will provide developers with a greater degree of certainty about where development may be encouraged. It is a proactive approach to planning, which reflects positive choices about the direction of future housing developments, rather than a reactive approach to development opportunities as they arise. Examples of broad locations include those:

- **Within or adjoining settlements** – for example, areas where housing developments are, or could be, encouraged and small extensions to settlements; and
- **Outside settlements** – for example, major urban extensions, growth points, growth areas, new free-standing settlements.

As part of the HELAA update and review, a column will be introduced to specify whether an area of land has been assessed as a site or as a broad strategic location.

**Stage 2: Site/Broad Location Assessment**

**Calculating Development Potential**

The housing potential of a site refers to the net number of dwellings that the site can be assumed to accommodate through its development or conversion of existing buildings.
The HELAA had taken a relatively simplistic approach to modelling\(^4\), based on an assumption of 30 units per hectare (ha). In reality the density will vary relative to the size of the site and the amount of open space. In addition, the Council specifies minimum amounts of private outside space and minimum amounts of amenity space in residential developments. Therefore, rather than simply apply the 30 units/ha used in the HELAA the following densities have been used (based on the advice contained within the Arun viability study).

<table>
<thead>
<tr>
<th>Residential Development Densities</th>
<th>Units/ net ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smaller villages and other locations</td>
<td>30</td>
</tr>
<tr>
<td>Modern Estate Housing</td>
<td>32</td>
</tr>
<tr>
<td>Main Settlements and large villages</td>
<td>35</td>
</tr>
<tr>
<td>PDL in urban area</td>
<td>45</td>
</tr>
<tr>
<td>Urban Flats</td>
<td>75</td>
</tr>
</tbody>
</table>

*Source: Local Plan Viability Assessment Update, HDH (July 2016)*

In addition, the following net developable areas have been identified, which have influenced the final suggested yield of each site. With this in mind the following assumptions have now been used in the modelling:

<table>
<thead>
<tr>
<th>Residential Net Developable Areas</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>up to 0.4ha</td>
<td>100%</td>
</tr>
<tr>
<td>0.4 – 2ha</td>
<td>80%</td>
</tr>
<tr>
<td>2 – 5ha</td>
<td>70%</td>
</tr>
<tr>
<td>5ha+</td>
<td>60%</td>
</tr>
</tbody>
</table>

---

\(^4\) As set out in paragraph 8.2 of the Housing and Economic Land Availability Assessment (HELAA) Draft Mid Examination Topic Paper and HELAA Update Methodology May 2016
Build Out Rates

The HELAA has taken a pragmatic approach and made an assumption on build out rates largely dependent on the amount of dwellings that the development of a site could yield. The assumption used is for 50 dwellings a year (on average) associated with an independent means of access to the site. It is recognised that in the first year that completions are expected, the build out rate may be slower as development may have only occurred for part of the year.

This approach has been taken to ensure that a consistent approach is followed for all sites.

*It should be noted that the Assessment does not pre-empt or prejudice any planning decision made in the future on any particular site and the assumptions made on densities or indicative yields should not be taken outside of the context of the HELAA.*

Factors to be considered when assessing whether sites or broad locations are likely to be developed

As set out above, paragraph 47 of the NPPF requires Local Authorities to ‘identity and update annually a supply of specific ‘deliverable’ sites sufficient to provide five years’ worth of housing against their housing requirements….and a supply of ‘developable’ sites or broad locations for growth for housing over the longer term’.

The footnote to paragraph 47 provides the following definitions for deliverable and developable sites:

**Deliverable:** To be considered deliverable, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered onsite within five years, and in particular that development of that site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within the first five years; for example if they are no
longer viable or if there is no longer a demand for the type of units, or if sites have long term phasing plans.

**Developable** – To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

**Not currently developable** - If it is unknown when a site could be developed, then it will be regarded as ‘not currently developable’, this could be, for example, because of severe constraints to development and not knowing when or if, they might be overcome.

The assessment criteria for determining whether a site is considered suitable, available or achievable is summarised below.

**Assessing Suitability**

The assessment of suitability will be guided by the emerging Arun Local Plan policies, Neighbourhood Plan policies and national policy. Market and industry requirements in the housing market or functional economic market area have also been considered.

The full suitability assessment assesses sites against the following criteria:

- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution, contamination
- Potential impacts including effect upon landscapes, nature and heritage conservation
- Appropriateness and likely market attractiveness for the type of development proposed (market appraisal)
- Contribution to regeneration priority areas (addressing emerging policy requirements)
- Environmental/amenity impacts
Sites in existing development plans or with planning permission will be considered suitable for development. However, these sites will be checked to identify whether circumstances have changed which would alter their suitability.

**Assessing Availability**

The Guidance considers a site to be ‘available’ for development when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies, or operational requirements of landowners. Generally this means that the landowner has expressed an intention to develop, or that it is in the control of a developer who has expressed an intention to develop.

The conclusions about site availability were informed by an assessment of the information provided during the Call for Sites process and/or engagement with the landowners. In addition, Development Control Officers provided information about certain sites through their knowledge of planning applications or informal pre-application discussions.

A secondary issue to consider when assessing availability was the timescales required to overcome any identified constraints. In the majority of cases, sites included in the first five years are those with full planning permission or allocated and with a firm commitment by the developer to bring the site forward for development. If a constraint to development exists but it is felt that this constraint could be overcome in the longer term, then the site is classified as ‘available’ but deliverable in the longer term 6-10 or 11+ years, depending on the nature or complexity of the constraints on the site.

The availability of the majority of sites was established by contacting the developers / land owners and checking relevant planning history to help clarify the legal status. Where problems have been identified, an assessment was made as to how those problems could be realistically overcome. This was based upon details provided from the land owner(s), the expert judgement of Planning Officers on the basis of local
knowledge and information collected during site visits. In addition, if the background to a site shows a history of un-implemented permissions, then this has been taken into consideration when assessing deliverability.

**Assessing Achievability for Housing**

The assessment of whether a site is achievable or not is based on a judgement about the economic viability of the site, coupled with the ability of a developer to complete the scheme within a given time period. The assessment of a site’s **achievability** takes into account the following factors:

- **Market Factors** such as:
  - Effect adjacent land uses may have on site
  - The attractiveness of the locality
  - Potential marketability of the site

- **Cost Factors** including:
  - Site preparation costs and/or exception costs
  - Affordable housing provision
  - Highways improvement works
  - Access issues and impact on Strategic Road Network
  - Third party land requirements
  - Availability and capacity of local utilities/ connection costs

- **Delivery Factors** including
  - An assessment of projected build out rates
  - Single or multiple developers
  - Size and capacity of the developer
  - Is third party land required?

For a site to be considered achievable, and therefore deliverable, there should be a ‘reasonable’ prospect that housing will be delivered on the site at a given point in time. In essence this is a judgement about the economic viability of the site and the ability of the developer to complete and sell housing over a certain period. If there is
clear evidence that sites with planning permission will not be implemented before the permission expires, they should not be identified as achievable or deliverable.

In order to feed into this assessment work, the Council is currently commissioning an Affordable Housing and Viability Assessment which includes, in its brief, a viability appraisal to assess a sample of HELAA sites to consider whether they would be economically viable when assessed against a range of development cost assumptions. The results of this work have been added to the HELAA database and used to inform the final assessment of each site.

Each site in the HELAA has been assessed against the criteria above to determine whether it is suitable, available and/or achievable. The information was then used to determine whether the site should be classified as ‘Deliverable’, ‘Developable’ or ‘Not Currently Developable’ for housing development.

**Overcoming Constraints**

The PPG states that where constraints have been identified through the suitability, availability and achievability assessment, the consideration should be given to what action would be needed to remove them.

Where there are constraints on a site, the site/broad location assessment will consider whether there is a need for new infrastructure and environmental improvement or addressing the issue of multiple landowners. As part of the assessment, emerging ALP policies may also need to be reviewed where they are currently constraining development.

**Determining a development Trajectory**

Once the initial stages of the assessment had been undertaken and an assessment of deliverability and developability made, the housing potential of all sites will be used to produce an indicative housing trajectory, setting out how much housing could potentially be provided in the District and at what point in the future it is likely to be delivered.
As has already been stated, it is emphasised that the inclusion of a site within the assessment does not imply that that site will definitely be granted planning permission. The HELAA is a technical document used to identify a portfolio of housing sites which may be picked for future planning purposes. However the final decision as to whether a site should be granted permission would be decided through the planning application process.

**Stage 3: Windfall Assessment**

The guidance identifies that a windfall allowance may be justified in the 5 year supply if a Local Planning Authority has compelling evidence as set out in paragraph 48 of the NPPF.

A windfall allowance will therefore continue to be included within future Housing Land Supply (HLS) Reports, however, this will be based on small sites under the definition of 6 dwellings or less, this is likely to result in a lower windfall allowance figure to be reported for the HLS 2017-2022 period.

**Stage 4: Assessment Review**

Following the full site assessment, the development potential of all sites will be collected to produce an updated indicative housing trajectory. This will set out how much housing and the amount of economic development that can be provided, and at what point in the future.

A risk assessment will be included which sets out whether sites will come forward as anticipated. If it is identified that there is not sufficient sites to meet the OAN, the HELAA assessments will need to be reviewed again to identify whether there are any development potential assumptions that can be amended. Contingency arrangements will need to be identified where it is not possible to identify sufficient suitable, achievable and available sites to meet the OAN.
The updated trajectory will be used to update the Arun Local Plan Housing Implementation Strategy in line with the requirements of the NPPF.

**Stage 5: Final Assessment**

The core outputs form the HELAA shall be:

- List of all sites or broad locations considered, cross-referenced with an National Land and Property Gazetteer number to locations on maps;
- An assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;
- Contain more detail for sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons; the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- An indicative trajectory of anticipated development and consideration of associated risks to be incorporated into the Arun Housing Implementation Strategy.
Site Assessment

This chapter sets out the results of the HELAA in summary format. Detailed site assessments are contained within individual pro-forma contained within the appendices to this report, or via the interactive map found on the Arun District Council website (www.arun.gov.uk).

Deliverable, Developable and Not-developable sites

The determination of a site’s suitability, availability and achievability combined with timeframe for development directly informs the overall site assessment as either:

- Deliverable,
- Developable, or
- Not-developable.

The NPPF explains in footnote 11 to Paragraph 47 that for a site to be considered deliverable, it “should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years”.

Paragraph 47 continues in footnote 12 by explaining that for a site to be considered developable, it “should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. A developable site is Suitable, Available and Achievable and has timeframe for development of 5-10 years”.

In order to ensure that we abide by the above guidance, we have classified suitable, available and achievable sites as either being deliverable or developable. This is explained in the sub-headings within this section.
New HELAA sites

New sites can be submitted to the HELAA at any point through the site submission form which is available on the HELAA webpage. Sites submitted up to the 12 May 2017 have been included in this update. The majority of new sites have been received as formal site submissions through the call for sites exercise. There were also a number of sites sourced from work being undertaken by Parish Councils producing Neighbourhood Plans and sites coming through the planning process.

With all new sites, relevant supplementary information provided by individuals and organisations on specific sites or wider known constraints which would impact upon the assessment of sites, were fed into the update.

13 new sites were assessed or included as part of the 2017 update, of which 6 were concluded to be deliverable (suitable, available and achievable), 0 sites were developable and the remaining 7 sites were found to be not deliverable or developable due to suitability, availability or achievability reasons.

Amendments to existing assessed housing sites

The Assessment is a ‘living’ document which allows for the conclusion of existing SHLAA sites to be reconsidered in light of new or updated information submitted to, or acquired by, the Council from site proponents or relevant stakeholders. This information may be a factual update on the recent progress of a site with extant planning permission or reflecting additional work undertaken by proponents of a site to resolve previously identified constraints.

The yield capacities of a number of deliverable or developable sites have been amended to reflect the most recent guidance form the viability study.

The dwelling capacities/ site rationales with extant planning permission have been amended to reflect any commencements or completions in the last year.
Deliverable Sites

For the purposes of this report, we have classified sites that have been assessed to be suitable, available and achievable to be deliverable. Deliverable sites have three sub-categories: Deliverable (general), Deliverable Neighbourhood Plan and Deliverable Strategic and

In summary, 43 sites were considered to be deliverable (general), capable of bringing forward 2,099 dwellings. All sites considered to be deliverable are contained within appendix 1 in the form of a proforma.

Developable Sites

For the purposes of this report, we have classified sites as being developable if they are either suitable, available and achievable sites, but specific information suggests that development could not come forward within 5 years;

In summary, 44 sites were considered to be developable, capable of bringing forward 3548 dwellings. All sites considered to be developable are contained within appendix 2 in the form of a proforma.

Not-Developable

A site is not-developable where the prospect of development is unlikely as it does not meet all three criteria of being suitable, available and achievable. As such, there are multiple reasons as to why a site would be considered non-developable.

All sites considered to be not developable are contained within appendix 3 in the form of a proforma.

Employment Sites

Employment sites contained within the Arun HELAA are located within appendix 4.
Final HELAA figures

LPA Area Assessment

The table below (table 2) summarises the above information by both the number of sites assessed and potential dwelling yield for the LPA area. The figures reflect any changes in capacity made in the assessment of the site.

<table>
<thead>
<tr>
<th>Total sites assessed</th>
<th>Deliverable sites**</th>
<th>Developable sites**</th>
<th>Not developable</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of sites</td>
<td>Dwelling Yield</td>
<td>No. of sites</td>
<td>Dwelling Yield</td>
</tr>
<tr>
<td>269</td>
<td>5647</td>
<td>43</td>
<td>2099</td>
</tr>
<tr>
<td></td>
<td></td>
<td>44</td>
<td>3548</td>
</tr>
<tr>
<td></td>
<td></td>
<td>182</td>
<td>N/A*</td>
</tr>
</tbody>
</table>

Table 2: Final HELAA figures.

*Please note that sites classed as not-developable are not allocated a capacity

** Please also note that these figures relate to sites that have not been identified either as strategic allocations within the modifications to the Local Plan or as a site within a Made Neighbourhood Plan.

Strategic sites are additional to these figures as they are being assessed through the SA process.

Permitted/Commitment sites

For this update an additional summary table has been produced which extracts those sites with extant planning permission/commitments (see appendix 5). Whilst permitted sites are a key source of sites for the purposes of the HELAA, they should not be counted towards the final HELAA totals. A total of 93 sites have been identified as commitment sites.
Windfall Assessment

Background

The NPPF identifies 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’.

Paragraph 48 of the NPPF states that Local Planning Authorities may make an allowance for windfall sites in the 5 year supply based on the following criteria:

1) They have compelling evidence that such sites have consistently become available in the local area; and
2) These sites will continue to provide a reliable source of supply.

An allowance for windfall development may also be made in Local Plans to assist Local Authorities in meeting their identified housing target. If doing so, the NPPF and PPG are clear that any allowance should have regard to the HELAA by, historic windfall delivery rates and expected future trends.

Historically, a significant contribution to the housing supply has come from residential garden land; however the Government has explicitly excluded this element from windfall calculations (NPPF para. 48).

Approach

The Council’s view is that the delivery of unidentified small sites in the district has been, and will continue to be, an integral source of housing supply, and therefore the HELAA should include a calculation of potential future housing delivery through windfall sites. This allows the Council to consider making an allowance for windfall development in the emerging Local Plan.

The Council will only include a windfall allowance for sites capable of accommodating 5 or less net dwellings. Sites providing net dwellings of 6 units or
more should be identified through the HELAA process, and as such, will not be counted as windfall as it would result in sites effectively being double counted.

**Historic Windfall Delivery**

To calculate an estimated windfall figure, the Council has looked at the average net completions on residential developments of 5 or less dwellings between the 2003/2004 and 2015/2016 monitoring periods.

**Small site implementation projections and windfall estimates**

Table 3 shows projected small site implementation rates and small site windfall allowance. For each year the windfall allowance is reduced by the projected implementation rate to give a composite assessment of small site implementation.

<table>
<thead>
<tr>
<th>Site Type</th>
<th>Units</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
<th>Year 4</th>
<th>Year 5</th>
<th>Total</th>
<th>Overall % Projection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ice</td>
<td>127</td>
<td>63.5</td>
<td>38.1</td>
<td>25.4</td>
<td>0.0</td>
<td>0.0</td>
<td>127</td>
<td>64%</td>
</tr>
<tr>
<td>Full</td>
<td>196</td>
<td>29.4</td>
<td>29.4</td>
<td>19.6</td>
<td>9.8</td>
<td>0.0</td>
<td>88</td>
<td></td>
</tr>
<tr>
<td>Outline</td>
<td>45</td>
<td>0.0</td>
<td>9.0</td>
<td>4.5</td>
<td>4.5</td>
<td>2.3</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>368</td>
<td>92.9</td>
<td>76.5</td>
<td>49.5</td>
<td>14.3</td>
<td>2.3</td>
<td>235</td>
<td>64%</td>
</tr>
<tr>
<td>Losses (Demol)</td>
<td>70</td>
<td>7.8</td>
<td>6.4</td>
<td>4.2</td>
<td>1.2</td>
<td>0.2</td>
<td>19.8</td>
<td></td>
</tr>
<tr>
<td>Net</td>
<td>292</td>
<td>85</td>
<td>70</td>
<td>45</td>
<td>13</td>
<td>2</td>
<td>216</td>
<td></td>
</tr>
<tr>
<td>Windfall balance</td>
<td>0</td>
<td>0</td>
<td>30</td>
<td>59</td>
<td>73</td>
<td>168</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Table 3: Data Source West Sussex County Council 2016**

Whilst historically windfall calculations have included those coming forward on residential garden land, the NPPF states that residential land should be excluded from such calculations. As such, we have filtered garden land development out of the windfall completion figures. This is shown in the table below.

Table 4 includes data from the WSCC RLA on dwelling completions on sites of 5 dwellings or less in the Arun LPA area from 2003 to 2016, specifically excluding development on residential gardens, in compliance with NPPF para 48. This demonstrates that completions on such sites were never lower than 36 dpa, and were as high as 147 dpa with an overall average of 75 dpa.
Projected completions on small windfall sites

On this basis it is concluded that it is reasonable to provide a windfall allowance for sites of 5 dwellings or less at a rate of 75 dpa (the minimum average for the period 2003-2016) for the 5 year HLS period.

Next Steps

The Council will update this section on an annual basis as part of the HELAA review process and will recalculate its figure based on new small site windfall completions and market assumptions.

Table 4: Data Source West Sussex County Council 2016
Final Assessment/Conclusions

Summary

This section of the report summarises the main findings of the HELAA and indicates how the findings will be used as part of the preparation of the Local Plan.

Planning Practice Guidance

The Planning Practice Guidance identifies a number of core outputs from the HELAA. These shall be identified alongside reference points to the Arun District Council HELAA.

NPPF: A list of all sites or broad locations considered should be prepared, cross-referenced with a National Land and Property Gazetteer (NLPG) number to locations on maps

ADC Response: All of the sites contained within the Council’s HELAA have been identified and provided with their NLPG number. This has helped the authority to link the site to the planning applications database which enables a clearer picture of a sites individual planning history to be identified and understood. This is particularly helpful when undertaking future reviews of the HELAA. This is visible within the HELAA database of sites.

NPPF: An assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when

ADC Response: This information is contained with the Council’s HELAA spreadsheet. This has been based on information available to the Council including individual submissions received from site owners or promoters. The results of which have also been incorporated into individual site pro-forma. The site pro-forma’s are
contained within the appendices to this report along with an interactive map which is contained on the Arun District Council website (www.arun.gov.uk).

NPPF: Contain more detail for sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons; the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;

**ADC Response:** This information is contained with the Council’s HELAA spreadsheet. The results of which have also been incorporated into individual site pro-formas. The site pro-formas are contained within the appendices to this report along with an interactive map which is contained on the Arun District Council website (www.arun.gov.uk).

NPPF: An indicative trajectory of anticipated development and consideration of associated risks to be incorporated into the Arun Housing Implementation Strategy.

**ADC Response:** An indicative Housing trajectory will be prepared as part of the Housing Implementation Strategy.

**Overall Supply of Deliverable and Developable Sites**

43 sites were considered to be deliverable, with capacity for 2099 dwellings on those sites. A total of 44 sites were found to be developable, capable of bringing forward 3548 dwellings.

**Windfall Delivery**

The Council has estimated that it could make an allowance for 75 dwellings per year coming forward on small windfall sites. This is because the Council has a strong history of delivering windfall sites and will consider how this is factored into the overall land supply of the Local Plan.
Housing Trajectory

Using the information collected on sites assessed as being deliverable and developable, we will be able to produce a notional housing trajectory for the period 2011-2031. This trajectory will be included within the Housing implementation Strategy, and published separately.

How the Findings will be used

The findings of the HELAA will be used alongside other evidence base documents, to inform the production of the Local Plan by helping to identify development options for consideration and assessment.

It is important to remember that the classifying of a site as suitable in the HELAA does not grant a site planning permission and is not an allocation. Only a Local Plan can allocate land for development.

Future Updates

The HELAA is a process that is to be repeated on an annual basis. As such, this HELAA report will be revised to take into account additional information submitted to the Council. It will reassess sites based on this additional information and will assess any further sites submitted to at the same time.

The estimated windfall delivery rate will be recalculated to take into account recent completions and a reassessment of market conditions.
APPENDICES

The appendices contain detailed site assessments in the form of individual proforma according to the status of the site. Please note that the appendices are ordered by parish. The appendices are ordered as follows:

Appendix 1 Deliverable Sites
Appendix 1.1 Deliverable Sites - Summary Tables
Appendix 1.2 Deliverable Sites (excluding Neighbourhood Plan Sites) - Detailed Proforma
Appendix 1.3 Deliverable Sites (Neighbourhood Plan Sites) - Detailed Proforma
Appendix 1.4 Potential Strategic Deliverable Sites – Detailed Proforma

Appendix 2 Developable Sites
Appendix 2.1 Developable Sites - Summary Tables
Appendix 2.2 Developable Sites (excluding Neighbourhood Plan Sites) - Detailed Proforma
Appendix 2.3 Deliverable Sites (Neighbourhood Plan Sites) - Detailed Proforma
Appendix 2.4 Potential Strategic Developable Sites – Detailed Proforma

Appendix 3 Not-Developable Sites
Appendix 3.1 Not-Developable Sites - Summary Tables
Appendix 3.2 Not-Developable Sites - Detailed Proforma

Appendix 4 Employment Sites
Appendix 4.1 Employment Sites - Existing Employment Sites
Appendix 4.2 Employment Sites - Potential Employment Sites

Appendix 5 Permissions/Commitments
Appendix 5.1 Permissions/Commitments – Summary Table
**Proforma**

The Proforma contains the following information:

- HELAA Site Reference
- National Land and Property Gazetteer number
- Site address
- Site area
- An assessment of each site in terms of its suitability for development, availability and achievability
- A decision as to whether the site has been assessed as deliverable, developable or not developable

Sites considered to be either deliverable or developable also contain the following information:

- The potential type and quantity of development that could be delivered
- A reasonable estimate of build out rates;
- An indication of the timescale for delivery

**Interactive HELAA Map**

Alternatively, the proforma can be obtained via the interactive map found on the Arun District Council website (www.arun.gov.uk). The map provides an easy to use system for identifying a specific site within the assessment area. This is particularly helpful if you wish to identify a specific site or sites within a parish or settlement.